



**AVIATION SAFETY  
FOUNDATION**  
AUSTRALASIA

**Towards a National Aviation Policy Statement  
Submission**

Submitted to:

Mr Michael Taylor AO  
The Secretary  
Dept. of Infrastructure, Transport,  
Regional Development and  
Local Government

Submitted:

7 July 2008

## Table of Contents

Towards a National Aviation Policy Statement – Submission .....	2
Introduction .....	2
Background on the Aviation Safety Foundation Australasia .....	2
The Flight Safety Foundation – An International Partnership .....	2
Section A. Response to Questions from “Chapter 3 – Aviation Safety” .....	3
Question One .....	3
Question Two .....	3
Question Three .....	4
Question Four .....	5
Question Five .....	5
Question Six .....	5
Question Seven .....	5
Question Eight .....	6
Question Nine .....	6
Section B. Identified Priorities in Aviation Safety .....	7
Priority Aviation Safety Issues – Australasia .....	7
Priority Aviation Safety Issues – Globally (as identified by the Flight Safety Foundation) .....	8
Section C. Other Safety Related Questions Raised in the Issues Paper .....	9
Safety Question on Page 3 (chapter 1) .....	9
Safety Question on page 5 (chapter 1) .....	9
Support Information .....	10
About the “Aviation Safety Foundation Australasia” .....	10
About the “Flight Safety Foundation” .....	10
Contact Details .....	11

# Towards a National Aviation Policy Statement – Submission

## Introduction

The Aviation Safety Foundation Australasia (the Foundation) welcomes the opportunity to provide input to the process of developing the National Aviation Policy Green Paper. As the leading independent aviation safety organisation in the Australasian region, the Foundation strongly supports the Government's commitment to a program of consultation and engagement with the industry and looks forward to being able to provide assistance in aviation safety area throughout the process of developing the critically important National Aviation Policy Statement.

## Background on the Aviation Safety Foundation Australasia

The Aviation Safety Foundation Australasia is a national independent not-for-profit company focussing specifically on aviation safety in the Australasian region. It is administered by an honorary Board of Directors and supported by its Patron His Excellency Major General Michael Jeffery AC CVO MC (Ret'd) Governor General of the Commonwealth of Australia.

Globally the aviation industry will double in size by 2025. Despite having one of the best safety records in the world, Australia will not be immune from the added risks posed by growth and a number of emerging risk factors including the amongst others, the global skills shortage. These risks must be evaluated and addressed through effective management and safety education. The Foundation recognises this challenge and has aligned its work to the Global Aviation Safety Roadmap, the international aviation safety plan adopted by ICAO.

The Foundation aims to actively promote aviation safety and deliver important training, research, and thought leadership in the aviation sector. Representing all areas of the aviation industry, the Foundation is committed to promoting and facilitating safe aviation practices across all industry sectors in the Australasian region.

Members of the Foundation are able to access the latest safety information and research through its publications, special briefings and professional development programs.

The Foundation has strategic partnerships with a broad range of organisations including, the Australian Transport Safety Bureau, the Civil Aviation Safety Authority, Airservices Australia, Aerospace Maritime and Defence Foundation Australia and the major Australian airlines.

## The Flight Safety Foundation – An International Partnership

Through its partnership with the US-based Flight Safety Foundation (FSF) the Foundation is able to provide an international aviation safety perspective to its work in the region. The relationship with FSF gives access to international research and programs as well as advice from the leading global aviation and airline safety organisation. It allows the Foundation to address safety challenges across organisational boundaries, be the catalyst in producing end-to-end safety solutions and gives access to a global network of industry specialists.

The Foundation is currently working with the FSF, IATA and ICAO on the '**Industry Training and Qualification Initiative**' - An International Aviation Industry Approach to the Global Shortage of Pilots, Mechanics and Engineers.

