



19 February 2016

Mr Jim Wolfe  
General Manager  
Air Traffic Policy  
Department of Infrastructure and Regional Development  
GPO Box 594  
Canberra ACT 2601

Dear Mr Wolfe

**Aviation Rescue and Fire Fighting Services Regulatory Policy Review – Public Consultation Paper**

I refer to the announcement from the Australian Government in December 2015 advising of the release of the Department of Infrastructure and Regional Development's (the Department) Public Consultation Paper (the Paper) in relation to Aviation Rescue and Fire Fighting Services (ARFFS).

The Qantas Group (Qantas) is the largest user of Australia's airports and continues to be a significant contributor to the cost recovery of ARFFS. Appropriate provision and regulation of such services is therefore of considerable importance to Qantas and we welcome the opportunity to comment on the Paper.

As you would be aware, Qantas made comprehensive submissions to the Department's policy reviews of ARFFS in 2006 and 2010, and we appreciate the opportunity to do so again.

Qantas' previous submissions provided detailed comments and recommendations in relation to contestability and establishment criteria. The views expressed on each occasion remain relevant, including the potential to increase the threshold to deliver more comprehensive air services for consumers, without compromising safety outcomes.



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Qantas welcomes the Department's suggested regulatory change to a broader, composite approach to the allocation of ARFFS at applicable airports, moving away from the current uniform process. The suggested composite approach recognises the vastly different operating environments at each location and seeks to ensure Australia not only meets international best practise, but also provides a risk-based assessment process to ensure individual airport circumstances are managed.

In considering future arrangements for ARFFS at any airport, it is reasonable to retain international air services as a catalyst in alignment with the International Civil Aviation Organization's guidelines. Developing additional measures to build on existing fire safety procedures would be an appropriate way of ensuring operational efficacy. In particular, any risk assessment should also include the consideration of aircraft composition, airfield usage and management processes, and other airport variations in each individual location.

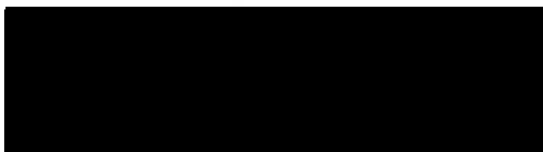
As per previous contributions to the operation of ARFFS, Qantas maintains a focus on delivering the safest possible working environment for all our operations. As such, we will continue to support the service, and note the importance of ensuring ARFFS is delivered in an economically responsible way. Given the cost of these facilities, we would appreciate further consultation from Airservices Australia in the practical establishment of any new ARFFS arrangements and potential changes to existing facilities.

As part of any process of industry consultation and among other matters, Qantas would particularly like to consider further independent options for the body that is to assess the risk profile of relevant airports. In principle we are of the view that the Civil Aviation Safety Authority's role should be restricted to that of an auditing capacity, to ensure appropriate governance and consistency of the assessment process.

Subject to the outcome of the Paper's recommendations and in developing any new regulation governing the implementation of the suggested measures, Qantas would appreciate further industry engagement. This will ensure an efficient consideration of implementation, transition period and operational commencement.

We look forward to receiving further information from the Department in due course on the outcome and process.

Yours sincerely,

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**Andrew Parker**

Group Executive, Government and International Affairs