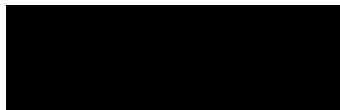# THE AUSTRALIAN FEDERATION OF AIR PILOTS (AFAP)

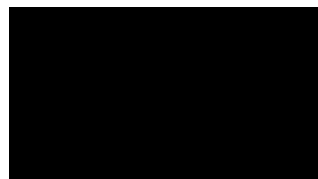# SUBMISSION TO THE AUSTRALIAN GOVERNMENT CONSULTATION ON:

THE AVIATION WHITE PAPER

MARCH 2023

Written by the **Australian Federation of Air Pilots** and authorised by:

Captain Louise Pole
President
Australian Federation of Air Pilots

Captain Phillip Remilton
Safety and Technical Director
Australian Federation of Air Pilots

Sent via email: aviationwhitepaper@infrastructure.gov.au

Contact: AFAP Safety and Technical: technical@afap.org.au

Executive Summary

- It is without doubt that a well-functioning aviation system is a critical part of Australia's national infrastructure. The Australian aviation industry is however experiencing a severe skills shortage. Australian pilots are being attracted overseas in record numbers, replacement pilots take time to train and will not emerge unless it becomes a more attractive career option. There needs to be a range of Government and industry policies to attract and retain pilots. These include:

  - Support for pilot professional development programs; and
  - VET fee help relief for return of service to approved GA operators

- In relation to achieving net zero carbon emissions, the AFAP supports the initiatives and positions of the International Federation of Airline Pilots' Associations (IFALPA) related to aviation-based emissions reduction.

- The AFAP is concerned that aviation related Government agencies are disproportionately allocating resources to projected technological advances to the detriment of current and near-term regulatory requirements. We need to fix the current system before projecting into the future.

  - A specific area of concern is Government and industry's inability to acknowledge the human health problems of organophosphates release from pyrolysis of oils in aircraft cabin air systems. There are some significant research and technology developments which will be released soon.

- Airservices Australia (AsA) is inappropriately prioritising politics related to aircraft noise over that of the legislated priority of the safety of air navigation. The Term of Reference regarding Airport planning and noise needs to be broadened to encompass all issues related to airport planning processes. Inaction towards reforming airport planning processes has led to the degradation of Federal airports. Flawed national airport safeguarding frameworks, unchecked non-aviation use of airport land, and inconsistent application of safety standards, has severely impacted the aviation industry.

- The AFAP proposes Government establish a tripartite body to oversee the pilot training pipeline. This tripartite body should be made up of representatives from the AFAP, employers and Government.

- Future workforce skills and training requirements need to be addressed by a range of complementary policies designed to make the aviation industry and pilot profession more attractive.

- Issues of consumer protections and access to services are largely a by-product of skills shortages. These would be addressed by measures such as sustainable rosters created in accordance with scientific fatigue mitigation principles.

- The AFAP recommends reforms to the management and governance of the CASA, AsA and the ATSB to align their conduct and service delivery with the needs of the aviation community.

- The AFAP recommends that the government recognise pressures on regional airports and address the lack of specialized skills by centralising certain roles from airport operators to a Government agency to achieve greater consistency in safety standards application.

- Finally, the AFAP looks forward to providing further input at the upcoming consultation meetings and in response to the Green Paper foreshadowed for release in mid-2023.

CONTENTS

Methodology

1. It was not clear to the AFAP whether the Government is seeking feedback on what the Terms of Reference for a White Paper should be and/or submissions directed at the ten Terms of Reference (TORs) identified in the invitation to provide a submission. The AFAP has decided to do both in its submission. We note the intention to release a Green Paper in mid-2023 and look forward to providing additional feedback on the Green Paper.

Background

2. The Australian Federation of Air Pilots (AFAP) represents over 5,500 professional pilots in aviation safety and technical matters and is the largest professional pilot association in Australia. We engage in policy reforms through our active safety and technical committee, which is a major contributor to the development of Australian and international aviation safety standards. The AFAP is also a foundation member of the International Federation of Airline Pilots' Associations (IFALPA), the global body representing professional pilots worldwide. Through IFALPA the AFAP contributes to the international aviation standards established by the International Civil Aviation Organisation (ICAO).

