



Advancing the interests of our members and the profession



AUSTRALIAN SENATE
Rural Affairs and Transport References Committee

**A Compendium of Recommendations made to the Inquiry
by the Australian and International Pilots Association**

*Pilot training and airline safety including consideration of the
Transport Safety Investigation Amendment (Incident Reports) Bill 2010*

29 April 2011

WHO IS AIPA/AUSALPA?

AIPA Affiliations

The Australian and International Pilots Association (AIPA) is a member organisation of the umbrella pilot representative body for Australia, AusALPA, and a member association of the International Federation of Airline Pilots' Associations (IFALPA). In the global context, IFALPA represents in excess of 100,000 pilots through over 100 aircrew organisations. IFALPA is recognised as a permanent observer to the ICAO Air Navigation Commission and, as such, participates fully in the technical deliberations of the Commission and ancillary Panels and Study Groups.

AIPA is also a partner of the OneWorld Cockpit Crew Coalition whose principal objective is to provide a co-operative forum for its member organisations to address matters of common interest affecting pilots within the airline companies who comprise the oneworld Alliance (currently Qantas, Aer Lingus, American Airlines, British Airways, Lan Chile, Iberia, Cathay Pacific, Finnair, Japan Airlines, Malev Hungarian Airlines and Mexicana) and their major codeshare partners.

AIPA's Role

AIPA seeks to advance the employment interests of its members and, to that end, represents individuals and the membership at large both in the workplace and in the broader aviation industry. In addition to being the social welfare voice of our membership, AIPA has a broader interest in the welfare of all Australian pilots and, through our work with IFALPA, the interests of pilots worldwide.

AIPA also provides passionate advocacy on safety and technical issues, both locally and internationally. AIPA regularly participates in regulatory, technical and government inquiries and forums, and is recognised by various government and quasi-government bodies as having a stakeholder interest in the Australian aviation industry.

There are many issues that arise in aviation that are often resolved without input from representative bodies such as AIPA. Some are matters that are not appropriate for representative body involvement and AIPA recognises and respects that circumstance. However, there are many other matters where the views and inputs of organisations such as AIPA, which are free of vested financial interests and not aligned with any commercial entities or business coalitions, can provide broad nonpartisan advice and add significant value to both the process and the outcomes.

Enquiries

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**THE COMBINED RECOMMENDATIONS MADE BY AIPA
TO THE AUSTRALIAN SENATE RURAL AFFAIRS AND TRANSPORT REFERENCES
COMMITTEE INQUIRY ON PILOT TRAINING AND AIRLINE SAFETY**

References:

- A. AIPA “Statement of Concern on Diminishing Flight Standards” October 2010
- B. AIPA “Submission and Response to the Terms of Reference” to the Australian Senate Rural Affairs and Transport References Committee Inquiry on Pilot Training and Airline Safety including consideration of the Transport Safety Investigation Amendment (Incident Reports) Bill 2010, 28 October 2010
- C. AIPA “Supplementary Submission” to the Australian Senate Rural Affairs and Transport References Committee Inquiry on Pilot Training and Airline Safety including consideration of the Transport Safety Investigation Amendment (Incident Reports) Bill 2010, April 2011

Layout

The original recommendations from the three reference documents have been combined and regrouped under focus areas. AIPA made a combined total of 103 recommendations, some of which contain a number of sub-elements and some of which contain minor overlaps with earlier recommendations.

The text of each recommendation appears verbatim from the parent reference. However, the recommendations have been renumbered and sorted by decreasing priority within each focus group for ease of consideration. Priorities are allocated as Priority One, Two or Three. Redundant or superseded recommendations are also identified.

The Focus areas are as follows:

RM	Risk Management	BAN	Banning Provisions
FAT	Pilot Fatigue Management	LAW	Rule Making
PE	Pilot Experience	REG	CASA (and ATSB) Staffing
PS	Pilot Selection	INC	Incident/Accident Reporting
TRG	Training Standards	GOV	Government Incentives/Support
CC	Regulation of Cabin Crew	FIN	Remuneration/Compensation

The original identifier of each recommendation is provided in square brackets at the end of each recommendation, so that the reader can revisit the context within which the original recommendation was made. Some recommendations are applicable to more than one focus area. Where a recommendation is repeated from another focus area, that recommendation will commence with an **[RPT xxnn]** annotation and is formatted as **dark blue** text.

Three Sections are presented:

1. AIPA’s Priority One Recommendations (36 in total);
2. AIPA’s Combined Recommendations by Focus Area and Priority; and
3. Redundant or Superseded Recommendations

SECTION 1 - AIPA'S PRIORITY ONE RECOMMENDATIONS

These 36 recommendations are considered by AIPA to be essential to addressing the subject matter of the Inquiry. Holistic consideration of the nature and urgency of each essential recommendation has resulted in some variation in priority from that seen within focus areas.

They have been selected by AIPA from the total of 95 active recommendations set out in Sections 3. Many of the remaining 59 recommendations to which AIPA has accorded a lower priority support these essential recommendations in the broader industry framework.

