

**AERODROME RESCUE AND FIRE FIGHTING SERVICES (PART 176) TWG  
ASAP TECHNICAL WORKING GROUP (TWG)  
TASKING INSTRUCTIONS and FINAL REPORT**

**17 September 2025**

The Aerodrome Rescue and Fire Fighting Services (Part 176) Technical Working Group is established to operate and report to the Aviation Safety Advisory Panel (ASAP) in accordance with the Terms of Reference of the ASAP dated June 2025 (or as amended).

**BACKGROUND/CONTEXT**

The role of the TWG is to provide relevant technical expertise and industry sector insight in relation to the draft CASR Part 176 and Part 176 Manual of Standards (MOS) to enable implementation of government policy for the regulation of Aerodrome Rescue and Fire Fighting Services (ARFFS). The Technical Working Group will:

- Provide industry sector insight and understanding of current needs and challenges
- Provide current, relevant technical expertise for the development, analysis and review of legislative and non-legislative solutions to identified issues
- Assist with the development of draft regulations, guidance materials and other supporting materials
- Provide endorsement and/or conditional endorsement of draft regulations, guidance materials and other supporting materials for consideration by the ASAP and CASA.

**TWG OUTCOMES**

The objective of the TWG is to ensure the Regulation and MOS achieves the policy intent by:

1. Evaluating whether the draft CASR Part 176 and draft Part 176 Manual of Standards (MOS) will:
  - a. achieve the identified policy intent, and
  - b. be implementable by the Australian aviation industry.
2. Providing a concise summary to the ASAP recommending either:
  - a. That the ASAP endorse CASR Part 176 and the Part 176 MOS.
  - b. That the ASAP endorse CASR Part 176 and the Part 176 MOS noting that further discussions are required in relation to certain provisions.
  - c. That the ASAP does not endorse CASR Part 176 and the Part 176 MOS due to underlying policy inconsistencies.

## ROLES AND RESPONSIBILITIES

CASA	TWG Members
<ul style="list-style-type: none"> <li>Organise meetings and workshops, and produce agendas, papers and supporting materials</li> <li>Facilitate meetings and workshops</li> <li>Record insights and findings</li> <li>Communicate openly and consistently with TWG members about project status and issues</li> <li>Respect the time of all TWG members by minimising work required to achieve outcomes</li> </ul>	<ul style="list-style-type: none"> <li>Commit to supporting the project objectives and timeline</li> <li>Engage and collaborate constructively at all times</li> <li>Prepare for working group activities by reviewing agendas, papers and supporting materials</li> <li>Provide timely and considered advice in meetings, and between meetings as required</li> <li>Respond to requests for feedback on draft materials within agreed timeframes</li> </ul>

## CONSENSUS

A key aim of the TWG is that a consensus be reached, wherever possible, in the finalisation and preparation of advice for the ASAP. The TWG will be guided by the ASAP Terms of Reference with respect to determining and documenting consensus.

### Process for achieving consensus

As required by the ASAP (& TWG) Terms of Reference, there must be agreement by all participants on the method used for obtaining consensus.

To obtain consensus, the TWG will discuss their views on the provided material during the meeting then address the below outcomes.

The CASA Lead has also provided commentary of the effectiveness of the TWG and whether it is believed that the recorded outcomes are a fair representation of the TWG from a CASA perspective.

## TWG MEETINGS

A virtual meeting of the TWG was held on 17 July 2025.

## MEMBERSHIP

Members of the TWG were appointed by the ASAP Chair, following ASAP processes. The Aerodrome Rescue and Firefighting Services (Part 176) TWG consists of the following members:

Scott Chamberlin	Nicholas Dyce-McGowan	Wesley Garrett
Brian Greeves	Sandy McFeeters	Peter McMahan
Warren Makings	Glenn Robinson	Trevor Rogers
Enes Seferovic	Mike Willson	Shane Wallis
Samuel Woodman		

Apologies:

- Nick Dyce-McGowan
- Trevor Rogers - Dan Murphy attended
- Sandy McFeeters - Brad Robinson attended.

The TWG CASA Lead, Roy Tuomela was supported by CASA subject matter experts during the meeting.

The ASAP Secretariat was represented by Kirstin Pierpoint.

### **MEETING SUMMARY 17 July 2025**

This meeting of the Aerodrome Rescue and Fire Fighting Service (Part 176) technical working group (TWG) sought endorsement of the draft summary of consultation (draft SOC) for "[Proposed changes to aerodrome rescue and firefighting services legislation \(creation of new Part 176 of CASR\)](#)".

#### **Recap of policy development:**

An overview of the project was provided.