3. The AFAP also partners with the other major pilot association in Australia, the Australian and international Pilots Association (AIPA), on safety and technical matters. This partnership is called the Australian Air Line Pilots Association (AusALPA) and represents joint positions of the AFAP and AIPA on aviation safety and technical matters.

4. As a key stakeholder in the aviation industry, the AFAP welcomes the opportunity to provide input into the Australian Government's consideration for future aviation policies and related matters.

Other Relevant Submissions from the AFAP

5. The AFAP has provided extensive input to various consultations and inquiries regarding aviation reform proposals and requests for stakeholder input. In particular, we have provided five relevant submissions to recent Rural and Regional Affairs and Transport (RRAT) Senate Standing Committee inquiries:

    a. Two submissions for the Inquiry into the current state of Australia's general aviation industry;

        i. AFAP Initial Submission to the RRAT GA Inquiry

        ii. AFAP Supplementary Submission to RRAT GA Inquiry (reform of the aviation regulations)

b. Three submissions to the Inquiry into the future of Australia's aviation sector, in the context of COVID-19 and conditions post pandemic.

    i. [AFAP Initial Submission to the Future of Aviation RRAT Inquiry](#)

    ii. [AFAP Supplementary Submission to the Future of Aviation RRAT Inquiry](#) (Job Ready Pilot Program)

    iii. [AFAP Second Supplementary Submission to the Future of Aviation RRAT Inquiry](#)

6. We have also been involved in providing input to various CASA and Airservices Australia (AsA) consultations. These and other letters and submissions articulate our positions more extensively than this submission, we draw from those submissions and summarise the main points here for ease of reference. Where appropriate, we have quoted from them but also provided links to the submissions and paragraph references to guide readers to the relevant expanded information, which we request is also considered with the feedback contained directly within this submission.

7. Job Ready Pilot Program (JRPP): AFAP submissions and Senate appearances over the last few years have called for a Job Ready Pilot Program (JRPP). With no meaningful response from the former Government the AFAP established a low-cost version of a JRPP to assist Australian pilots who were made redundant during the COVID-19 pandemic re-entering the workforce. The development of this program drew upon the AFAP's safety and technical expertise and affiliations with industry. It has proven successful in preparing a pilot to re-engage with their aviation career after a long period of inactivity. More recently the AFAP JRPP has been expanded to assist pilots through all steps of their careers with continuous professional development programs. This program is now called the "AFAP resilient pilot" a professional development program and is discussed further under TOR 6 - Future industry workforce skills and training requirements.

8. We note there have been numerous aviation related inquires, regulations reviews, Papers, Departmental round-table meetings and consultations on the current state and future of aviation. Despite this high level of consultation there seems to be a shortage of genuine policy reform adoption. In our submission we have also referenced the failure to implement much of the reform agenda flowing from the previous 2009 Aviation White Paper.

TOR 1: AVIATION'S ROLE IN ECONOMIC DEVELOPMENT, TRADE AND THE VISITOR ECONOMY – GENERAL, DOMESTIC, REGIONAL AND INTERNATIONAL AVIATION

A Well-Functioning Aviation System is a Critical Part of Australia's National Infrastructure

9. The COVID-19 crisis has highlighted many of the structural weaknesses within the Australian aviation industry. We have also been reminded of the importance of a well-functioning aviation system as a critical part of Australia's national infrastructure and global connectivity including air freight operations to allow for swift transport of equipment and supplies.

10. The role of aviation to facilitate fly-in-fly-out services for the resource sector workforce is also of unquestionable importance to the economy.

A Focus on General Aviation (GA)

11. The General Aviation (GA) sector in Australia plays a crucial role in connecting remote and regional communities with the rest of the country. It provides diverse services such as emergency rescue, fire spotting, scenic flights, aerial survey work, and agriculture sector-based airwork. GA is also responsible for training aviation personnel and serves as the initial step in the career path for many aviation careers, especially for pilots. GA is essential to maintain connectivity with remote and regional communities.

