

# AUSTRALIAN FEDERATION OF AIR PILOTS



MEMBER OF THE  
INTERNATIONAL FEDERATION OF  
AIR LINE PILOTS' ASSOCIATION

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## Towards a National Aviation Policy

### Submission of the Australian Federation of Air Pilots

The Australian Federation of Air Pilots ("the AFAP") operates as both a trade union and a professional association of air pilots in Australia. We represent over 2500 members employed in the aviation industry and cover all pilots, except for those pilots employed by Qantas international/mainline domestic operations and the Defence Force.

Whilst our primary role is to protect and improve the conditions of employment of our members, we are also pro-active in the promotion of flight safety and improving Australian and global aviation standards.

We are a foundation member of the International Federation of Airline Pilots Association.

The aviation industry is one of the most dynamic industries in the world. The recent dramatic increases in fuel prices are evidence of the volatility the industry can experience in the space of a few months. The imminent and growing challenge presented by carbon emission also challenges the industry in the future.

The Federation welcomes the opportunity to contribute to this significant and long overdue Policy. In so doing we indicate that any National Aviation Policy must take into account the dynamism referred to above. The Policy must be "alive" to internal and international forces and be subject to ongoing review.

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## 1. The Australian Aviation Industry

### 1.1 International Services

- It is our view that encouragement of the development of new Australian international airlines, such as V Australia, is preferred to the Government allowing international operators to conduct operations as if they were Australian.
- We see no benefit to the Australian domestic aviation industry of opening up the Australian domestic market to international operators. Australia is not their 'core' market and their involvement may be ephemeral during which time an Australian domestic operator may well be destroyed. Deregulation has served the Australian market well but we must be careful to avoid an American scenario of perpetual instability.
- Australia cannot rely on foreign airlines operating into this country to meet the standards we require. Whether the aircraft are owned or leased should be of no relevance as the same standards need to apply.

### *Regional International Airports*

- The costs associated with multiple international airports and its implications such as security, customs and quarantine, bring into question the issue of whether international airports other than at capital cities are viable and what value they really bring to that locale that would not be provided through major centres.
- There is only so much money available. We support a cost/benefit approach to international airport development with an outcome that encourages expenditure to be put into the major centres ensuring the most modern technology is sourced and used to provide as an example, 100% baggage checking.

### *Cargo*

- It is our view that a committee should be convened to conduct a thorough review of the cargo issue and how best to develop this vital segment e.g. the integration of infrastructure, i.e. air, rail and road as its potential has not yet been realised.

### *Access to Australian Markets*

- We believe 'bilaterals' have served Australia well but need to be part of an ongoing assessment.
- Our major concern was expressed earlier viz. international operators would not consider their Australian domestic operations as the core of their airline which as another example could result in *ad hoc* schedule changes to the disadvantage of domestic passengers.

## *Border Control*

- Australia must be at the forefront of new technology and profiling of passengers to ensure the protection of our borders.

## 1.2 Domestic Services

### *Ownership*

- In light of the recent APA private equity attempt to buy out Qantas it may now be an appropriate time to review the restrictions of foreign ownership of Australian international airlines.
- It is more preferable to have “Australian International airlines” owned in a majority by foreign airlines than what would have occurred had the private equity consortium, APA, been successful.
- We believe that there needs to be protections to ensure Australian carriers function economically and efficiently whilst still maintaining the primary role of servicing the Australian travelling public. Limitations on numbers on the Board may be one approach.

### *Deregulated Domestic Market*

- The Australia deregulated airline market is working in the terms in which it was intended; providing a reasonably high standard of service that offers choice and reasonably priced airfares.

## 1.3 Regional and General Aviation

### *Regional*

- The basis of government and industry policy towards air services to regional and remote communities should be to provide a safe service to all communities, an economically viable service to those communities which can afford to pay for the service and continued subsidised services to smaller remote communities which cannot afford the service, for example remote Aboriginal communities.
- There needs to be an assessment of the mix of government assistance and the free market to achieve the best outcome. This assessment should be conducted on an individual basis.
- The development of more efficient regional aircraft, capable of carrying more passengers, has been significant over the past 10 years or so. We assume this will continue and therefore centres that were not previously well serviced may have better options in the future.