Following the initial Task Force research process currently being undertaken around the world, the Foundation will host a Global Summit as part of the initiative, to be held in Melbourne, Australia in early 2009. The Summit is being convened to bring together the key decision-makers from the major airlines and regulators across the world to discuss the issues, review the Task Force reports and begin developing strategies to "safely staff the world's growing aviation system" over the next 20 years.

## Section A. Response to Questions from “Chapter 3 – Aviation Safety”

The following responses relate to the list of questions raised in Chapter 3 – Aviation Safety (page 17) of the Issues Paper.

### Question One

#### **Are there ways in which the approach to Safety Management Systems could be enhanced?**

Even with Australia’s excellent safety record growth in the industry will continue to pose added safety risks. The risks must be evaluated and addressed through effective management and safety education. The Foundation suggests that Australia should align its work to the Global Aviation Safety Roadmap, the international aviation safety plan adopted by ICAO.

Consistent with Australia’s ICAO obligations the Foundation fully supports the initiatives underway in the industry to introduce safety management systems (SMS) for passenger carrying AOC holders over the next twelve months. We also support the outcomes based approach rather than the prescriptive legislative approach, recognising that the legislative burden may not always produce the best result sometimes stifling innovation particularly among the smaller operators who may face resourcing challenges. Nonetheless we expect that the introduction of SMS into this area of the industry will generate significant gains in safety awareness.

The Foundation actively promotes aviation safety through safe business and operational practices. Through its partnership with the FSF the Foundation provides an international aviation safety perspective. This relationship has allowed the Foundation to address safety challenges across organisational boundaries, be the catalyst in producing end-to-end safety solutions and gives access to a global network. Through this, the Foundation has come to believe that SMS is but a part of the safety process and will not work effectively outside of an organisational safety culture. It is crucial that operators incorporate SMS into their day to day operations and generate the data and information required to inform decision making across the organisation.

It is noted that as SMS’ are implemented around the world, safety data collection systems and voluntary reporting systems continue to grow beyond those originally outlined in ICAO Annex 13 standard (5.12). It should be noted that the updated language in Appendix E to Annex 13 recommends the protection of data associated with all safety data collection and processing systems. This definition goes beyond 5.12 to include mandatory incident reporting systems, voluntary incident reporting systems, and self-disclosure systems including data capture systems. It would be unwise to restrict the scope of the TSI Act to address those items mentioned in 5.12 at a time when the international community is moving to a much broader definition of protected information.

Similarly CASA must continue to be diligent in working with industry to continually reinforce the regulatory environment, to coach and inform operators on its ongoing application to their day to day operations and from time to time undertake a review of the operation of SMS to ensure it continues to meet the modern safety challenges.

CASA’s Aviation Safety Advisers have an important role to play in this regard. Whilst it is understood that they are not intended to be involved in compliance and enforcement activities it will be an ongoing challenge for CASA to ensure the separation is maintained and that they are able to be effective and not regarded with suspicion by operators. CASA should take steps to ensure that the role of these officers is properly communicated and ultimately trusted by the industry.

### Question Two

#### **Should the governance arrangements for CASA be strengthened to better support the role of the safety regulator?**

The Foundation is supportive of measures to assist CASA to more effectively discharge its role and responsibilities. The re-introduction of a Board would give CASA greater knowledge of and influence over contemporary and emerging aviation issues. It would also facilitate closer working relationship with industry, enhance its ability to develop contemporary programs and implement aviation policy. It could also work more effectively with industry on safety outcomes as well as its traditional regulations enforcement role.

The composition of the Board should seek to achieve an appropriate balance between industry experience and access to external governance skills. Board members must understand governance and the importance of the separation of the roles of the Board and executive management. It is also important that the Board has an understanding of risk management and the resource implications of policy implementation.

It is envisaged that a suitable Board composition for CASA would assist the regulator to achieve a closer working relationship with industry providing a focus on strategic policy and planning, leaving the responsibility for operational implementation with the executive management of the organisation.