Policies to Train and Retain Skilled Professionals

12. The AFAP is concerned the growing shortage of trained and experienced aviation professionals will have a detrimental impact on the future Australian aviation industry.

13. The AFAP is primarily concerned with the retention and training of Australian pilots. There are a significant number of pilots leaving Australia for overseas flying positions. Many USA based operators are specifically targeting Australian pilots for recruitment and we believe this will only continue. In the past 12 months over 1000 experienced Australian pilots have decided to take up lucrative offers to US airlines under a US Government program known as the E3 Visa program. Additionally, we expect more experienced Australian pilots to be attracted overseas as Asian carriers begin to ramp up operations following the pandemic.

14. Many pilots are drawn to these opportunities by attractive remuneration and career incentives, coupled with an increasing dissatisfaction with the Australian operating environment from both regulatory and individual career progression perspectives.

15. To retain Australian pilots in Australia requires a whole-of-industry approach. The AFAP needs to be party to this solution.

16. The AFAP has previously stated Australia needs introduce a training levy on industry to subsidise pilot training. Government needs a policy specifically for training programs and support mechanisms for aviation professionals.

17. We have some specific workforce and training policy suggestions, summarised at TOR 6 being:

    a. Providing support for the AFAP resilient pilot program; and

    b. VET fee help relief for pilots in remote locations.

Policies Required to Attract Pilots

18. A secure and safe Australian aviation workforce ensures the Australian aviation industry remains a significant contributor to Australia's economy through its role as an enabling industry for tourism and trade. Industrial standards, both economic and non-economic, must not be undercut otherwise the available workforce will continue to seek career opportunities overseas or in alternative sectors of the economy.

19. In our experience, the retention of a highly skilled and professional Australian aviation workforce is open to being challenged on several fronts, including:

    a. The loss of workforce to overseas opportunities, such as via the US E3 Visa program.

    b. The use of an overseas workforce to perform Australian work.

    c. Unfair practices such as tag flights which in effect allow foreign airlines to fly domestic sectors by "tagging" on to international routes. This avoids the requirement to apply Australian employment laws operating for the benefit of the crew on that domestic sector.

    d. The use of cabotage in circumstances where there are Australian operators.

20. The use of these practices leads to the erosion of industrial standards creating an unstable employment environment. Employment that is unstable and insecure has many negative aspects, including effects on standard of living, social inclusion, the mental health continuum in addition to immediate economic considerations.

21. The AFAP suggests the Government adopt a policy to train and retain our own skilled aviation workforce and support this policy with viable and well-funded pilot training programs.

TOR 2: HOW TO MAXIMISE THE AVIATION SECTOR'S CONTRIBUTION TO ACHIEVING NET ZERO CARBON EMISSIONS INCLUDING THROUGH SUSTAINABLE AVIATION FUEL AND EMERGING TECHNOLOGIES

The AFAP Supports the Positions of IFALPA on Emissions Reduction.

22. The International Federation of Air Line Pilots' Associations (IFALPA) believes that the aviation industry, while continuing to pursue the highest level of aviation safety worldwide, should be environmentally, economically, and socially sustainable. The AFAP supports the initiatives and positions of IFALPA related to aviation based emissions reduction.

23. The AFAP has contributed to the working group within IFALPA on climate and environmental matters.

24. The IFALPA views and positions related to the "Long-Term Aspirational Goals (LTAG) for CO2 Reductions", are detailed in this IFALPA Position Paper. In our view, particular key positions worth noting for the development of Australian aviation policy include:

    a. Intermediate goals are needed to assure timely development and implementation of measures as CO2 emissions are cumulative (e.g. for 2030 and 2040).

    b. Safety should be the overriding principle and should not be affected negatively. The measures should take the predicted increased air traffic demand into account.

    c. Government support is required to facilitate this transition within the set timeframe, especially on encouraging the widespread use and production of Sustainable Aviation Fuels (SAFs).

    d. International agreed aspirational goals should be adopted into State Action Plans and legislation.

