Advancing the interests of our members and the profession

17 March 2023

Mr Jason Dymowski
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Dear Mr Dymowski,

Thank you for your letter dated 7 February 2023 advising us of consultation and seeking our initial views to assist in the development of the Aviation Green Paper.

The Australian and International Pilots' Association (AIPA) represents around 2,400 professional airline flight crew, including nearly all Qantas pilots and a significant percentage of pilots flying for the Qantas subsidiaries (including Jetstar Airways Pty Ltd). In addition, AIPA, through the Australian Airline Pilots Association (AusALPA), is a key member of the International Federation of Airline Pilot Associations (IFALPA) which represents over 100,000 pilots in 100 countries.

AIPA notes that the White Paper will examine the government policy and economic reforms necessary to promote efficiency, safety, sustainability and competitiveness of the aviation sector out to 2050. AIPA has reviewed the Terms of Reference and is largely satisfied that the scope and themes listed are appropriate for developing a future focussed Aviation White Paper.

Our interests on the scope and themes on the Terms of Reference are broad ranging and we anticipate preparing a detailed submission as part of the Green Paper process. In the meantime, please find a high-level summary of issues for the Australian Government's consideration at **Attachment A**.

Once again, thank you for consulting with us at this early stage. AIPA looks forward to working with you and the Australian Government through the course of developing the Aviation White Paper.

Yours sincerely

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Maintaining fit-for-purpose aviation safety, air navigation and aviation security systems and service delivery agencies

Cooperation between the Commonwealth and States and Territories

AIPA supports the Commonwealth continuing to enhance its engagement with States and Territories in order to effectively address the many intersections and disruptions to our aviation system. This includes:

- Developing Commonwealth, State and Territory agreements that provide greater clarity on roles and responsibilities to ensure the resilience of Australia's aviation systems.
- Revising quarantine models to ensure that decisions made by the States and Territories do not adversely impact the operation of Commonwealth managed airports and associated connectivity issues related to domestic travel.
- Securing greater cooperation on the application of work, health and safety laws when operating on interstate and international flights.
- Examining ways to achieve a greater level of consistency on the application of Australian criminal law when operating Australian registered aircraft.

Consultation with industry stakeholders on fit-for-purpose aviation safety, air navigation and aviation security systems and service delivery agencies

AIPA continues to advocate on behalf of our members for greater accountability, transparency and scrutiny in relation to the Australian Government's legislative and regulatory functions that relate to aviation.

While AIPA understands that there may be a degree of sensitivity for commercial operators to have this information published, often these safety cases and risk analyses relate to public rather than private risks. AIPA is of the strong view that the public has the right to see both the proposed justification as well as the reasons for a decision when the Australian Government and associated agencies decide to set aside a pre-existing requirement.

- An effective reform could be to implement improvements in how important matters like approvals, exemptions and permissions are notified and communicated to relevant industry stakeholders, such as AIPA, and the broader Australian community.

Australian Transport Safety Bureau (ATSB)

AIPA consider it entirely appropriate that the ATSB investigate decisions that have safety consequences, such as the issues at Essendon Airport. However, matters like the Directly Involved Party (DIP) process should not become a vehicle to delay reports or to attempt some sort of institutional obfuscation of inappropriate decision-making.

- AIPA suggests that the White Paper examine how the ATSB conducts safety investigations of related agency decisions as a proactive measure to prevent excessive risks due to inadequate standards, procedures or decision making.

Airservices Australia (AsA)

AIPA is concerned that AsA's current Airspace Modernisation Program lacks cohesion, and we continue to express concerns about the proper consideration of operational implications when transiting the various classes of airspace.

- AIPA encourages the Australian Government to increase the transparency and accountability requirement of AsA to ensure that privacy and confidentiality protections are not used excessively to avoid public scrutiny.

Civil Aviation Safety Authority (CASA)

As a part of this White Paper process, AIPA encourages the Australian Government to thoroughly examine the role and operation of CASA, and to consider policy and legislative options that mean it will remain fit for purpose and agile to a changing aviation sector. This includes effective reforms that respond to the following key areas:

- National Airports Safeguarding Framework Guidelines (NASAG).
- Implementation of Fatigue Risk Management Systems (FRMS).
- Greater oversight and review of CASA's operations by an independent body.

