

28 April 2008

Secretary
Department of Infrastructure, Transport,
Regional Development and Local Government
GPO Box 594
CANBERRA ACT 2601

Issues Paper: Towards a National Aviation Policy Statement

I am responding to the invitation from The Hon Anthony Albanese MP, in the Minister's Foreword to the above Issues Paper; dated 10 April 2008.

My professional background is Airport Engineering; which was the basis of my long aviation career starting with Department of Civil Aviation (DCA), in 1971. My career with the Australian Government included four years as Counsellor Transport, Washington D.C. and several senior executive roles with Department of Transport and with Department of Aviation.

The Issues Paper highlights the need for skills and training policies; with particular reference to pilots and air traffic controllers. For the Australian Government to be effective in these areas, it needs to be *INFORMED*. At a time like the present; I believe it to be vital for the Australian Government to fully understand the status of the current skills available within Government. I am suggesting a full and frank *SKILLS AUDIT* within the relevant agencies.

Deskilling of the Aviation portfolio commenced with the compulsory transfer to Canberra in the late 1970's and was virtually completed with the infamous CAA Review of Resources and rhetoric associated with Affordable Safety.

Looking at Airports, for example. The core business of our Civil Aviation Safety Authority (CASA), is to regulate the safety of civil aviation. Key functions include rulemaking, standards setting, entry control and compliance.

As I write this submission, CASA has *ONE* remaining Airport Engineer. The Authority has no permanent expertise in airport lighting, and survives by using "non-ongoing" services of one former senior lighting specialist. There appears to be no training or development scheme in place for future generations.

In terms of safety surveillance; CASA employs around 12 airport inspectors to service the entire continent. All of these officers are senior in age and there are no succession plans in place.

The Department of Infrastructure, Transport, Regional Development and Local Government has no airports specialist knowledge in the relevant group. Notwithstanding this, the *Airports Act 1996* has the Minister approving Master Plans, Development Plans and Environmental Protection Plans for Australia's federally leased (privatised) airports.

The Parliamentary Standing Committee on Public Works (PWC), no longer has jurisdiction over the privatised airports; because public expenditure isn't applied. Despite this, the Minister was able to approve the expenditure of some \$28.5 million

taxpayer funding in May 2006, for runway and taxiway work at Canberra Airport. This outlay was on top of \$8.8 million spent on Canberra Airport in 2003. The then Minister approved of this expenditure without the need for any in-house specialist knowledge. With my in depth knowledge and experience in heavy aircraft pavement design, construction, evaluation and maintenance; I can't begin to understand how this expenditure could be justified on a privatised airport.

My second recommendation concerns the level of *generalist management* within Australian aviation. As the various reform processes took affect from the 1980s, numerous instant experts entered the industry at senior management levels.

The Issues Paper makes reference to Australia's "world-renowned safety record". In fact this reputation was earned prior to the 1980s, and has been under threat for two decades. To a large extent this situation has come about by a lack of understanding by those at senior levels within the industry and within Government.

In the case of airports, the list of fiascos is both serious and continuous. For instance;

- A hangar collapse at Canberra
- Runway lights "OUT" at Sydney
- Building induced turbulence at Canberra
- Boeing 737-300 bogged at Melbourne
- "Mystery" gas leak emergency at Melbourne
- Leaking sand under the third runway at Sydney
- Bird-hazard water features at Canberra
- Catering vehicle runway incursion at Sydney
- 6 months delay in terminal opening Adelaide
- Runway lights "OUT" at Canberra (Oct 2006)
- Total power blackout at Sydney (March 2006)
- White powder contamination at Adelaide (June 2006)

I am particularly concerned about the "OPEN DAY" at Canberra Airport on 2nd July 2006; more on that later.

I am not sure what Government can do about Amateur Hour in the Corporate Sector; but I am suggesting there may be an opportunity to ensure the public interest is protected by decision makers with genuine and *relevant* aviation industry experience.

In this regard, I noted a recent interview of the Minister, Hon Anthony Albanese, in the April/May 2008 issue of "*Aviation Business*" magazine. (ABM).

ABM: "There are few if any senior personnel in your Department with aviation industry experience. Have you identified this as a deficiency and if so do you have plans to recruit to rectify the situation?"