25. We encourage policy developers to further draw upon the existing and ongoing work of IFALPA and other key stakeholders in the international arena for how Australia can and should respond to this important issue.

TOR 3: CHANGING AVIATION TECHNOLOGIES AND WAYS TO POSITION OUR POLICIES, REGULATIONS AND SYSTEMS TO ENCOURAGE UPTAKE AND MANUFACTURING OF NEW, MORE EFFICIENT, TRANSPORT TECHNOLOGIES

Anticipated Technology Needs Should Not Distract from Current Technology Needs

26. Aviation related Government agencies are disproportionately allocating resources to projected technological advances to the detriment of current and near-term requirements. By way of example, over 20 CASA officers are working on UAV (unmanned aerial vehicles) rules and surveillance with a disproportionality small number of CASA officers are working on the transition of industry to a complete reform of the fatigue rules. The AFAP does agree that technology will rapidly change, the regulator needs to ensure that the legislation remains relevant and that the technology is compatible.

27. The AFAP is a founding member of the Global Cabin Air Quality Executive (GCAQE). In Australia there was considerable awareness of the cabin air quality issue and possible long-term health effects after numerous incidents of crew incapacitation involving fumes resulted in a Senate inquiry in 1999. An Expert Panel on Aircraft Air Quality was then formed, by CASA, which reviewed potential crew and passenger health issues. Most of the recommendations in the final report of 2010 remain unactioned. The AFAP has collected its own fume event samples and had them analysed by an expert in Canada. The results were definitive evidence of toxic organophosphates (OP) airborne in the cabin during certain fume events. New research, an internationally certified blood test and the development of OP free oils are all imminent. The AFAP and GCAQE remain committed to educating the industry and calling for changes to aircraft design and operations to prevent fume events.

28. The 2023 AsA workforce planning and management does not meet the 2009 White Paper statements and international standards and expectations. This is compromising safety. Currently there exists inappropriate and repeated use of Traffic Information Broadcasts by Aircraft (TIBA) within busy airspace across Australia. TIBA has become common practice by AsA as a "band-aid" solution to staff shortages. Prior to 2021 TIBA had been rarely used in Australia although there was a period in 2008 where AsA admitted staff shortfalls as the cause for TIBA use. ICAO is likely to again query the Department of Infrastructure on a TIBA status report.

29. Modern aviation philosophies are evolving at the international level. This includes concepts that help pilots prepare and adapt to rapidly evolving technology. The AFAP and its affiliate associations believe that automation (AI) will not supersede the safety of a well-trained pilot crew for many decades, if at all. Concepts like ICAO competencies and behaviours, well trained and supervised mentoring, Safety-II and salutogenic approaches will all assist the pilot workforce to adapt to a technologically disruptive and dynamic workplace.

TOR 4: AIRPORT DEVELOPMENT PLANNING PROCESSES AND CONSULTATION MECHANISMS THAT CONSIDER THE IMPACT AND CHANGING NATURE OF AIRCRAFT NOISE AND RELATED EXPECTATIONS ON THE ROLE OF NOISE SHARING AND CURFEW ARRANGEMENTS

Airport Development Planning is Broader than Noise and Curfew Issues

30. This TOR relates airport issues directly to community concerns with aircraft noise. The AFAP believes this isn't the most critical of concerns related to airport development planning processes and consultation mechanisms.

31. Expanding the TOR to include aircraft operational safety is necessary.

32. The Australian Government's failure to reform airport planning processes has caused a degradation of airports as key national infrastructure, contrary to the intended outcome of providing aviation infrastructure that serves the Australian community. Issues that need reform include a lack of coordination between levels of government, flawed adoption of national airport safeguarding frameworks, grandfathering of safety standards, unchecked non-aviation use of airport land, flawed airspace protection regulations, lack of transparency in airport master development plan consultation processes, and inconsistency on applying safety standards and pursuing land use initiatives. The AFAP supports establishing a public independent inquiry to address these issues and achieve policy goals.

