Proposed changes to aerodrome rescue and firefighting services legislation (creation of new Part 176 of CASR) - (PP 2101AS)

# Overview

CASA is seeking feedback on our proposal for the creation and implementation of CASR Part 176 - regulation of aerodrome rescue and firefighting services (ARFFS).

The policy proposal includes the transition of the *Civil Aviation Safety Regulations 1998 (*CASR) Subpart 139.H ruleset to Part 176 of CASR as a standalone ARFFS regulation suite.

CASA's review of the Subpart 139.H ruleset considered the recommendations of reviews by:

* Department of Infrastructure, Transport, Regional Development and Communications (the Department) (2015-2016)
* Senate Rural and Regional Affairs and Transport References Committee (2018-2019).

The proposal aims to modernise the ARFFS ruleset with an increased focus on performance-based approaches.

The areas of policy change are:

* functions of ARFFS
* ARFFS establishment criteria
* ARFFS establishment requirements
* graduated ARFFS
* removal of prescriptive regulatory requirements
* modernisation of ARFFS standards.

The proposed changes intend to provide:

* better alignment of safety regulations governing ARFFS with the International Civil Aviation Organization (ICAO) standards and recommended practices (SARPS) and guidance material
* a clearer definition of the role and functions of ARFFS, to ensure ARFFS providers can perform their core functions and prioritise non-aviation requests
* defined aerodrome responsibilities in the establishment and provision of ARFFS
* clearer ARFFS establishment/disestablishment requirements and timeframes
* location specific ARFFS resource (staffing and equipment) and training requirements, based on aircraft operations and aerodrome factors, providing a stronger safety focus.

CASA is proposing 24 changes in total including amendments and additions to the current ARFFS ruleset.

The proposal also considers contemporary ICAO SARPS and guidance material to proposed regulatory amendments which ensure ARFFS can adopt to modern, performance-based approaches in the performance of their functions.

A [Technical Working Group](https://www.casa.gov.au/about-us/who-we-work/aviation-safety-advisory-panel/technical-working-groups/part-176-technical-working-group) appointed by the Aviation Safety Advisory Panel has considered policy options and provided relevant technical expertise and industry sector insight for this proposal.

## **Who this is relevant to**

The proposed new ARFFS ruleset will be comprised of the CASR Part 176 regulation and Part 176 Manual of Standards (MOS), and will apply to:

* existing and prospective ARFFS providers
* accredited ARFFS training providers
* aerodrome operators.

The proposed changes also have relevance to State and Territory fire authorities due to clarification of ARFFS functions, providing greater clarity about the delineation of the ARFFS provider and State and Territory fire authorities’ roles.

# Why your views matter

Your feedback will help us make sure the proposed requirements are suitable, the final legislation is clear and will work as intended.

Please submit your comments using the survey link on this page.

If you are unable to provide feedback via the survey link, please email [regulatoryconsultation@casa.gov.au](mailto:regulatoryconsultation@casa.gov.au?subject=Consultation%20on%20Flight%20Training%20and%20Flight%20Tests%20for%20Grant%20of%20Certain%20Endorsements%20(Sling%2C%20Winching%20and%20Rappelling%2C%20Firefighting)%20Approval%20(CD%202304FS).) for advice.

## **Documents for review**

A copy of the policy proposal PP 2101AS and other documents related to this consultation are attached in the ‘Related’ section at the bottom of the overview page. They are:

* Policy Proposal PP 2101AS: Proposed changes to aerodrome rescue and firefighting services legislation (Creation of new Part 176 of CASR), which outlines the proposed policy and position(s) and proposed changes to the current ruleset