ID	PRIORITY ONE RECOMMENDATIONS	
TOP 01	(PE 01)	CASA should require that the Captain and Co-Pilot of jet public transport aircraft should hold ATPLs and, until such time as the existing legislation is modified, that a minimum hours experience requirement be established for High Capacity RPT aircraft Captains and Co-Pilots. [Ref C, Recommendation 37, page 22]
TOP 02	(PE 02)	CASA should restrict the employment of low-experience pilots to non-jet aircraft with 50 or fewer seats as a general rule, with any proposed variation subject to substantial justification on an exceptional circumstances basis. [Ref C, Recommendation 36, page 22]
TOP 03	(RM 01)	CASA should develop and publish a specific policy on the risk mitigation strategies for the employment of low experience pilots to both address the increased risk and to provide a standardised approach for all operators (the costs for that risk mitigation through appropriate supervision and mentoring are the cost of operations and should not be a major determinant for that policy). [Ref C, Recommendation 35, page 22]
TOP 04	(RM 04)	To properly support Safety Managements Systems as the foundation of safe operations, CASA should provide a model of the expected level of risk management training. There needs to be clarity of the relevant target levels as, left without guidance, the industry will do nothing or as little as they believe will appease the local regulatory staff. [Ref C, Recommendation 7, page 20]
TOP 05	(RM 03)	CASA should ensure that risk management modules are included for every licence level and as a prerequisite for the approval of AOC appointments and the granting of most, if not all, approvals, permissions and delegations. [Ref C, Recommendation 8, page 20]
TOP 06	(TRG 01)	AIPA recommends that CASA review the knowledge, specified behavioural objectives and skills required for type rating and recurrent training programmes. This review should focus on the skill set necessary for a pilot of a modern complex aircraft to deal with sophisticated automation, degraded auto-flight modes and manual flight skills throughout the aircraft's flight envelope. It should also define minimal levels of systems and aircraft knowledge such that systems confusion and automation dependency do not become a flight safety issue. [Ref B, page 12]
TOP 07	(TRG 02)	CASA should, given the negative aspects of operating highly automated aircraft, develop an appropriate training model that ensures that the interactions between autopilot, flight director and the flight management system are well understood, that the original equipment manufacturers provide adequate design and operating data and that appropriate procedures to update the knowledge base are in place. [Ref C, Recommendation 6, page 20]

ID	PRIORITY ONE RECOMMENDATIONS	
TOP 08	(LAW 05)	CASA should develop and publish detailed guidance on performance standards for SMSs, including the quality of risk assessments, incident investigation, documentation and records, feedback mechanisms, safety promotion and emergency response planning. [Ref C, Recommendation 14, page 21]
TOP 09	(FAT 1)	CASA should vigorously re-engage in the supervising and monitoring of rostering and fatigue management practices of operators. [Ref C, Recommendation 53, page 23]
TOP 10	(CC 02)	The Committee should refer the matter of cabin crew fatigue management to the Minister for Infrastructure and Transport to be included in his current inquiry into cabin crew numbers. [Ref C, Recommendation 56, page 24]
TOP 11	(LAW 04)	CASA must complete delivery of the revised regulations as a priority, as the implementation and transition phases will necessarily delay the required solutions to current problems. [Ref C, Recommendation 38, page 22]
TOP 12	(GOV 05)	Government should extend efforts in the vocational and higher education areas to provide better support and incentives for people undertaking flying training, in particular by extending HECS support to Air Transport Pilot Licence (ATPL), Flight Instructor and type rating training. [Ref C, Recommendation 44, page 23]
TOP 13	(GOV 06)	Government should review the taxation arrangements for aviation training under the anomalous “self-education” provisions so that unemployed pilots forced to pay for training are not doubly disadvantaged. [Ref C, Recommendation 39, page 22]
TOP 14	(RM 05)	CASA should identify, develop and publish specific aviation risk management guidance material as a matter of urgency. [Ref C, Recommendation 9, page 20]
TOP 15	(RM 02)	AIPA recommends that a comprehensive review of the minimum experience requirements for Australian airline pilots to act as a crew member on Regular Public Transport operations be undertaken by the Civil Aviation Safety Authority with extensive stakeholder input. The ultimate purpose of the review should be to design a compulsory “pilot experience and safety management plan” (PESMP) that would be binding on commercial airlines operating in and out of Australia. In turn, the essence of the PESMP would be to establish a compulsory risk management framework that would see lower experienced pilots having their piloting skills assessed, corrected and confirmed more frequently than experienced flight crew. The PESMP would also have to address a robust support and supervision requirement that would mitigate increased pressure on Captains operating with a low experience crewmember. [Ref B, page 3]
TOP 16	(TRG 04)	CASA extends the improvements identified in the MPL training design across the traditional pilot licences and reviews the adequacy of the theory training in light of modern aircraft and systems development. [Ref A, Recommendation 8, page 45]
TOP 17	(CC 01)	The Committee should refer the matter of cabin crew qualifications, training and competency checking to the Minister for Infrastructure and Transport to be included in his current inquiry into cabin crew numbers. [Ref C, Recommendation 54, page 23]

ID	PRIORITY ONE RECOMMENDATIONS	
TOP 18	(TRG 03)	<p>CASA prepares a public Position Paper on the strategic management of aircraft endorsement training for all industry sectors, including:</p> <ul style="list-style-type: none"> (a) simulation policy covering all industry sectors; (b) the relevance and progress on Part 142 of the CASRs, (c) the safety implications of self-funded training on Part 25 aircraft, (d) the procedures for syllabus review and quality assurance of training, and (e) the quality control of ATOs and CAR 217 Check pilots. <p>[Ref A, Recommendation 9, page 45]</p>
TOP 19	(TRG 06)	<p>CASA prepares a public Position Paper on the strategic management of IOE/LT and recurrent T&C requirements that is appropriate to:</p> <ul style="list-style-type: none"> (a) the experience levels, (b) training source, and (c) cultural background of pilots. <p>[Ref A, Recommendation 10, page 45]</p>
TOP 20	(REG 03)	<p>Government should consider an industry support scheme for ATSB (and CASA) along the lines of the Defence Reserve Leave Scheme that would provide an available pool of resources from which the agencies could draw in times of need for specialist knowledge and expertise. [Ref C, Recommendation 4, page 20]</p>
TOP 21	(INC 01)	<p>AIPA recommends that existing provisions for mandatory reporting be strengthened with outcomes obligations to supplement existing prescriptions. [Ref B, page 18]</p>
TOP 22	(INC 03)	<p>[RPT LAW 10] AIPA recommends that the Parliament adopt the Transport Safety Investigation Amendment (Incident Reports) Bill 2010. [Ref B, page 19]</p>
TOP 23	(INC 04)	<p>ATSB should review its approach to the investigation and publication of human factors with a view to achieving a more robust and useful learning tool for the industry.</p>
TOP 24	(INC 06)	<p>CASA should ensure that operators demand the highest standards of incident reporting from their personnel and provide appropriate training as part of the safety promotion function of their SMS. [Ref C, Recommendation 26, page 21]</p>
TOP 25	(INC 05)	<p>CASA, in concert with ATSB, should develop and publish guidance on model reporting to minimise understatement of the actual or potential significance of aviation events. [Ref C, Recommendation 25, page 21]</p>
TOP 26	(INC 02)	<p>AIPA recommends that SMS data be accorded appropriate legal protection along the lines of ATSB investigation material. [Ref B, page 19]</p>
TOP 27	(INC 07)	<p>AIPA recommends that SMS data sharing be explored with ATSB as the lead agency. [Ref B, page 20]</p>
TOP 28	(GOV 01)	<p>Government should ensure that cost implications are identified and subsequent decisions made on any supporting funding or subsidy arrangements that may be required to ensure that aviation risk management training underpins the future Australian aviation industry. [Ref C, Recommendation 13, page 20]</p>

