

# Tiger Airways Australia



Submission to the Development of a  
National Australian Aviation Policy  
Statement

## Summary

Tiger Airways Australia is pleased to be provided with the opportunity to input into the government's comprehensive review of Australian aviation. The enclosed submission covers aspects of aviation policy that have a direct relationship to the operations of Tiger Airways in Australia. It also provides background on the airline's operations.

In summary our recommendations to the issues paper are:

- **Define 'national interest' in regard to international aviation access to the benefit of consumers.**
- **Continue to liberalise international air services agreements, particularly to regional gateways.**
- **Continue to negotiate with other countries for principal place of business as the criteria for designation of Australian international airlines.**
- **Remove domestic legislative restrictions as quickly as possible that block Australian airlines from accessing existing international air services agreements that already contain principal place of business designation criteria.**
- **Government should continue to allow up to 100 percent foreign owned Australian airlines access to the Australian domestic market .**
- **Australia should continue to work with ICAO and governments in the Asia Pacific region to drive harmonisation of aviation regulation with the aim of improving international safety standards.**
- **That the Government examines regional airport security charges and puts in place a policy remedy to ensure that such destinations do not miss out on the economic benefits of aviation competition due to the high relative costs of providing government mandated security.**
- **The Government provides incentives for airlines that reduce the fuel burn per actual passenger and provides incentives for airlines to make investments to ensure that their fleets are furnished with the latest technological advancements so they can improve the environmental performance and operations of their aircraft.**
- **The Government works with the aviation industry to continue to develop improved efficiency of air traffic control management.**
- **Remove withholding tax on overseas aircraft lease rental agreements**
- **That current consumer protection mechanisms strike an appropriate balance between consumers and encouraging low fare competition in Australia.**
- **Current disability standards in relation to air transportation are appropriate.**
- **That the HREOC not be given the power to refer alleged breaches to the Federal Court, as conciliation on a case by case basis is more effective than a heavy handed and costly legalistic approach.**
- **the Government examines facilitation of Australia becoming a global centre for aviation training through incentives for training providers to expand operations**
- **the Government examines mechanisms to support and develop training across the aviation industry.**
- **that the Government facilitates an increase of capacity in the Sydney Basin in the most economic way possible.**

- **Implement new technologies and policies to ensure efficient air traffic control systems.**
- **Australia should continue to take an international leadership position in forums that promote harmonization of efficient air traffic control systems.**
- **CASA's reform program should pursue greater international harmonization of aviation regulation in the Asia Pacific region.**

Australia is an important market to Tiger Airways and we are grateful to the Government and the Australian people for the support and encouragement extended to the airline since we commenced services in November 2007.

Representatives of the airline are available to discuss any element of this submission.

## Background on Tiger Airways

### Three Terrific Years and Roaring

Tiger Airways Australia is part of the Tiger Aviation group of companies which form the Asia Pacific region's only true low fare airline group. The airline is based on the successful business model of low fare airline Ryanair, now the world's largest international airline in terms of passengers carried. Tiger Airways offers passengers not only the lowest airfares in the market, providing invaluable opportunities for affordable travel for all Australians, but safe, reliable and convenient point-to-point air travel. Tiger Airways first took to the skies in Asia during September 2004 with two aircraft in its fleet and three routes in its network. In less than four years of operation, Tiger Airways now flies the widest geographic network of any low fare airline in the region to more than 27 destinations across 9 countries, including major growth markets such as India and China, on a fleet of brand new Airbus A320 aircraft. Tiger Airways commenced domestic flights in Australia on 23 November 2007 and currently serves a network of 13 destinations from our home in Melbourne, Victoria. Tiger Airways is currently establishing another hub operation in North East Asia through the creation of Incheon Tiger Airways, which will serve the important markets of Korea, Eastern China and Japan.