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

Pilots are already minimising both the emissions and noise footprint of the aircraft we fly within the capabilities of the technology. Importantly, there are safety considerations that limit our attempts to maximise efficiency.

Flight path management is constrained by the need to avoid excessive tailwinds, or crosswinds, or manoeuvres that compromise handling and performance margins. While we recognise the desirability of a peaceful lifestyle, our immediate and most compelling duty of care is to our passengers, followed closely by that to people on the ground under the immediate flight path of the aircraft.

- AIPA would like to see this area examined in the White Paper to incorporate matters that relate to airport development planning and consultation processes beyond noise management. This includes the effective consideration of matters such as the construction of new buildings, the temporary docking of ships, cranes and other obstacles close to airports.

How to support and regenerate Australia's general aviation sector

Australia's general aviation sector is the cradle for developing our future pilots, engineers and other important sectors that feed into the commercial airline sector. AIPA believes that the challenge in supporting and regenerating Australia's general aviation sector lies in recognising that the supply of infrastructure is not enough. There must be a realistic demand for general aviation services in order to support and regenerate this sector.

The proximity of secondary airports to population centres is another important factor in encouraging demand in Australia's general aviation sector. Secondary airports in our future will require greenfield sites. As a result, it is important to ensure that our existing urban sites are protected and that general aviation businesses are encouraged to stay by ensuring that expansion of these sites remains a realistic proposition. Every business that leaves a general aviation airport, or closes its doors due to lack of demand for its services, or lack of space, or a suitable site to conduct business, has a degenerative effect on the viability of remaining businesses.

- AIPA is supportive of the Australian Government analysing their role in supply side issues in the general aviation sector. This includes examining opportunities to reduce costs by embracing scalability, including being alert to areas that can be subject to a much lighter regulatory touch without unnecessarily increasing the risks to the public.

Future industry workforce skills and training requirements

The reduction in general aviation activity during the COVID-19 pandemic and into recovery has meant that there are far fewer job opportunities for Australian-based pilots than in previous years. While the pandemic provided the ideal opportunity for some major operators to clean up unfunded liabilities through early retirement and redundancy schemes, very few of those pilots have resurfaced in general aviation. It is AIPA's view that a significant amount of experience has been lost throughout our aviation system.

Australia is currently seeing an exodus of our general aviation pilots to companies in the United States of America (USA). Many of these companies are prepared to put together employment packages, residency support and substantial promotion prospects that emphasise their competitive offerings in comparison to Australian-based companies. AIPA estimates that approximately 600 pilots have taken up those offshore opportunities and fears that many will not easily return to work in Australia.

- AIPA encourages the Australian Government to consider reforms that better support pilot and engineer training facilities beyond the major operators to ensure the viability of the general aviation sector.
- In the context of developing the White Paper, AIPA recommends that the Australian Government consider Recommendation 8 from the March 2022 Senate Rural and Regional Affairs and Transport References Committee inquiry report into 'The future of Australia's aviation sector, in the context of COVID-19 and conditions post pandemic'.
    - *The committee recommends that the Australian Government urgently considers the skills needed across the sector, and the best means of retaining those skilled workers, including developing a scheme that provides financial support directly to pilots, engineers and other highly skilled, in-demand aviation professionals to assist in maintaining their accreditation and training requirements.*

Airports as strategic assets

AIPA is not aware of any strategic planning for airports at any scale that addresses the combined needs of Defence, population centres or emergency services. It is our view that Australia is unlikely to move away from the need for our airports to maintain long runways that are strong enough to handle large aircraft in all weather conditions. Emerging technologies are likely to stay in small scale proof-of-concept operations for some time, so an appropriate investment horizon for airports will remain, at least within this White Papers' coverage.

Disaster preparedness

It is AIPA's position that regional airports have an important role to play in achieving better, more resilient and more flood-proof infrastructure. The recent and widespread flooding across Australia has highlighted the impossibility of flood-proofing a higher degree of our roads and railway lines, while highlighting the vulnerability of many of our population centres to isolation from flooding. Retaining a connection by air can significantly ease the hardship for those affected, particularly in more remote communities, and may well be the most cost-effective first step.