

FILED
18 Nov 2025

**OFFICE OF THE
INDUSTRIAL
REGISTRAR**



IRC Form 65 v1
Industrial Relations Commission Rules

NOTIFICATION OF A WHS DISPUTE

Pursuant to Division 7A of the *Work Health and Safety Act 2011*

COURT DETAILS

Court	Industrial Relations Commission of NSW
Jurisdiction	Commission
Registry	Parramatta
Case number	2025/00446199

TITLE OF PROCEEDINGS

First Notifier	“Automotive, Food, Metals, Engineering, Printing and Kindred Industries Union” known as the Australian Manufacturing Workers’ Union (AMWU)
Second Notifier	“Communications, Electrical, Electronic, Energy, Information, Postal, Plumbing and Allied Services Union of Australia” known as the Electrical Trades Union (ETU)
Third Notifier	The Australian Workers’ Union
Respondent	Qantas Airways Limited

FILING DETAILS

Filed for	Notifiers
Representative	Samantha Trimby AMWU
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Respondent contact name, telephone and email	Gemma Henry Senior Manager Industrial Relations 0437 579 232 gemma.henry@qantas.com.au

DETAILS OF DISPUTE

Workplace where dispute exists	Qantas Airways Limited 10 Bourke Road MASCOT NSW 2020
WHS matter the subject of the dispute	<input type="checkbox"/> Work group determination matter. <input type="checkbox"/> Work group variation matter. <input type="checkbox"/> Access to information by a health and safety representative under s 70(1)(c). <input type="checkbox"/> A request by a health and safety representative for a person assisting the representative to have access to the workplace under s 70(1)(g). <input type="checkbox"/> A matter mentioned in s 72(2)(a) or (b) or (4) relating to training for a health and safety representative. <input type="checkbox"/> A health and safety committee matter. <input checked="" type="checkbox"/> A matter about work health and safety that is an issue to which Division 5 applies. <input type="checkbox"/> An issue about cessation of work under Division 6.
Has an inspector been appointed to assist the parties to reach an agreement or resolve a dispute?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
#If yes – has there been a decision made by the inspector to exercise, or not exercise, compliance powers under Part 10 subject to review under Part 12?	<input type="checkbox"/> Yes <input type="checkbox"/> No

DESCRIPTION OF DISPUTE AND RELIEF SOUGHT

Note: Set out below a summary of the dispute and the relief sought. Please **be brief** – you will have the opportunity to provide more details to the Commission at the conciliation and during any arbitration

Background

- 1 Recently, Qantas Airways Limited (**Qantas**) introduced a new towing procedure provided in the Qantas Engineering Authorisations & Training Manual (**Qantas Manual**) which removes Aircraft Maintenance Engineers (**AMEs**) from the Person In Charge (**PIC**) role in the Airbus aircraft A321XLR towing operations. The Qantas Manual is **attached** and marked "**Annexure A**".
- 2 The new towing procedure assigns the PIC role to third party Ground Service Provider (**GSP**) employees (**New Towing Procedure**). The New Towing Procedure is **attached** and marked "**Annexure B**".

- 3 The change in assignment of the PIC role represents a significant change from the previous system where the PIC role was held by an AME during an engineering tow.
- 4 The AMWU, AWU & ETU (**Alliance Unions**) as the representative of the affected workers understand that no risk assessment was performed, nor consultation provided to their employees or representatives.

Safety Issues

- 5 On 29 September 2025, the Alliance Unions raised work, health and safety concerns relating to towing and associated duties performed by AMEs on the new Airbus aircraft A321XLR with Qantas (see **attached** and marked "**Annexure C**").
- 6 Specifically, under the new towing procedure, the PIC authorisation is being transferred to GSP employees who do not hold a trade certificate or equivalent certification.
- 7 The Qantas Manual sets out the requirements and prerequisites to hold a PIC Authorisation, namely a Trade Certificate or equivalent certification is required which illustrates that the PIC role is a skilled role.
- 8 The Alliance Unions understand that no risk assessment was carried out by Qantas in relation to the New Towing Procedure which is required under the New Towing Procedure on page 2. Given that the new A321XLR aircraft has requirements that differ from other aircraft types, for example the A321XLR being a longer aircraft, a risk assessment should be performed to ensure potential hazards are identified and communicated to employees and control measures are implemented to prevent and mitigate accidents and injuries.
- 9 Further Qantas Airways Limited failed to consult under sections 48 and 49 of the *Work Health and Safety Act 2011* (NSW) by not giving employees or their representatives a reasonable opportunity to express their views and raise work health safety issues in relation to the New Towing Procedure.
- 10 The Alliance Unions seek the assistance of the Industrial Relations Commission in relation to Qantas ensuring, so far as is reasonably practicable:
 - a. the provision and maintenance of a work environment without risks to health and safety;
 - b. the safe use, handling, and storage of plant;
 - c. the provision and maintenance of safe systems of work; and

- d. the provision of any information, training, instruction or supervision that is necessary to protect all persons from risks to their health and safety arising from work carried out as part of the conduct of the business or undertaking; and
- e. a proper and adequate risk assessment for the New Towing Procedure and engaging in genuine consultation under sections 48 and 49 of the *Work Health and Safety Act 2011* (NSW).

LISTING DETAILS

The parties will be advised of the date, time and place when the Commission will list this matter for directions. Any enquiries should be made to the Industrial Relations Commission Registry on 02 8688 3516.

SIGNATURE

Signature of Prosecutor



Capacity	Legal Officer
Date of signature	18 November 2025

COMPLIANCE WITH PRACTICE NOTES

Parties must comply with the Practice Notes of the Commission. The Practice Notes may be found at the following website:

<https://www.irc.nsw.gov.au/irc/practice-and-procedures/practice-notes.html>

REGISTRY ADDRESS

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