33. In recent years, the AFAP has become concerned that AsA is inappropriately prioritising politics related to aircraft noise over that of the legislated priority of the safety of air navigation.

34. Community backlash after the recent redesign of arrival routes into Hobart has left AsA embarrassed. It appears that noise now disproportionately influences decision making. In the following examples safety was clearly not the priority:

   a. Support for increasing crosswind limitations for runway direction selection at Sydney airport beyond international safety standards.

   b. Support for increasing the tailwind limits for runway direction selection at Brisbane airport beyond international safety standards,

35. Implementing more effective policy directions and accountability upon AsA as required by the Act needs to be included in the TORs.

TOR 5: HOW TO SUPPORT AND REGENERATE AUSTRALIA'S GENERAL AVIATION (GA) SECTOR

A Skills Focused Approach to GA Regeneration

36. A structured career path for pilots will regenerate the GA sector. A problem has been created by the major airlines through not carefully managing and planning recruitment. Airlines can go a number of years without recruiting any pilots before suddenly having a high recruitment need. Qantas for example did not recruit any pilots to its mainline operation for almost nine years but has been recruiting heavily in recent years.

37. Whilst the larger airlines are better able to weather a variation in supply and demand (to some degree they control it), GA operators (being smaller) are affected by reduced pilot supply and pilot attrition to a much greater extent. In 2023 this is now an acute problem.

38. Attempts to attract overseas pilots via visa programs do not work and are bad for the industry. It exacerbates the current problems and further deskills the workforce. Similarly, excessive training bonds[1] are punitive in their nature and do not work.

39. The solution is a more structured career path and training pipeline for pilots.

40. The AFAP proposes Government establish a tripartite body to oversee the pilot training pipeline. This tripartite body should be made up of representatives from the AFAP, the Regional Aviation Association of Australia (RAAA) as the peak body for GA and regional operators, and Government.

41. Please also refer to our response to TOR 6 for our proposals on regeneration of GA through supporting and stabilising the provision of skilled professionals to the GA sector of the aviation industry.

---

[1] A training bond is where a pilot signs an agreement/contract to stay with an employer for a certain period (usually a number of years) in return for the training that the employer provides.

TOR 6: FUTURE INDUSTRY WORKFORCE SKILLS AND TRAINING REQUIREMENTS

AFAP Policy Proposal – VET Fee Help Relief for Return of Service to Approved GA Operators

42. The 2009 White Paper articulated a policy goal of '*a well-trained workforce, developed through partnerships between government and industry, to meet the future needs of Australia's aviation sector*". This is a worthy policy goal that should be revisited as part of this TOR intent.

43. It is well known that challenges exist in many regional or remote communities attracting and retaining medical professionals to serve the people of those communities. To help alleviate the challenges and reach service outcomes, there are programs that formalise targeted Government intervention and support. For example, the Bonded Medical Program.

44. The AFAP suggests that there is a need for a similar type of program to serve the needs of the GA sector.

45. This sector has traditionally been the place where pilots learn their trade, gaining experience in operating smaller aircraft while providing a much-needed service to remote communities. GA operators are unable to match the remuneration and conditions offered by the larger airlines and certainly not the currently lucrative opportunities overseas.

46. The lack of available pilots coupled with the ever-increasing costs of compliance have meant that GA operators have struggled to run viable businesses. Unscrupulous operators have resorted to tactics resembling indentured labour in a desperate attempt to retain pilots. Instead of individualised training bonds which can be excessive, the AFAP suggests a broad program that rewards pilots for staying in remote work that will benefit the industry.

47. The AFAP proposes Government adopt a policy to develop and establish a program similar to the Bonded Medical Program (BMP) for pilots. In our view the program would need to address and adopt these characteristics:

    a. Pilots operating in the program would gain debt relief from the VET Fee Help, accrued from their commercial pilot licence training at an RTO.

    b. We suggest the pilot complete at least 12 months of employment service with an approved operator in the program, with a view for further pro-rata debt relief for service provided up to 24 months.

    c. Operators in the program would need to meet entry and review requirements.