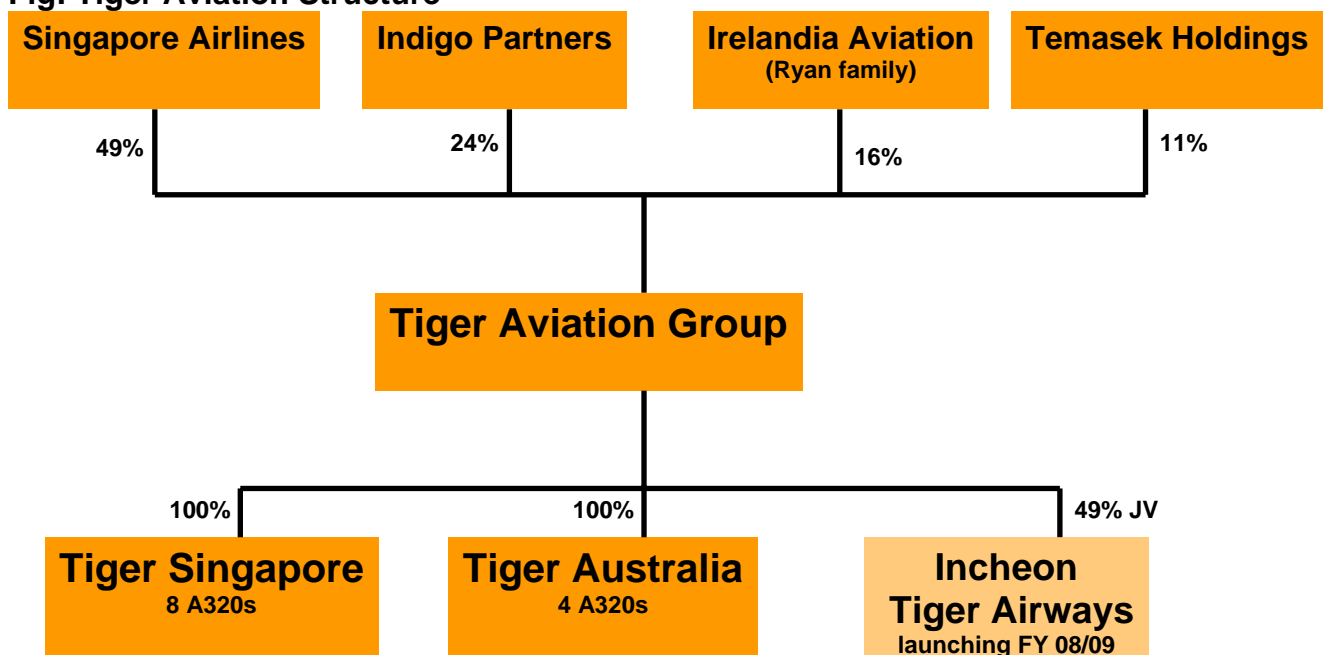
**Fig: Tiger Airways network- The most extensive LCC network across Asia Pacific serving a market of over 3Bn people**



## Shareholder Structure

Tiger Airways Australia is 100% owned by Tiger Aviation Pte Limited. Tiger Aviation's shareholders represent some of the world's most highly rated aviation investors. The equity split is as follows - Singapore Airlines Limited (49%); Indigo Partners LLC, the US investment firm founded by Bill Franke (24%); EU based Irelandia Investments Limited, the private investment arm of the Ryan family, founders of Ryanair, (16%); and Temasek Holdings Pte Ltd (11%). The Tiger Aviation Group consists of Tiger Airways Singapore and Tiger Airways Australia, both 100% owned by the Tiger Aviation Private Limited and Incheon Tiger Airways of South Korea, a joint venture with the Metropolitan City of Incheon.

**Fig: Tiger Aviation Structure**



## Core Business Strategy

Tiger Airways, is Australia's true low fare airline and operates on three customer-focused core strategies:

- I. Market stimulation - creating opportunities for new travellers and empowering budget-conscious people to fly more often by making travel affordable with its consistent low fares.
- II. Stringent cost controls through our operations so that we can keep our fares consistently low for travellers.
- III. Capacity utilisation - maximising the number of sectors served by our aircraft per day with efficient air traffic planning.

## **The Proven Business Model**

The Tiger Airways Australia's business model is based on Ryanair, which uses its very low cost base to offer very low fares on a consistent basis. This involves scrutinising every single aspect of the business to remove all non-essential costs but not cutting any corners in areas such as passenger safety, security and punctuality.

