



16th February 2009

Aviation Green Paper,
National Aviation Security Taskforce,
Office of Transport Security,
Department of Infrastructure, Transport, Regional Development and Local
Government,
GPO Box 594,
CANBERRA ACT 2601

SUBMISSION ON THE AVIATION GREEN PAPER

Thank you for the opportunity to attend the recent briefing held by the National Aviation Security Taskforce in Hobart relating to the Aviation Green Paper released by the Hon. A. Albanese MP, Minister for Infrastructure, Transport, Regional Development and Local Government.

There is no doubt that the aviation industry is facing unprecedented challenges, particularly the increasing security threat relating to air travel.

As the owner and operator of a small remote airport, my Council remains extremely concerned that the perceived risks are managed at a level commensurate with the traveller's capacity to accept and assume the costs associated with the management of those risks.

You will appreciate that Flinders Island is exactly that; an island located remote from the rest of Tasmania that relies on air travel as its principal means of access. There is a barge for goods transport, but passenger travel is not recommended, so we must fly with a service that is monopolised by one service provider due to lack of population with a socio-economic profile that is amongst the lowest in Tasmania.

This service must be accessed for any activity or service provision off the island; visit by relatives, attendance to medical specialists, lobbying of government; even regional matters associated with government and business. We cannot drive anywhere; we must fly at an already unrealistic and unsustainable cost that currently restricts the Council's ability to grow the population, business or tourism base to ensure the financial sustainability of the island into the future.

So we become concerned at any potential cost increase in air travel that will further erode the resident's or business owner's capacity to remain attracted to the island or indeed financially viable.

The financial impact of the introduction of security measures on a small remote airport will not close the airport. It can't close as we have no other way to access the rest of the world. But there is a limit to which it will remain viable, and if increased costs dissuade local patronage, potentially the monopolistic service provider will withdraw from the market due to the fall in financial sustainability. This is not 'Chicken Little', this is pragmatic reality.

Additionally, the introduction of the security measures would require additional building infrastructure and personnel employment, a cost that is not within the Council capacity to assume, let alone pass on to the consumer. Any additional cost, capital and ongoing operational, would need to be borne by the Government as it is not sustainable or reasonable to expect the consumer to bear the cost on such a low volume airport that is essentially the only form of direct transportation with the outside world.

It is appropriate to make comments concerning the proposals contained within the Green Paper:

1. TSP (Transport Security Program) Up-grade

Organisations operating in aviation are currently required to draft a Transport Security Program (TSP) for approval by the Department of Transport and Security. These programs outline the organisation's security measures to manage and maintain security, and respond to security incidents.

Any changes to Government Policy will require re-drafting, up-grading and re-submitting our TSP for approval, a time-consuming task for an airport with limited resources. Perhaps consideration could be given to a regional profile overlay that would enable a simpler template for completion or coordination at a local level.

2. Changes to ASIC (Aviation Security Identification Card)

It is appreciated that a comprehensive review of the ASIC scheme was recently completed. Significant vulnerabilities were highlighted. Recommendations include:

- Increasing the frequency of criminal history checks;
- Separating background checks and physical access control, with all aspects of background checks being centralised in government;
- Phasing out the use of ASIC as evidence of background checks, use Government's agency AusCheck for verification and governed under new regulatory requirement;

- Providing individuals with the option of applying for a one, three or five year qualification instead of the current two year ASIC validity period.

The Council appreciates that this will affect all current ASIC holders and supports the proposals, particularly as they have the potential to reduce costs to the operators.

3. Policy settings for aircraft requiring passenger screening

It is understood that the Taskforce has explored options to implement a regime where the decision to screen or not to screen an aircraft will be independent on the method of propulsion. A number of factors will be taken into account to determine the type of aircraft to be screened, including the weight and speed, fuel load, passenger numbers, and kinetic energy at time of impact.

From the discussion in Hobart, it appears that there is support for the trigger for the screening of aircraft to be the maximum take-off weight (MTOW). It is argued that this measure would provide a transparent and consistent trigger point for the industry and therefore the government on which to base the decision to implement aviation security screening.

Flinders Airport is currently serviced by Airlines of Tasmania who operate two types of aircraft – Dornier 228-212 (MTOW 6400) and Titan (MTOW 3810).