On 13 July 2023, CASA published the Proposed changes to aerodrome rescue and firefighting services legislation (creation of new Part 176 of CASR) - (PP 2101AS) for consultation. The recommendations from Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts and Senate reviews, along with additional opportunities to modernise the ARFFS ruleset with an increased focus on performance-based approaches, were considered in the development of the policy proposals.

The CASA review identified the following six broad policy areas, which included 24 specific policy change proposals:

1. Functions of ARFFS
2. ARFFS establishment criteria
3. ARFFS establishment requirements
4. Graduated ARFFS
5. Removal of prescriptive regulatory requirements
6. Modernisation of ARFFS standards.

CASA received 45 total responses to the consultation.

#### **Presentation of the draft summary of consultation:**

The TWG was provided with a copy of the draft summary of consultation (draft SOC) prior to the meeting and provided the following feedback on the draft SOC:

- TWG members questioned the qualification of the popular majority of respondents that indicated agreement to the policy positions. The project team responded that comments are not currently publicly available but will be provided once the draft SOC is published.

## **Key feedback against each of the policy areas was provided to the TWG:**

The project team advised that while consultation responses indicated majority support for the proposals, many responses were diametrically opposed and because of that, the scope of ARFFS was reviewed.

### **1) Functions of ARFFS**

- The TWG was informed that ICAO Annex 14 Vol. 1, chapter 9 sets out aerodrome emergency plans (AEP) before its rescue and firefighting provisions, highlighting the priority for aerodrome emergency procedures, and with regard to rescue and firefighting (RFF), calls for a focus on saving lives from aircraft accidents and incidents on and in the vicinity of the aerodrome, and excluding property.
- Noting Airservices' regulations contain broader functions required of an RFF service, CASA looked at leading aviation authorities around the world. Similar regulators such as Federal Aviation Administration, United Kingdom Civil Aviation Authority, New Zealand Civil Aviation Authority and Transport Canada focus their RFF regulations on the ICAO requirements.
- The TWG was advised that Australia underwent an ICAO audit in 2023. The audit highlighted international air transport operations, and as such, the trigger of international air transport passengers, as well as 350,000 air passengers, was retained as the trigger for the establishment of an ARFFS.
- The TWG was provided with the link to the [2023 ICAO focused safety audit and assessment](#).

### **2) ARFFS establishment criteria**

- AEP requirements relate to all aerodromes, including those without a dedicated ARFFS. As such, under CASR Part 139, if an aerodrome has more than 50,000 air transport passengers per year an AEP is required, which requires a certified aerodrome operator to document the delineation of responsibilities between emergency service providers. This plan then sets out the responsibilities between current Subpart 139.H, or future part 176 ARFFS providers, and local State and Territory fire services.
- TWG members acknowledged that the AEP requirements are quite robust.
- The TWG was informed that BITRE data provides the trigger for the establishment of ARFFS in Australian aerodromes, and that this data is monitored.
- One TWG member advised that the Canadian model provides greater certainty in terms of when the establishment of an ARFFS should take place. Acknowledging the comments, the TWG was reminded that further feedback can be provided throughout the consultation process.

### **3) ARFFS establishment requirements**

- Australia will retain a difference to ICAO Annex 14 Vol I, in that ARFFS will not be provided at all aerodromes serving commercial air transport operations, because it would be economically unviable.
- One TWG member noted an important policy shift by Airservices in updates to section 16 and section 20 of the Air Services Regulations, requiring the need to collectively understand what this means for the regulatory set.

- The TWG was advised that CASA looked at all comments of the consultation, due to the wide responsibilities of RFF. As such, the scope of ARFFS was reviewed in line with the CASRs. It was determined and recognised that Airservices has broad functions that need to be recognised under Part 176 and the ICAO Annex 14 requirements.

4) **Graduated ARFFS and 5) Removal of prescriptive regulatory requirements**

- The TWG discussed the importance of the delineation between aviation and non-aviation activities, and the new provision, providing an option for an airport operator to determine their own ARFFS provider.
- The importance of the AEP was reiterated to assist in delineation of functions.
- The current trigger of 350,000 scheduled air transport passengers which covers 95% of regular public transport (RPT) passengers was retained, noting that it will be the responsibility of the aerodrome operator to commence discussions with ARFFS providers, prior to triggers being met.
- TWG members raised issues with comparative timeframes to provide an ARFFS. The TWG was advised that in the absence of an ARFFS, the AEP is the appropriate regulatory mechanism to deal with gaps between provision of non-Airservices RFF services and an Airservices ARFFS. TWG members expressed a lack of confidence in this process.
- The TWG requested a summary of the hot fire training requirements. It was advised the training can be located outside an ARFFS aerodrome subject to CASA approval but only in relation to one training facility. TWG members commented that CASA should prioritise regulation of current training facilities.
- The TWG was advised of CASA's focus on compliance with regulation and advised that any exemptions provided are based on a risk assessment.