It would be desirable for a consultative committee to be established to bring the Board and industry members together on a range of industry issues. These would include policies and strategies to address contemporary and emerging issues. It would provide a dialogue between industry, the Board and executive management to build improved relationships with industry and offer the Board and the CEO of CASA valuable soundings on strategic issues and

emerging risks. It is recognized that the Aviation Safety Forum (ASF) currently undertakes the role of a special consultative body to the aviation community and the Civil Aviation Safety Authority. It is envisaged that ASF or a similar body may undertake the role in the future as a consultative committee to the Board.

The Board could also play an important international role in policy planning and development in conjunction with ICAO and relevant member states. This could provide an opportunity for CASA to assist those authorities within the region to develop and enhance their aviation governance across their aviation industries. This would also enhance relationships at an inter-governmental and inter-industry level within the region.

### Question Three

#### **How can CASA strengthen the way it relates to industry while meeting the community expectations of a firm regulator?**

This question reflects the Issues Paper proposition that it is a complex role to work with industry and encourage good safety practices as well as set and enforce standards that ensure safety and protect the public. CASA has a role to communicate best practice in safety, to give counsel and where necessary to enforce standards without favour.

The role is more complex because of the spread of operators from large well resourced airlines to small operators with limited capital. Nonetheless safety must be pre-eminent and not an area of competitive behaviour. The outcomes based regulatory approach allows more innovation but may also provide a more complex enforcement environment. However easy it may be in an incident free environment, CASA's role will always be seen as a pre-eminent regulator in the event of a catastrophic aviation incident.

CASA must also inform itself of trends and emerging risks in the industry. In this respect it would be well served by a close rapport with industry. A Board would provide a strong governance approach that would assist in navigating between an industry facilitation and enforcement role. This authoritative body may also act as an extension body to explain CASA role to the wider industry.

The following measures although already implemented to varying degrees warrant mention as ongoing requirements for industry outreach and enforcement:

- Industry Self Regulation – as far as practicable CASA needs to empower and entrust the industry to embrace a safety culture. The industry has an excellent reputation that is in the interests of all players to maintain. Regulatory services can be devolved to the industry to allow CASA to focus on industry wide safety issues.
- Allow industry through the outcome focussed regulation to design its own safety measures. Institute supporting arrangements; approved means of compliance and advisory circulars to better inform industry operators.
- Extension Role: provide an information and safety extension role to the industry to ensure operators understand:
  - The safety risks in the industry and industry best practice for their mitigation and compliance with the regulatory environment and
  - The consequences of the failure to undertake safety audits and to promote a compliant safety regime.
- Extensive consultation with the industry to ensure CASA understands the emerging risks in the industry and to understand the practical issues confronting the industry in addressing them.
- Provide a fair streamlined and independent grievance procedure to deal expeditiously with complaints from industry about the action or inaction of CASA.
- Streamline the issue of licences, certificates and approvals to ensure industry safety issues are adequately addressed in a timely way to minimise the disruption to industry and to ensure that CASA resources are most profitably engaged.
- Liaise closely with bodies such as the Foundation to ensure that a productive conduit continues to exist between CASA and the industry on issues which may become otherwise too sensitive to discuss with the regulator.
- Uncompromisingly take strong enforcement action where it is warranted for passenger safety. CASA could also consult with the industry in determining appropriate sanctions for breaches of the regulations ranging from immediate grounding where warranted followed by prosecution or a range of clearly defined breach notifications and penalties. This would lend them greater industry support and lead to a system that is very defensible with the public.

#### Question Four

**How can the Australian Government and industry ensure CASA completes its long-running regulatory reform process as soon as possible, to give clarity to industry and to clear the way for new approaches to meeting the regulatory challenge?**

The Foundation understands that the delays in the regulatory reform process are currently beyond the control of CASA, being due to the lack of legislative drafting personnel. It is therefore proposed that the Department provides the funding necessary for CASA to engage its own legislative drafting personnel for a period of 12 months to enable the finalisation of this otherwise tardy process.