**Other useful references**

* Department of Infrastructure and Regional Development (2015) [Aviation Rescue and Fire Fighting Services Regulatory Policy Review: Public Consultation Paper](https://www.infrastructure.gov.au/sites/default/files/migrated/aviation/arffs/files/ARFFS_Policy_Paper_for_Consultation.pdf)
* Department of Infrastructure and Regional Development (2016) [Aviation Rescue and Fire Fighting (ARFFS) Regulatory Policy Review: Agreed Recommendations](https://www.infrastructure.gov.au/sites/default/files/migrated/aviation/arffs/files/Recommendations_of_ARFFS_Regulatory_Policy_Review.pdf)
* Department of Infrastructure and Regional Development (2016) [Aviation Rescue and Fire Fighting (ARFFS) Regulatory Policy Review: Agreed Reforms](https://www.infrastructure.gov.au/sites/default/files/migrated/aviation/arffs/files/Recommendations-of-ARFFS-Regulatory-Policy-Review.pdf)
* Rural and Regional Affairs and Transport References Committee (2019) [The provision of rescue, firefighting and emergency response at Australian airports](https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Rural_and_Regional_Affairs_and_Transport/Aviationrescueservices/Report)
* [Australian Government response to the Senate Rural and Regional Affairs and Transport References Committee report](https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Rural_and_Regional_Affairs_and_Transport/Aviationrescueservices/Additional_Documents?docType=Government%20Response): The Provision of Rescue, Firefighting and Emergency Response at Australian Airports

**What happens next**

At the end of the response period, CASA will:

* review all comments received
* make responses publicly available on the consultation hub (unless you request your submission remain confidential)
* publish a summary of consultation which summarises the feedback received and outlines any intended changes and next steps.

All comments received on the proposed policy will be considered. Relevant feedback that improves the proposal and is consistent with the intent of Part 176 policy will be incorporated into the changes to the ARFFS ruleset (comprising of CASR Part 176 regulation and Part 176 MOS).

# Give Us Your Views [Appears on the overview page at the bottom]

[Online Survey](https://consultation.casa.gov.au/regulatory-program/pp1816us/consultation/) [This link is on the front page of the survey and takes you to the survey questions]

**Related**[This section is at the bottom of the front page and contains all the links to other sites and documents related to this consultation]

**Related Documents**

List of documents attached to this consultation:

PDF – PP 2201AS (654 KB)

MS word – MS word copy of online consultation - Proposed changes to aerodrome rescue and firefighting services legislation (new Part 176) - (PP 2101AS) (77.5 KB)

# Audience & Interest groups

**Audience**

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| --- |
| * Aerodrome operator |
| * Air operator |
| * Airworthiness organisations |
| * Air traffic service providers |
| * Aerodrome owner/operators |
| * CASA aerodrome inspector |
| * Aerodrome industry consultant |
| * Training organisation representative |
| * Emergency services provider/operator |

**Interest**

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| * Emergencies and incident reporting |

# Page 1: Consultation contents

**Proposed changes to aerodrome rescue and firefighting services legislation (creation of new Part 176 of CASR)**

The consultation process is seeking feedback on the proposed policy regarding changes to aerodrome rescue and firefighting services legislation (creation of new Part 176 of CASR).

The survey has been designed to give you the option to provide feedback in its entirety or to provide feedback on the policy topics applicable to you.

We will ask you for:

* **personal information**, such as your name, any organisation you represent, and your email address
* **your consent** to publish your submission
* **your responses** to the proposed changes in the regulations

**General comments**

The last page of this consultation is a General Comments page, where you can provide freeform comments on the proposed changes.

CASA’s [**website**](https://www.casa.gov.au/rules/changing-rules/consultation-industry-and-public) contains more information on making a submission and what we do with your feedback.

When you have completed the consultation, click the **‘Finish’** button at the bottom right of this page.

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| Page | Table of content |
| 1 | Consultation contents |
| 2 | Personal information |
| 3 | Consent to publish submission |
| 4 | Policy area 1 – Functions of ARFFS |
| 5 | Policy area 2 – ARFFS establishment criteria |
| 6 | Policy area 3 – ARFFS establishment requirements |
| 7 | Policy area 4 – Graduated ARFFS |
| 8 | Policy area 5 – Removal of prescriptive regulatory requirements |
| 9 | Policy area 6 – Modernisation of ARFFS standards |
| 10 | General comments |
| 11 | Your priorities |

# Page 2. Personal information

## First name

*(Required)*

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## Last name

*(Required)*

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## Email address

*If you enter your email address, you will automatically receive an acknowledgement email when you submit your response.*

Email

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## Do your views officially represent those of an organisation?

## *(Required)*

*Please select only one item*

Yes, I am authorised to submit feedback on behalf of an organisation

No, these are my personal views.

If yes, please specify the name of your organisation.

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Which of the following best describes the group you represent?

