

**Submission to Senate Inquiry**  
**Pilot Training and Airline Safety**

Dear Sirs

I apologise for this late and rather short submission but I have only just become aware of the existence of the enquiry.

Although I have an interest in most elements of the enquiry, I wish to make comment on the first two areas, which are linked: specifically in relation to pilot experience requirements and the consequence of any reduction in flight hours requirements on flight safety and the recent FAA Extension Act of 2010 which has imposed the requirement for a minimum of 1500 hours before a pilot is able to operate on regular public transport services.

Within the airline pilot training industry there is widespread concern over the recent US legislation. The Act was introduced and rushed in to law largely as a reaction to a fatal accident involving a turboprop aircraft. Although I have not been directly involved in assessment of the causes of the accident, a number of colleagues who are senior managers within airlines which operate the same type of aircraft have been. The causes of the accident are varied and complex; the response of the US legislators in assuming that experience of the flight crew was the prime cause and required the introduction of mandatory minimum flight hours was flawed and, and remains so.

The factors which most directly effect flight safety are the quality and relevance of the training. Pilot training is a highly regulated and well understood process in most countries, not the least Australia. The following comments apply specifically to ‘ab-initio’ training – that is, the initial training of young pilots who commence with no experience and must undergo both ground theory and flight training to obtain a licence. The comments are also specific to Flight Training Organisations (FTOs) which train students for direct entry in to airlines as co-pilots.

Quality FTOs, which are often contracted directly by airlines, usually deliver a syllabus of flight training of around 200 hours of flight and synthetic (simulator) training leading to the issue of a Commercial Pilot Licence; typically the graduate will hold a multi-engine instrument rating and will have completed all Airline Pilot Transport Licence theory examinations. Generally they then undergo further training which emphasises multi-crew concepts prior to the Type Rating Training which qualifies them to act as a co-pilot on a specific aircraft type. By the end of this training they will have somewhere between 250 – 300 hours. The hours I have quoted here vary between the different national regulatory authorities but are indicative of many nations – particularly in Europe where there has been an attempt to unify the rules of aviation under what was the Joint Aviation Authority but which is now being replaced by the European Aviation Safety Agency.

The point I wish to make here is that young people who are trained as I have outlined above are extremely capable and competent flight crew. The reason they are capable and competent is that the training they have undergone is of a high quality and is relevant to the job they will do. They are more capable than someone who perhaps has

1500 flying hours but has not received proper instruction in the competencies required for airline flying. It is not unusual in my business to reject candidates who have many thousands of flying hours and yet employ others who have far less hours but the proper training – I cannot over-emphasise the fact that flying experience in terms of hours does not necessarily imply competence. Competence and therefore flight safety are directly related to the quality and relevance of the training, as I have already stated.

In support of what I am saying it is only necessary to look at the policies and procedures of many of the worlds best and safest airlines: one can start of course with Qantas which has had cadet programmes for many years but I can add many others such as British Airways (and its predecessors), Lufthansa, KLM and Singapore Airlines.

I should also add that pilot training is a relatively traditional business and changes do not happen quickly – nevertheless, some of the more recent introductions such as competency based training, Crew Resource Management/Threat and Error Management and the Multi-crew pilot license are, in my view, steps along the way to improved flight safety. On the other hand, some arbitrary minimum flight hours requirement, dreamed up by what I can only imagine are rather ill-informed US legislators, will contribute nothing to an improved flight safety record.

In conclusion, I should add that I have been involved in aviation all of my working life – more than 40 years. For the last 20 years I have been involved with the training of airline cadets for a wide variety of airlines in Australia, throughout Asia, South Africa, the Middle East and Europe. On the basis of that experience I strongly urge the committee to reject the notion of a mandatory minimum of flight hours and to focus on the improvement of the quality and relevance of training for all aviation activities but, in particular, regular public transport.

Yours faithfully

Peter Sadler