Otherwise the Foundation supports, as an interim measure, the use by CASA of Civil Aviation Orders to introduce elements of the program such as maintainer licensing, on an interim basis and possibly the introduction of Safety Management Systems pending the final legal drafting of Part 119. It is clear that CASA requires the capacity to introduce reform expeditiously and that the removal from the overhang in the legislative drafting section of the Attorney General's Department is required.

In addition the Foundation supports the harmonisation of rules with global aviation powerhouses such as Europe and the USA and the negotiation of Bilateral Aviation Safety Agreements to achieve mutual recognition of regulatory decisions to further facilitate the international activities of Australian aviation businesses.

#### Question Five

**What changes can be made to improve how Australia's aviation safety agencies work together?**

The Foundation notes that this question was dealt with in the ATSB/CASA Review 2007 Report to the Minister for Infrastructure, Regional Development and Local Government (The Miller Report). A copy of our detailed response to The Miller Report including comment by the Flight Safety Foundation (FSF) can be made available to the Department if required.

#### Question Six

**What steps can the aviation industry as a whole take to ensure it maintains safety standards as it grows and diversifies?**

The Foundation believes that risks must be evaluated and addressed through effective management and safety education. The Foundation supports CASA's *outcomes focussed regulatory approach* that by its nature places an onus on operators to achieve safety outcomes in the industry. Similarly, the Foundation's comments in respect to governance would lead to a greater interchange between CASA and industry participants.

The Foundation has a role to play in the challenge posed by this question. It has aligned its work in the aviation industry to the Global Aviation Safety Roadmap, the international aviation safety plan adopted by ICAO. The Foundation actively promotes aviation safety to its members through safe, sound business practices. It communicates its message through its training, research, and leadership across the region. Members of the Foundation are able to access to the latest safety information and research through the Foundation's publications, special briefings and professional development programs.

The Foundation is prepared to use its influence in the industry and its strategic partnerships with a broad range of organisations including, the Australian Transport Safety Bureau, the Civil Aviation Safety Authority, Airservices Australia, Aerospace Maritime and Defence Foundation Australia and the major Australian airlines to promote industry role in maintaining safety standards.

Through its partnership with the Flight Safety Foundation (FSF) the Foundation provides an international aviation safety perspective. The relationship with FSF gives access to international research as well as advice from the leading global aviation and airline safety organisation. It allows the Foundation to address safety challenges across organisational boundaries, be the catalyst in producing end-to-end safety solutions and gives access to a global network and assistance network.

#### Question Seven

**What steps should be taken to ensure Australia maintains a high standard of safety in the context of global developments?**

Globally the aviation industry will double in size by 2025. Despite having one of the best safety records in the world, Australasia will not be immune from the added risks posed by growth. The risks must be evaluated and addressed through effective management and safety education. The Foundation recognises this challenge and encourages the wider industry to, do as it has done and, aligning its work to the Global Aviation Safety Roadmap, the international aviation safety plan adopted by ICAO.

The Foundation along with CASA already actively promotes aviation safety through safe, sound business practices. It communicates its message through its training, research, and leadership across the region. The Foundation's members

are able to access to the latest safety information and research through the Foundation's publications, special briefings and professional development programs.

Through its partnership with the FSF the Foundation provides an international aviation safety perspective. The relationship with the FSF gives access to international research as well as advice from the leading global aviation and airline safety organisation. It allows the Foundation to address safety challenges across organisational boundaries, be the catalyst in producing end-to-end safety solutions and gives access to a global network and assistance network.

An example of this is the Foundation's involvement with the FSF, IATA and ICAO "**Industry Training and Qualification Initiative**" (An International Aviation Industry Approach to the Global Shortage of Pilots, Mechanics and Engineers).

