



26 March 2026

Mr Scott Watkins  
Senior Vice President – Aviation  
Toll Government & Defence

By Email: [scott.watkins@tollgroup.com](mailto:scott.watkins@tollgroup.com)

Dear Scott

**Re: Notices in Relation to Partial Work Bans**

We refer to notices issued by Toll on 26 March 2026, pursuant to sub-section 471(1)(c) of the *Fair Work Act 2009* (Cth) (**FW Act**).

Several matters raised in the notices require comment and a response from Toll:

**First**, it is not correct to state that there is “no need” for a telephone and internet allowance on days a pilot is engaged in the Contact Ban. The allowance is not defined solely by accepting or responding to work-related telephone calls or electronic messaging. Pilots use their personal devices for other operational purposes including accessing weather information flight planning tools and aircraft tracking/deconfliction tools. The Contact Ban does not extend to those uses.

**Second**, the methodology of the reduction is unclear. It is not evident whether the reduction is calculated as daily pro-rata of the telephone and internet allowance or some other form of pro-rata reduction. Further, given that the Contact Ban does not extend to all uses contemplated by the telephone and internet allowance, it is not apparent that a full daily reduction (if that is what is contemplated) is warranted.

**Third**, it is unclear how Toll intends to determine when a Pilot is engaging in the Contact Ban in circumstances where all Pilots are directed to use Toll-issued mobile phones.

We request clarification on these matters by 4pm AEST on Monday, 30 March 2026, and reserve our rights, include making an application under sub-section 472(4) of the FW Act.

Please contact me should you wish to discuss.

Yours sincerely

Andrew Molnar  
**Legal Counsel**  
**Australian Federation of Air Pilots**

**AUSTRALIAN FEDERATION OF AIR PILOTS**

MELBOURNE OFFICE  
LEVEL 4 132-136 ALBERT RD  
SOUTH MELBOURNE VIC 3205  
T: 03 9928 5737 F: 03 9699 8799

BRISBANE OFFICE  
33 MONTPELIER ROAD  
BOWEN HILLS QLD 4006  
T: 03 9928 5737 F: 03 9699 8799

E: [ADMIN@AFAP.ORG.AU](mailto:ADMIN@AFAP.ORG.AU)  
[WWW.AFAP.ORG.AU](http://WWW.AFAP.ORG.AU)

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