



**INTERNATIONAL AIR TRANSPORT ASSOCIATION
(IATA)**

SUBMISSION ON:

**DEPARTMENT OF INFRASTRUCTURE AND
REGIONAL DEVELOPMENT'S
PUBLIC CONSULTATION PAPER (DEC 2015)**

**Aviation Rescue and Fire Fighting Services
Regulatory Policy Review**

12 February 2016

Executive Summary

IATA is encouraged by the DIRD review of Regulation 139H for the provision of Aviation Rescue and Fire Fighting Services (ARFFS), particularly with respect to concentrating resources for more efficient delivery of services directly related to aviation activities, whilst not compromising on safety. The removal of “hard” triggers that immediately prescribe establishment of an ARFFS at a location is a positive step towards improving flexibility for determination of the service delivery.

However, IATA continues to support a broader review of the responsibilities for providing ARFF Services in Australia as current arrangements do not promote challenging inefficiencies and also retain excessive barriers-to-entry for potential competition by not providing opportunity for local users to access more affordable options. Although the outcome of these proposed Regulatory changes may result in fewer locations for Airservices Australia ARFF Stations, there will remain a reliance on cross-subsidization through charges to recover the costs at those locations unable to do so themselves under current and proposed charges models.

Measures of Airport Activity

IATA has no objection to the proposed passenger level triggers for establishment and disestablishment risk assessments provided those triggers are themselves reviewed at regular periods, in consultation with local operators, to ensure they reflect appropriate numbers as predicted traffic growth is realized. The amended Regulation should include provision for increasing these triggers without need for further Regulation change.

IATA supports the retention of receipt of scheduled international air passenger services as a contributing trigger for a risk review as part of conformance to ICAO guidelines, and agrees that overseas models don't necessarily present best solution for Australia, particularly where those models would result in more locations in Australia requiring ARFFS than risk assessments would advise.

Having said that, IATA will continue to support further reviews on the whole design of providing ARFFS in Australia with a view to promoting world's best practice. This may mean a greater shift of the responsibility for delivering the service from the ANSP to Airport Operators.

When using passenger numbers as a trigger, associated risk assessments must be clear on the distinction between domestic travel for business and tourism which are both long term, and domestic travel for fluctuating activities, such as FIFO operations, which are generally related to finite projects.

Potential Measures

Establishing a design for graduated services could include mobility of assets to prevent stranded assets at locations where sudden and unforeseen fluctuations occur that drive short notice establishment or disestablishment. This can be a typical outcome of the presently volatile resources industry in Australia that has seen rapid and significant decline in project investment and resultant FIFO operations.

Preferred approach to ARFFS Establishment / Disestablishment

In setting the new trigger for assessing a location for disestablishment, IATA doesn't support a three year hiatus for recently established sites if the numbers are driven by finite activities; e.g.: if the location is at risk of rapid decline in numbers due potential short notice drops in activity levels such as in the Australian mining industry.

Also, it is noted that those locations recently established by the hard trigger of 350k passengers would continue to be monitored for three years as they may reach 400K pax (disestablishment trigger). It would be more appropriate that the 500k establishment trigger be applied to the monitoring in order to remove potential for long term support of locations that have never met the new trigger level.

Once introduced, IATA would support a review of all current ARFFS locations against the amended Regulation to determine if risk reviews present alternative solutions to all current aerodrome categories as determined by existing Chapter 3 of the MOS Part 139H. This embraces the intent within the consultation document that modern aircraft capabilities and fire suppression systems, the presence of ATC, and improved evacuation procedures lowers the risk to passengers of scheduled services. Potential reduction of categories at any airports would provide reductions in annual operating and depreciation costs that could be passed on to airlines and other operators.

ARFFS Roles & Responsibilities

IATA supports redefining the ARFFS' roles and responsibilities on an aerodrome so that priority is given to those activities that are directly or closely connected to aviation only. This contributes to reducing or removing callouts to non-aviation related events that threaten the capability for immediate response to an aircraft event which is a better utilization of resources.

However, IATA cautions against redefining the boundary of roles and responsibilities between ARFFS and Civil Fire Brigades (CFBs) solely by moving geographical boundaries. Whilst it is constructive to define a primary

area on the aerodrome to remove distraction of responding to commercial and retail activities that are constantly growing on aerodrome land, there is still a need to maintain an area of response based on coverage capability in the event of an aircraft impact within that area. That is, there still should be a defined area of response (aerodrome boundary or a prescribed distance beyond) whereby it is critically preferable that ARFFS are the primary responders and retain ultimate responsibility.

Conclusion

IATA supports the proposal conditionally with the comments within this response. We look forward to further communications on how DIRD will seek to incorporate the feedback and will reserve final position until the final draft Regulation amendments are presented for consideration.

IATA re-iterates that it considers these Regulation amendments as an encouraging step towards longer term review of the ARRF service delivery model in Australia and a resultant improvement in efficiency and the allocation of related charges.

For additional information or clarification, please contact:

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