

Comment on the report of the Aviation Safety Regulation Review

My input into this review focused on the resources available to the ATSB and its role.

I sought to ensure that the ATSB be fully resourced to enable it to conduct such tasks as are necessary to progress aviation safety.

These activities include:

- Sufficient resources for the ATSB to undertake what investigations of transport accidents and incidents as it deems necessary,
- Sufficient resources to enable the ATSB laboratory to remain in its present position at the top of world best practice,
- Sufficient resources to enable ATSB officers to be assigned to investigations of major incidents or accidents to any aircraft type on the Australian civil register,
- Enhanced resources to enable the ATSB to expand its training and education role – in alliance with tertiary aviation education institutions (in a manner similar to but on a smaller scale than, the US NTSB Academy), and

Resources and the sport and recreational sector:

The Review made no specific recommendations as to the resourcing of the ATSB, however it did recommend (**Recommendation 3**) that the ATSB investigate as many fatal accidents in the sport and recreational area as its resources allow.

This seems a rather weak recommendation.

It might better have recommended that the ATSB have the resources to investigate as many such accidents as it deems necessary.

Training and education (and accident prevention):

A major role of the ATSB, along with the investigation of incidents and accidents, is the making of recommendations aimed at improvements – physical and procedural – to the transport sector in order to prevent repetition of such safety failures.

It does this via its many publications and through its education function - and also via extensive and sophisticated statistical analysis of available data, leading to indications of trends 'hidden causes and links' and the like.

This function is key to the maintenance of safe transport – air, rail and maritime.

Recommendation 20 then seems misguided in recommending that the safety education function be transferred from the ATSB to CASA.

The Report skimmed over this area and did not present any persuasive justification – in fact any argument at all, beyond a 'bald statement' - for this recommendation.

My submission called for the ATSB to *increase* its training and education role – via an alliance with one or more Australian tertiary education institution. In other words, I called for the reverse of that recommended.

In view of the ATSB's three mode responsibilities, transferring aviation safety education to CASA would leave the Rail and Maritime sectors unaddressed. CASA would not be expected to take over training and education role for these two surface

modes. And it leaves these sectors without the skills and knowledge of safety management systems generated and held by the aviation sector.

CASA are the safety investigation (and safety enhancement) experts, whereas CASA are the regulators. CASA does promote knowledge of these regulations but does not undertake training of aviation safety investigators – nor should it as the expertise resides in the main with the ATSB.

I would respectfully suggest that Recommendation 20 not be acted upon.

In calling for enhanced resources to the ATSB for training and education, I also include the maintenance and honing of the skills of its own investigative and analysis personnel.

An importantly part of this is to ensure that the ATSB has the resources to continue to assign investigators to any accident or incident relating to any aircraft on the Australian civil register, which occur anywhere in the world. This provides valuable experience for our air safety investigators.

Resources should also continue to fund the ATSB Laboratory to world standard.

Appropriate and sufficient resourcing is the key to the ATSB being able to perform its necessary tasks. This is an area that the Review did not address directly but I would suggest must be uppermost in addressing the effectiveness of the ATSB.