ID	PRIORITY ONE RECOMMENDATIONS	
TOP 29	(GOV 03)	The Productivity Commission (PC) should investigate the efficacy of the various pathways to generate the pool of experienced pilots required by the Australian aviation industry as well as options for investment in development of GA feeder operations. That investigation should consider the need for suitable incentives to revitalise the diversity of people choosing aviation as a career path. [Ref C, Recommendation 16, page 21]
TOP 30	(GOV 04)	AIPA recommends that the Bureau of Infrastructure, Transport and Regional Economics (BITRE) be tasked with investigating the price sensitivity of flying as a career choice, pricing structures within the aviation training industry and the relative position of aviation training within Government financial and fee assistance/incentive programs. [Ref B, page 10]
TOP 31	(REG 01)	CASA prepares a public Position Paper on its ability to: <ul style="list-style-type: none"> (a) attract, train and retain quality technical personnel; (b) develop and implement more contemporary and future-looking regulatory models to protect flight standards; and (c) adequately protect the public interest through its supervisory mechanisms. [Ref A, Recommendation 13, page 46]
TOP 32	(REG 02)	AIPA recommends that the Government fund CASA to keep designated personnel current with technologies employed by the RPT sector. This may mean embedding CASA personnel for a period of time in industry or regular training of key CASA personnel. [Ref B, page 14]
TOP 33	(FIN 01)	AIPA recommends that Airline operators no longer be permitted to charge employees for post graduate training programs to fly specific aircraft types. In AIPA's considered view, these forms of training should remain an Airline's cost of doing business. [Ref B, page 8]
TOP 34	(GOV 02)	[RPT RM 15] The Australian Parliament reviews the safety consequences of transferring costs which are legitimate costs of business onto employees. [Ref A, Recommendation 22, page 47]
TOP 35	(BAN 01)	The Australian Parliament adopts legislative changes that provide for court-imposed exclusion periods for any person found guilty of an offence under the Civil Aviation and related acts. [Ref A, Recommendation 21, page 47]
TOP 36	(BAN 02)	CASA should investigate options for greater penalties for management personnel found to be "not fit and proper" to hold safety-critical roles within organisations. [Ref C, Recommendation 33, page 22]

- END OF SECTION 1 -

SECTION 2 - AIPA'S COMBINED RECOMMENDATIONS BY FOCUS AREA AND PRIORITY

These 95 active recommendations reflect the priorities and scope of AIPA's submissions to the Inquiry. While the volume may appear large, AIPA is of the view that this is merely a reflection of the complexity of the subject matter and therefore implores the reader to contemplate the totality of these recommendations.

Risk Management

PRIORITY ONE

- (RM 01) CASA should develop and publish a specific policy on the risk mitigation strategies for the employment of low experience pilots to both address the increased risk and to provide a standardised approach for all operators (the costs for that risk mitigation through appropriate supervision and mentoring are the cost of operations and should not be a major determinant for that policy). [Ref C, Recommendation 35, page 22]
- (RM 02) AIPA recommends that a comprehensive review of the minimum experience requirements for Australian airline pilots to act as a crew member on Regular Public Transport operations be undertaken by the Civil Aviation Safety Authority with extensive stakeholder input. The ultimate purpose of the review should be to design a compulsory "pilot experience and safety management plan" (PESMP) that would be binding on commercial airlines operating in and out of Australia. In turn, the essence of the PESMP would be to establish a compulsory risk management framework that would see lower experienced pilots having their piloting skills assessed, corrected and confirmed more frequently than experienced flight crew. The PESMP would also have to address a robust support and supervision requirement that would mitigate increased pressure on Captains operating with a low experience crewmember. [Ref B, page 3]
- (RM 03) CASA should ensure that risk management modules are included for every licence level and as a prerequisite for the approval of AOC appointments and the granting of most, if not all, approvals, permissions and delegations. [Ref C, Recommendation 8, page 20]
- (RM 04) To properly support Safety Managements Systems as the foundation of safe operations, CASA should provide a model of the expected level of risk management training. There needs to be clarity of the relevant target levels as, left without guidance, the industry will do nothing or as little as they believe will appease the local regulatory staff. [Ref C, Recommendation 7, page 20]
- (RM 05) CASA should identify, develop and publish specific aviation risk management guidance material as a matter of urgency. [Ref C, Recommendation 9, page 20]

PRIORITY TWO

- (RM 06) CASA establishes an Industry Training Support Team with appropriate government funding support to identify and develop industry wide training material specific to identified high risk issues, similar to the FAA and OEM groups that dealt with Aircraft Upset and Takeoff Safety. [Ref A, Recommendation 15, page 46]
- (RM 07) CASA should broaden its approach to the formal examination of prospective managers and require operators to provide proper training schemes for managers, including continuing professional development. [Ref C, Recommendation 34, page 22]

