FLYING TO RECOVERY

Professionals Australia

Response to the *Future of Australia's Aviation Sector* issues paper

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Professionals Australia is a network of thousands of engineers, managerial and technical professionals whose mission is to shape the future of our professions based on the expressed wishes of professionals themselves; and to help our members get the careers they deserve. We believe our members should have a strong voice and more influence over the big issues in their industry, their professions and in their workplaces.

We are the union representing professionals in commercial, general and defence aviation, aviation manufacturing and engineering and the Civil Aviation Safety Authority and Airservices Australia. As employees in the sector, our members work in regulatory, surveillance and oversight roles, advanced manufacturing and engineering, air navigation and aviation communications, and information and communication technology. They are engineers, pilots, professionals in policy development and ICT, airworthiness inspectors, flying operations inspectors and examiners and a range of associated roles.

As part of a comprehensive range of services, Professionals Australia advocates for members in workforce and employment-related areas with the aim of positively impacting their operating environment and ensuring their interests are represented at the policy and decision-making level. This involves advocating for ways to ensure proper workforce development in industries including aviation.

The Australian Government recently released its issues paper *The Future of Australia's Aviation Sector – Flying to Recovery*. The paper outlines the government response so far to the impact COVID-19 has had on the sector, and the long term policy and reform options that are on the table to further support the industry now that restrictions are lifting.

The paper also put out a call to the sector in general with questions on what stakeholders think the impacts of COVID-19 have been, and what should happen to help the sector take off again. Professionals Australia provides answers to these questions on behalf of our members in the sector.

What critical components of the aviation sector need support during the COVID-19 crisis? (Page 11)

Commercial aviation is particularly exposed as discretionary and business travel have tanked. Even though these areas will be slowly taking off from this moment in time, the international part of commercial aviation will require support for the medium term to ensure that international operators don't exit the Australian market altogether during this recovery phase.

Jobkeeper and Jobseeker have been of benefit to some parts of the industry which have experienced downturn, however the scope of the schemes have left very many Australian workers in aviation out of scope (eg foreign owned but Australian staffed ground handling companies including Dnata).

Critical skills in aviation engineering and STEM broadly are at risk of being lost from the industry due to stand downs, restructures and redundancies. These job security issues are exacerbated by the easing of some regulation intended to ease the strain on businesses, but which creates the perverse outcome of removing the imperative which underpins the employment of these professionals.

What issues need to be considered in shaping future airspace protection policies and regulations? (Page 19)

The following statement from this section of the issues paper is inaccurate: '*An important part of airspace design is safeguarding airspace from development of buildings around airports to ensure the viability of the industry for the future*'. Airspace design is unrelated to airspace protection, which is an important element of airport safeguarding.

Airspace design is concerned with allocating the appropriate classification to a volume of airspace to ensure that aircraft operators receive the appropriate level of air traffic services to ensure the safety, regularity and efficiency of operations. This task is conducted by the Office of Airspace Regulation (OAR) in CASA. The OAR was established under the *Airspace Act 2007*.

"Airspace Management" is essentially aimed at managing the establishment of various airspace classes, air routes and prohibited, restricted and danger areas. Australia is already on track to evolve our airspace management systems through OneSky and this work was underway long before COVID-19.

In contrast, "Airspace Protection" is aimed at managing the risk to the safety of aircraft operations from tall structures in the vicinity of airports. This risk is managed through the *Airports (Protection of Airspace) Regulations 1996*, Part 139 of the *Civil Aviation Safety Regulations 1998* and various State/Territory legislation and policies.

We note that these questions were examined in great detail by the Department of Infrastructure and Regional Development in a consultation paper published in December 2016. However, it is unclear what action has been taken by the Department following the publication of this paper and receipt of submissions. We recommend that the Department should take action on the reform proposals in the 2016 paper based on its analysis of submissions received instead of conducting a new project on the topic of airspace protection which is likely to take several years.