48. Such a program targeted at the aviation sector could mean that GA operators are assured of a steady flow of well-trained, qualified pilots who have committed to remain in the job for a

minimum period. In return pilots would be eligible to have all or a portion of their training costs covered by Government.

AFAP Policy Proposal – Professional Development Program

49. The AFAP believes that a professional development program is necessary to prepare pilots for technological advancements and changes in the aviation industry. During the COVID-19 pandemic we transformed the AFAP JRPP proposal and implemented the AFAP Resilient Pilot program, which provides a non-punitive environment for individual professional development at all career levels.   The program consists of technical and non-technical workshops, virtual simulator scenarios, and mentoring/coaching. The program builds pilot confidence and competence and prepare pilots for surprises from technology. This approach fits into the Safety-II concept.

50. The AFAP would like to highlight that the UK Government, via the training arm of the UK CAA (the CAAi) encouraged this programs development including initial seed funding and ongoing funding.[2]

51. CASA has a new pilot supervision initiative. From experience with the AFAP resilient program we suggest that this supervision requires a non-jeopardy element to be incorporated to support pilot development.[3]

---

[2]   https://www.resilientpilot.com/caairesiliencedevelopmentprogramme; CAAi backs the Resilience Development Programme | News (caainternational.com)

[3] Pilot supervision - Draft Advisory Circular 61-20 v1.0 - Civil Aviation Safety Authority - Citizen Space (casa.gov.au)
AFAP Pilot Supervision submission to CASA December 2022

TOR 7: APPROPRIATE CONSUMER PROTECTIONS AND ACCESS TO SERVICES

Consumer Protection

52. Recently a great deal of attention has been focussed on poor airline performance. Current delays and cancellations are partially a product of worker shortages - including pilot shortages - exacerbated by a slow ramp up of retraining post pandemic.

53. A large part of the solution to reducing delays and cancellations is in establishing the correct number of pilots employed and ensuring stable and sustainable rosters. Working pilots beyond reasonable hours will only increase fatigue and sick leave and result in increased delays, cancellations and reductions in safety margins. Ensuring sound fatigue management principles are applied and regulated by CASA is critical to ensuring a reliable airline system, improving the consumer experience.

54. There are a significant number of pilots who are (or would be) attracted to the traditional regional airline or charter pilot lifestyle. For regional pilots this generally means rosters that minimise the time away from home base and for many charter pilots most weekends free of duty (matching the 'fly-in fly-out' customers they service).

55. Multiple overnight trips and long periods spent at hotels or airports between flights are not efficient nor part of the traditional regional airline lifestyle. This diminishes the attractiveness of a pilot remaining in a regional airline, in lieu of being drawn to the similar lifestyle but greater pay of a larger airline.

56. In recent years the duty time and time away from home base has increased significantly while the flight time (the actual productive time) has actually gone down. This mismanagement combined with higher salaries elsewhere has led to many long-serving regional pilots and charter pilots going, or considering going, to greener pastures.

TOR 8: MAINTAINING FIT-FOR-PURPOSE AVIATION SAFETY, AIR NAVIGATION AND AVIATION SECURITY SYSTEMS AND SERVICE DELIVERY AGENCIES

Airservices Australia (AsA)

57. The AFAP believes the civil Air Navigation Service Provider (ANSP), AsA, is operating in a manner that is not fit for purpose. There are many concerning examples of their conduct that indicate there are significant issues with the way AsA is being managed and governed.

58. The AFAP has been involved in the ASTRA council by way of our AusALPA membership. The ASTRA council was the primary consultation body for collaborating with stakeholders on airspace related matters. Since the pandemic, AsA has almost eliminated this consultation forum. In its place is a disjointed consultation methodology where feedback is sought independently from stakeholders, creating less shared understanding among stakeholders and a reduction in AsA's accountability.

59. Of concern is that AsA has reduced their workforce resources to the point that many services are simply not being provided on an alarming number of occasions.