- (RM 08) CASA considers processes to monitor occupational stress within an operator's technical employees as a flight safety risk factor, including;
- (a) remuneration and conditions of service,
 - (b) management training and development schemes,
 - (c) rostering practices,
 - (d) commuting rules, and
 - (e) the implementation of "Just Culture" or similar schemes.
- [Ref A, Recommendation 12, page 46]
- (RM 09) CASA formally conducts an Industry Risk Profile Assessment for each area of its regulatory responsibility. [Ref A, Recommendation 1, page 45]
- (RM 10) CASA establishes Industry Risk Management Teams that include demographically relevant representatives by industry sector, in particular industrial representative bodies such as AIPA. [Ref A, Recommendation 2, page 45]

PRIORITY THREE

- (RM 11) CASA should ensure that there is defined (aviation risk management) courseware to ensure a uniform response across the industry. The delivery level needs to be identified within the current vocational and tertiary sectors for each required course. [Ref C, Recommendation 11, page 20]
- (RM 12) CASA should require each operator to ensure that each and every employee has a relevant understanding of risk management. [Ref C, Recommendation 10, page 20]
- (RM 13) Government should ensure that CASA has the interdepartmental support to exert control over who delivers aviation training. This risk management training must be certifiable within the Australian education system. [Ref C, Recommendation 12, page 20]
- (RM 14) Based on emerging trends, Government should conduct a policy risk assessment and review with industry and Departmental stakeholders, including DIT, DEEWR, ACCC, PC and DIAC and the Australian Skills Quality Authority (ASQA). [Ref C, Recommendation 42, page 23]
- (RM 15) The Australian Parliament reviews the safety consequences of transferring costs which are legitimate costs of business onto employees. [Ref A, Recommendation 22, page 47]
- (RM 16) CASA considers treating those operators who require "pay for training" or who offer "pay to fly" schemes as higher risk operations for surveillance purposes than those that do not. [Ref A, Recommendation 6, page 45]
- (RM 17) (By extension,) CASA should review the processes for oversight of foreign operators to ensure that they cater for differences in compliance standards assessed by ICAO for the various States of registry flying into Australia. [Ref C, Recommendation 50, page 23]

Pilot Fatigue Management

PRIORITY ONE

- (FAT 1) CASA should vigorously re-engage in the supervising and monitoring of rostering and fatigue management practices of operators. [Ref C, Recommendation 53, page 23]

PRIORITY TWO

- (FAT 2) CASA should reconsider the concept of requiring a Rostering Protocol to be agreed between operators and flight crew as a condition of granting exemptions to CAO 48. [Ref C, Recommendation 51, page 23]
- (FAT 3) Operators should consider the mutual benefits of introducing formal Fatigue Management Committees under the auspices of the SMS. [Ref C, Recommendation 52, page 23]

Pilot Experience

PRIORITY ONE

- (PE 01) CASA should require that the Captain and Co-Pilot of jet public transport aircraft should hold ATPLs and, until such time as the existing legislation is modified, that a minimum hours experience requirement be established for High Capacity RPT aircraft Captains and Co-Pilots. [Ref C, Recommendation 37, page 22]
- (PE 02) CASA should restrict the employment of low-experience pilots to non-jet aircraft with 50 or fewer seats as a general rule, with any proposed variation subject to substantial justification on an exceptional circumstances basis. [Ref C, Recommendation 36, page 22]
- (PE 03) [\[RPT RM 02\]](#) AIPA recommends that a comprehensive review of the minimum experience requirements for Australian airline pilots to act as a crew member on Regular Public Transport operations be undertaken by the Civil Aviation Safety Authority with extensive stakeholder input. The ultimate purpose of the review should be to design a compulsory "pilot experience and safety management plan" (PESMP) that would be binding on commercial airlines operating in and out of Australia. In turn, the essence of the PESMP would be to establish a compulsory risk management framework that would see lower experienced pilots having their piloting skills assessed, corrected and confirmed more frequently than experienced flight crew. The PESMP would also have to address a robust support and supervision requirement that would mitigate increased pressure on Captains operating with a low experience crewmember. [Ref B, page 3]

PRIORITY TWO

- (PE 04) CASA should re-examine supervision within GA and the low capacity airlines and consider requiring continuing professional development approaches to capitalise on the exposure to real world operations. [Ref C, Recommendation 28, page 22]
- (PE 05) [\[RPT RM 01\]](#) CASA should develop and publish a specific policy on the risk mitigation strategies for the employment of low experience pilots to both address the increased risk and to provide a standardised approach for all operators (the costs for that risk mitigation through appropriate supervision and mentoring are the cost of operations and should not be a major determinant for that policy). [Ref C, Recommendation 35, page 22]
- (PE 06) A wider range of certified courses of aviation specific training, including simulator instructor, HF/NTS Instructor and aviation course development training, should be identified and developed as part of an overall CASA risk mitigation strategy and supported by Government through HECS and other industry support incentives. [Ref C, Recommendation 30, page 22]
- (PE 07) CASA reviews the experience requirements for Captains of LCRPT as set out in CAO 82.3, particularly the AICUS provisions in light of the change in approach by both CASA and operators to the meaningful conduct of AICUS. [Ref A, Recommendation 3, page 45]

- (PE 08) CASA reviews the need to establish minimum experience requirements for Captains of High Capacity RPT, conceptually similar to that published for Low Capacity RPT. [Ref A, Recommendation 4, page 45]

PRIORITY THREE

- (PE 09) The focus by CASA on competency based training should be broadened to include management and operational support staff. [Ref C, Recommendation 29, page 22]
- (PE 10) AIPA recommends that the experience requirements for the grant of an Australian ATPL should be reviewed to ensure that sufficient weight is placed on multi-engine aeroplane experience as opposed to the recognition of glider and ultralight experience. [Ref B, page 6]
- (PE 11) CASA should better define and more closely monitor “on the job” training and mentoring for all safety critical roles. [Ref C, Recommendation 31, page 22]

Pilot Selection

PRIORITY TWO

- (PS 1) CASA considers adopting through a CAAP the selection processes published by IATA as a means of establishing an industry best practice model for pilot selection for commercial purposes licences. [Ref A, Recommendation 5, page 45]

