



DISCUSSION PAPER

POSSIBLE SECURITY CLASSIFICATION FOR AUSTRALIAN AIRPORTS

Office of Transport Security

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1. Enquiries

If you have any questions regarding this document, have a suggestion for improvements, or would like to nominate additional industry members for inclusion in the consultation process please contact:

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The Office of Transport Security will be accepting submissions regarding the paper and responses to discussion questions until 25 February 2011.

2. Overview

The *National Aviation Policy White Paper: Flight Path to the Future* (Aviation White Paper) noted the Australian Government's intention to amend the *Aviation Transport Security Act 2004* (the Act) to enable security controlled airports to be designated according to risk profiles. The Government considers these changes will provide sensible security outcomes effectively meeting requirements of industry and the travelling public. This undertaking was met by amending Section 28 of the Act in April 2010,¹ providing for the grouping of airports into bands with similar operating environments and threat and risk profiles following the assessment of a number of relevant factors. This will enable each airport to be subject to proportional application of the layers of aviation security relevant to its threat and risk profile at a point in time.

At the same time the Aviation White Paper announced maximum takeoff weight (MTOW) would replace method of propulsion as the trigger for screening of regular public transport (RPT) and open charter air services. MTOW is an important component within airport classification policy as the MTOW of an aircraft correlates strongly to its security risk profile. As outlined in the Aviation White Paper, the extensive range of aircraft currently servicing regional and remote airports in Australia means the location of airports is a less important factor in determining threat and risk than the MTOW of the aircraft.

This change in the determinant of screening requirements and the adoption of a more granulated risk/threat allocation of screening technique will provide an enhanced aviation security outcome

¹ The *Aviation Transport Security Act 2004*(ATSA) and *Aviation Transport Security Regulations 2005* (ATSR) are available electronically at www.comlaw.gov.au

3. Key Policy Objectives

The key policy objectives of the proposed airport classification model are:

- implementation of an approach recognising the differing operations of airports across the national network and applies targeted and proportional measures through a layered approach to aviation security;
- ensuring measures and practices required at each airport are proportionate to the threat and risk environment for the airport and across the national network more broadly; and
- providing for scalability of aviation security measures and practices according to the operating environment at a point in time.

These objectives underpin the security policy goal of the Aviation White Paper to foster an effective, focussed and proportionate aviation security system which mitigates the risk to Australia's air travellers and the general public from terrorism and criminal interference.

Note: The need for an overarching airport classification policy was established through consultation undertaken in the development of the Aviation White Paper.

4. Current Measures and Practices

A de-facto security classification system has developed with airports effectively being divided into four broad categories for security purposes: major, regulated screened, regulated unscreened and unregulated. The current model determines threat and risk according to aircraft propulsion type and airport location, and allocates security measures according to the level of threat and risk determined for each airport type.

The attractiveness of an aircraft for use in a terrorist attack will, in part, be driven by its size, the number of passengers on board, the capacity of the aircraft to reach attractive ground targets from its departure point and the capacity of the aircraft to cause catastrophic damage to buildings and other infrastructure if used as a weapon. Large civilian aircraft operating RPT air services are the most likely categories of aircraft to be targeted for a terrorist attack designed either to destroy the aircraft in flight or to hijack the aircraft and use it as a weapon against a ground target.

As larger turbo-propeller powered aircraft are introduced into Australian routes, the current model becomes less effective in determining where security measures are applied. This is highlighted when comparing a jet turbine powered Embraer 170 with the turbo-propeller powered Bombardier Dash-8 Q 400 (Q 400). Both carry

comparable numbers of passengers and have similar security risk profiles; however, currently the Q400 is not required to be screened.

An overview of the current measures and practices applied to airport and aircraft categories is outlined in Table 1 below.

Table 1- Current Aviation Security Measures and Practices

Type	Factors	Requirements
Major	Gateway/International Proximity to Significant Infrastructure	<ul style="list-style-type: none"> • Passenger & checked bag screening • Random and continuous Explosive Trace Detection (ETD) • Permanent Counter Terrorism First Response police presence • Transport Security Program
Regulated Screened Airport	RPT/Open Charter Jet Turbine and Turbo-Propeller Aircraft	<ul style="list-style-type: none"> • Passenger & checked bag screening for jet services • Random and continuous ETD • Implementation of an operational period for screening • Transport Security Program
Regulated Unscreened Airport	RPT/Open Charter Turbo-Propeller Aircraft	<ul style="list-style-type: none"> • Transport Security Program
Unregulated	General Aviation and Closed Charter Operations only	<ul style="list-style-type: none"> • No requirements

5. Principles of Screening and Clearing

The Aviation Transport Security Regulations 2005 require all persons to be cleared prior to being granted access to a sterile area.² A number of classes of person prescribed in the regulations are deemed to be cleared to enter a sterile area without undergoing screening.³ These classes include screening officers, emergency services personnel and members of the Australian Defence Force who are responding to an event or threat of unlawful interference with aviation. All other people must be screened before they receive clearance to enter the sterile area.