The Foundation recognises the importance of exposure of industry participants to international developments and practices. It is imperative that Australia continues to learn from the rest of the world as well as share its own learning. This is particularly important in the area of shared data on risk management, safety rules and developments in the important international forums such as ICAO, FAA-EASA.

## Question Eight

### **What issues should a 21st century aviation regulator be focussed on?**

The sheer growth projected for the industry by 2025 will be a major influence on industry regulation into the future. Particular issues will require a dynamic approach to regulation and probably regular review. They include:

- The politics and reality of global warming as it emerges over the next decade, including the effects of attaining 'peak oil' on the cost of operations and the characteristics of possible alternative aircraft propellants.
- Emerging global powers of China and India, as they relate to:
  - the potential for a cultural shift in the treatment of regulation;
  - the growing demand for personnel and the mobility their services.
- The local and global skills shortage, and the potential safety related impact this may have, including the risks associated with a degradation of experience levels.
- Technological developments in aircraft, avionics and other allied systems.

## Question Nine

### **Is self-administration a key factor in the growth of recreational aviation? Is there more scope for some parts of the industry to self administer? What are the opportunities and risks for the industry, regulators and the community in greater self administration?**

CASA could allow self regulation in those parts of the industry that can demonstrate the competence to undertake a self administration role. This may require the preparation of clear guidelines and an assessment process, including:

- Clear rules and standards applying to self administered activities that are consistent with the rules applying to other airspace users.
- Accreditation of self-administering organisations whereby they demonstrate competency in airworthiness and flight operations.
- Demonstration of their ability to ensure the compliance of their members and aircraft owners to the rules and regulations.
- Subject to scrutiny and where necessary intervention by CASA.
- Demonstration that the risk of an accident in any passenger carrying activities is being satisfactorily mitigated.
- The finalisation of CASR parts 103 and 149 would be necessary to provide a sound regulatory environment for self-administration.



## Section B. Identified Priorities in Aviation Safety

One of the key purposes of the Foundation (as articulated in its constitution) is to “conduct research and develop an understanding of future regional aviation safety issues”. Accordingly, the Foundation has an strong ongoing commitment to undertake independent research and in the coming six months will establish an annual “Aviation Safety Survey”.

In the interim however, we have compiled a list of priority aviation safety issues, identified from our anecdotal research and feedback from our broadly experienced board of directors and industry advisers. Please note that the following list is in alphabetical order and not in order of priority or importance.

### Priority Aviation Safety Issues – Australasia

The following list outlines some of the key aviation safety issues identified by the Foundation:

#### 1. Potential Safety Effects Caused by Economic Pressures on General Aviation Sector

The General Aviation (GA) sector of the industry exists in a typically highly competitive market segment which represents a significant variance in operational risks. Whilst a number of operators will consider contract work, in terms of reward and risk, an organisation may deem that certain operations do not meet its risk profile and choose not to bid for such work. In this example, the organisation has considered and accepted what it considers to be an acceptable level of risk for its operations and decides that it will not accept higher levels of risk for a variety of reasons. Economically, it might not need to since other core contract work makes this unnecessary.

However, faced with an economic downturn which may see the cancellation of such typically lower risk contracts, in addition to facing increasing costs, such as fuel, organisations face two choices. They can exit the industry (be sold or forced into bankruptcy), or they can choose to accept higher risk contract work with, potentially, higher rewards. Given that this organisation's shareholders previously identified its risk profile as unacceptable for accepting higher risk contract work, it may need to invest in processes, training, procedures and equipment to bring it into a position where it has a new and more robust risk mitigating profile. This will obviously cost, in terms of both money and time. But what if the organisation has neither the time to establish the necessary infrastructure nor the necessary capital for the associated investment? Might this organisation now be forced into a position where, rather than exit the industry, it rationalises the risk of higher risk ventures? If it does, it takes on higher risk ventures for which it is ill equipped and suited in order to attain, what might be termed in economic parlance, extraordinary profits. Organisations such as these live on a knife edge, balancing between regulatory compliance, capability and disaster.