### *Security at Regional Airports*

- There needs to be continuous review of security at regional airports.
- A cost benefit analysis needs to be conducted to determine whether or not it is beneficial to provide security outbound at regional airports versus providing security inbound at the major cities into which passengers fly.
- We need to ensure that security tokenism does not occur and that the security is worth the money being spent. It may be that money being spent on security at regional airports is better spent ensuring the most modern security technology is sourced and used at the major centres.

### *General Aviation*

- General aviation encompasses all operations other than commercial services in large aircraft. It covers fringe, private and recreational aviation activities ranging from the operation of small light aircraft to very large transport aircraft. Addressing it in this review is difficult.
- The industry has many vested interests with the potential for conflict. It is a highly complex, fractious and vocal industry.

### *Ageing Aircraft*

- This relates back to what is really meant by “general aviation”. Many ageing aircraft are owned by individuals who may lease the aircraft out commercially (perhaps once a year). Much of the time it is a recreational ‘toy’. These aircraft should not be skewing the average age of GA aircraft. This situation may be a major contributor to the issue of ageing aircraft.
- Depreciation of aircraft is one logical way to unhinge the aged aircraft however it may also lead to unwanted aircraft in the industry and has been tried before with dubious outcomes.
- The targeting of depreciation on aircraft would be a difficult task.
- In order to maintain continued safe operation of ageing aircraft, safety regulations need to target all commercial operations carrying commercial passengers.

## 1.4 Addressing Skills needs in the Aviation Industry

- The following excerpts from recent AFAP submissions may assist:
  - \* The upfront cost to qualify for a CPL is very significant and a major disincentive to anyone wishing to enter the industry. Pilots who have qualified for a Private Pilot Licence (PPL) and who wish to continue studying and training for a career in commercial aviation i.e. for a CPL initially, should have access to the HECS-HELP scheme or some other means of financial support. HECS-HELP is only available to students currently studying commercial subjects as part of an aviation degree e.g. Bachelor of Technology (Aviation); however not all aspiring professional pilots wish or need to achieve their CPL and ATPL subjects via a degree course. There is also a demonstrated demand beyond the Airline group for Rotary Wing, Emergency Services and Agricultural operations. The fact that the training is conducted by accredited organisations other than universities should not be an impediment to accessing HECS-HELP. A reinvigorated TAFE system would provide another alternative to university training. A resurrection of the Commonwealth Flying Scholarship Scheme, which proved to be practical and popular in the late sixties and early seventies should also be considered.
  - \* Whilst a pool of aspiring untrained pilots may be available in a short time frame, the mentors needed to develop them will not be. In the current environment, the airlines are drawing recruits from every sector of the industry, including the GA charter and flying training sectors. This is leaving a shortage of qualified pilots and instructors to cover the ab-initio and basic commercial pilot training stages. Salaries and conditions are traditionally not very attractive so an obvious remedy for this sector of the market is to improve remuneration and working conditions to retain pilots. However most young professional pilots generally regard the GA stage of their careers, be it engaged in charter flying or as a flight instructor, as an opportunity to accumulate flying hours before moving on to an airline career.
  - \* To make matters worse for the industry, even those pilots who are older and who up to this point have opted for flight instruction or charter/commuter flying as a career are now finding it difficult to resist the opportunities currently on offer from the airlines. As previously stated better salaries and working conditions, and recognition of their status, is the key if we are to retain experienced and dedicated people in GA and the flying training sector.
  - \* The major airlines have over the years benefited significantly from the output of GA and should be required to make a greater contribution towards the training of professional pilots for example supplying expertise from their pilot ranks, subsidizing salaries to provide instructional support to approved flying schools, or operators developing higher throughput cadet schemes, or more radically, pooling their resources to establish centres of aviation excellence.

- \* Initiatives such as providing scholarships to aspiring pilots in regional and indigenous communities would also broaden the recruitment base and make the retention of pilots in these communities more likely.
- \* The costs associated with maintaining qualifications are also a significant factor. The policy of Cost Recovery has seen the costs for professional pilots achieving and maintaining their qualifications increase dramatically for example the cost of medicals, licence renewals, etc. Although seemingly small when viewed individually, the collective toll on a pilot's livelihood, particularly in the GA sector, is very significant. CASA costs in particular need to be looked at.
- In addition to the above, we make a further submission that the standardisation of pilot and air traffic controller training and certification, and the sharing of training resources and infrastructure by civilian and military trainees should be supported. Qualifications in military and commercial spheres up to a level to be determined, for example CPL, would enable the greater utilisation and quicker transition for professionals in both of these sectors.