In addition to this requirement, all persons boarding a screened air service must undergo screening prior to being allowed to board the aircraft. The regulations set out special requirements for the screening of dignitaries and air crew.⁴

Cost estimates conducted by the Department of Infrastructure and Transport indicate screening of passengers at some regional airports, when conducted in the same way as is conducted at capital cities, could cost \$70 or more per passenger.

6. Classification of Airports

Classification of airports for security purposes will allow the Government to move away from the current regulatory model grouping airports into large, inflexible bands and adopt a more responsive approach to the application of security measures at Australian airports.

The proposed model will use MTOW as the primary basis for consideration, but will also recognise the number of outbound passengers from each airport as a secondary consideration. This will allow security measures to be tailored to meet the requirements of each airport by providing different approaches catering for passenger facilitation while continuing to meet a robust security outcome. By considering both MTOW and passenger throughput, the proposed classification structure recognises the fundamental operating differences between large, high-volume airports and smaller regional airports and provides a more appropriate balance between required security measures and the threat and risk environment.

The possible extension of MTOW as a trigger for aviation security regulation for closed charter operations was another initiative of the Aviation White Paper, recognising the increasing use of large aircraft in support of the mining and oil and gas sectors, particularly in northern and northwest Australia. The airport classification framework will be developed ensuring remote and charter only airports may be

² ATSR Regulation 3.20 (3) (d) and (e)

³ ATSR Regulation 4.10

⁴ ATSR Regulations 4.08 and 4.12

captured in a way facilitating the application of appropriate security measures to airports, if required, to protect the integrity of the aviation network. In the Aviation White Paper the Government committed, in consultation with industry, to examine the feasibility of extending MTOW as a trigger for aviation security measures for closed charter operations. In conjunction with the aviation industry and relevant closed charter users, work is currently underway examining security issues surrounding closed charter flights. Options such as an industry code of practice are being explored and further consultation through the charter and remote aviation working group will assist in the development of a proposed model and way forward for this industry sector. It is expected a final position will be considered by the Government in mid 2011.

Under the proposed new model, the methods, techniques and equipment applied to achieve acceptable screening will be better tailored to airport throughput and passenger facilitation requirements. The proposed classification model is based on:

- identification of broad operating environment categories applicable across Australian airports;
- grouping of like environments to form classification bands;
- application of consistent but not necessarily uniform measures across each classification band;
- application of security measures to support flexibility, interoperability and scalability across each classification band aligned with environmental or operational pressures (such as peak seasons or regular fly-in/fly-out charter operations);
- consideration of the operating environment at non-security controlled remote airports with closed charter operations (such as fly-in/fly-out resources sites); and
- considering the operating environment at remote regional airports with RPT and open or closed charter aircraft operations.

The model aims, where possible, for passengers cleared through any of the screening measures applied across the network to be cleared into the network. Once screened, a passenger should be able to enter any sterile area without the requirement to undergo re-screening, provided the passenger does not exit the sterile area. All checked bags will be subjected to checked baggage screening by X-ray (CBS X-ray) at the first point where this equipment is available. For example, a checked bag may be

subjected to an explosive trace detection test as an alternative screening measure for the journey from a small regional airport to a capital city and then rescreened using a CBS X-ray machine before being stowed onboard a connecting flight.

Section 6 – Questions for discussion:

- a) Are departing passenger volumes an appropriate secondary consideration?
- b) What other factors could be considered?
- c) Will the use of MTOW and outbound passenger volumes allow an appropriate degree of distinction between airport operating environments?
- d) Are there impediments to a passenger, screened by alternative measures, being cleared into the network?
- e) Should additional security measures be applied to passengers cleared by alternative measures upon entry into sterile areas at airports with differing screening requirements?

7. Proposed Airport Classification Model

The proposed model for airport classification includes nine levels to provide maximum flexibility to establish an appropriate security outcome taking into account risk and the operational environment at each airport. It is proposed airports could move between each band depending on operational conditions. In addition, the proposed model provides for airports to transition into higher bands as their operational environment changes. The model has been developed to provide the smallest number of classification bands while appropriately distinguishing between very different market sectors. A table outlining the proposed model is included at **Attachment A**.