#### 2. Runway Safety

Runway safety issues, defined as: any safety issue that deals with the runway environment (or any surface being used as a runway) and the areas immediately adjacent to it (e.g. overruns, high speed taxiways). Runway Safety issues include: runway incursions, runway excursions, runway confusion, and inappropriate use of runways. The data from the Flight Safety Foundation's Runway Safety Initiative shows we are being effective in preventing runway incursion **accidents**, however the number of incidents and severity still indicates a very high risk. Runway excursions are the most common type of runway safety accident (96%) and the most common type of fatal runway safety accident (80%).

#### 3. Skills Shortage

The current and future skills shortage for pilots, mechanics, engineers and air traffic controllers, in both Australia and globally. The Foundation is calling on all industry and government agencies to work together to develop meaningful long-term strategies to ensure that the aviation sector in Australia does not compromise its excellent safety record or economically affect the industries that rely so heavily on aviation, such as tourism and import/export industries.

From a global perspective, the Foundation is involved in the FSF/IATA/ICAO '**Industry Training and Qualification Initiative**' (an international aviation industry approach to the global shortage of pilots, mechanics and engineers), and plans to host the associated Global Summit of senior industry decision makers to be convened in Melbourne, Australia in early 2009.

The Foundation is also a member of the '**Future Pilot Task Force**' initiative formed to address the Australian industry shortages. Given Australia's high training standards, these current and future pilot shortages will potentially be exacerbated by the substantial demand for personnel in other parts of the world (fuelled by significant medium to long-term industry growth) and the systematic poaching of experienced Australian personnel.

Current forecasts (compiled through the FSF/IATA/ICAO 'Industry Training and Qualification Initiative'), predict that the following **number of pilots will be needed to support fleet growth and pilot retirements between 2006 and 2026**. These figures do not include: corporate aviation; air charter; flight instruction; turboprop operators; associated industry requirements.

• Australia	7,300	• North America	111,100	• SE Asia	27,100
• China	49,300	• SW Asia	13,400	• Europe	73,400
• South America	23,800	• NE Asia	20,100	• Middle East	15,200

## Priority Aviation Safety Issues – Globally (as identified by the Flight Safety Foundation)

The following list outlines the current priority aviation safety issues as identified by the Foundation's international partner, the US-based Flight Safety Foundation.

### **1. Approach and Landing Accident Reduction (ALAR)**

The continued prevalence of approach and landing accidents at all levels of aviation around the world. Controlled flight into terrain (CFIT) continues to be the leading cause of fatalities in commercial aviation, with approach and landing accidents (ALA) responsible for over 50% of all hull losses at every level of aviation.

The Flight Safety Foundation (FSF) international Approach-and-landing Accident Reduction (ALAR) Task Force was created in 1996 as another phase of CFIT accident reduction initiative. The task force includes 100 representatives from airlines, corporate flight departments, aircraft and equipment manufacturers, civil aviation authorities, and many other technical, research and professional organizations. The initiative was a major effort to identify the causes of CFIT and ALA, develop interventions, and get this critical information to the aviation personnel around the world.

The result of this effort is the ALAR Tool Kit, which consolidates the data, products, findings, conclusions, and recommendations of nine years of work by over 300 international aviation experts. FSF regularly conducts ALAR Tool Kit Workshops throughout the world making available this important safety information to the people who can use it. More than 26 highly successful workshops have been held around the world to date, at locations including: Miami, Mexico City, Cairo, Iceland, Bangkok, Nairobi, Johannesburg, Perth, Melbourne, Brisbane, Beijing, Dakar, Moscow, Brussels, Dubai, Bahrain, Korea, Washington DC, Christchurch, Anchorage, Abu Dhabi, Muscat, New Delhi, and Caracas, Tokyo, and Baku, and Bangladesh. The aviation regulatory authorities in Mexico, India, and Cuba on have made ALAR training based on the ALAR tool kit mandatory for all pilots. Despite this continued work, CFIT and ALAR continue to be significant aviation safety issue.