Careful thought needs to be put into safeguards on property encroachment around airports. Regulations in this space exist to maintain the safety of air crew, passengers and people on the ground. Making changes to safeguards which allow more development on land adjacent to airports and aerodromes will impact the operational capacity of those sites, such as restricting flight paths into and out of the port. The pros and cons of increased development must be weighed against the regulatory changes which would be required, and how these changes would impact the operation of airports and the organisations which use them.

Carefully considered changes to airport curfews could allow airlines to vary their schedule and offset their losses, and potentially assist international commercial aviation recover quicker. However, this option would need to be balanced with local community consultation.

Are there barriers to the take-up of innovative technologies in the aviation sector? (Page 21)
Generally, Australians embrace new technology and support innovation. Uber Air's VTOL aircraft and the exponential increase in the use of UAVs (unmanned aerial vehicles) are good examples of the take up of innovative technology in the Australian aviation sector.

The other item that has emerged over recent years is the introduction of software-based air transport aircraft. One such new aircraft model has over 1200 individual items of software. Australia must ensure that the oversight of these aircraft is world leading and this can only be conducted by trained operators and regulators who can make accurate judgement calls from every aspect. These aircraft will be the backbone of passenger carrying transport for decades to come and like every other digital aspect of life, Australia must ensure all barriers are well considered in order to ensure that the safety of passengers, crew and aircraft is assured.

Issues with ICT and data security coupled with vulnerability to cyber-attack are the most clear and present risks in this area. Australia requires specific strategies to address them in the aviation context, as well as the expansion of the government's directly employed, sovereign owned cybersecurity workforce.

Are there options for governments to improve aviation safety governance and consultation processes? (Page 22)
It is our view that the discussion paper is simplistic in its discussion about regulation. Regulation in the Australian aviation sector has been built following a hundred years on industry evolution. Our nation also exists as part of an international aviation community and Australia are signatories to the International Civil Aviation Organization (ICAO).

ICAO's core function is to maintain an administrative and expert bureaucracy to follow industry trends, research new air transport policy and standardisation innovations and advise internationally on consistent practices for civil aviation. Simply put, Australian aviation is part of an international regulatory community and our international obligations should be a central input into any discussion about aviation safety governance.

The Australian aviation industry also has international supply chains, and changes to one area of the sector can have unintended knock on effects to other parts of the sector.

Consultation processes related to aviation safety governance also need to give due consideration to the workplace health and safety implications on employees in the sector, particularly the psychosocial impacts.

Are there options to improve environmental outcomes while maintaining an efficient and effective aviation sector? (Page 23)
The COVID-19 downturn in aviation has had impacts on environmental outcomes. Airlines with reduced capacity have retired aging and less efficient aircraft (e.g. QANTAS and the 747s) and as business takes off these airlines will be looking to bring online new, advanced aircraft with a smaller environmental footprint.

Other considerations - Workforce planning
The Australian Government needs to ensure that a 5-year plan for the aviation sector includes a plan for the aviation workforce. The government should develop a comprehensive, industry workforce plan through a tripartite process with industry stakeholders, employers and representatives of

aviation workers. The plan should analyse and articulate the skills required across the industry and propose strategies to train, develop, attract and retain workers with those skills.

Other considerations - Targeted assistance, sustainable funding for Australian aviation agencies
The reliance on the operation of industry, particularly commercial aviation, to generate funding for the functioning of CASA and Airservices Australia has been demonstrated as deficient by the COVID-19 driven downturn. Alternative funding models should be investigated with a view to developing one robust enough to weather industry disruption such as that caused by COVID-19, while being well-designed to fairly and transparently distribute cost recovery.

We understand that the relevant Commonwealth agencies including the department, have examined this issue several times since CASA and Airservices Australia were established and we recommend that these previous examinations be closely considered before conducting yet another examination.

Professionals Australia is the trading name of the registered organisation, the Association of Professional Engineers, Scientists and Managers Australia (APESMA).

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