*Please select only one item*

ARFFS provider

ARFFS training provider

Aerodrome operator

state and territory fire authority

ARFFS vehicle / equipment provider

Other

Please specify ‘Other’ if selected.

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# Page 3. Consent to publish submission

To provide transparency and promote debate, we intend to publish all responses to this consultation. This may include both detailed responses/submissions in full and aggregated data drawn from the responses received.

Where you consent to publication, we will include:

* **your last name** if the submission is made by you as an individual or
* **the name of the organisation** on whose behalf the submission has been made
* **your responses** and comments

We **will not** include any other personal or demographic information in a published response

Do you give permission for your response to be published?

*(Required)*

*Please select only one item*

Yes - I give permission for my response/submission to be published.

No - I would like my response/submission to remain confidential but understand that de-identified aggregate data may be published.

I am a CASA officer.

Information about how we consult and how to make a confidential submission is available on the CASA [website](https://www.casa.gov.au/rules/changing-rules/consultation-industry-and-public)<https://www.casa.gov.au/rules/changing-rules/consultation-industry-and-public>.

Page 4: Policy area 1 – Functions of ARFFS

The proposed changes to the ARFFS ruleset seek to better reflect the core functions of ARFFS providers as the primary responders to aviation-related incidents and accidents at an aerodrome and address identified inconsistencies between Subpart 139.H of the CASRs and the Air Services Regulations 2019 relative to functions of an ARFFS provider. The proposed changes also reflect the principal objective of a rescue and firefighting service per ICAO Annex 14.

**Proposal 1 – Amend the ARFFS functions to be primarily aviation-related**

CASA proposes to amend the functions of ARFFS to:

* 1. rescue and protection of people and property from, or threatened by, aircraft fire, accident and incidents at, or in the vicinity1 of, an aerodrome
  2. protection of people and property threatened by a fire, accident and incident in an area of an aerodrome connected with, or used for the purposes of, activities related to aviation
  3. control and extinguishment of a fire referred to in paragraph (a) or (b)
  4. performance of activities and provision of services related to an operation or a circumstance mentioned in paragraph (a), (b) or (c).

1 Within 1000 metres of the runway threshold.

**Question 1:** Do you agree with CASA amending the functions as outlined above?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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**Proposal 2 – Introduce ARFFS priority response area requirements**

CASA proposes to introduce response area requirements when performing ARFFS functions, requiring an ARFFS provider to give priority to operations at an aerodrome, within 1000 metres of the runway threshold.

**Question 2:** Do you agree with CASA introducing response area requirements for ARFFS as outlined above?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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**Proposal 3 – Introduce constraints for non-aircraft and non-aviation related ARFFS operations**

CASA proposes to introduce new provisions that enable an ARFFS provider to deliver assistance outside its primary functions in limited cases. This relates to non-aircraft and non-aviation situations where an incident or circumstance could or has caused death or injury, damage to property, harm to the environment or disruption to essential services. The assistance to be provided must relate only to the provision of rescue and firefighting services in circumstances that do not impact in any way upon the ability of ARFFS to deliver its primary aviation related functions.

1. ARFFS providers will continue to be permitted to provide non-aviation related services, provided the provision of such services does not compromise the provision of aircraft and aviation-related ARFFS at, or in the vicinity of, an aerodrome. In providing such assistance, an ARFFS provider would be required to give priority to an incident or circumstances that occur at an aerodrome, or within 1000 metres of the runway threshold. Additionally, State and Territory fire authorities would be able to assist an ARFFS provider in the provision of ARFFS when providing such services either under the direction of an approved ARFFS provider, and/or where providing services under a formal agreement with the ARFFS provider.
2. ARFFS providers would only be permitted to continue to respond to non-aircraft and non-aviation related incidents or circumstances outside of an aerodrome where the provision of such assistance was subject to written agreement with, or formal request of, state and territory fire services under an MOU or other applicable regulatory provisions (such as those contained within Air Services Regulations 2019 (Section 20) where Airservices Australia is providing ARFF services), and the provision of aircraft and aviation-related ARFFS at, or in the vicinity of, an aerodrome is not compromised.

