



29 February 2016

Department of Infrastructure and Regional Development  
GPO Box 594  
Canberra  
ACT 2061

## REGIONAL EXPRESS (REX) GROUP SUBMISSION

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

To whom it may concern

The Regional Express (Rex) Group appreciates the opportunity to comment on the Department's Aviation Rescue and Fire Fighting Services Regulatory Policy Review, Public Consultation Paper December 2015.

The Rex Group comprises Regional Express (Australia's largest independent regional airline), air freight and charter operator Pel-Air Aviation and Dubbo-based regional airline Air Link, as well as the Wagga based Australian Airline Pilot Academy.

Regional Express itself operates a fleet of more than 50 Saab 340 aircraft on some 1,500 weekly flights to 58 destinations throughout New South Wales, Victoria, Tasmania, South Australia, Queensland and Western Australia.

**In summary, The Rex Group strongly supports the Key Proposals contained within the policy review particularly those in relation to thresholds and the use of thorough Risk Assessments/Reviews.**

The Rex Group has long argued, and made consistent submissions as such, that both the passenger number movement threshold is low and furthermore that any such threshold or "trigger" should be to cause a detailed Risk Assessment/Safety Case to be conducted to fully examine the need for the provision of ARFF Services at a particular airport.

#### Arrangements for establishment and disestablishment

The Review examines a number of potential measures that could be used to determine the need, or otherwise, for the provision of ARFF services. The Rex Group agrees with the preferred measure, that being passenger movements in a 12 month period, with a revised threshold, and airports receiving international services.

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Whilst each of the other measures examined are possible factors in ultimately determining whether an ARFF Service is required, they are not considered appropriate primary measures to determine the need for a Risk Assessment.

### **Risk Assessment**

Given the important factors that should be considered before ultimately deciding whether an ARFF service is or is not required, the Rex Group agrees that such decision should only be made following a thorough risk assessment process. As the review indicates, this will enable the full range of operational factors to be considered rather than the current one size fits all approach.

The risk assessment process and philosophy is not only consistent with an outcomes based approach but importantly is in line with CASA's risk review principle in other areas such as airspace classification and air traffic services.

The proposals are also aligned with CASA's "DAS Directive" of 01/2015, "Development and Application of Risk- Based and Cost- Effective Aviation Safety Regulations".

### **Passenger protection and ICAO**

It is noted, according to the Review Paper data, that the proposed passenger number threshold would, if adopted, cover 94% of the travelling public and meet and exceed the 2001 policy decision.

The Rex Group also feels that the proposals sufficiently balance and addresses the needs and nature of Australian air travel and operations and Australia's commitment to ICAO standards and recommendations.

In closing, the Rex Group feels the Department, as detailed in the ARFFS Regulatory Policy Review Paper, has completed a thorough review to provide advice on the potential improvements to the efficiency and clarity of Aviation Fire Fighting Service requirements.

We would be happy to address any questions or provide any further detail in relation to our submission.

Yours faithfully



Chris Hine  
Executive Director

