



# **RAAA SUBMISSION**

**DEPARTMENT OF INFRASTRUCTURE  
AND REGIONAL DEVELOPMENT**

**AVIATION RESCUE AND FIRE FIGHTING SERVICES  
REGULATORY POLICY REVIEW**

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*Serving regional aviation, and through it, the people and businesses of regional Australia*

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3 February 2016

The Department of Infrastructure  
and Regional Development  
ARFFS Regulatory Policy Review  
GPO Box 594  
CANBERRA ACT 2601

Dear Sir,

## **RAAA SUBMISSION**

### **Department of Infrastructure and Regional Development**

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

The RAAA is pleased to provide this submission in response to the Department of Infrastructure and Regional Development's Regulatory Policy Review into Aviation Rescue and Fire Fighting Services.

## **I. RAAA Background**

### **The RAAA and its Members**

The Regional Aviation Association of Australia (RAAA) is a not-for-profit organisation formed in 1980 as the Regional Airlines Association of Australia to protect, represent and promote the combined interests of its regional airline members and regional aviation throughout Australia.

The Association changed its name in July 2001 to the Regional Aviation Association of Australia (RAAA) and widened its charter to include a range of membership, including regional airlines, charter and aerial work operators, and the businesses that support them.

The RAAA has 29 Ordinary Members (AOC holders) and 65 Associate/Affiliate Members. The RAAA's AOC members directly employ over 2,500 Australians, many in regional areas. On an annual basis, the RAAA's AOC members jointly turnover more than \$1.5b, carry well in excess of 2million passengers and move over 23 million kilograms of freight.

RAAA members operate in all States and Territories and include airlines, airports, freight companies, engineering and flight training companies, finance and insurance companies and government entities. Many of RAAA's members operate successful and growing businesses providing employment and economic sustainability within regional and remote areas of Australia.

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## RAAA Charter

The RAAA's Charter is to promote a safe and viable regional aviation industry. To meet this goal the RAAA:

- promotes the regional aviation industry and its benefits to Australian transport, tourism and the economy among government and regulatory policy makers;
- lobbies on behalf of the regional aviation industry and its members;
- contributes to government and regulatory authority policy processes and formulation to enable its members to have input into policies and decisions that may affect their businesses;
- encourages high standards of professional conduct by its members; and
- provides a forum for formal and informal professional development and information sharing.

The RAAA provides wide representation for the regional aviation industry by direct lobbying of Ministers and senior officials, through parliamentary submissions, personal contact and by ongoing, active participation in a number of consultative forums.



## II. RAAA Response to Aviation Rescue and Fire Fighting Services Regulatory Policy Review

The Regional Aviation Association of Australia (RAAA) welcomes and supports this review into the regulatory settings around the provision of ARFFS at Australian airports.

### Risk Reviews

In particular, the RAAA welcomes the approach to the establishment / disestablishment of an ARFFS at an airport. The combined criteria of Scheduled International Services and passenger numbers of 500,000 / 400,000 over a rolling 12 month period and in the context of a risk assessment is supported. The proposed disestablishment of an ARFFS when passenger numbers are less than 400,000 over 12 months is reasonable and should be prosecuted regardless of how recently the ARFFS was established. The cost of the provision of an ARFFS is ultimately borne by the aircraft operator and paying for this service at a location such as Ballina beyond a 12 month period where passenger numbers are less than 400,000 would not be supported. The cost of the provision of this service in the anticipation that numbers may increase somewhere in the future is not supported.

### Regulatory Reach

The regulators role should be reviewed in relation to fire-fighting related services where the provision of an ARFFS is not required under the CASR.

### Roles and Responsibilities

Removing the requirement for state and territory fire authorities to hold separate CASA approvals and clarifying the role of the airport operator in the provision of ARFFS is also supported.

### Prescriptive legislation

The proposed outcomes based amendments to CASR 139.H and the associated MOS is consistent with the recent drafting style used by the regulator in most other areas. This approach would also produce a number of efficiencies that are unavailable under the current framework.

## III. CONCLUSION

The RAAA is grateful for the opportunity to provide our views for the Department of Infrastructure and Regional Development's Regulatory Policy Review of Aviation Rescue and Fire Fighting Services. If you would like further information about the items contained in this submission, or clarification on any of the points we make, the RAAA would be more than happy to assist.

Regards



Mike Higgins  
Chief Executive Officer