This includes:

- Online internet sales to help keep sales and distribution costs low. Over 99 percent of flights are booked direct at [www.tigerairways.com](http://www.tigerairways.com).
- Ticketless travel to save on print and distribution of paper tickets.
- Removing frills so passengers only pay for what they want. Check-in luggage, and meals are all available at affordable prices should passengers want them.
- New aircraft which provide the latest technology with greater fuel efficiency and less maintenance.
- Operating at budget terminals and secondary airports to reduce operating costs.
- Short aircraft turn-arounds to keep ground time low and flying time high. This means more seats can be sold on more flights for passengers to enjoy more cheap fares; and
- Outsourcing aircraft maintenance to reputable companies such as John Holland Aviation Services in Melbourne and Singapore Airlines Engineering Company to ensure high safety standards are achieved at competitive rates.

## **Low Fares, More Savings, More Choices**

Tiger Airways consistently strives to be the leading low fare airline in the Asia-Pacific region. It is committed to offering passengers real cost savings in air travel not just through provision of low airfares, but through a comprehensive range of Tiger Add-on products such as Luggage Upsize™, Sports Equipment Check-in and Seat Selector. These Tiger Add-ons are designed to ensure passengers can enjoy more convenience, assurance and comfort when flying with Tiger Airways.

## **Brand New Aircraft**

Tiger Airways recently ordered a further 50 brand new Airbus A320s to grow its fleet to a total of 72 aircraft, making it one of the region's largest and fastest growing low fare airlines. By operating newer aircraft which ensures better fuel efficiency, the airline can not only realise greater cost savings, but passengers can also benefit from more low, low fares coupled with additional comfort whilst travelling. The Tiger Aviation Group's investment in aircraft is forecast to exceed US \$ 4.3bn through to 2016.

## **Tiger Airways Australia**

Tiger Airways' entry into the domestic aviation market has helped grow the domestic tourism market and has led to a much greater availability of discount fares. The entry of Tiger Airways into the domestic market has also resulted in a competitive response, including the greater availability of discount fares, from the incumbent airlines, which is good for the people of Australia, the economy and particularly the tourism industry.

Tiger Airways Australia's initial route network now serves several routes that were previously either not served, or underserved, which along with low fares, has assisted with regional dispersal of both domestic and international tourists.

One of the key factors behind the success of Tiger Airways Australia to date has been our ability to keep our costs much lower than the incumbent airlines. Our model is a true low cost model, not a pretender. It is for this reason that Tiger Airways has found success as a new domestic entrant where previous start-up airlines have failed.

## **SPECIFIC RESPONSES TO THE ISSUES PAPER**

### **International services**

There is no doubt that aviation liberalisation has greatly contributed to the economic growth of the Australian economy and particularly job creation in downstream industries such as tourism, an industry that currently employs over 480,000 Australians.

Aviation will remain critical to Australia's inbound tourism industry. Over 99 percent of international visitors to Australia arrive by air. Whilst there has been substantial liberalization of Australian air services agreements, the process is still far from complete.

There has been an increasing trend toward international liberalization gathering pace in the Asia Pacific region. The progression of the implementation of the ASEAN Roadmap for liberalization of air services has already had a substantial impact in prompting the phenomenal growth of low fare carriers in the region. Air Asia, Jetstar and Tiger Airways are tangible proof of this.

Liberalisation and the increased competition, and lower prices it brings, are good for the Australian economy. As countries across the region continue to open access to their markets, Australia is in danger of denying itself the further economic benefits of increased international passenger numbers if it does not take a leadership role in regional liberalization.

In continuing Australia's international aviation reform it is important that a transparent definition of the 'national interest' is published in regard to international aviation access.

In setting this public definition it is important that not only the interests of Australian resident shareholders of a particular airline are taken into account, but appropriate consideration is also given to the more significant wider macro economic benefits accruing to all the relevant entities in the economy including:

- airports;
- tourism businesses;
- freight businesses;
- other allied aviation businesses;
- Australian resident aviation employees,
- Australian travelers; and
- Australian tax payers.

It is also important that there should be no national interest premium allocated to specific businesses, purely for being an iconic brand.

