

**Mailing Address:**

P.O. Box 2101

Gladstone Park

Melbourne, Victoria 3043

Australia

Committee Secretary  
Senate Rural Affairs and  
Transport References Committee  
Parliament House  
Canberra, ACT 2600

Dear Ms Radcliffe,

In your letter of 6 October 2010, Tiger Airways was invited to respond to proposals laid before the Rural Affairs and Transport References Committee in relation to Pilot Training and Airline Safety.

Tiger Airways welcomes the opportunity to respond to these proposals which we believe if fully enacted could have a serious negative impact on the Australian aviation industry both in Safety and in Economic terms.

Dealing with each of the matters in your letter in turn:

- 1) Pilot experience requirements and the consequence of any reduction in traditional flight hour requirements on safety;*

It is unclear what the expression 'traditional flight hour requirements' means. However, this point would seem to refer to the fact that there has been a trend internationally over the past twenty years, or so, away from 'traditional' routes for pilots into commercial aviation. Traditional routes into aviation did generally mean that pilots did have a higher number of flight hours than is the case today.

Traditionally the commercial aviation sector has drawn pilots from ex military sources, pilots who have reached the end of their military careers and from pilots who have made their way through the General Aviation system.

Military pilots are highly trained and generally have several thousand hours of flying experience when they reach the end of their service careers. They are sought after by the airlines. However, even here there has been a growing realisation that the personality traits that suit a pilot to fly a high performance fighter in battle are not necessarily suited to the role of the airline pilot. None would be affected by the proposal being considered by the committee.

The General Aviation route into commercial aviation is a more uncertain path for the aspiring pilot. Pilots will often progress through it in stages. Typically a period of training delivers the Private Pilots Licence. If the pilot wishes to progress beyond this he has to 'build' flying hours. There are various ways in which he might do this but typically the next stage is to become a flying instructor at a flying club. Once certain hours targets are achieved the pilot can sit further exams and progress to other types of General Aviation flying. At the end of this process the pilot will have accumulated several hundred flying hours but for a significant proportion of this time he will have been flying alone, uninstructed and un-mentored. The consequence is that the product

of this route can be of mixed quality it is often the case that an airline recruiting such a candidate will need to train in depth to teach basic airmanship skills which will either never have been taught or have been long forgotten.

It was recognised in the 1960's and 70's that these two routes into aviation would not provide pilots in the numbers that were required. Furthermore there was concern that the General Aviation route described above would not provide pilots of the guaranteed quality that was to be required.

Several of the large airlines around the world set up their own training schemes and schools around this time. However few airlines now have dedicated training schools. There has been a move to outsource this training to privately run Flying Training Colleges and Schools. These Colleges provide training programmes normally residential, lasting around 2 years which are entirely tailored to the delivery of pilots qualified and licensed to operate in the commercial aviation sector. Typically the programme will be built around 250 flying hours. The academic requirements and flight tests will all be conducted to Captain standard although the licence issued is 'frozen' at the First Officer level until the pilot has achieved minimum on the job experience requirements (typically 1500 hours).

From these courses pilots joined the airlines. In the early years when turboprop aircraft were in more general use, even by the larger airlines, the graduates from this College route were introduced into airline flying through the small capacity turboprop fleets. Having built some experience here they moved on to the smaller jets.

As the proportion of turboprops within the larger airlines reduced then graduates from these schemes were introduced directly on to jet aircraft. This has been normal practice in Europe, in particular, for the past 20 years. A considerable number of the world's largest airlines have cadet pilot entry programmes which draw pilots with low hours (250-300) directly into the airline jet fleets. As a consequence of this development training has been adapted to include a focus on jet training.

The following airlines have long established programmes for introducing such pilots on to their jet fleets (the percentages where shown indicate the approximate proportion of new entrant pilots from the College route): Lufthansa, KLM, Air France, Swiss, Alitalia (75%), Iberia (60%), British Airways (60%), EasyJet (60%), Ryanair (60%)

It is now the case in Europe that the second General Aviation 'self improver' route into commercial aviation has almost been closed off. There is a recognition that high quality training has a more important part to play in delivering piloting skill than does simple 'experience' based on flying hours.

Flying hours have been reduced within these training courses but at the same time modern realistic flight simulators have been introduced and these allow the trainee to practise emergency procedures that could never be conducted in the air.

Furthermore, there have been other international developments. Over the past 5-6 years under the guidance of the ICAO a standard has been set for the training of pilots towards the grant of a Multi-crew pilots licence. This scheme is entirely driven towards delivering pilots for the modern multi-crew airline environment to the extent that such graduates are only qualified to fly as a member of a multi pilot crew, for a specific airline. Training programmes within this scheme are highly detailed and training is competency based. Pilots who complete this course will not have

high numbers of flying hours but they will be experienced in the sense that they will have spent considerable time during their training being instructed with the training and assessment entirely geared towards the role that they will perform in their working lives.

It is the view of Tiger Airways that the quality of the training is the best determinant of the 'safety' of the pilot and that these modern training systems provide the best means of securing aviation safety for the future. Applying a minimum hours requirement is an entirely arbitrary approach.