60. The AsA redundancy program called the Retirement Incentive Scheme (RIS) ran for a year (2021/22 financial year) with 128 controllers taking a redundancy package. As a result, AsA is now frantically trying to train new recruits to fill the vacancies created by the over issuing of redundancies.

61. Many aerodrome control towers are not able to provide Air Traffic Control (ATC) services during the hours published for provision of the service. In some instances, significant training restrictions are imposed by ATC on operations in the circuit area, leading to delays in training pipelines for many pilots and significant barriers to operations and lost revenue for operators.

62. The AFAP is concerned these mistakes by AsA, in critical projects and service delivery shortages, leave our members and the travelling public in a precarious position. One example of a key project by AsA is the 2022 introduction of a non-standard form of airspace unique to Australia and not conforming to ICAO standards. The so-called Surveillance Flight Information Service (SFIS) at Ballina remains an obscure and obvious example of AsA diverging from agreed international standards.

63. We suggest Government adopt a policy to better align AsA conduct to the service needs of the aviation community including more stringent means of accountability and transparency.

The Civil Aviation Safety Authority

64. The AFAP recommends several reforms to CASA, its structure, and governance, as well as associated regulations. These recommendations include the need for better governance and accountability, adequate resourcing for the regulator, appropriate composition of the CASA Board

and Aviation Safety Advisory Panel, and genuine outcomes-based regulations. The AFAP also suggests that the government adopt policies to conclude the inquiry into the GA industry and adequately resource the regulator to respond and implement certain reform requirements. The AFAP's full submissions can be found in paragraphs 22-73 of the initial submission to the GA inquiry and paragraph 47 of the supplementary submission.[4]

Aviation Security – Proposed Expedited Crew Access (ECA) System:

65. While the airport security issuing mechanism at airports is being reviewed, the AFAP proposes an expedited crew access system for aircrew members based on their trusted status as known individuals to reduce delays and inefficiencies caused by current passenger security processing. The proposed system involves a secure database that ties secure facility access to verified identity cards with biometric links, similar to the successful US Known Crew Member (KCM) program.[5]

66. The system would reflect the known risk profiles of Aviation Security Identification Card (ASIC) holders and permit an Expedited Crew Access system that reduces unnecessary security duplication and added time and distance currently wasted in accessing the workplace. The implementation of a similar program based on the trusted status of ASIC holders would improve aviation security, enhance efficiency, and reduce safety risks.[6]

67. The AFAP suggests that Government adopt a policy to align airport restricted areas access and security screening requirements to a risk based methodology, where acknowledgment that flight crew "known to the system" (due to extensive background and records checking) presents a lower risk to that of the average unknown member of the flying public.

The Australian Transport Safety Bureau

68. Currently the ATSB has an investigative process step that facilitates fact checking with Directly Involved Parties (DIP) process. The aim of such a process is: "To check factual accuracy and ensure natural justice, Directly Involved Parties (DIPs) are given the opportunity to comment on the final report before it is approved to ensure their input to the investigation has been accurately reflected." It is unclear of the processes to ensure that only appropriate input is provided or if attempts of self-serving input is common or otherwise in such processes.

---

[4] AFAP initial submission to the GA inquiry, supplementary submission to the GA inquiry,

[5] https://www.knowncrewmember.org/

[6] AusALPA SUBMISSION ON THE AUSCHECK DISCUSSION PAPER - December 2022

69. The AFAP doesn't want the DIP process removed but believes there is room for policy improvement to ensure that no ATSB investigation is compromised.

70. Regarding investigations, we also believe there needs to be a focus upon the systemic aspects involved in safety events. The use of MOUs between Government aviation agencies does help for better inter-agency coordination however, we should not remain naive to the possibility of circumstances where open critique of agency matters having relevance or influence in safety event circumstances. Examples where investigation reports should have at least mentioned the influence of another agency include:

    a. The investigation of a separation occurrence involving a Boeing 737 and a Cessna Caravan 208, at Ballina Byron Gateway Airport mentions the SFIS AsA initiated but there is not mention or critique of this being non-standard airspace service. The ICAO SARPs don't mention anything about such an air traffic service. Yet, there is no commentary in the report about AsA diverging from international standards and how this influenced the confusion of the reduced separation occurrence.