It is with this principle in mind that Tiger Airways proposes that it is in the national interest to ensure that all Australian airlines, regardless of ownership, are able to be designated as an Australian international airline in line with the International Civil Aviation Organisation (ICAO) standard "principal place of business" criteria. At last count Australia has

successfully negotiated “principal place of business” designation criteria to replace historic provisions requiring majority “national ownership and control” in over a dozen agreements out of the 60 or so such bilateral agreements.

Tiger Airways believes that as a general principle, viable and safe Australian based airlines that want to enter and grow the international market should be encouraged. It is in Australia’s national interest that companies based in this country, who employ Australian workers and pay tax in Australia on their local activities, should be encouraged. It is ironic that under the “principal place of business criteria” that Australia has agreed with numerous foreign governments, airlines based in other countries wishing to fly to Australia who may not be majority owned by nationals of that country would be permitted by Australia to commence operations, whilst as a result of existing domestic legislation the Australian government is prevented for granting its own locally based airlines similar access.

In particular airlines, such as Tiger Airways, that have shown a strong commitment to Australia in terms of investment, employment and growth should be encouraged to continue to grow their commitment through provision of opportunities under international air services arrangements. This is especially true in these difficult trading conditions when many other airlines have already committed to reduce their international services to and from Australia.

Tiger Airways appreciates that some carriers are concerned by the threat of true competition in international markets, however the facts speak for themselves. Competition has provided for an expansion in capacity and benefited consumers without any significant adverse impact on incumbent airlines. Much of the proposed future growth of Tiger Airways internationally will come from regional airports other than Sydney and in markets that are not even served by any incumbent Australian international airlines. Indeed Low fare airlines such as Tiger Airways grow markets through stimulation rather than looking to take existing market share. This has been demonstrated in Tiger Airways’ domestic market entry with Domestic passenger numbers at Melbourne Airport performing very strongly, delivering 9% growth, or over 1.5 million passengers, on the previous year. By allowing airlines like Tiger Airways to access these markets, the residents of those markets would benefit from additional point to point services direct to their local catchment area and the wider economy would benefit from the proven multiplier effect of additional inbound tourism. Lower fares in the outbound and inbound markets, grow demand and deliver it directly to the region rather than via one of the traditional gateways, making more efficient use of congestion infrastructure at major airports.

At present, historic domestic legislation blocks all Australian based airlines that are not majority owned by Australian nationals from operating international routes using Australian registered aircraft and crews. This means that whilst Tiger Airways can operate international services on routes such as Singapore to Darwin or Perth, it can only do so if it uses aircraft and crews based outside of Australia, even though countries such as Singapore and Malaysia have already agreed to accept the designation of all airlines that have their principal place of business in Australia irrespective of their ownership structure. This prevents Tiger Airways from creating Australian jobs to service these routes having to

rely on foreign crews instead. For every aircraft that Tiger Australia introduces to its fleet, around 30 flight and cabin crew jobs are created. When taking the associated activities such as maintenance, ground handling and administration into account, this number is significantly higher.

Tiger Airways believes that the domestic legislation that restricts Australian based airlines from accessing international services should be relaxed as quickly as possible to facilitate true low fare competition, especially to regional gateways, creating more high quality Australia based jobs and offering a greater contribution to the Australian tourism industry..

#### **Recommendations:**

- **Define 'national interest' in regard to international aviation access to the benefit of consumers.**
- **Continue to liberalise international air services agreements, particularly to regional gateways.**
- **Continue to negotiate with other countries for principal place of business as the criteria for designation of Australian international airlines.**
- **Remove domestic legislative restrictions as quickly as possible that block Australian airlines from accessing existing international air services agreements that already contain principal place of business designation criteria.**

#### **Domestic Services**

The current policy settings that allow up to 100 percent foreign owned domestic Australian airlines are appropriate and demonstrate the forward thinking and leadership position adopted by Australia in relation to domestic liberalization. As a result the Australian economy has greatly benefited. For example, the entry of low cost airlines into Melbourne has provided significant additional capacity including additional services from incumbent airlines. This has provided significant economic benefit to the state of Victoria.

