

**A SUBMISSION FROM THE CTC AVIATION GROUP PLC**

To

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**SENATE STANDING COMMITTEE ON RURAL AFFAIRS AND TRANSPORT**

PO Box 6100  
Parliament House  
Canberra ACT 2600  
Australia

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**Transport Safety Investigation Amendment (Incident Reports) Bill 2010 Inquiry**

This submission is presented by Captain C K Clarke, Chairman of the CTC Aviation Group plc

The CTC Aviation Group is one of the worlds largest providers of pilot training services to the airline industry. The company provides training to airlines across the globe – from Europe to the Middle East, Asia, the Far East, Australia and New Zealand. The company trains over 200 new (ab initio) pilots each year to achieve the issue of their commercial pilots licence and also provides type rating training for specific models of Airbus or Boeing aircraft for between 400 and 700 experienced airline pilots each year. The company also conducts selection and assessment services for its clients – undertaking some 5000 assessments each year.

This submission makes specific reference to the following inquiry topics:

- (a) pilot experience requirements and the consequence of any reduction in flight hour requirements on safety;
- (b) the United States of America's Federal Aviation Administration Extension Act of 2010 which requires a minimum of 1 500 flight hours before a pilot is able to operate on regular public transport services and whether a similar mandatory requirement should be applied in Australia;
- (c) current industry practices to recruit pilots, including pay-for-training schemes and the impact such schemes may have on safety;

## **Commercial pilot experience level requirements across the world**

Airlines have been placing young pilots straight out of flying school into the co-pilot's seat of large commercial aircraft for over 50 years. As an example, in the European theatre British Airways was amongst the first airlines in the world to introduce a cadet training programme and the vast majority of its current highly experienced captains today are the product of such a programme having entered the airline and started commercial operations on large aircraft with approximately 200 hours of initial flying training. With its reputation as being amongst the most prestigious airlines in the world, no better comment can be submitted than that provided here by the current Head of Head of Resourcing, Industrial Relations and Strategy for British Airways – British Airways being a client of CTC's for whom we have provided training services for many years.

*"British Airways' employment policy relating to the experience requirements of new pilots entering the airline takes a broad spectrum view of the resources available in the market and the cross-cockpit gradient of experience enjoyed by the airline at the time. However, throughout the past five decades, cadet pilots have indeed formed a significant percentage of our pilot intake, joining the airline with approximately 200 hours of previous flying experience.*

*With the benefit of a robust selection and assessment process, and a high quality of initial licence training conducted by carefully chosen industry providers, we bring the low experienced cadet into the airline operation through a series of structured training programmes comprising a Jet Orientation Course, Type Rating course and comprehensive line training with a highly experienced Training Captain.*

*Looking back over our experience of many years, we can identify no evidence that the employment of cadet pilots has had any adverse effect on safety within our organisation. On the contrary, the evidence would indicate our operational standards have been enhanced as a consequence of incorporating cadet pilots into our heavy jet operations. Our operational experience provides no evidence to support the concept of introducing an arbitrary 1500 hour requirement before a pilot can be a crew member of a large commercial aircraft. In fact, such an approach is in our opinion flawed precisely because it takes no account of the quality or relevance of the experience that the 1500 hours has delivered to the individual. In fact we might suspect that many pilots, exposed to the general aviation industry to conduct those additional flying hours, may well be exposed to experiences that have no relevance to an airline operation and indeed may, in some circumstances, constitute negative training in preparation for an airline career.*

*Our view is that with a well structured training programme, a carefully selected low hour pilot is an ideal candidate to adhere to the safety culture and performance requirements of today's modern airline pilot. With competency base training philosophies and the support of both regulatory and internal airline proficiency checks we have complete confidence in ongoing cadet pilot intakes satisfying a proportion of our future pilot requirements. "*

**Robin Glover**  
**Head of Resourcing, IR and Strategy**  
British Airways Flight Operations  
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Today nearly every major airline in Europe has a programme for the initial training of cadet pilots and airlines like KLM, Air France, Lufthansa all take the majority of their new entrant pilots directly from the flying schools – these pilots having a total experience of between 180 – 210 hours of flying training prior to undertaking the further training required during entry into the airline. Equally, across the globe, airlines in the Middle East, Asia and the Far East follow this example and staff large proportions of their new pilot requirements direct from the flying schools.

