



**Australian Government**  
**Civil Aviation Safety Authority**

OFFICE OF THE CHIEF EXECUTIVE OFFICER

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Dr Jane Thomson  
Secretary  
Senate Rural and Regional Affairs and Transport References Committee  
PO Box 6100  
Parliament House  
CANBERRA ACT 2600

Email: [rrat.sen@aph.gov.au](mailto:rrat.sen@aph.gov.au)

Dear Dr Thomson

**Inquiry into the provision of rescue, firefighting and emergency services at  
Australian airports**

Thank you for your email of 11 December 2018 inviting the Civil Aviation Safety Authority (CASA) to provide a submission to the inquiry into the provision of rescue, firefighting and emergency services at Australian airports.

Please find attached CASA's submission for your consideration.

CASA is happy to discuss our submission and any other Aircraft Rescue and Firefighting matters during the hearing on 14 March. Please contact Ms Carolyn Hutton, Branch Manager Government and International Relations if you have any questions.

Yours sincerely

Shane Carmody  
Chief Executive Officer and  
Director of Aviation Safety

**Submission by the Civil Aviation Safety Authority to the Rural and Regional Affairs and Transport References Committee for inquiry into the provision of rescue, firefighting and emergency response at Australian airports**

**Terms of Reference:**

- a) *Current standards applicable to the provision of aerodrome rescue and firefighting services relating to community safety and the emergency personnel safety:*

There are no standards in the *Civil Aviation Safety Regulations 1998* (CASRs) applicable to Aerodrome Rescue and Firefighting Services (ARFFS) that relate specifically to community safety or the work, health and safety of emergency personnel. These considerations are addressed in other Commonwealth and State/Territory work, health and safety legislation.

However, as outlined below, aerodrome operators may have a number of safety-related obligations under CASA's regulations that extend generally to activities at an aerodrome that may pose safety risks to emergency personnel, among other persons.

- b) *The standards for the provision of emergency response at Australian airports including emergency medical response and response to structure fires and other incidents:*

ARFFS functions are specified in CASR 139.710:

**CIVIL AVIATION SAFETY REGULATIONS 1998 - REG 139.710  
Functions of ARFFS**

- (1) The functions of an ARFFS for an aerodrome are:
- (a) to rescue persons and property from an aircraft that has crashed or caught fire during landing or take-off; and
  - (b) to control and extinguish, and to protect persons and property threatened by, a fire on the aerodrome, whether or not in an aircraft.
- (2) Nothing in subregulation (1) prevents the ARFFS provider for an aerodrome from performing fire control services or rescue services elsewhere than on an aerodrome, but the provider must give priority to operations mentioned in subregulation (1).

- c) *Comparison of safe systems of emergency response standards and systems of work for firefighting and rescue operations for structure fires, aircraft rescue, emergency medical response and other emergency incidents:*

This is a matter for Airservices Australia (AA). However, during surveillance events, CASA has observed that AA's reviews of Standard Operating Procedures (SOPs) include comparisons of contemporary SOPs from other fire/rescue agencies. AA is currently the only approved service provider, but this would be expected of any other provider.

- d) *Consideration of best practice including relevant international standards:*

The safety standards reflected in the civil aviation safety legislation governing the provision of ARFFS are based on, or informed by, internationally recognised standards and recommended practices (SARPs) specified by the International Civil Aviation Organization, published Australian Standards and the United States' National Fire Protection Association standards.

- e) *The mechanisms and criteria for the review of the provisions of safety standards for the provision of rescue and firefighting services, if any:*

CASA uses planned surveillance events and audits as well as post implementation reviews of regulations to identify possible need for changes to the legislative requirements governing the provision of ARFFS.

Activities of the kind mentioned above allow CASA to identify any deficiencies in current practices and may highlight areas in which regulatory and other legislative changes may be appropriate. In considering the possible introduction of such changes, CASA utilises various consultation mechanisms, including such input as may be provided by the Aviation Safety Advisory Panel, the primary advisory body through which CASA directs its industry engagement.

As part of the post implementation review of Part 139.H CASA is currently reviewing the ARFFS standards applied in the United Kingdom, New Zealand, Canada and the United States. This Subpart sets out how to receive approval as an ARFFS provider and the operating and technical standards applicable to such a service. The CASA review is expected to be completed by the end of March 2019.

*f) A review of Airservices Australia policy and administration of aviation rescue and firefighting services:*

Although this is a matter for AA, CASA can provide the following information. CASR 139.880 requires a provider to have an appropriate organisational structure with sound and effective management in relation to the provision of an ARFFS. As an ARFFS provider, AA is subject to CASA regulation and oversight. Except to the extent these may be seen to be related directly to the safety-related elements of the provider's activities, CASA does not regulate how AA administers the corporate aspects of its ARFFS operation.

*g) The effectiveness and independence of the regulator the Civil Aviation Safety Authority (CASA) to uphold Aviation rescue and firefighting safety standards:*

As part of its core regulatory functions, CASA independently conducts oversight and surveillance of approved providers of ARFFS for civil aviation in Australia. In doing so, CASA is properly mindful of the views and concerns of the Department of Infrastructure, Regional Development and Cities, ARFFS providers and other industry and community stakeholders in the consideration of relevant regulatory matters. CASA is also directly involved in the development and promulgation of ARFFS standards, as these are reflected in the Civil Aviation Safety Regulations and the supporting Manual of Standards. The process of formulating these standards includes appropriate consultation and engagement with all relevant stakeholders.

CASA undertakes a risk-based approach to the assessment of surveillance of ARFFS operations. Such assessments focus on the effectiveness of an authorisation holder's management of its systems and risks and enable targeted surveillance of high-risk areas of an authorisation holder's systems. It also provides a basis on which CASA can evaluate all of the regulated activities conducted by an authorisation holder to help ensure they are as safe as reasonably practicable.

Changes to the provision of ARFFS by AA are assessed by CASA through the review and approval of safety case information, having regard to the provider's standard operating procedures. CASA also uses independent reviews of changes to AA's procedures and practices where they are available.

Some of the proposed changes from the review of Part 139.H include additional requirements for ARFFS providers to apply the ICAO resourcing model at each ARFFS location. The ICAO resourcing model focusses on a balance between available resources

and the risks associated with an aircraft accident rather than exclusively on the availability of certain resources.

*h) The impact on Australia's national and international reputation and aviation safety record as a result of any lowering of aviation rescue and firefighting services:*

Under the Civil Aviation Act, CASA is bound to regard safety as the most important consideration in performing our functions and exercising our powers. We are and remain committed to fulfilling that obligation. With this in mind, CASA is aware of no evidence to indicate that ARFFS have been compromised in any way that could reasonably be seen to impact negatively on Australia's reputation or safety record.

*i) Any other related matters:*

CASA has no further comments to offer.