*2) The United States' Federal Aviation Administration Extension Act of 2010 which requires a minimum of 1500 flight hours before a pilot is able to fly a commercial plane, and whether a similar mandatory requirement should be applied in Australia;*

The application of a mandatory minimum flying hours requirement is not regarded by Tiger Airways as being the best way of ensuring aviation safety for the reasons described above. Furthermore we believe that it would be right for the committee to consider the following in its deliberations:

There exist only a small number of ways in which a pilot might gain 1500 flying hours within Australia. This is fundamentally constrained by the volume of non-passenger flying that takes place. An aspiring pilot within Australia would therefore have limited choices if he wished to pursue a professional flying career.

In Europe the college entry system is now so well established that it has become the norm. European airlines recruit significant numbers of pilots from these sources. The aspiring Australian pilot would probably be best advised to take up a training course in Europe and to use a European airline to build up his flying hours to the 1500 hours level.

In the short to medium term imposing the 1500 hours limit is likely to create a pilot shortage and Australian airlines will be forced to look outside the country to satisfy their pilot needs.

The view of Tiger Airways is that this scenario is a real possibility and that the safety needs of the Australian aviation industry are best served through the recruitment of Australian pilots into the Australian industry. It is our view that the long term safety goals of the industry will be best secured through the continued delivery of high quality pilot training within Australia and that this is likely to be diminished through the imposition of a minimum hours requirement.

We believe that the committee should also note that many current pilots see it as being in their personal financial interests to set the barrier to entry into the career at as high a level as possible.

*3) Current industry practices to recruit pilots, including Pay-for-Training schemes, and the impact such schemes have on safety;*

The view of Tiger Airways is that the quality of the training and the standards being set by the training organisation are the key determinants of the safety outcome. How such training is paid for whether by the individual, the airline or the government is of little relevance. We do believe that the aviation sector is a key part of the national infrastructure and that government should be willing to support pilots in the considerable costs that they incur in achieving their career goals.

The 'gold standard' is airline and flying training school working together to deliver to the airline a pilot trained to the standards and procedures of the receiving airline.

The committee should also be aware that whilst many of the new entrant pilots are young and embarking on a first career, many are not. Many have worked in other walks of life and are realising a long held ambition to become a pilot. To refer to either of these groups as 'kids' is somewhat demeaning and a gross over simplification.

*4) Retention of experienced pilots;*

Tiger Airways does not see any of the items above being a threat to or have an impact on the retention of experienced pilots.

Experience within the airline has always been a factor in setting the standard for progression to Command and this naturally drives retention of experienced pilots.

*5) Type rating and recurrent training for pilots;*

Tiger Airways is of the view that Type Rating training is of a high standard and maintains it's own high standards within recurrent training.

*6) The capability of CASA to appropriately oversee and update safety regulations given the ongoing and rapid development of new technologies and skills shortages in the aviation sector;*

Tiger Airways has not experienced any shortage of manpower or skills within CASA.

*7) The need for public immunity for pilots to be introduced, in line with the United States and European approaches, to encourage pilots and crews to speak out about incidents in the interest of safety, and the need for greater protections for those who speak out in the public interest; and,*

Tiger Airways maintains a safety reporting system and promotes a 'just' safety culture. In essence this means that the airline wishes to have a full understanding of the hazards and risks with which it is faced. To this end the airline encourages open and honest reporting within it's 'safety culture'. Tiger Airways believes that such a culture should extend to the reporting of incidents to the relevant authorities and that the authorities should not take action against an individual solely on the basis of a report made to them (in line with such reporting systems in other parts of the world).

However, the pilot carries an obligation to his passengers. The passengers have a right to expect that if the pilot commits a breach of the law that the law will be suitably applied and that the pilot should not be a hallowed individual who in any sense sits above the law. Regulations must strike a balance between the need to 'learn from the errors of others' that arise from the frank admission of error (to which it is desirable to apply some level of immunity should be applied) and the need to ensure that pilots act responsibly in accordance with the law.

A recent report of the ATSB in relation to the failure of Tiger Airways to report an incident which occurred on one of it's aircraft is quoted in relation to this matter. It is the case that the ATSB report highlighted this failure but concluded that this was a 'minor safety issue'. It was the judgement of the individuals involved in this event that this matter was non-reportable to the

ATSB. Tiger Airways absolutely refutes any suggestion that there was any attempt by the airline to hide this matter or that the judgement of the individuals concerned would have been any different as a consequence of this proposal.

*The reporting of incidents to aviation authorities by pilots, crew and operators, and how reporting processes can be strengthened to improve safety and related training, including the Transport Safety Investigation Amendment (Incident Reports) Bill 2010*

Tiger Airways believes that the needs of safety are best achieved through voluntary collaboration of all concerned. It foresees no circumstances under which any individual within the airline would be put in jeopardy by these proposals so raises no objection to them.

We are grateful for the opportunity to make a contribution to the inquiry and if we can assist the committee with the provision of further information we would welcome the opportunity to do so.

Yours faithfully

**Captain T Berry**  
**Director of Operations**  
**Tiger Airways (Australia)**