Within the LCC airlines (Low Costs Carriers) the practice of sourcing crew complement requirements from cadet entry pilots is also now widespread and successful. Since 1995, CTC has trained over 2000 pilots who have joined easyJet – one of Europe's most successful LCC's - and some 800 of those have been pilots who have just obtained their commercial pilots licence and have the minimum flight hour exposure prior to undertaking their airline training courses. As with British Airways, there is no evidence to suggest that this has in any way diminished the safety standards of the airline.

It is CTC's view that the current regulatory requirements within Australia stipulating the hours required to train a pilot to obtain his or her Commercial Pilot's licence accord with the generally accepted norms throughout the world and that CTC would not support a lowering of those basic training flight hours. However, the view from within an element of the Australian airline fraternity that a pilot must build his experience by gathering flight hours outside of the airline before he can sit in the co-pilots seat of a large commercial aircraft is now somewhat out of step with many other parts of the world. CTC robustly supports the concept that a newly licenced pilot, with appropriate and relevant training is fully qualified to undertake flying duties in a large commercial aircraft.

### **Pilot Experience and relevant training – what does this mean?**

Like many airlines, CTC believes that a view held that a commercial pilot should have say 1500 hours of experience before flying a commercial aircraft is an inappropriate solution to what some would view as solving the "experience" requirement debate.

Experience must be relevant to the task in hand – a Doctor completing 5 years of general practitioner services is not then qualified to become a heart surgeon! Equally, a pilot towing gliders, taking tourists on sightseeing trips, or flying a crop spraying aircraft in fine weather learns nothing from this experience that is relevant to high altitude, high speed complex aircraft in challenging weather conditions.

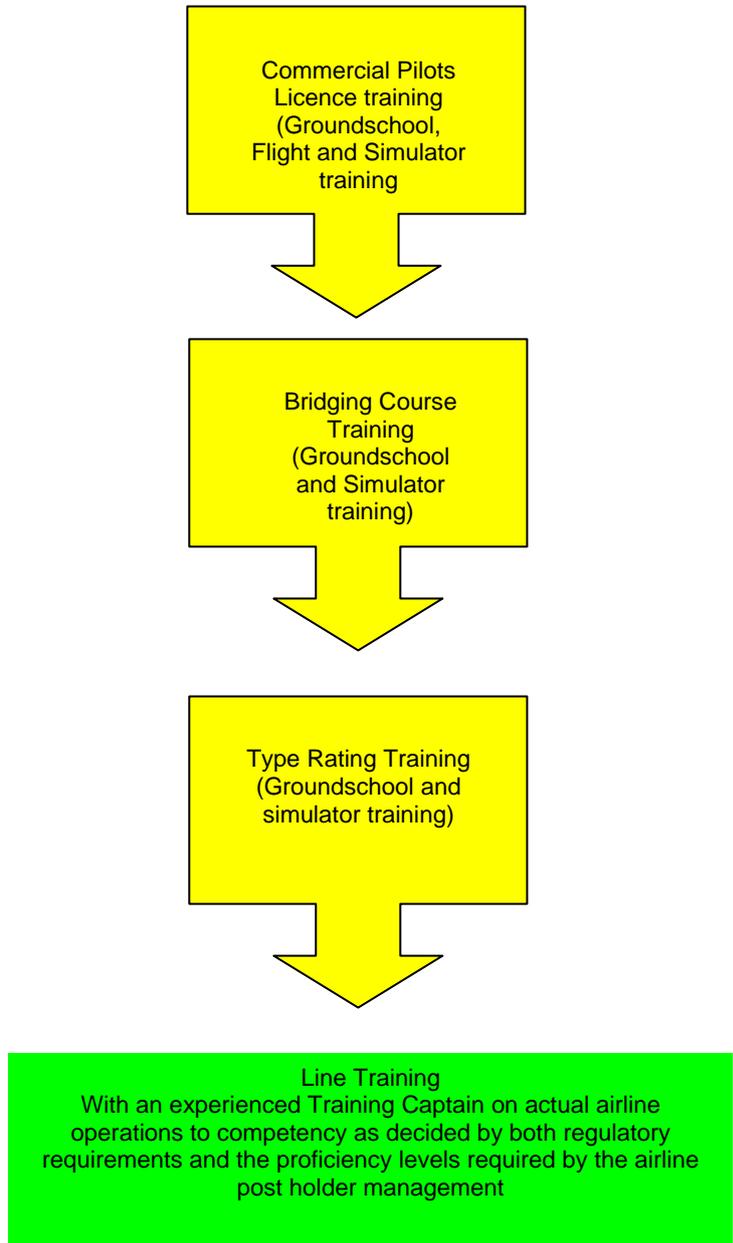
Some opinion states that a pilot should fly a smaller turboprop aircraft to gain experience – again this is flawed in that the modern turboprop aircraft of today is just as complex and usually more challenging to fly than today's modern jet airliner. This view, taken to its extreme, is that it is OK for a pilot to gain experience and risk being involved in an accident in a small turboprop with only 20 passengers on board; clearly this is a totally unacceptable view.