**Question 3:** Do you agree with CASA introducing constraints for non-aircraft and non-aviation related ARFFS operations, as outlined above?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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Page 5: Policy area 2 – ARFFS establishment criteria

Under the current requirements, ARFFS are required to be established at locations where an international air service operates (i.e, as few as a single international flight) and any other aerodrome that exceeds 350,000 air transport passengers during the previous financial year. These establishment requirements do not recognise that some regional and remote aerodromes that receive infrequent international passenger operations have fewer than 350,000 air transport passengers overall.

**Proposal 4 – Introduce a single ARFFS establishment trigger**

CASA proposes to remove the distinction between international and domestic air passenger services in relation to the ARFFS establishment criteria, with the proposed establishment criteria to retain the current ARFFS establishment hard trigger of 350,000 passengers annually.

**Question 4:** Do you agree with CASA introducing a single ARFFS establishment trigger, as outlined above?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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**Proposal 5 – Amend the ARFFS establishment trigger definition**

CASA proposes to amend the ARFFS establishment trigger definition to require the provision of ARFFS for scheduled air transport operations passenger numbers. This amendment will clarify the requirement to establish (or provide) an ARFFS based on an aerodrome’s total regular scheduled annual (per financial year) passenger numbers only.

**Question 5:** Do you agree with CASA amending the ARFFS establishment trigger definition, as outlined above?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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Page 6: Policy area 3 – ARFFS establishment requirements

CASA proposes to identify Airservices Australia as the principal (however, not exclusive) provider of ARFFS in Australia, reflecting the legislative role of Airservices Australia. We also want to provide flexibility for an aerodrome operator to either provide ARFFS, or engage an alternate ARFFS provider, subject to ARFFS approval requirements in either instance.

The proposed ruleset would incorporate specific accountabilities for aerodrome operators and Airservices Australia, and is intended to provide greater direction and flexibility in relation to the ARFFS establishment process and timeframes.

**Proposal 6 – Introduce ARFFS establishment requirements for the aerodrome operator**

CASA proposes to establish that it is an offence for an aerodrome operator not to provide an ARFFS when establishment triggers and associated timeframes are met.

**Question 6:** Do you agree with CASA introducing ARFFS establishment requirements for the aerodrome operator?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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**Proposal 7 – Introduce a default requirement for Airservices Australia to provide ARFFS**

CASA proposes to introduce an obligation for Airservices Australia to establish an ARFFS where an establishment requirement is triggered, unless an aerodrome operator elects to use an alternative CASA-approved ARFFS provider.

**Question 7:** Do you agree with CASA introducing a default requirement for Airservices Australia to provide ARFFS where an establishment requirement is triggered?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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**Proposal 8 – Introduce a timeframe for the submission of ARFFS establishment documentation**

CASA proposes to introduce a requirement for an approved ARFFS provider to submit ARFFS establishment documentation to CASA within 3 months of passenger numbers for the preceding financial year being published by the Bureau of Infrastructure and Transport Research Economics (BITRE) (typically in October) that demonstrate the ARFFS establishment hard trigger of 350,000 passengers per year has been met.

**Question 8:** Do you agree with CASA introducing a timeframe for the submission of ARFFS establishment documentation?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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**Proposal 9 – Introduce documented ARFFS establishment requirements and timeframes**

CASA proposes to introduce provisions to allow initial ARFFS service levels and establishment dates to be determined on a case-by-case basis, through risk-based discussions between CASA and the approved ARFFS provider, where a full service cannot be established in accordance with regulatory timeframe requirements.

**Question 9:** Do you agree with CASA introducing provisions to allow initial ARFFS service levels and establishment dates to be determined on a case-by-case basis?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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Page 7: Policy area 4 – Graduated ARFFS

Where an ARFFS cannot be established in accordance with regulatory requirements within the 12 months of the establishment trigger event, CASA proposes to allow the establishment of an ARFFS capability that is to be referred to as graduated ARFFS.

This would permit the initial establishment of an aerodrome-based aviation-related emergency response capability that is not to full regulatory requirements, which would focus on providing assistance during aviation-related emergencies and incidents at an aerodrome, pending the establishment of a full ARFF service.

CASA proposes the current regulatory framework for disestablishment of an ARFFS, where annual air transport passenger numbers fall below 300,000 and remain below this level for a 12-month period, would be retained.

**Proposal 10 – Introduce provisions for graduated ARFFS establishment**

CASA proposes the option for graduated ARFFS during the establishment of ARFFS, allowing the provision of ARFFS to be a lower category than the required ARFFS category during an agreed establishment period for up to 12 months, where a full service cannot be established in accordance with regulatory requirements (timeframe) (and subject to CASA approval).