#### **Recommendation:**

- **Government should continue to allow up to 100 percent foreign owned Australian airlines access to the Australian domestic market .**

#### **Developing improved competition and access to services while maintaining appropriate levels of aviation safety and security**

All Australian airlines, irrespective of their business model, are regulated to the same standards of safety and security. This is both appropriate and necessary for the successful regulation of the industry. The regulation of international airlines can vary in some countries across the region. As such it is important that the Australian government takes a leadership role in ensuring that Aviation regulation and oversight in the region is harmonized as much as is possible through engaging with ICAO and appropriate regional bodies.

Such harmonisation should aim to increase safety levels across the region.

**Recommendation:**

- **Australia should continue to work with ICAO and governments in the Asia Pacific region to drive harmonisation of aviation regulation with the aim of improving international safety standards.**

**Airport security**

Appropriate levels of airport security are vital to the long term sustainability of the aviation industry, however, it is not only the industry that derives a benefit from the provision of appropriate aviation security. The Australian community as a whole derives a benefit. It is in essence a public service obligation, and as such it is appropriate that the community as a whole through government plays a role paying for the provision of aviation security and safety measures.

The present charging regime falls disproportionately on airlines that serve regional destinations and indeed the smaller communities that they serve. In particular a number of Tiger Airways' regional destinations such as Darwin and Alice Springs are subjected to the same levels of aviation security requirements as major Australian international gateway airports without having similar volumes of passengers over which to allocate the costs.

Tiger Airways is concerned that its planned expansion of jet services to regional destinations, utilizing smaller Airbus A319 aircraft could be constrained due to the high per passenger airport security charges resulting from location specific security pricing.

To ensure that regional airports and the communities they serve do not face a competitive disincentive to the establishment of new jet services, Tiger Airways would propose that the Commonwealth either examine network pricing for these services or offset the costs for the provision of government mandated security and safety measures at low volume regional destinations as a measure for facilitating economic development.

**Recommendation:**

- **That the Government examines regional airport security charges and puts in place a policy remedy to ensure that such destinations do not miss out on the economic benefits of aviation competition due to the high relative costs of providing government mandated security.**

**Environment**

It is important for a stakeholders that the Government develop a balanced policy position on aviation emissions. On one hand ensuring that the direct benefits to Australian travelers and regional development is not inappropriately curtailed and on the other hand delivering

on the expectations of the community that the government meets its overall environmental objectives.

Tiger Airways ensures that it minimizes its environmental impact through a highly efficient operation utilizing a modern, fuel efficient fleet of aircraft. The average age of the Tiger Airways fleet in Australia is just over one year. This has allowed Tiger Airways to ensure that it has the most up to date technology on offer from our aircraft and engine manufacturers.

Airlines that apply a true low cost airline model, such as Tiger Airways, are very focused on reducing costs, of which fuel burn per passenger is a significant component. Tiger Airways seeks to ensure that it reduces the cost and the environmental impact per passenger through:

- ensuring our aircraft operate with the most effective seating capacity, rather than using large amounts of the aircraft space for first and business class type cabins;
- avoiding congested airports as much as possible to reduce flying in holding patterns and spend less time taxiing;
- utilizing point to point services thereby ensuring that travelers fly directly to their final destination rather than through a congested hub;
- strict application of the low frills model, such that our customers only pay for what they really want and therefore Tiger Airways can carry less weight and reduce the amount of fuel it uses;

It is important that any market based policy for emissions trading encourages the industry to make the most efficient use of its aviation assets.

As Tiger Airways is a pan Asia Pacific airline, it strongly encourages the Australian Government to ensure that any fiscal mechanisms it may propose to reduce the environmental impacts of air transport are harmonized as much as possible with the region to ensure that additional investment in aviation in Australia is not discouraged.

It is important that Air Services Australia is provided with appropriate access to levels of resource so it is able to continue to develop and expand improved efficiency measures in air traffic control management.