Section 7 – Questions for discussion:

- a) Do the proposed classification bands adequately differentiate between the differing environments across the Australian aviation sector?
- b) Do the entry thresholds to each band require amendment or adjustment?
If so, why?
- c) Are additional bands required to cover particular operating environments?
- d) Should particular bands be amended or deleted?
- e) Can you easily identify which category your airport would fall within under the proposed model outlined at **Attachment A**?

8. Allocation of Security Measures at Each Classification Band

The proposed airport classification model outlines possible security measures to be applied at each class of airport. The application of specific security measures at each classification band will be the focus of ongoing policy development and review.

The proposed airport classification model highlights current requirements as announced by the Government (such as the upcoming requirements for the use of body scanners and other optimal technologies) and as required through international agreements including Annex 17 to the Convention on International Civil Aviation. Among other things, this agreement requires member states provide authorised and suitably trained personnel readily available for deployment at airports serving civil aviation to assist in dealing with suspected, or actual, cases of unlawful interference with civil aviation. This obligation forms the basis for requiring police presence at Australian international airports including co-located domestic terminals.

Section 8 – Questions for discussion:

- a) Are the indicative security measures outlined in the table at **Attachment A** achievable for each category of airport?
- b) Does the proposed table adequately prescribe measures for each category of airport?

9. Special Consideration

The Department recognises the need for the inclusion of special consideration provisions within the classification structure. Due to timelines for facility redevelopments and budgetary constraints a number of airports may be initially unable to comply with requirements set out in their nominal classification band. In order to minimise the cost burden on new entrants to classification bands, an option would be available to the Secretary to place an airport in a lower band for a set period of time.

Transitional bands will allow airports to apply screening measures prescribed for lower bands while the capability to screen at the prescribed level is developed.

10. Practical Application of Special Consideration Classification Bands

As outlined above, a small number of airports may require reclassification either up or down due to local conditions and other circumstances. This may be achieved through a determination to be made by the Secretary based on criteria defined in regulations.

Entry into any three of the bands listed below would be by the Secretary's determination. These categories have been established to cater for airports with exceptional circumstances and for transitional purposes. Entry into each band is proposed as follows:

- **Classification 2:** open to international airports with seasonal or irregular departures by application to the Secretary. The decision would include consideration of flight scheduling annual departing passenger volumes, airport location and proximity to areas of national importance, co-located services, community impact of regulation and other factors considered relevant by the decision maker.
- **Classification 5:** open as a transitional band for airports initially unable to implement full screening. This band would be open to domestic RPT airports with $\geq 20,000$ and $< 40,000$ departing passengers per year and less than 4,000

departing flights per year. In order to be placed in this band, airports would be required to submit a plan to implement full security screening to the Secretary for approval. Eligibility to remain in this band would be reviewed annually.

- **Classification 8:** this band would be used to ensure appropriate security measures are implemented at large general aviation aerodromes and at metropolitan airports not falling into any higher class. Entry into this band would be based on: airport operations; airport location; proximity to areas of national importance; community impact of regulation and other factors considered relevant by the decision maker.

By applying the considerations outlined above to airport classification, proportionate and appropriate security measures would be implemented at each airport across Australia.

Section 10 – Questions for discussion:

- a) Will the special consideration bands outlined in the table at **Attachment A** provide adequate assistance to airports?
- b) Should entry into special classification bands be subject to a time limit or to regular reviews?
If so, what should the time limit or review period be?
- c) Are additional bands for consideration required?
- d) Should the entry conditions and required security measures for these bands be amended?
If so, what should the entry conditions or security requirements include?

11. Financial Analysis

In July 2008 the Department undertook a costing exercise to determine the approximate price per passenger of screening measures undertaken at Australian domestic airports. The results from this exercise have been updated and amended to provide indicative costs for passenger screening at each band of airport. These cost estimates are indicative to each airport band; costs may be higher for the full screening option at remote and regional airports where the construction of supporting infrastructure is required.

The cost estimates are underpinned by four key variables:

1. **The number of passengers departing the airport:** larger departing passenger volumes provide a greater base to spread the costs of screening. Smaller airports are likely to experience higher per passenger screening costs due to their inability to spread costs over a large passenger base.
2. **The number of departing passengers required to be screened:** this is closely linked to the total passenger numbers; however, some airports choose to screen all departing passengers regardless of the legislative requirement to do so. Other airports others screen only those departing passengers according to relevant legislative requirements. Where airports service a large number of unscreened outbound flights, the base to spread costs is reduced and the price per passenger increases.
3. **Infrastructure development requirements:** some airports will require significant capital upgrades to commence screening operations. For example, some airports may need to construct sterile areas to hold screened passengers, baggage make-up areas, buildings to house screening equipment such as CBS X-ray machines, and supporting infrastructure. These costs vary from airport to airport depending on existing infrastructure, passenger volumes, anticipated flight operations and the requirements and preferences of airport operators.
4. **Flight scheduling and frequency:** the flight scheduling and frequency of flights into airports dictates the number of screening and support staff required and the period required for staff to be in attendance at the airport. Some airports have just one or two flights a week, while others have a number of flights spread across each day. Where flights are spread across the day, downtime between flights can increase costs to airport operators as staff may be on site but without work to undertake. In some cases it may be possible to decrease costs through flight scheduling to group departing flights and minimise staff downtime.