PRIORITY THREE

- (PS 2) Industry representative bodies consider adopting common best practice models for selection and training, to the extent of providing joint venture or other collaborative arrangements to conduct these activities on behalf of a number of operators. [Ref A, Recommendation 18, page 46]

Training Standards

PRIORITY ONE

- (TRG 01) AIPA recommends that CASA review the knowledge, specified behavioural objectives and skills required for type rating and recurrent training programmes. This review should focus on the skill set necessary for a pilot of a modern complex aircraft to deal with sophisticated automation, degraded auto-flight modes and manual flight skills throughout the aircraft’s flight envelope. It should also define minimal levels of systems and aircraft knowledge such that systems confusion and automation dependency do not become a flight safety issue. [Ref B, page 12]
- (TRG 02) CASA should, given the negative aspects of operating highly automated aircraft, develop an appropriate training model that ensures that the interactions between autopilot, flight director and the flight management system are well understood, that the original equipment manufacturers provide adequate design and operating data and that appropriate procedures to update the knowledge base are in place. [Ref C, Recommendation 6, page 20]

- (TRG 03) CASA prepares a public Position Paper on the strategic management of aircraft endorsement training for all industry sectors, including:
- (a) simulation policy covering all industry sectors;
 - (b) the relevance and progress on Part 142 of the CASRs,
 - (c) the safety implications of self-funded training on Part 25 aircraft,
 - (d) the procedures for syllabus review and quality assurance of training, and
 - (e) the quality control of ATOs and CAR 217 Check pilots.
- [Ref A, Recommendation 9, page 45]
- (TRG 04) CASA extends the improvements identified in the MPL training design across the traditional pilot licences and reviews the adequacy of the theory training in light of modern aircraft and systems development. [Ref A, Recommendation 8, page 45]
- (TRG 05) [\[RPT PE 06\]](#) A wider range of certified courses of aviation specific training, including simulator instructor, HF/NTS Instructor and aviation course development training, should be identified and developed as part of an overall CASA risk mitigation strategy and supported by Government through HECS and other industry support incentives. [Ref C, Recommendation 30, page 22]
- (TRG 06) CASA prepares a public Position Paper on the strategic management of IOE/LT and recurrent T&C requirements that is appropriate to:
- (a) the experience levels,
 - (b) training source, and
 - (c) cultural background of pilots.
- [Ref A, Recommendation 10, page 45]

PRIORITY TWO

- (TRG 07) [\[RPT RM 06\]](#) CASA establishes an Industry Training Support Team with appropriate government funding support to identify and develop industry wide training material specific to identified high risk issues, similar to the FAA and OEM groups that dealt with Aircraft Upset and Takeoff Safety. [Ref A, Recommendation 15, page 46]
- (TRG 08) CASA continues with its excellent work improving standards of instructor training and instrument flying training and extends the work to include CAR 217 training and check pilots as soon as practicable. [Ref A, Recommendation 7, page 45]
- (TRG 09) [\[RPT RM 03\]](#) CASA should ensure that risk management modules are included for every licence level and as a prerequisite for the approval of AOC appointments and the granting of most, if not all, approvals, permissions and delegations. [Ref C, Recommendation 8, page 20]
- (TRG 10) [\[RPT RM 05\]](#) CASA should identify, develop and publish specific aviation risk management guidance material as a matter of urgency. [Ref C, Recommendation 9, page 20]
- (TRG 11) [\[RPT RM 04\]](#) To properly support Safety Managements Systems as the foundation of safe operations, CASA should provide a model of the expected level of risk management training. There needs to be clarity of the relevant target levels as, left without guidance, the industry will do nothing or as little as they believe will appease the local regulatory staff. [Ref C, Recommendation 7, page 20]
- (TRG 12) [\[RPT RM 07\]](#) CASA should broaden its approach to the formal examination of prospective managers and require operators to provide proper training schemes for managers, including continuing professional development. [Ref C, Recommendation 34, page 22]
- (TRG 13) [\[RPT RM 11\]](#) CASA should ensure that there is defined (aviation risk management) courseware to ensure a uniform response across the industry. The delivery level needs to be identified within the current vocational and tertiary sectors for each required course. [Ref C, Recommendation 11, page 20]

- (TRG 14) [RPT PE 09] The focus by CASA on competency based training should be broadened to include management and operational support staff. [Ref C, Recommendation 29, page 22]
- (TRG 15) [RPT PE 11] CASA should better define and more closely monitor “on the job” training and mentoring for all safety critical roles. [Ref C, Recommendation 31, page 22]

PRIORITY THREE

- (TRG 16) [RPT RM 12] CASA should require each operator to ensure that each and every employee has a relevant understanding of risk management. [Ref C, Recommendation 10, page 20]
- (TRG 17) [RPT RM 13] Government should ensure that CASA has the interdepartmental support to exert control over who delivers aviation training. This risk management training must be certifiable within the Australian education system. [Ref C, Recommendation 12, page 20]
- (TRG 18) CASA should review the level of testing of all applicants for Australian licences, ratings, approvals and permissions based on foreign qualifications. [Ref C, Recommendation 48, page 23]
- (TRG 19) CASA should ensure that all crew members on Australian aircraft meet the same standards of training, competency checks and English language proficiency. [Ref C, Recommendation 47, page 23]
- (TRG 20) CASA prepares a public Position Paper on the intended outcomes, including privacy protection and employment consequences, underpinning the recent CASA demand for the CAR 217 records of individual pilots. [Ref A, Recommendation 16, page 46]
- (TRG 21) [RPT RM 17] (By extension,) CASA should review the processes for oversight of foreign operators to ensure that they cater for differences in compliance standards assessed by ICAO for the various States of registry flying into Australia. [Ref C, Recommendation 50, page 23]

Regulation of Cabin Crew

PRIORITY ONE

- (CC 01) The Committee should refer the matter of cabin crew qualifications, training and competency checking to the Minister for Infrastructure and Transport to be included in his current inquiry into cabin crew numbers. [Ref C, Recommendation 54, page 23]
- (CC 02) The Committee should refer the matter of cabin crew fatigue management to the Minister for Infrastructure and Transport to be included in his current inquiry into cabin crew numbers. [Ref C, Recommendation 56, page 24]