The key lies in providing relevant experience for the future airline pilot – this experience is provided through courses of training specifically designed to provide the pilot with appropriate tools – those technical and soft skills that are required to adequately prepare the pilot for commercial operations. Specifically, a "bridging course" (sometimes called a Jet Orientation Course, an Airline Qualification Course or a Multi Crew Cooperation course) lays the foundation for a pilot who has only just completed the commercial pilots licence training and is undertaken prior to commencing his "Type Rating" training (i.e. training on the specific aircraft type). During Bridging, Type Rating and the subsequent Line training the cadet pilot benefits from the instruction and transfer of experience from the airline qualified Training Captain.

It is with this relevant training that the cadet pilot gains best advantage for he or she is exposed to the most highly qualified and experienced Instructors and Training Captains in

the industry. This is a key point of note – the most experienced and competent instructors suited to training the airline pilot are those that have airline experience themselves. These instructors and Training Captains do not sit in the “General Aviation” arena and thus a pilot who is merely hours building to achieve a notional level of experience may not benefit from relevant experience **OR** instruction.

The appropriate flow of training therefore is as follows: -



**Is there any impact on safety as a result of current pilot employment methods and “pay for training” schemes?**

The airline industry has changed considerably over the past decade. Low cost carriers are the most rapidly growing part of the industry and their survival and future growth depends entirely on their ability to remain competitive and commercial.

To sustain growth the LCC's need to embrace both innovation and adaptability and within a fiercely competitive environment the cost efficiencies sought by the LCC often appear to be challenging and somewhat threatening to the more traditional view of the manner in which the industry should operate. The fundamental drivers of demand have remained strong despite some global financial difficulties and if the industry is to continue to develop its global reach and to expand its provision of services to satisfy the ever growing demands of the public for both leisure and cost effective business travel then an amendment to some more traditional views must be accepted.

Amongst these traditional views are that airlines should pay for all of the training of its pilots – this is no longer the view held by a majority of airlines. Pilot training is amongst the most expensive of all career training activities, costing upwards of AUD 200,000 to bring a graduating trainee into the co-pilots seat of a modern commercial aircraft. In many instances the airline now requires the incoming pilot to bear a significant proportion of these training costs. Whilst this is a burden on the individual pilot, and one which CTC is intimately aware of through its dealings with trainee pilots, we have no evidence that such financial requirements have any effect on the performance of the trainee; indeed one might argue that the desire to succeed and motivation in general is enhanced as a result of the investment that the individual has made in his training.

It is however important to realise that the “pay for your own training” concept is only immune from misuse if the regulatory processes of monitoring training standards are robustly maintained. The industry must guard against apparently cheap training courses offered by dubious organisations.

With regard to differing employment processes such as productivity related service contracts, CTC has significant experience in these new processes being utilised in the pilot supply chain. Again, provided that the regulatory authority and the airline management adhere to established rules and regulations there is no reason to be concerned that safety standards are, or might be diminished. Having provided over 1000 pilots to airlines on various contract terms, CTC has no evidence whatsoever of any threat to safety standards.

It must be remembered that the airlines themselves are highly motivated to maintain standards and to achieve the highest level of safety – it is doubtful that there is any executive or manager within the industry who is not acutely aware that an accident or a major incident could bring about the downfall of their organisation. Whilst this is not an argument for self regulation, it is certainly a pertinent factor in maintaining standards. A key point of importance therefore is that regulatory authorities should maintain their particular attention to the approval and oversight of the management personnel appointed to post holding positions within the industry.

Capt C K Clarke  
Chairman  
CTC Aviation Group plc