The cost estimates indicate screening at major airports on average costs \$3.54 per departing passenger and applying the same standards of screening to airports carrying 20,000 or more passengers could cost in the order of \$15-\$40 per departing passenger. At smaller airports the costs increase significantly and screening, using methods, techniques and equipment the same as at capital cities, could cost \$35-\$70 or more per ticket.

The introduction of alternative screening methods could reduce significantly the financial burden placed on smaller airports while ensuring an appropriate security outcome is achieved. The primary driver for installing the more expensive screening equipment and supporting infrastructure is passenger facilitation. As passenger numbers increase so does the necessity to install more sophisticated and faster screening equipment. The proposed tiered approach would also support airports in a progressive transition to more efficient passenger screening equipment as the airports grow or upgrade facilities.

The use of alternative screening methods would provide a degree of equivalence in screening costs per passenger to costs of large regional domestic airports.

Section 11 – Questions for discussion:

- a) Is the level of proposed cost equalisation provided by allowing alternative screening across the classification bands appropriate to alleviate the pressures on smaller remote and regional airports?

12. Further Steps

This discussion paper forms the first consultative step within a communications and industry engagement strategy to support the introduction of airport classification as outlined in the Aviation White Paper.

Industry members will have an initial opportunity to comment on the discussion paper at meetings of the Aviation Security Advisory Forum (ASAF) and the Regional Industry Consultative Meeting (RICM) in early December 2010 as well as the Charter and Remote Aviation Working Group. Final written comments will be due to the Office of Transport Security no later than 25 February 2011. Additional follow-up meetings will be planned ahead of this deadline as required.

A regulatory impact statement will be required ahead of any regulatory amendments to give effect to the proposed classification model. Feedback provided in relation to this discussion paper will be included in data assembled to underpin the regulatory impact statement.

Proposed Airport Terminal Classification Model

Classification	Aircraft MTOW	Eligibility Criteria	General security requirements	Screened by	Screening Infrastructure	Passenger measures	Carry on measures	Checked baggage measures
1.	Any international	International airports with 50,000 or more departing passengers each year	TSP and associated requirements as per current regulations	Screening authority **	Screening operations are conducted in terminals using semi-permanent infrastructure and equipment	As per current Aviation Screening Notice sections related to international flights		
2.	Any international	Open to international airports with less than 50,000 departing passengers each year or airports with only seasonal, infrequent or irregular departures by application to the Secretary	Enhanced airside inspection requirements may apply			As per current Aviation Screening Notice sections related to international flights with possible exemptions from body scanner requirements subject to international obligations		
3.	20,000kg or more	Airports with 1,000,000 or more departing passengers each year OR Domestic terminals co-located on an airport with a Category 1 international terminal	TSP and associated requirements as per current regulations	Screening authority **	Screening operations are conducted in terminals using semi-permanent infrastructure and equipment	As per current Aviation Screening Notice sections relating to domestic flights		
4.	20,000kg or more	Domestic RPT airports with 20,000 or more departing passengers each year	TSP and associated requirements as per current regulations					
5.	20,000kg or more	Open to airports by application to the Secretary only. Domestic RPT airports with $\geq 20,000$ and $< 40,000$ departing passengers per year and less than 4,000 departing flights per year	TSP and associated requirements as per current regulations Plan to implement screening ahead of 1 July 2014			Screening operations may be conducted in terminals as outlined above, or by using portable or temporary screening equipment and structures provided by either the airport or airline.	As per current Aviation Screening Notice sections relating to domestic flights	As per current Aviation Screening Notice sections relating to domestic flights
6.	20,000kg or more	Domestic RPT airports with $< 20,000$ departing passengers per year	TSP and associated requirements as per current regulations	Visual and physical inspection, random and continuous ETD				
7.	10,750 – 19,999kg	RPT and open charter flights	TSP and airside area	Nil	Nil	Nil	Nil	Nil
8.	Less than 10,750kg	High risk RPT, open charter and general aviation – only by Secretary's notice						
9.	Less than 10,750kg	Low risk RPT, open charter and general aviation	No set requirements					

** Screening Authorities are appointed by the Secretary and can be airport owners or operators, airline owners or operators, and /or screening providers. All screening authorities must meet specific selection criteria and be assessed by OTS prior to approval