PRIORITY TWO

- (CC 03) CASA should ensure that training and checking of cabin crew should be subject to similarly rigorous legislative controls as apply to flight crew. [Ref C, Recommendation 55, page 24]

PRIORITY THREE

- (CC 04) In its base modelling of acceptable operational structures, CASA should include consideration of the management linkages between Flight Operations and Cabin Crew management to ensure that AOC post holders who have responsibility for safety of flight have appropriate authority over flight standards matters. [Ref C, Recommendation 57, page 24]

Banning Provisions

PRIORITY ONE

- (BAN 01) The Australian Parliament adopts legislative changes that provide for court-imposed exclusion periods for any person found guilty of an offence under the Civil Aviation and related acts. [Ref A, Recommendation 21, page 47]
- (BAN 02) CASA should investigate options for greater penalties for management personnel found to be “not fit and proper” to hold safety-critical roles within organisations. [Ref C, Recommendation 33, page 22]

Rule Making

PRIORITY ONE

- (LAW 01) [RPT PE 01] CASA should require that the Captain and Co-Pilot of jet public transport aircraft should hold ATPLs and, until such time as the existing legislation is modified, that a minimum hours experience requirement be established for High Capacity RPT aircraft Captains and Co-Pilots. [Ref C, Recommendation 37, page 22]
- (LAW 02) [RPT PE 02] CASA should restrict the employment of low-experience pilots to non-jet aircraft with 50 or fewer seats as a general rule, with any proposed variation subject to substantial justification on an exceptional circumstances basis. [Ref C, Recommendation 36, page 22].
- (LAW 03) [RPT RM 01] CASA should develop and publish a specific policy on the risk mitigation strategies for the employment of low experience pilots to both address the increased risk and to provide a standardised approach for all operators (the costs for that risk mitigation through appropriate supervision and mentoring are the cost of operations and should not be a major determinant for that policy). [Ref C, Recommendation 35, page 22]
- (LAW 04) CASA must complete delivery of the revised regulations as a priority, as the implementation and transition phases will necessarily delay the required solutions to current problems. [Ref C, Recommendation 38, page 22]
- (LAW 05) CASA should develop and publish detailed guidance on performance standards for SMSs, including the quality of risk assessments, incident investigation, documentation and records, feedback mechanisms, safety promotion and emergency response planning. [Ref C, Recommendation 14, page 21]
- (LAW 06) [RPT RM 03] CASA should ensure that risk management modules are included for every licence level and as a prerequisite for the approval of AOC appointments and the granting of most, if not all, approvals, permissions and delegations. [Ref C, Recommendation 8, page 20]

PRIORITY TWO

- (LAW 07) CASA should develop and publish resourcing models for typical SMSs, including staff positions by type and number of personnel as well as qualifications, training and professional development targets. [Ref C, Recommendation 14, page 21]
- (LAW 08) [RPT RM 05] CASA should identify, develop and publish specific aviation risk management guidance material as a matter of urgency. [Ref C, Recommendation 9, page 20]

- (LAW 09) CASA should urgently introduce a condition on AOCs that requires operators to facilitate participation in independent anonymous surveys conducted by ATSB to truly get a measure of the management climate and safety culture of operators. [Ref C, Recommendation 14, page 21]
- (LAW 10) AIPA recommends that the Parliament adopt the Transport Safety Investigation Amendment (Incident Reports) Bill 2010. [Ref B, page 19]
- (LAW 11) AIPA recommends examination of an ASAP type program as part of the formal adoption of a regulatory “Just Culture” for aviation. [Ref B, page 20]

PRIORITY THREE

- (LAW 12) CASA should, when designing regulatory interventions, consider the consequences of each operator adopting a business model that satisfies each and every compliance requirement at the minimum permitted level. [Ref C, Recommendation 5, page 20]
- (LAW 13) CASA should ensure that operators publish the policy and procedures for “Just Culture”, train all levels of management and the staff and regularly review the implementation and performance of those policies and procedures. [Ref C, Recommendation 14, page 21]
- (LAW 14) [\[RPT RM 12\]](#) CASA should require each operator to ensure that each and every employee has a relevant understanding of risk management. [Ref C, Recommendation 10, page 20]
- (LAW 15) AIPA recommends that CASA, in consultation with industry, further review the rule making for flight standards to ensure its relevance and effectiveness. [Ref B, page 14]
- (LAW 16) Government should ensure that adequate safety-based feedback mechanisms exist within industry and between industry sectors and the regulator to ensure that interaction is holistic and productive rather than fragmented and divisive. [Ref C, Recommendation 45, page 23]

CASA (and ATSB) Staffing

PRIORITY ONE

- (REG 01) CASA prepares a public Position Paper on its ability to:
- (a) attract, train and retain quality technical personnel;
 - (b) develop and implement more contemporary and future-looking regulatory models to protect flight standards; and
 - (c) adequately protect the public interest through its supervisory mechanisms.
- [Ref A, Recommendation 13, page 46]
- (REG 02) AIPA recommends that the Government fund CASA to keep designated personnel current with technologies employed by the RPT sector. This may mean embedding CASA personnel for a period of time in industry or regular training of key CASA personnel. [Ref B, page 14]
- (REG 03) Government should consider an industry support scheme for ATSB (and CASA) along the lines of the Defence Reserve Leave Scheme that would provide an available pool of resources from which the agencies could draw in times of need for specialist knowledge and expertise. [Ref C, Recommendation 4, page 20]

PRIORITY TWO

- (REG 04) AIPA recommends that the Government review CASA salaries with a view to making them more attractive to suitably qualified applicants for key operational roles. [Ref B, page 14]
- (REG 05) AIPA recommends that CASA develops internal professional development programs, in consultation with industry and academia, to ensure that CASA staff are familiar with and employing current best practice in aviation training, technologies and systems development. [Ref B, page 14]
- (REG 06) CASA extends its internal staff training requirements for inspectors to develop model training and experience requirements for operators' technical managers. [Ref A, Recommendation 14, page 46]