### **2. Criminalization of Accidents**

The accelerating trend toward criminal prosecution of pilots or other aviation professionals, including air traffic controllers following accidents.

International standards clearly state that it is not appropriate to pursue criminal charges based on the data collected during a safety investigation. In situations of gross negligence or malfeasance, the judicial authorities need to pursue their own, separate investigation. For the sake of safety and a just culture, safety investigators, plus those who are being investigated, must have complete confidence in the integrity of the process. The lives of future passengers are dependent on the important safety information that is normally gathered during an accident investigation. There is major industry concern that if there is a fear of prosecution, then the parties involved will be less inclined to be open during the investigation process.

### **3. Lack of Political Will to Adequately Implement Aviation Safety Regulations**

The lack of political will of various countries/regions (i.e. Africa), to implement meaningful plans for Aviation Safety.

### **4. Runway Safety**

Runway safety issues, defined as: any safety issue that deals with the runway environment (or any surface being used as a runway) and the areas immediately adjacent to it (e.g. overruns, high speed taxiways). Runway Safety issues include: runway incursions, runway excursions, runway confusion, and inappropriate use of runways.

The FSF has initiated the Runway Safety Initiative (RSI) to address the challenge of runway safety, focusing on the three areas: runway incursions, runway excursions and runway confusion. This is an international effort with participants representing Airbus, Airports Council International (ACI), Association of Asia Pacific Airlines (AAPA), Association of European Airlines (AEA), Boeing Commercial Airplanes, Civil Air Navigation Services Organisation (CANSO), Direction Générale de l'Aviation Civile (DGAC) of France, Embraer, Eurocontrol, European Aviation Safety Agency (EASA), European Regions Airline Association (ERA), International Air Transport Association (IATA), International Civil Aviation Organization (ICAO), International Federation of Air Line Pilots' Associations (IFALPA), National Aerospace Laboratory NLR–The Netherlands, U.S. Federal Aviation Administration (FAA) and U.S. National Transportation Safety Board (NTSB).

### **5. Skills Shortage**

The current and future global skills shortage for pilots, mechanics, engineers and air traffic services personnel.

The skills shortage issue is a major priority for the aviation industry globally, as evidenced by the development of the **'Industry Training and Qualification Initiative'** as a joint project of the FSF, IATA and ICAO.

The initiative involves the formation of a task force to undertake detailed research on the global shortage of pilots, mechanics and engineers, the findings of which will be discussed at a Global Summit of senior industry decision makers to be convened in Melbourne, Australia in early 2009. The Summit will bring together the key decision-makers from major airlines and regulators across the world to discuss the issues, review the 'Task Force' reports and begin developing strategies to safely staff the world's growing aviation system.

### **6. Supporting Indonesia's Aviation Safety System Enhancement**

To support Indonesia to address identified deficiencies of Civil Aviation safety oversight and to upgrade the capabilities.

## Section C. Other Safety Related Questions Raised in the Issues Paper

The following information addresses questions raised outside of chapter three ("Aviation Safety") of the Issues Paper that relate to aviation safety.

### Safety Question on Page 3 (chapter 1)

**How might the Australian Government best ensure all international airlines flying into Australia maintain the highest of safety standards? How might the Australian Government most effectively monitor and enforce safety standards of airlines that lease aircraft rather than operating their own aircraft?**

CASA should maintain a strict approach to the issue of Foreign Airline AOCs, including the ongoing surveillance to maintain compliance with operational and airworthiness standards.

Maintain support for the ICAO oversight program which audits individual states' regulators and their regulatory frameworks to ensure that the requirements of the Chicago Convention and Annexes are met.