**Question 10:** Do you agree with CASA introducing the option for graduated ARFFS during the establishment of ARFFS?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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**Proposal 11 – Introduce provisions for graduated ARFFS disestablishment**

CASA proposes the option for graduated services during the disestablishment of ARFFS, allowing the provision of ARFFS to be a lower category than the required ARFFS category during an agreed disestablishment period of up to 12 months.

**Question 11:** Do you agree with CASA introducing the option for graduated ARFFS during the disestablishment of ARFFS?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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Page 8: Policy area 5 – Removal of prescriptive regulatory requirements

CASA proposes to identify opportunities to remove or amend some prescriptive and inefficient requirements within the current regulatory framework and replace them with a more performance-based approach.

**Proposal 12 – Amend fire vehicle colour requirements**

CASA proposes to amend the existing colour requirement for ARFFS firefighting vehicles to be a single conspicuous colour, preferably red or yellowish green, consistent with ICAO Standards and Recommended Practices.

**Question 12:** Do you agree with CASA amending the colour requirement for ARFFS firefighting vehicles to be a single conspicuous colour, preferably red or yellowish green?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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**Proposal 13 – Amend complementary agent and expellant gas cylinders reserve supply requirements**

CASA proposes to amend the minimum reserve supply of complementary agent and expellant gas cylinders, to require reserve supply holdings to be consistent with ICAO Standards and Recommended Practices.

It is intended the existing requirement to hold additional reserve stocks where replenishment delays may be reasonably anticipated would remain, with such circumstances and amounts to be determined by the ARFFS provider.

**Question 13:** Do you agree with CASA amending the minimum reserve supply of complementary agent and expellant gas cylinders, to require reserve supply holdings to be consistent with ICAO Standards and Recommended Practices?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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**Proposal 14 – Remove the requirement for inshore rescue boats to be housed undercover**

CASA proposes to remove the requirement for inshore rescue boats to be housed undercover.

**Question 14:** Do you agree with CASA removing the requirement for inshore rescue boats to be housed undercover?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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**Proposal 15 – Amend provisions that specify the location of ARFFS-related facilities**

CASA proposes to amend requirements in relation to the location of ARFF-related facilities to be informed by operational requirements, rather than prescribing specific requirements.

For example:

* Amend the requirement for boat ramp and boat launching facilities to be located at the aerodrome (where a WRS is provided).
* Amend the requirement for the provision of ARFFS training facilities to be located at the aerodrome.

**Question 15:** Do you agree with CASA amending the requirements in relation to the location of ARFF-related facilities to be informed by operational requirements?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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Page 9: Policy area 6 – Modernisation of ARFFS standards

CASA proposes to modernise ARFFS standards to provide opportunities for greater innovation and improvements to service delivery through a more systems and performance-based approach.

**Proposal 16 – Introduce defined roles and responsibilities (aerodrome and the ARFFS provider) for ARFFS establishment and provision**

CASA proposes to introduce clearly defined aerodrome operator and ARFFS provider roles and responsibilities in relation to the establishment and ongoing provision of ARFFS, particularly for required aerodrome-based facilities and infrastructure.

**Question 16:** Do you agree with CASA introducing clearly defined aerodrome operator and ARFFS provider roles and responsibilities in relation to the establishment and ongoing provision of ARFFS?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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**Proposal 17 – Amend ARFFS Fire Station Communications Centre (FSCC) requirements**

CASA proposes to amend ARFFS Fire Station Communications Centre (FSCC) requirements to allow the use of technology-based solutions, such as runway viewing cameras, to assist in the observation of all aircraft approaches and departures.

**Question 17:** Do you agree with CASA amending the ARFFS Fire Station Communications Centre (FSCC) requirements to allow the use of technology-based solutions, such as runway view cameras, to assist in the observation of all aircraft approaches and departures?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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**Proposal 18 – Amend the requirement for aerodrome fire alarms to terminate at the ARFFS Fire Station Communications Centre (FSCC)**

CASA proposes to amend the requirement for aerodrome fire alarms to terminate at the ARFFS FSCC to allow alternate fire alarm monitoring and alarm termination (or terminating) arrangements to be made by an aerodrome owner/operator, providing flexibility to aerodromes to streamline infrastructure and communications requirements.