6) **Modernisation of ARFFS standards**

- The TWG was advised there were no changes to the remaining modernisation standards. The ICAO training resource analysis (TRA) will determine the number of firefighting personnel and whether the officer-in-charge can be part of the operational shift or not.
- Requirements in relation to foam testing, foam production and foam production systems to ensure the physical properties and fire extinguishing performance of firefighting foam achieving acceptable ICAO performance levels were accepted. Additionally, training foam would only be acceptable where the foam is demonstrated to mimic the characteristics of operational foam during operational training activities and exercises, subject to CASA approval.
- A majority of TWG members supported the inclusion of regulatory requirements for foam testing at an ambient temperature of 40 degrees, intended to provide assurance of foam performance levels in conditions at Australian locations with high ambient temperatures. In earlier discussions, TWG members noted that CASA was going to raise this with ICAO directly. The TWG was informed that this point is not within the scope of this TWG.
- The TWG was informed that ICAO standards are currently in place for 193 Member States, and that Australia's climate is not unique. It was recommended that proponents of a change to ICAO standards should find a sponsor, such as

IFALPA, to support a review of higher temperature foam testing requirements by ICAO.

- The TWG was advised that CASA was also aware of other National Fire Protection Agency standards through the Part 139H MOS consultation.
- The TWG raised strong concerns around the qualifications of respondents to the public consultation that comprise the percentages of support provided in the draft SOC.

#### **Proposed changes to Part 139H Manual of Standards:**

The TWG was advised that a separate Part 139H MOS amendment was recently consulted.

The 7 change proposals put forward in the Part 139H MOS include:

1. Amending the colour of fire vehicles to be predominantly a single conspicuous colour, rather than signal red
2. Adding Performance Level C foam as an extinguishing agent
3. Allowing 100% of water to be replaced by a complementary agent for category 1 and 2 aerodromes
4. Allowing reserve supplies of foam concentrate and expellant gas cylinders to be 100% instead of 200%
5. Allowing use of technology-based solutions, such as runway view cameras, to assist in the observation of all aircraft approaches and departures
6. Allowing remote termination of fire alarms subject to monitoring by an approved Automatic Fire Alarm Service Provider (AFASP)
7. Allowing the housing of inshore rescue boats to be more performance-based.

#### **Next Steps:**

The TWG was advised that any further development of a proposed Part 176 and MOS would be subject to government and legislative drafting priorities, CASA does not believe this will happen in the near future but the Part 176 Regulation and MOS will again be referred to a working group and opened to public consultation once further work is conducted.

The TWG was advised that a report would be prepared for the consideration of the Aviation Safety Advisory Panel, and the TWG will be disbanded upon finalisation of the report.

All members of the TWG were thanked for their extended time and efforts in support of the Aerodrome Rescue and Fire Fighting Services (Part 176) TWG.

#### **Request for endorsement:**

The TWG was asked to endorse CASA publishing the draft SOC and disbanding the TWG.

**SUMMARY OF OUTCOMES – Final Report 17 July 2025**

1. Does the TWG support publication of the SOC for proposed amendments to aerodrome rescue and firefighting legislation (creation of new Part 176 of CASR)?

**FULL CONSENSUS / GENERAL CONSENSUS / DISSENT**

<b>CASA Summary</b>
<p>Comment: The TWG report is accurate and reflects some TWG members were not happy with certain policy proposals, or potential changes to policies following the public consultation. Additionally, the TWG disputes the nature of how support for proposals is presented in the SOC. It is extremely difficult to weight responses based on a specific organisation e.g. industry associations versus a service provider and it is CASA’s role to consider all responses and comments in order to provide a balanced summary of the consultation that took place. The procedures and processes applied in the case of this consultation followed CASA’s standard regulatory consultation processes. It is CASA’s intention as the aviation safety regulator to consider all responses and determine an appropriate safety outcome.</p> <p>It should be noted that there were 24 policy proposals agreed by the TWG for public consultation and rejection of the SOC negates the general agreement in regard to the majority of policy proposals. A more granular review by the TWG of the 24 policy proposals, previously endorsed by the TWG for consultation, may have led to a possibility of a General Consensus with the majority of the policy proposals.</p> <p>Acknowledging the feedback from the TWG, the final SOC to be published will include only a summary of the feedback received to the consultation and not the CASA policy proposals. CASA has yet to settle any of the final ARFFS policy settings and will re-engage with industry when we are ready to recommence work on the project.</p> <p>CASA would like to take this opportunity to thank all members of the TWG for their contributions.</p>

<b>Aviation Safety Advisory Panel Summary</b>
<b>Chair</b>
Comment:

**Appendix**

1. [Aviation Safety Advisory Panel Terms of Reference | Civil Aviation Safety Authority](#)