#### **Recommendations:**

- **The Government provides incentives for airlines that reduce the fuel burn per actual passenger and provides incentives for airlines to make investments to ensure that their fleets are furnished with the latest technological advancements so they can improve the environmental performance and operations of their aircraft.**
- **The Government works with the aviation industry to continue to develop improved efficiency of air traffic control management.**

## **Withholding tax on aircraft lease rental agreements**

The current domestic taxation regime applies a significant withholding tax on the majority of overseas aircraft lease rental agreements and as a result is a potential impediment to Tiger Airways Australia growing its fleet into the future. Aircraft leasing is a global industry and provides an attractive financial alternative to owning the aircraft outright. Whilst owned aircraft costs do not attract withholding tax, the higher value of new, fuel efficient aircraft means that aircraft leasing is a more attractive method of investing in new equipment. The withholding tax puts Australia at a potential competitive disadvantage when compared to other countries in the region where such taxes are increasingly being reduced and ultimately eliminated. The total value of withholding tax collected is relatively small relative to the wider economic and environmental benefits to be gained through the increased number of new aircraft being brought into service.

### **Recommendation**

- **Remove withholding tax on overseas aircraft lease rental agreements**

## **Consumer protection**

Since Tiger Airways entered the Australian domestic market it has successfully brought down the cost of air fares for more than 1 million travellers. The tens of millions of dollars in savings that consumers have enjoyed have been as a direct result of its application of a true low fare model by Tiger Airways. This trend is confirmed by Bureau of Infrastructure, Transport and Regional Economics statistics which have recorded significant falls in airfares since the start of services by Tiger Airways.

Tiger Airways strict adherence to its terms and conditions is a central element of our low fare model. Terms and conditions are made clear on our website so consumers can make an informed decision on what they are purchasing. Major changes and relaxation of terms and conditions would result in airfares increasing for all travelers.

It should be noted that the level of disruption to passengers of true low fare point to point airlines such as Tiger Airways are significantly lower than with traditional carriers. Indeed it is a central business objective of Tiger Airways to offer the most reliable airline product in Australia. To ensure that consumers have full information to make an informed choice when purchasing an airline ticket Tiger Airways is voluntarily reporting its on time performance statistics to the Bureau of Infrastructure Transport and Regional Economics

Our recently released statistics for April 2008 showed that Tiger Airways led the Australian industry with zero cancellations compared with 242 cancellations for Qantas, 200 for Virgin Blue and 30 for Jetstar. Tiger Airways also strives to minimise delays achieving the highest level of on time departures in the industry for April 2008 at 81.3 per cent.

It is imperative that the true low fare aviation industry, which is in its infancy in Australia, is not faced with heavy handed government intervention that increases the cost of air travel and reduces competition.

It is of concern that some commentators have suggested legislation to penalize airlines for situations outside their control, such as weather, technical issues or curfews. Such proposed legislation would have a detrimental impact on low fare airline competition. By making airlines pay compensation that is several times higher than the average fare charged to the passenger all travellers and downstream industries such as tourism will be negatively effected. Such legislation will drive up fares at a time when input costs, such as fuel, are hitting record levels. Many Insurance companies already offer comprehensive travel policies for those passengers who require such coverage.

**Recommendation:**

- **That current consumer protection mechanisms strike an appropriate balance between consumers and encouraging low fare competition in Australia.**

**Disability Standards**

Tiger Airways seeks where ever practical to make its services available to all persons.

We have and are continuing to take all appropriate steps to not only comply with the letter of current legal requirements, but the spirit of *access to all*.

We have responded positively to the vast majority of requests for access and have dealt co-operatively with the HREOC and other agencies. We are proud of our successful track record in responding to and successfully dealing with access issues.

We feel that current standards are generally adequate. Our approach is personal – we prefer dealing with issues on a sincere and conciliatory basis rather than in a heavy handed and legalistic fashion. We have had singular success on resolving all such issues on this conciliatory basis. The costs of formal legal proceedings are not only another input cost as it were but such proceedings also consume vast and disproportionate amounts of valuable management time. We have been happy however to deal with the HREOC and similar state agencies on an informal or semi formal basis to discuss and conciliate issues that have been raised.

When explained in a non-confrontational manner, our customers have also understood that operating an airline is a complex equation and whilst we do our best, it is unrealistic to expect us to be all things to all people at all times. Our customers including those with special needs would be disappointed if our fares were to increase dramatically or we ceased to exist as a result of unrealistic expectations and heavy handed regulation. We offer a particular service and price and seek to do so within the prevailing legal environment, which we accept.