PRIORITY THREE

- (REG 07) CASA needs to be adequately resourced to continue its much broadened focus on safety-critical positions and the training systems, particularly during the implementation of the new rules. [Ref C, Recommendation 41, page 23]

Incident/Accident Reporting

PRIORITY ONE

- (INC 01) AIPA recommends that existing provisions for mandatory reporting be strengthened with outcomes obligations to supplement existing prescriptions. [Ref B, page 18]
- (INC 02) AIPA recommends that SMS data be accorded appropriate legal protection along the lines of ATSB investigation material. [Ref B, page 19]
- (INC 03) [\[RPT LAW 10\]](#) AIPA recommends that the Parliament adopt the [Transport Safety Investigation Amendment \(Incident Reports\) Bill 2010](#). [Ref B, page 19]
- (INC 04) ATSB should review its approach to the investigation and publication of human factors with a view to achieving a more robust and useful learning tool for the industry.
- (INC 05) CASA, in concert with ATSB, should develop and publish guidance on model reporting to minimise understatement of the actual or potential significance of aviation events. [Ref C, Recommendation 25, page 21]
- (INC 06) CASA should ensure that operators demand the highest standards of incident reporting from their personnel and provide appropriate training as part of the safety promotion function of their SMS. [Ref C, Recommendation 26, page 21]
- (INC 07) AIPA recommends that SMS data sharing be explored with ATSB as the lead agency. [Ref B, page 20]

PRIORITY TWO

- (INC 08) [\[RPT LAW 09\]](#) CASA should urgently introduce a condition on AOCs that requires operators to facilitate participation in independent anonymous surveys conducted by ATSB to truly get a measure of the management climate and safety culture of operators. [Ref C, Recommendation 14, page 21]

- (INC 09) [\[RPT LAW 05\]](#) CASA should develop and publish detailed guidance on performance standards for SMSs, including the quality of risk assessments, incident investigation, documentation and records, feedback mechanisms, safety promotion and emergency response planning. [Ref C, Recommendation 19, page 21]
- (INC 10) [\[RPT LAW 07\]](#) CASA should develop and publish resourcing models for typical SMSs, including staff positions by type and number of personnel as well as qualifications, training and professional development targets. [Ref C, Recommendation 18, page 21]
- (INC 11) Operators should ensure that all managers are trained in the required elements for Procedural Fairness and there should be a primary and appeal procedure as well as an overall implementation and performance review process. [Ref C, Recommendation 21, page 21]
- (INC 12) AIPA recommends that CASA examine adopting a more formal approach to “Just Culture” internally and ensure that frontline staff are consistent in their responses to information made available to them by ATSB and operators. [Ref B, page 18]
- (INC 13) Operators should embrace employee representative participation in some critical SMS functions, in order to ensure that all stakeholders can have faith that the safety function is being conducted with appropriate autonomy and authority. [Ref C, Recommendation 15, page 21]
- (INC 14) The Office of the Privacy Commissioner (OPC) should investigate the application of the Privacy Act to aviation events and, if appropriate, should make a Public Interest Determination to enhance the safety outcomes of investigations. [Ref C, Recommendation 22, page 21]

PRIORITY THREE

- (INC 15) [\[RPT LAW 11\]](#) AIPA recommends examination of an ASAP type program as part of the formal adoption of a regulatory “Just Culture” for aviation. [Ref B, page 20]
- (INC 16) [\[RPT LAW 13\]](#) CASA should ensure that operators publish the policy and procedures for “Just Culture”, train all levels of management and the staff and regularly review the implementation and performance of those policies and procedures. [Ref C, Recommendation 20, page 21]
- (INC 17) ATSB should review existing processes for the categorisation of aviation events to ensure that miscategorisation is minimised and opportunities for system improvement are not lost. [Ref C, Recommendation 24, page 21]
- (INC 18) Whilst not strictly translatable in their current form, AIPA recommends that the US and UK models of legislative immunity are examined in order to extract the strongest elements of each system. [Ref B, page 16]

Government Incentives/Support

PRIORITY ONE

- (GOV 01) Government should ensure that cost implications are identified and subsequent decisions made on any supporting funding or subsidy arrangements that may be required to ensure that aviation risk management training underpins the future Australian aviation industry. [Ref C, Recommendation 13, page 20]
- (GOV 02) [\[RPT RM 15\]](#) The Australian Parliament reviews the safety consequences of transferring costs which are legitimate costs of business onto employees. [Ref A, Recommendation 22, page 47]

- (GOV 03) The Productivity Commission (PC) should investigate the efficacy of the various pathways to generate the pool of experienced pilots required by the Australian aviation industry as well as options for investment in development of GA feeder operations. That investigation should consider the need for suitable incentives to revitalise the diversity of people choosing aviation as a career path. [Ref C, Recommendation 16, page 21]
- (GOV 04) AIPA recommends that the Bureau of Infrastructure, Transport and Regional Economics (BITRE) be tasked with investigating the price sensitivity of flying as a career choice, pricing structures within the aviation training industry and the relative position of aviation training within Government financial and fee assistance/incentive programs. [Ref B, page 10]
- (GOV 05) Government should extend efforts in the vocational and higher education areas to provide better support and incentives for people undertaking flying training, in particular by extending HECS support to Air Transport Pilot Licence (ATPL), Flight Instructor and type rating training. [Ref C, Recommendation 44, page 23]
- (GOV 06) Government should review the taxation arrangements for aviation training under the anomalous "self-education" provisions so that unemployed pilots forced to pay for training are not doubly disadvantaged. [Ref C, Recommendation 39, page 22]