Leased aircraft by foreign airlines are subject to home country and foreign country regulatory supervision in the same way as 'owned' aircraft.

### Safety Question on page 5 (chapter 1)

**Are security and safety measures adopted for major capital city trunk routes appropriate for regional and remote services? If not, what alternative measures could be adopted?**

There should be an acknowledgement that passenger carrying operations in regional and remote areas using low capacity aircraft can pose an increased safety risk. Measures appropriate for the particular risk should be developed on an assessment of the risk the outcomes basis already discussed. Where it is deemed necessary CASA should apply an accentuated surveillance program to regional and remote services.

## Support Information

### About the “Aviation Safety Foundation Australasia”

The Aviation Safety Foundation Australasia (the Foundation) aims to actively promote aviation safety and deliver important training, research, and thought leadership in the aviation sector. Representing all areas of the aviation industry, the Foundation is committed to promoting and facilitating safe aviation practices across all industry sectors in the Australasian region.

Established in 1997, the Foundation is a non-government, not-for-profit, incorporated public company administered by an honorary Board of Directors and supported by its Patron His Excellency Major General Michael Jeffery AC CVO MC (Ret'd) Governor-General of the Commonwealth of Australia.

Providing both corporate and individual membership, the Foundation offers its members access to professional development programs and special briefings, as well as direct access to the latest safety information, research and publications.

The Foundation has a broad range of industry strategic partnerships. Within the region, the Foundation works closely with organisations including, the Australian Transport Safety Bureau, the Civil Aviation Safety Authority, Airservices Australia, Aerospace Maritime and Defence Foundation Australia, and many of the major airlines within Australia.

Internationally, the Foundation is a regional partner of the US-based Flight Safety Foundation providing access to substantial research and other resources, regarded as one of the leading players globally in the area of aviation/airline safety.

### About the “Flight Safety Foundation”

Flight Safety Foundation is an independent, non-profit, international organisation engaged in research, auditing, education, advocacy and publishing to improve aviation safety. Membership is open to everyone interested in promoting aviation safety - in any of its aspects. The FSF roster of more than 1,070 members from 142 countries represents a “who’s who” of industry leaders from airlines, helicopter manufacturers, corporate operators, suppliers, insurance companies, regulators and others.

The Flight Safety Foundation’s mission is to pursue the continuous improvement of global aviation safety and the prevention of accidents.

Their objectives are to:

- Pursue the active involvement and participation of the diverse elements of global professional aviation;
- Anticipate, identify and analyse global aviation safety issues and set priorities;
- Communicate effectively about aviation safety; and,
- Be a catalyst for action and the adoption of best aviation safety practices.



Often referred to as the “conscience of the industry,” Flight Safety Foundation has contributed significantly to the evolution of aviation safety and the saving of lives. The Flight Safety Foundation occupies a unique position among the many organisations that strive to improve flight safety standards and practices throughout the world. Effectiveness in bridging cultural and political differences in the common cause of safety has earned the Flight Safety Foundation worldwide respect.

They are distinguished by their objectivity. While interacting with others in the aviation industry, they are independent of government and commercial organisations.

The air transport industry is a unique global enterprise — a single flight can cross the borders of several countries and several continents. The Foundation, with members from more than 142 nations around the globe, transcends local, regional or national political interests.



**AVIATION SAFETY  
FOUNDATION**  
AUSTRALASIA

## Contact Details

### Contact Person:

Paul Fox  
Executive Director  
Aviation Safety Foundation Australasia  
Email: [paul.fox@aviationsafety.org.au](mailto:paul.fox@aviationsafety.org.au)  
Phone: 1300 557 162  
Fax: 1300 557 182  
Mobile: 0410 737 686

### Postal Address:

GPO Box 3026  
Melbourne Vic 3001

### Office Address:

Suite 1601, Level 14, 530 Little Collins Street  
Melbourne Vic 3001