## **Recommendations:**

- **Current disability standards in relation to air transportation are appropriate.**
- **That the HREOC not be given the power to refer alleged breaches to the Federal Court, as conciliation on a case by case basis is more effective than a heavy handed and costly legalistic approach.**

## **Skills in the aviation industry**

Tiger Airways has not been adversely impacted by a shortage of staff during its start up phase, however across the Asia Pacific region the industry is facing shortages of appropriately trained staff, especially pilots and aircraft engineers.

As outlined above Tiger Airways has significant plans for growth both domestically in Australia and throughout the region. As such the airline is committed to commencing a pilot cadet training program later this year.

A window of opportunity currently exists for Australia to become a global leader in aviation training given the country's ample space, high standards of training, established excellence in aviation services and unprecedented demand for training facilities. To facilitate Australia becoming a global centre for aviation training it is important that the Government provide incentives for training providers to expand operations at current facilities and invest in new facilities. At present, important facilities such as aircraft flight simulators are already operating at maximum capacity.

It is important that the Government examines mechanisms that will assist students in financing their chosen field of expertise through a HECS style funding mechanism as is in place for University education.

## **Recommendations:**

- **The Government examines facilitation of Australia becoming a global centre for aviation training through incentives for training providers to expand operations**
- **The Government examines mechanisms to support and develop training across the aviation industry.**

## **Aviation infrastructure**

Tiger Airways has not in its start up phase flown to Sydney Airport. Sydney Airport is already Australia's most congested airport and as a result the airport is not as well suited to Tiger Airways low fare model as other airports. As a true low fare airline, Tiger Airways where possible focuses on flying to airports that support short aircraft turn-arounds thus allowing us to keep ground time low and flying time high.

The Government should examine options to quickly provide additional capacity in the Sydney basin as the Sydney region will benefit greatly from appropriate facilities that will

drive passenger growth through the reduction of operational costs. This examination should include options for reducing congestion and increasing capacity at the existing airport infrastructure. It should also identify options for creating additional aviation infrastructure through the development of passengers services at other airfields in the Sydney region. It is important for the growth of low fare travel in Australia that the final decision for the basin is not gold plated and that options to ensure efficient use of current infrastructure are pursued to reduce overall charges. Lower costs will be passed through to passengers in the form of lower fares which will stimulate demand and thereby boost both the NSW and national economy.

### **Recommendation**

- **that the Government facilitates an increase of capacity in the Sydney Basin in the most economic way possible.**

### **Air traffic management**

As a low cost carrier Tiger Airways is extremely focused when it comes to cost control. With fuel becoming an ever increasing component of all airlines operational cost base, it is imperative that the Government has the most efficient air traffic management system possible.

A crucial part of promoting a policy of efficient air traffic management is to ensure that RPT operators are central to the future growth of the Australian aviation industry. As such a policy should be established to promote the most direct and advantageous flight paths. This policy objective should be encouraged across the whole of government, including the defense department in respect to the military airspace that they control.

It is important that as technologies are developed especially in the areas of communications and satellite technology, that the Government works collaboratively with industry to facilitate its early introduction to the benefit of consumers and industry participants. These technologies not only make our industry more efficient thus saving money, they will also play an important role in assisting the government in meeting its environmental policy priorities.

As part of this process it will be necessary for Australia to ensure that these technologies are adopted in a standardized way with international partners. As such, Australia should continue to take a leadership position in international forums that promote harmonization of efficient air traffic control systems.

### **Recommendations**

- **Implement new technologies and policies to ensure efficient air traffic control systems.**
- **Australia should continue to take an international leadership position in forums that promote harmonization of efficient air traffic control systems.**

## **Aviation safety**

Tiger Airways has confidence in the Australian aviation safety regulatory process. However, to ensure that Australia maintains its industry leading position on aviation safety matters, Government policy should aim to ensure that CASA's reform program pursues greater international harmonization of aviation regulation in the Asia Pacific region.

As a pan Asia Pacific group of airlines it is important that Tiger Airways' operations are harmonized as much as practically possible to ensure that industry best practice is maintained across all areas of operation.

### **Recommendations:**

- **CASA's reform program should pursue greater international harmonization of aviation regulation in the Asia Pacific region.**