**Question 18:** Do you agree CASA amending the requirement for aerodrome fire alarms to terminate at the ARFFS FSCC, to allow alternate fire alarm monitoring and alarm termination arrangements to be made by an aerodrome owner/operator?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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**Proposal 19 – Introduce minimum operational (firefighter) staffing requirements**

CASA proposes to introduce minimum operational staffing requirements for aircraft-related incidents/accidents specific to aerodrome requirements, as determined by the task resource analysis (TRA) (with minimum staffing levels to be approved by CASA).

**Question 19:** Do you agree with CASA introducing minimum operational staffing requirements for aircraft-related incidents/accidents specific to aerodrome requirements, as determined by the TRA (with minimum staffing levels to be approved by CASA)?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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**Proposal 20 – Amend ancillary equipment requirements**

CASA proposes to amend ancillary equipment requirements to allow ARFFS providers to establish the scope, types and quantities of rescue equipment applicable to the range of airport categories, with reference to ICAO Standards and Recommended Practices.

**Question 20:** Do you agree with CASA amending ancillary equipment requirements to allow ARFFS providers to establish the scope, types and quantities of rescue equipment applicable to the range of airport categories, with reference to ICAO Standards and Recommended Practices?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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**Proposal 21 – Amend ARFFS Officer in Charge (OIC) minimum qualification requirements**

CASA proposes to amend the minimum qualification requirements for the ARFFS OIC role and clarify OIC operational requirements, consistent with industry standards. The required minimum OIC qualification would be reduced from Advanced Diploma to Diploma of Public Safety (Firefighting Management) (or its equivalent), and require the role of the OIC to be based at the aerodrome and a member of firefighters on operational shift.

**Question 21:** Do you agree with CASA amending the minimum qualification requirements for the ARFFS OIC role and clarify OIC operational requirements, consistent with industry standards, reducing the required minimum OIC qualification from Advanced Diploma to Diploma of Public Safety (Firefighting Management) (or its equivalent), and require the role of the OIC to be based at the aerodrome and a member of firefighters on operational shift?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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**Proposal 22 – Amend initial and recurrent ARFFS training requirements**

CASA proposes to amend initial and recurrent ARFFS training requirements to allow ARFFS training providers to tailor competency based ARFF training and skill demonstration in accordance with contemporary training requirements. ARFFS training providers would need to develop and deliver a training and proficiency program, informed by a suitable Training Needs Analysis, that ensures both personnel and equipment are, at all times, fully efficient.

**Question 22:** Do you agree with CASA amending initial and recurrent ARFFS training requirements to allow ARFFS training providers to tailor competency based ARFF training and skill demonstration in accordance with contemporary training requirements?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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**Proposal 23 – Introduce specific requirements for foam testing, foam production and in-service testing of foam production systems**

CASA proposes to introduce specific requirements in relation to foam testing, foam production and foam production systems relating to foam quality and the operational foam production reliability, consistent with ICAO guidance. This is intended to strengthen ongoing assurance activities that the physical properties and fire extinguishing performance of firefighting foam achieves acceptable ICAO performance levels.

**Question 23:** Do you agree with CASA introducing specific requirements in relation to foam testing, foam production and foam production systems relating to foam quality and the operational foam production reliability, consistent with ICAO guidance?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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**Proposal 24 – Introduce provisions to permit the use of training foam during training activities/exercises**

CASA proposes to introduce provisions to permit the use of training foam, as a substitute for operational foam, during ARFFS training activities/exercises.

**Question 24:** Do you agree with CASA introducing provisions to permit the use of training foam, as a substitute for operational foam, during ARFFS training activities/exercises?

*Radio buttons*

Agree

Agree with changes (please specify suggested changes below)

Disagree (please explain why and provide any alternative suggestions below)

Undecided / not my area of expertise

Comment

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Page 10: General comments

Do you have any additional comments about the proposed policy?

(Please note, this should not include points you have already raised)

Please include in these comments any impact this change may have on you or your operation.

Comments

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Page 11: Your priorities

When you reflect on the feedback you have provided throughout this consultation, what are the three matters you consider most important?

Priority 1

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Priority 2

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Priority 3

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