Unfortunately, the Minister's response was very brief and dismissive. But, we the general public do not want another TAAATs project debacle; 5 years late on delivery, \$100 million over spent, and not to quality. We also do not want another \$40 million handout to a privatised airport.

What are the airport specialist credentials of senior personnel advising the Minister on airport issues involving safety, planning, public expenditure, environmental impact, and environmental nuisance?

My next recommendation relates to the basic approach to *Aviation Safety Management*. I believe there is an urgent need for the Government to clearly state in non-ambiguous terms, what we are aiming for.

For example, in the case of the US Federal Aviation Act, “the opening section lays down the ultimate standard for the entire aviation community. The standard set in that law is not whatever safety you can afford, not safety at the margin; not the bare minimum of safety; but safety with all its redundancy, back-ups, fail safe devices, and all the caution our inventive genius can build into aircraft.” (Jim Oberstar, Chairman US Congressional Sub-Committee Transport; circa 1980s)

This is generally where I come from, and aligns with the traditional D.C.A. culture. My firm position is the only level of safety is the best you can do. This doesn't mean safety at all costs; as there is still the matter of efficiency and effectiveness, in the use of resources.

In essence, the first part of safety management is a genuine build up of safety awareness culture within an organisation. From there, what we are talking about is a system to facilitate identification of risk factors; followed by actions to either remove or manage those risks in order to avoid an accident/incident.

Then came the aviation reform processes and agents of change; along with the myths of affordable safety. In my view, we have drifted beyond the confusion of affordable safety, and we are now in the age of “*She'll-be-Right*”.

Let me explain, by using the Canberra Airport “Open-Day” as an example. On 2 July, 2006, the airport held an Open Day to mark the opening of the new runway extension. Here we had upwards of one thousand people allowed under the threshold approach of an operational airport.

When I saw the news report on this event, I began to think about the numerous events which could have produced a horrible disaster; had they occurred at the wrong time.

What if one of those “screeching, roaring jets” had experienced an aborted take-off in the direction of those happy families? What if we had a long landing in the same direction? Worse still, a premature touchdown before the displaced threshold?

Let's not forget at Canberra we have contributing risk factors, such as building induced turbulence, and an elevated threat of bird-strike.

With all of this in mind, I wrote to CASA on 14th July, asking the basis for allowing public access under the approach of an active runway. The response took a very long time, and did nothing to alleviate my fears about public safety.

In conclusion, I was told; “There is no doubt that landing long an over running a runway, undershooting and landing short, and the possible over running of a runway during an aborted take-off, are very real hazards. However for the event held on 2 July, 2006 at Canberra Airport, there was an 800 metre buffer between the threshold and the public, which minimized the safety risk to the public.” (*Minimized!!*)

In other words, we will be lucky; ... *SHE'LL BE RIGHT*. The potential hazards could easily have been removed, by not allowing the public to be placed in harms way. This type of risk taking should never be allowed to occur again.

Make no mistake, runway excursion is a very real and significant occurrence.

- 23rd September 1999 Qantas B747 overrun; Bangkok Thailand
- 9th July 2006 Siberian Airbus A310 overrun; Irkutsk Russia
- 7th March 2007 Garuda B737-400 overrun, Yogyakarta
- 17th July 2007 Tam Airlines Airbus 320 excursion, Congonhas Brazil
- 25th March 2008 Qantas B747 aborted takeoff, Los Angeles Int'l
- 18th January 2008 British Airways B777 undershoot, Heathrow
- 16th April 2008 Hewa Bora Airways DC-9 aborted t.off. Goma, Congo.

As indicated in the Issues Paper (3.1, page 16)... “this is not a time to be complacent.”

Can we now re-assert safety primacy?

Regional and General Aviation

The Issues Paper talks about key challenges. Here again, I believe we can learn from the past; particularly with regard to the role of the Federal Government.

The Aerodrome Local Ownership Plan (ALOP) became serious in 1958, along with rapid growth in the aviation industry. In essence, the Commonwealth funded any agreed development work and shared the costs of ongoing aerodrome maintenance costs.