PRIORITY TWO

- (GOV 07) [\[RPT REG 03\]](#) Government should consider an industry support scheme for ATSB (and CASA) along the lines of the Defence Reserve Leave Scheme that would provide an available pool of resources from which the agencies could draw in times of need for specialist knowledge and expertise. [Ref C, Recommendation 4, page 20]
- (GOV 08) Government should consider establishing a Tripartite Safety Regulation Research body, involving CASA, ATSB and the Aviation Policy portfolio of the Department of Infrastructure and Transport (DIT), to conduct and participate in safety regulation research and innovation. [Ref C, Recommendation 32, page 22]
- (GOV 09) Government should make a clear policy statement on its position with regard to the offshoring of Australian jobs, in particular how it distinguishes between economic efficiency and exploitation of lesser developed societies. [Ref C, Recommendation 2, page 20]
- (GOV 10) Government should review its proposed policy on permitting cabotage (international carriers operating domestically) within the aviation industry, given the stark contrast with coastal shipping. [Ref C, Recommendation 1, page 20]
- (GOV 11) The Australian Government reviews their financial incentives and support mechanisms for aviation training to identify if the those mechanisms should be targeted at the employer or the employee. [Ref A, Recommendation 17, page 46]
- (GOV 12) AIPA recommends that the Government examine incentives to reinvigorate the pool of potential pilots and disincentives for those airlines that misallocate training resources to the detriment of the industry at large. [Ref B, page 8]
- (GOV 13) Government should ensure that no subsidies or other incentives flow to aviation organisations who force excessive levels of training costs onto employees or prospective employees. [Ref C, Recommendation 3, page 20]

PRIORITY THREE

- (GOV 14) Government should consider a levy on operators to partially fund incentives and support for the GA and low capacity public transport sectors and which could attract some level of rebate according to the initial training costs paid directly by the operator. [Ref C, Recommendation 40, page 22]

- (GOV 15) Government should embark on a series of mini-White Papers that provide more detailed policy guidance for each sector and there should be public exposure of current and planned activities that are being justified as driven by that policy statement. [Ref C, Recommendation 46, page 23]
- (GOV 16) The Jetstar Cadet Scheme should be examined by the Australian Taxation Office (ATO), the Department of Education, Employment and Workplace Relations (DEEWR) and the Department of Immigration and Citizenship (DIAC) to ensure that this and similar schemes do not avoid obligations to the Australian Government. [Ref C, Recommendation 17, page 21]
- (GOV 17) Government should consider, through DEEWR and DIAC, imposing a duty on Australian employers to ensure that all employees are protected to the standards that apply to Australian employees. [Ref C, Recommendation 49, page 23]
- (GOV 18) [\[RPT RM 13\]](#) Government should ensure that CASA has the interdepartmental support to exert control over who delivers aviation training. This risk management training must be certifiable within the Australian education system. [Ref C, Recommendation 12, page 20]
- (GOV 19) [\[RPT INC 22\]](#) Government should move to protect SMS data collected by operators but not necessarily reported to ATSB from misuse, perhaps broadly along the lines of the protection afforded to data in the possession of ATSB. [Ref C, Recommendation 27, page 22]
- (GOV 20) [\[RPT RM 14\]](#) Based on emerging trends, Government should conduct a policy risk assessment and review with industry and Departmental stakeholders, including DIT, DEEWR, ACCC, PC and DIAC and the Australian Skills Quality Authority (ASQA). [Ref C, Recommendation 42, page 23]
- (GOV 21) [\[RPT LAW 16\]](#) Government should ensure that adequate safety-based feedback mechanisms exist within industry and between industry sectors and the regulator to ensure that interaction is holistic and productive rather than fragmented and divisive. [Ref C, Recommendation 45, page 23]

Remuneration/Compensation

PRIORITY ONE

- (FIN 01) AIPA recommends that Airline operators no longer be permitted to charge employees for post graduate training programs to fly specific aircraft types. In AIPA's considered view, these forms of training should remain an Airline's cost of doing business. [Ref B, page 8]

PRIORITY TWO

- (FIN 02) Employers consider financial support supplements based on the cost of living at each of their bases. [Ref A, Recommendation 23, page 47]

- END OF SECTION 2 -

SECTION 3 - REDUNDANT OR SUPERSEDED RECOMMENDATIONS

In the process of providing AIPA's concerns, observations, conclusions and recommendations to the Committee, it is inevitable that some Recommendations have become redundant or have been superseded by expansion of the number of recommendations, recasting of the proposed solutions or being subsumed into a broader view. For completeness, those recommendations identified by AIPA as falling into this category are presented below to assist any reader who might care to audit the disposition of each and every recommendation AIPA has made to the Committee.

REDUNDANT OR SUPERSEDED RECOMMENDATION	
(PE 12)	AIPA recommends that minimum licence and experience requirements should be determined for each crewmember in both Low and High Capacity Regular Public Transport. [Ref B, page 6]
(TRG 22)	CASA develops a best practice model for automation training and usage in line operations, as well as a review process for extant automation training. [Ref A, Recommendation 11, page 46]
(REG 08)	(Alternatively,) AIPA recommends that the Government and CASA look at a method of secondment from industry of key operational personnel for a defined period of time. Properly handled this would ensure that personnel with currency and expertise are available to CASA. [Ref B, page 14]
(INC 19)	AIPA recommends that it is appropriate to provide legislative and employment immunity to pilots who report legitimate safety matters. [Ref B, page 16]
(INC 20)	The Australian Parliament reviews the aviation safety reporting mechanisms to identify ways to increase their effectiveness and reduce impediments to full and open reporting. [Ref A, Recommendation 19, page 46]
(INC 21)	The Australian Parliament adopts legislative changes that make it an offence to interfere with a report of an aviation safety event or a reporter. [Ref A, Recommendation 20, page 46]
(INC 22)	Government should move to protect SMS data collected by operators but not necessarily reported to ATSB from misuse, perhaps broadly along the lines of the protection afforded to data in the possession of ATSB. [Ref C, Recommendation 41, page 22]
(GOV 22)	The PC or the Bureau of Infrastructure, Transport and Regional Economics (BITRE) should investigate the likely trajectory of Australian domestic airline pilot employment to inform the debate and future planning for the training industry. [Ref C, Recommendation 43, page 23]

- END OF SECTION 3 -



Advancing the interests of our members and the profession

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