## **2. Aviation Infrastructure**

### **2.1 Airport Planning and Development**

- The encroachment of community development around airports may lead to the very disaster the original planners specifically sought to avert. Entrepreneurs purchasing airport sites for commercial development is a worrying trend that will inhibit aviation development in the future.

### **2.2 Air Traffic Management**

- There is currently a shortage of qualified air traffic controllers and it is impacting on air traffic in Australia and placing more pressure on pilots in their day to day operations.
- The government must be prepared to fund the technological development required for air traffic management.
- Domestic airspace management has tended to be a political football at times in the past and must be avoided. Advanced navigation systems, technology and new generation aircraft demand an independent review of current airspace architecture e.g. SIDS and STARs, free from political interference.

### 3. Aviation Safety

#### 3.1 Safety Regulation and Regulatory Reform

- We believe that in essence the current demarcation of CASA and ATSB functions should remain. We have previously commented on the relationship between CASA and the ATSB in our response to the Miller Report. For convenience we have attached that report to this submission.
- We acknowledge the concern of the “flag of convenience” arrangement and believe the best way of dealing with that is to prevent flag of convenience carriers entering Australia whether carrying cargo or passengers. If they are allowed entry that entry should be subject to stringent surveillance.
- The question of self administration remains unanswered in certain areas but overriding any self administration regime is the need for adequate and competent CASA oversight.
- The direction of CASA is as you would expect dependent on the most senior managers at the time and we believe has changed far too often over the past decades.
- CASA has been the subject of unrelenting change and ongoing scrutiny since it was the Department of Aviation in the Hawke Labor Government’s earliest years. It has undergone many iterations since that time and the lack of a clear and defined role for it has resulted in years of uncertain management.
- It is this mixture of politics, management uncertainty and at times under funding that has made CASA the ‘cot case’ it is currently perceived to be. A question remains whether this is perceived or real but from the point of view of the people we represent in CASA there has been a marked degradation in the level of technical expertise and the knowledge required and maintained by CASA.
- We will have more to say in relation to CASA in our submissions to the Senate Committee which is conducting a concurrent review.
- There have been admittedly protracted reviews of the regulations. When something as serious as aviation regulations are being reviewed this may not be such a bad thing!
- Conversely we understand that in NZ the review of regulations occurred far more rapidly (approximately 2 years) - that process may be used as a template in Australia rather than the all inclusive approach that has possibly been a contributing factor in the protracted reviews
- There is a dilemma here for the industry because the industry that demands consultation and involvement in these reviews and the formulation of new regulations represents the same interests (and may be the same voices) as the people that are critical of the process and length of the review.

## **4. Customer and Community Protection**

### **4.1 Aviation Emissions and Climate Change**

- Currently there is much research and testing of various methods to reduce aviation emissions throughout the world.
- In Australia there are plans to establish a national Carbon Trading Scheme in 2011. The scheme will involve the issuing of emission permits with incentives for those making early reductions such as offset schemes. We believe this will be a step forward.
- We believe that an 'opt out' option rather than an 'opt in' would increase the take up rate of offset schemes.
- The reality is that if the projected growth in air travel is realised the greenhouse gas emissions of the aviation industry will become a much larger and highly visible proportion of the global total. Advances in airframe and engine technology will partly address the issue.
- New generation aircraft have reduced environmental footprints which need to be recognised by politicians and communities surrounding airports. If this is achieved carbon emissions will be significantly reduced.

## **5. Aviation Security**

- We reiterate our earlier comments in this submission regarding security particularly with regards to security at regional airports.
- There is a limited amount of funds to spend on security at airports outside the major airports and we believe those funds could be better utilised. We seriously challenge the efficacy of air marshals and believe the money could be better spent elsewhere.
- Our members regularly provide examples of inconsistencies in screening procedures and their application.
- New technology and vetting of persons prior to a flight will facilitate transition of passengers in a security sense and minimise the threat to aviation security and delay to passengers.

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