Naturally we are concerned that the adoption of a maximum take-off weight as the trigger for passenger screening will have ramifications for a number of Australia's regional and remote airports, where screening is not currently required. This will result in significant start-up and operational costs and we believe that the Department of Infrastructure should assess the major impact of these costs, based on a risk management perspective, before considering any change.

We believe that any introduction of these measures will have severe ramifications for Flinders Airport. Currently RPT flights land at Launceston and are exempt from screening due to landing at a small separate terminal: Essendon airport is also exempt. If the trigger point as detailed above, is accepted by the government, all RPT flights originating from Flinders Island will be required to be screened, thus requiring full time screeners and equipment, increasing the passenger cost even if the MTOW limits are not applied at Flinders.

Additionally, Flinders Island has traditionally had a number of charter and private operator movements that do not originate or depart from the Flinders Airport, including Lady Barron and Killiecrankie, but also smaller private strips. We are perplexed that the consideration of application of additional security measures can apply at some airports, but not others i.e. if Flinders

Airport was required to implement the proposed security measures because of the RPT service, what is the differentiating factor that determines that other airstrips are less prone to a security breach from a risk management perspective?

4. Terminal Security / Front-of-House

It is apparent that the Government will address front-of-house mitigation strategies, based on four key themes.

- Infrastructure design incorporating security
- Enhanced operational measures
- Staff training in front-of-house matters
- Enhanced stakeholder engagement.

Matters relating to some of these issues will require potential alterations to the current building infrastructure, a cost that cannot be funded by the Council or borne by the consumer. In an endeavour to reduce costs, it may be appropriate that issues are addressed on a regional basis to achieve greater economies of scale and to facilitate greater information sharing.

It is appropriate to address the current qualification or requirements for the security guard position and make it more targeted to airport screening rather than the current requirement. Addressing career development and training would also assist.

Assessed low risk items should be deleted from the prohibited items list to reduce the inconvenience to passengers.

5. Cost of Passenger / Baggage Screening

We are aware that the Government has received a number of submissions seeking a different charging system for aviation security.

It is assumed that the pricing associated with the cost of screening would be passed onto the airlines using the screening services, which in turn, would be passed on to the passengers. We are led to believe that the Queensland Government subsidises RPT services to make it more affordable for remote air service and believe that the Federal Government should consider a similar approach from a CSO perspective for remote locations.

It has been argued that airports must have appropriate air cargo security measures in place, but this needs to be balanced with a true risk assessment and the passengers ability to assume that additional cost. It may be appropriate that different security standards are adopted for different airports that balance the true risk assessment associated with those airports.

Alternatively, we would support consideration that the cost per passenger for the introduction of additional security measures be averaged across all airports and passengers, rather than smaller airports being disadvantaged due to lower volumes. We are advised that the larger airports currently assume a security cost of approximately \$2.00 to \$2.50 per passenger, and that it would cost approximately \$0.50 to \$0.60 per passenger for the additional security measures if the cost was averaged for all airports. Considering the alternatives for high cost low volume remote airports, we cannot believe that a reasonable person would disagree with this approach.

6. National Aviation Security Training Program

It is obvious that the Government recognises Australia's approach to aviation security training has, over time, fallen behind global best practice.

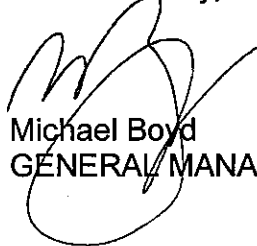
It is accepted and agreed that a robust aviation security regime relies on the use of appropriate technology, sound processes and a motivated and skilled workforce. The Council supports the view of the need to focus on the development of an appropriately skilled and motivated workforce.

Flinders Island Airport currently has five casual trained screeners, but their training is updated as required and does not allow for any consideration of a career path in the aviation industry. It could be questioned regarding their competency as their skill and training is utilised so infrequently.

As indicated previously, it is appropriate to address the current qualification or requirements for the security guard position and make it more targeted to airport screening rather than the current requirement. Addressing career development and training would also assist.

We thank you for the opportunity to make comment on this important policy document concerning the operation of the airport on Flinders Island.

Yours faithfully,



Michael Boyd
GENERAL MANAGER