    b. The investigation of a mid-air collision south of Mangalore Airport involved aircraft seeking to utilise the ground based navigation aids (navaids) for instrument procedures training. In the years prior to the accident, many of the previously existing navaids had been decommissioned. This has had an effect of concentrating training flights to the limited remaining Navaids within what is referred to as the Backup Navigation Network (BNN). Mangalore is one such location where a BNN Navaid exists. Both CASA and AsA were involved in the project to reduce the number of Navaids in the BNN. Information of this type was not included or mentioned as an underlying influencing factor in this accident yet, in our view, it is inextricably linked and of useful relevance.

71. The ATSB appears to be reluctant to criticise or even mention concern of the influence of the other Government agencies upon safety events and occurrences. This can mean that some necessary safety lessons and reforms are overlooked as a result.

72. The AFAP proposes the revision of the MOUs between the Government aviation agencies with an aim to ensure that all relevant facts are presented including where potential conflict exists between agencies.

73. The Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA, "the Department") is crucial in delivering policy goals and assisting with the coordination between the Government aviation agencies and indeed, stakeholders of the industry too. Given that so many of the 2009 White Paper policy goals remain unactioned, partially completed or in some circumstances, the issue has worsened, we suggest that there need to be a greater degree of accountability and responsibility for actions placed upon the Department by our elected office holders.

74. The AFAP questions to what degree the departmental staff are out of touch with the needs of the industry. There is an appearance that there is more effort serving the larger operators than there is on serving the wider aviation sector and the broader Australian community. Consultation practices should fairly involve stakeholders and not just 'oiling the squeaky wheel'.

75. The AFAP believes that it is necessary for Government to review and enhance the aviation related expertise and resources in the Department with a view to being able to effectively deliver on the other aviation White Paper policy goals. There is a widespread view that there is an insufficient level of expertise within the Department.

TOR 9: THE ROLE OF AIRLINES AND AIRPORTS IN SUPPORTING REGIONAL ECONOMIES

Government Policy and Programs Underpin Regional Economies

76. Past government reforms of the aviation industry have affected how airports and airlines operate. The deregulation of airline competition and the break-up of the former Federal Airports Corporation has created segregation of the aviation industry into business-units and away from emphasis of it being key national transport infrastructure. Subsequently, there is a natural tendency for rationalisation of service and infrastructure provision to areas and services where commercial viability is proven or has greater prospects, at the expense of less profitable or loss making areas.

77. The shift towards a more commercially focused model creates challenges faced by both airlines and airports in supporting regional economies, leaving many regional airports reliant on government welfare interventions such as the Regional & Remote Aviation Assistance Programs. Many air transport services to regional and remote communities are reliant on similar government support.

78. Regional airports are typically owned and operated by local shire councils, which struggle to maintain ageing infrastructure and attract skilled personnel. The AFAP recommends that future aviation policy should recognize the pressures on local governments, coordinate government efforts more effectively, and address the lack of specialised skills through the Department of Infrastructure and Transport.

79. The AFAP suggests that the lack of certain specialised skills in some aerodrome occupational categories should be addressed by transferring these responsibilities from airport operators into the Department of Infrastructure and Transport. This may not be possible for roles that require an on-site presence but many roles related to standards interpretation and determination of compliance could be centralised into the Department and become shared resources for many airports.

80. We therefore suggest that Government adopt a policy to explore what skills and occupational roles in regional airports could be taken on by specialist teams in the Department, with a view to relieve the airport operators (including shire councils) of the ongoing burden to find and retain appropriately skilled and qualified personnel and to achieve a greater level of consistency of safety standards application.

TOR 10:OTHER SIGNIFICANT ISSUES RAISED DURING THE CONSULTATION PROCESS

81. Noting that the consultation is ongoing, the AFAP reserves its position on this item at this time. We look forward to providing verbal feedback at the face-to-face consultation meeting planned in Melbourne on 21 March 2023.

Australian Federation of Air Pilots

March 2023