

Aviation Rescue and Firefighting Services (ARFFS) in Australia – Continuous Operation Under ICAO Remission Factor

NOTE

This Safety Bulletin was distributed by IFALPA Member Association AusALPA. IFALPA believes it to be relevant to the global pilot community and is reproducing it here for your information. In all cases, please follow the guidance of your operator and local regulator.

Please review and share widely wherever relevant.

ATTACHMENTS

Two (2) page Safety Bulletin, 24AUSALPASB02 – April 2024, *Aviation Rescue and Firefighting Services (ARFFS) in Australia – Continuous Operation Under ICAO Remission Factor*



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AusALPA Safety Bulletin

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BACKGROUND

The Australian Airline Pilots' Association (AusALPA) represents more than 7,200 professional pilots within Australia on safety and technical matters and is committed to protecting and advancing Australia's excellent aviation safety standards and operations.

AusALPA has been made aware of inadequate level of Aviation Rescue and Firefighting Services (ARFFS) at several international aerodromes around Australia. It is evident that Airservices Australia, the government agency responsible for provision of ARFFS at most Australian airports, has operated under the ICAO Remission Factor since the Covid-19 pandemic. Our position on this matter mirrors that of IFALPA, which is to protect and preserve safety on the ground by **not** relying on the Remission Factor for providing ARFFS in any Member State, not even for a limited period.

IFALPA's position paper on usage of the Remission Factor can be [read here](#).

We believe that some international airports in Australia have been under-categorised for the level of ARFFS required by the largest aircraft operating into these aerodromes and mandated by ICAO's Annex 14 Vol 1.

We also believe that some of the international airports in Australia have been consistently providing ARFFS of two or more categories **lower** than required by the largest aircraft operating into these airports and mandated by ICAO's Annex 14 Vol 1. Furthermore, in the preceding several months, there have been multiple instances where ARFFS were completely withdrawn from a few international airports in Australia, resulting in delayed departure and/or arrival of aircraft without any level of protection.

AusALPA believes that these safety-jeopardising practices, now "normalised" in Australia, are linked solely to a number of issues at Airservices Australia including:

- Insufficient number of employed aviation firefighters (understaffing across the whole agency has been a continuous issue since the Covid-19 pandemic);
- Obscure methodology of calculating the number of airport movements which appears to only happen once a year on 1st November, which assists Airservices Australia in relying on the ICAO Remission Factor to provide a consistently lower RFF service; and
- No set methodology used to determine the requisite minimum RFF staffing levels at Australian aerodromes, notwithstanding the existence of readily available ICAO Task Resource Analysis (TRA) methodology successfully used by other Member States but not implemented by Airservices Australia.

This Safety Bulletin is to alert Member Associations to the continual lowered level of ARFFS provided at Australian airports, possibly as low as nil and often activated at a short notice, and to assist in developing relevant contingency protocols for flight crews flying into Australia.

SAFETY IMPLICATIONS

Providing inadequate ARFFS at Australian airports may result in serious degradation of chances of survival for both crew and passengers should an emergency such as a fire or an accident occur.

For example, providing Cat 7 instead of Cat 9 at Gold Coast (YBCG) aerodrome means the following significantly reduced minima:

- ARFFS vehicles available – 2 instead of 3
- Water available – 12,100 litres instead of 24,300 litres
- Foam discharge rate – 5,300 litres/minute instead of 9,000 litres/minute
- Dry chemical powder available – 225kg instead of 450kg
- ARFFS operational crew available – 6 instead of 10 (1 Fire Commander + 1 Station Officer + Firefighters)

RECOMMENDATIONS

- Before conducting a flight into any airport in Australia, operators should conduct a comprehensive risk assessment. This assessment should consider all potential safety hazards and implement effective mitigation measures to minimise risks to aviation safety. This is particularly relevant to Cat 10 aircraft operations into Melbourne (YMML), Brisbane (YBBN) and Perth (YPPH), and Cat 9 aircraft operations into the Gold Coast (YBCG) as these airports routinely do not provide the required level of ARFFS.
- It is essential that all pilots are briefed on the current ARFFS situation in Australia and the appropriate response protocols by their operators.
- Flight crews should remain vigilant and obtain regular NOTAM updates enroute and have a contingency plan in place (such as a suitable Alternate airport) whenever they fly to any Australian airport.
- All instances of lowered ARFFS provided in any Australian aerodrome should be immediately reported as a hazard both internally to the operator and externally to the appropriate authorities.

The safety of passengers, crews and aircraft should always be the paramount concern in any aviation operation. Operating aircraft into aerodromes that do not provide the required level of ARFFS in Australia poses serious safety risks in the event of a fire or an accident should not be underestimated or ignored.

AusALPA calls upon all stakeholders, including airlines, regulatory authorities, and ICAO, to work together to ensure that the Remission Factor is only ever used as intended, i.e. as a contingency measure and in a limited period of time.

Please direct any questions and concerns to AusALPA by emailing safety.technical@ausalpa.org.au or calling +61 (0) 3 9928 5737.