Leaving aside financial issues; a very handy feature of the ALOP was that the Commonwealth provided technical support and assistance to the aerodrome operators.

Without doubt, the last decade has seen a significant reduction in the pool of expertise in airport development, operation and maintenance.

Some of the issues were highlighted by the House of Representatives Standing Committee on Transport and Regional Services inquiry into commercial regional aviation services in Australia, and alternative transport links to major populated islands.

The November 2003 Inquiry Report, titled “*Making Ends Meet*” indicates that many Councils are struggling to operate and maintain their airport facilities, and some sort of assistance may be required.

To my knowledge, the Government has yet to respond to the Inquiry recommendations. My suggestion is for the Australian Government to consider these Recommendations as part of the National Aviation Policy Green Paper.

In particular, I believe it to be timely to review the features of the ALOP with a view to establishing an Agency Business Unit, capable of providing technical advice to regional and local aerodrome operators.

Significantly, recommendation 28 of the above Inquiry Report, calls on CASA to place greater focus on activities to assist Industry players in complying voluntarily with the regulations.

Aviation Security

We didn't need the expensive British security expert to tell us that security at Australia's airports is seriously flawed. Despite the follow up to the Wheeler Report; there is still much more work to be done; far too much to be covered in a submission such as this.

The Aviation Business Magazine for December 07/January 2008 carried a timely article; noting Aviation security is “overdue for rationalisation”. The article claims our security “appears to be process driven rather than outcome focussed; and it remains reactive rather than proactive”.

I have a suggestion to start the rationalisation. The essential issue here is to consider security as part of the overall airport operational task; unlawful interference cannot be seriously considered in isolation from matters of airport safety and inadvertent entry or interference.

At present we have CASA responsible for airport safety including inadvertent entry; whereas the Transport Department is responsible for airport security.

Those new to the world of Airports could reasonably expect the Manual of Standards (MOS) – Part 139 Aerodromes, would (along with the CASRs) contain a comprehensive description of standards and operating procedures applicable to Airports. Not so; instead the MOS introduction tells us: “This MOS includes standards and procedures relating to the prevention of inadvertent entry of animals and people to the movement area.” “This MOS does not address Aviation Security i.e. the safeguarding against acts of unlawful interference, the subject matter is under the purview of the Federal Department with carriage for Transport.”

The reality is of course; as far as Airport planning design, operations and maintenance is concerned; safety and security go together.

I believe ONE AGENCY should be responsible for both. At the very minimum the security and safety issues should be detailed together in the same MOS; in order to ensure the participants have the full picture.

Bird-strike Hazard

A significant event in our Aviation history, was the closing down of the (three person) Bird Hazard Investigation Unit in 1991.

At this time the number of birdstrike incidents was in the order of 300 per annum. Contemporary figures are of the order of 1500 birdstrikes per annum.

The problem is getting out of hand.

There is a strong case for the Commonwealth to re-establish a Bird Hazard Control Unit to provide ongoing advice and services across the industry; including the regional and local aerodromes.

In conclusion

In summary my suggestions for the Green Paper include:

- (i) A full and frank SKILLS AUDIT within Agencies
- (ii) Audit of relevant aviation experience at senior levels
- (iii) Re-assert safety primacy
- (iv) Look at establishing technical assistance for regional and local aerodromes
- (v) One agency to be responsible for aerodrome safety AND security
- (vi) Re-establish Bird Hazard Control Unit within Government.

Taking all these suggestions into account along with the need to re activate National Planning functions and facilitate the Commonwealth as an informed regulator and decision maker; I believe the Government should look at the establishment of an Airports Division within one of the Agencies or even as a separate Bureau, reporting to the Minister.

Business units would include:

- Standards setting and safety surveillance
- Airport Security
- National Planning
- Master Plan/Development plan Approvals
- Environment, incl noise and environmental impact
- Technical assistance; incl skills/training oversight
- Operations; specialist services inc Bird Hazard Control
- Aerodrome lighting

Because of the age profiles and remaining skills within the Airport industry; I believe there is only a small window of opportunity for this to be achieved. Some of the above functions can be combined, depending on the qualifications and experience of the available personnel.

I would be happy to discuss the content with either the Minister or his staff.

Sincerely

Graham Bailey