

Supplemental comments to Aviation Safety Regulatory Review

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The Minister is to be commended for instituting the review and it is hoped that the majority of the recommendations are implemented without undue delay. The existing issues within the regulator are significant and it is hoped that a new Board and Director will be able to bring the ship about.

My concerns as an experienced Airline Safety Manager relate to the following:

- 1 Recommendation 19. Until such time as there is a high degree of trust and confidence in the regulator this recommendation needs to be deferred. It has the potential to stop safety reporting if there is considered any chance (by the reporter) that the regulator may use the data for other than safety investigation (and promotion). Safety reporting is the corner stone of aviation safety management systems and needs to be encouraged in accordance with Just Culture principles. In an ideal world, the regulator must not be part of the safety investigation process.
- 2 With such a low level of trust in the regulator, together with a very poor culture, serious consideration needs to be given to a name change for the regulator, preferably without the word "safety" therein.
- 3 In order to advance the regulation review the Act itself needs to be reviewed in order to reflect contemporary aviation practices and culture. Strict Liability needs to be removed from aviation regulations. Existing policy of the AG Department is a safety hazard in itself, in the way the various regulations are written.
- 4 Safety Promotion would be best handled outside of the regulator. There is little trust from within the industry of what the regulator says. Consideration needs to be given to either having the ATSB or outside agencies conduct all safety promotion in order for it to be believed and have maximum penetration.

Thank You for the opportunity to provide additional comment.