

From: Michael Watson
Sent: Wednesday, 25 February 2009 3:38 PM
To: Aviation Statement

Subject: National Aviation Policy Statement.

I would like to submit some comments on the Aviation Green Paper.

I am a Licenced Aircraft Maintenance Engineer in the Avionics Trade which includes Electrical, Instrument and Radio Categories and I have been working in the Aviation Industry for over 40 years.

In relation to Safety issues I would like to draw your attention to these observations that I have noticed:-

- 1; About CASA's Regulatory Reform, CASA seem to be turning a blind eye to the problems now being encountered in Europe caused by the removal of Electrical signing privileges from the "B2" LAME's licence and CASA's refusal to adopt the steps that EASA have had to take to try to remedy the major problems with the rectification of Electrical defects on aircraft in Europe. Also I have recently been issued with a "B2" and a "B1.1 Limited" Maintenance Authority and I and most of my colleagues cannot work out exactly what I am allowed to sign for or not under the "B1.1 Limited" attachment.
- 2; Most LAMEs cannot understand why CASA feels a need to downgrade our licencing system to any other Country's licencing system, as we have had the safest maintenance and licencing system in the world, but we have noticed over the last 10 years an erosion of these standards to try to match other regulators around the world. A prime example of this is the Virgin Blue Embraer aircraft that blew a tyre on takeoff from Melbourne on 24/2/2009. Today this aircraft does not require a LAME to sign for a preflight check prior to each flight as was required 10 years ago for an aircraft of this class and also this aircraft does not even require a LAME to sign for a "First Flight of the day" preflight which most other Regular Passenger Transport aircraft flying in Australia today still do. Either of these LAME preflights being carried out on this aircraft would have found the faulty tyre and it would have been changed before flight. The background to this is that around 10 years ago the major Aircraft Manufacturers stopped mandating these checks by LAMEs as a cost cutting promotion to sell more aircraft and when these aircraft came to Australia it appears that CASA did not have the backbone to say that the overseas regulators who allowed these checks to be disposed of were wrong and it was unsafe to allow their removal. There is a feeling of some LAMEs that if you do not have to sign for a check why bother to carry it out as it cannot be too important if CASA have not mandated that you must sign for it and also some employers do not give a LAME time to carry out a check which does not require signing for. CASA also mention "harmonisation" as an excuse for Regulatory Reform, but there will still be a need for Bi-Lateral Agreements to enable Licencing "equality" to overseas countries after the reforms have been completed.
- 3; CASA need to enforce that Self Reporting is being carried out as required by the Airlines and their Maintenance and Repair Organisations and that Airlines are not pressuring LAMEs or even overriding the LAMEs defect reports to show a lesser defect that does not require reporting to CASA. This reporting is not happening and some examples have been notified to CASA by the Australian Licenced Aircraft Engineers Association and apparently not even acknowledged and therefore probably just ignored.
- 4; CASA surveillance audits are notified in advance so the Airline or MRO then temporarily clean up and hide all their bad habits so then the audit does not find the problems and these problems carry on after the audit is finished. These audits must be completely unannounced to have any meaning or effect.
- 5; CASA are devolving their responsibilities and allowing self administration to some of their users to cut their own costs. They are having to charge more to their users but the sections of their users that do the least lobbying and complaining are being charged the most. These situations would indicate that CASA's budget must be greatly increased to allow them to regulate and control the safety of Australian Aviation properly.
- 6; The above budgetary constraints could be part of the reason that CASA's consultation and communication is diminishing, especially to AMEs and LAMEs. There seem to be lots of seminars for pilots but the engineer appears to be kept in the dark as we have not heard anything about the reforms for about 5 years or more. CASA appear to take an excessive amount of notice of lobbying from Airlines and MROs as they did on the trips to Europe to check out the EASA licencing system and the subsequent EASA style licencing rules.

7; I think that an experienced LAME should have a seat on the CASA board to counteract the Lobbying influences from the Airlines and MROs.

8; CASA need to have an extremely intense look at "Heavy Maintenance" facilities, both in Australia and Overseas. The work being carried out at these facilities is at a less than satisfactory standard, due to things like the fact that the signing LAME just sits in an office and signs off the work without even going anywhere near the aircraft or the jobs that they are signing for. Most of the workers overseas are unskilled and not even tradesmen, as Qantas have found with the emergency lighting wiring being repaired with staples and Virgin Blue have found with the latches to stop the oxygen masks dropping from the hat racks all being latched in the test position after one of their aircraft returned from a "heavy" check in Christchurch, which would have prevented all the oxygen masks dropping in an emergency.

9; Another problem is that the AMEs and LAMEs from overseas on Long Stay Temporary Business 457 Visas are nowhere near as qualified as their Australian co-workers and they are being threatened and abused by their employers. These employers artificially create a need for these workers by advertising at very low wage rates in Australia and then rejecting anyone foolish enough to apply at their interviews as they can then coerce the 457 workers to do almost anything with the threat of the taking away of these 457 Visas.

On the subject of Industry Skills we are very concerned that the same Training Organisations who check an engineer's "Required Prior Learning" for training requirements for an EASA type Maintenance Authority are the same "RTOs" that then sell you the required training and that there needs to be complete transparency so that RTOs cannot ask their customers to pay for more courses than their prior learning requires as it would appear at the moment that the wolf is in charge of the chicken shed. The only way to make this transparent would be to have a completely separate organisation checking the learning requirements to the organisations that teach those requirements

On the subject of Aviation Security I am concerned that most of the screening staff seem to be the exact people that we are screening for, as a lot of them appear to not be Australian born and I would wonder just how well their background is being security checked. I have noticed that the screening process varies greatly at different airports even though there is no reason that it should not be consistent across Australia.

The last problem that I have encountered is the excessive time that the Australian Federal Police take to do a Background Check for the issue of an ASIC card. My last one took 12 weeks even though I have had ASIC cards since their inception and I have no Police records. I think that AFP require more funds and/or an attitude change so that this job can be carried out in a more efficient manner as I consider that someone with my conditions should have had a clearance within 4 weeks as I have had for all my previous checks.

Regards,

Michael Watson.
Glenbrook N.S.W. 2773