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BY EMAIL

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Mr Jim Wolfe
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Dear Jim

Aviation Rescue Fire Fighting (ARFF) Regulatory Policy Review

Airservices provides ARFF services at 26 of Australia's busiest airports and in 2015 responded to 6,753 emergencies including 378 aircraft incidents and 3,670 first aid requests, saving ten lives in the process.

As a national operator, Airservices ARFF is one of the world's largest emergency service providers dedicated to aviation, with more than 900 operational and support personnel based around Australia.

The ARFF services primary function is to rescue people from an aircraft crash or fire and from other fires at the airport. We support updating of the current regulations to better reflect ARFF's roles and responsibilities and also the roles and responsibilities of state and territory fire services and the airport owner.

Airservices supports the proposed policy changes to improve the regulatory settings for ARFF in the Policy Review considering future arrangements in relation to the provision of ARFF services at Australian airports.

In particular, the proposed shift to a risk-based assessment approach for establishment and disestablishment of ARFF services is supported by Airservices. We believe that use of generic measures of airport activity, such as passenger numbers alone, as a hard trigger for the provision of ARFF services could be improved through consideration of the operational environment of each airport. This would be consistent with the outcomes-based approach to regulation increasingly being adopted by best practice international regulatory systems.

Airservices would welcome any opportunities to remove or amend cumbersome and inefficient requirements and replace them with a more outcome and performance based approach that support efficiency and productivity gains in the delivery of ARFF services without compromising safety.

We look forward to the outcomes of the review as progress towards a range of potential improvements to the efficiency and clarity of ARFF requirements.

Yours sincerely [REDACTED]

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Alec Wagstaff
Executive General Manager

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