

To whom it may concern,

I am a Training Captain for a large Australian regional airline, where I have been employed for eight years. In that context, I have significant ongoing day-to-day experience of the security environment of Australia's airports, both regional and major. In my prior employment as a safety manager and line pilot for a small charter and low-capacity regional operator, I was required to have significant involvement in the setup of that operator's security policies, including contact with (at the time) DoTARS representatives regarding security regulations in force at that time. Both then and now, I consider our aviation security regulations, and the security operations they engender at our airports, tend towards the wasteful and pointlessly obstructive. Nevertheless, despite a great deal of waste, there is no evidence that any of our security measures are insufficient for the threats faced by aviation operations in Australia, nor that any kind of "strengthening" is appropriate.

To follow us through a typical day at work reveals procedural absurdities that – while we are accustomed to them – still indicate a system primarily composed of what security expert Bruce Schneier refers to as "security theatre": things that look like security, but aren't. Tomorrow, I will begin work at Burnie-Wynyard regional airport. This airport operates without security screening, so neither my crew nor my passengers will be screened for anything prior to boarding. It is still illegal for anyone to have a weapon on board, but the regulations acknowledge that the threat to a 34-seat turboprop airliner departing a small regional town is low enough not to warrant x-ray machines or metal detectors. I trust airport staff and my fellow crew to be suitably alert to anything suspicious or unusual behaviour in the airport environment, and I have every reason to believe they will exercise an appropriate level of vigilance. This is not to say that no-one will ever board one of my flights with (for example) a pocket knife in their bag – on the contrary, I expect it probably happens on a regular basis – but that person is carrying it in their bag for a completely innocent reason, and poses no threat to the flight. The absence of a metal detector and an x-ray simply means that the harmless passenger does not lose one of their possessions because of an oversight, ignorance or forgetfulness.

Once we are all on board, we will fly to Melbourne, where I will pick up another group of passengers – all of whom were, this time, security screened before boarding – and fly them through to Mildura. My crew and I will remain on the aircraft during that turnaround, and no security screening of the crew will take place. This is entirely sensible, as the operating crew are not a threat to the flight for the purposes of these regulations (although we are not exempt from screening requirements in general). We will then fly through to Mildura, where I may stay on the plane during our 45 minute turnaround (and if so, I will not need to be screened), but if I get off the plane and go into our office immediately inside the airport terminal building (for example, to prepare paperwork for the next flight), I will then be required to be screened prior to getting back on my own aircraft. This requirement comes about because another – somewhat larger – turboprop regional airliner will have departed from the same apron some time within half an hour of when we next depart. This completely ignores the fact that, as soon as I return to my seat at the front of my aircraft, I will be sitting

immediately in front of a sizeable axe (part of the flight deck emergency escape equipment) which I would certainly not be permitted to carry through security screening. All of my passengers will also be screened at that time, although at a different time of day (without the larger turboprop operation), my passengers out of Mildura would not be screened.

By contrast, if we were in Wagga Wagga instead of Mildura, I could do exactly the same thing, with *no* need to be screened prior to reboarding my aircraft (and indeed, none of my passengers would be screened there), despite the identical operation of a larger turboprop regional airliner, because there is a blue line painted down the middle of the apron between where I park my aircraft and where the larger turboprop airliner parks, designating the other aircraft as departing from a different apron.

A blue line.

It is vitally important to understand that these inconsistencies happen as a direct result of the aviation security regulations we have at present, and ill-considered attempts to “strengthen” them over the past decade or so, as if rewriting regulations automatically makes our aviation operations more secure. If anything, such absurdities distract from genuine improvements in security, because those employed to security tasks obsess over the things that are specific, measurable and therefore regulated, rather than being encouraged to exercise judgement and collect meaningful information which could be useful to intelligence operations or genuine security improvements.

It is my opinion that the best thing that could be done to improve real aviation security would be to reduce the existing regulations. Specifically, to seek out regulations which impose a pointless load on security systems (or on those employed to implement them), and repeal those sections of the regulations, so that attention, focus and judgement can be directed towards identifying genuine threats.

I suggest the following aviation security requirements be reviewed and, potentially, repealed:

- security screening of 50+ seat regional turboprop airliners not departing from a major airport
- the prohibition on passengers travelling in the flight deck jump seat (provided such passengers are explicitly approved by the operator and the pilot-in-command), such as air crew for another airline or a pilot passenger traveling in possession of their ASIC: if someone depends on being explicitly permitted in the flight deck to carry out their terrorist activity, that operation is doomed to fail regardless of this regulation
- the prohibition on passengers being permitted to view the flight deck in flight (provided they request and receive the explicit permission of the pilot-in-command) – 8 year old children (or 80 year old children-at-heart) in awe of the miracle of human flight are not our next big security threat
- the prohibition of small knives (such as Swiss Army pocket knives), screwdrivers, metal cutlery, and small scissors: all of these are considerably less threatening than makeshift weapons someone could

- make by breaking a laptop computer screen, or even by sharpening a credit card... and no-one is suggesting prohibiting the last two items
- the prohibition on liquids and gels on international flights (an egregious example of ignorance being enacted as regulation: a brief consultation with either a qualified chemist or a security specialist would highlight the pointlessness of this prohibition)

It is not that any of the above measures in and of themselves make our security weaker, but rather that collectively they serve as distractions from those security measures that are *not* security theatre: identifying suspicious people, items or behaviour – things that don't belong, rather than things which appear on a list. The longer the list is, and the more work people are doing to spot things on that list, the less anyone is likely to notice that one critical case of something that *just isn't right*.

Regarding the terms of reference of this inquiry, I urge the committee to assign very little weight to media reports of “apparent breaches” where there was no adverse outcome for aviation operations. The media exist to sell themselves, and this is generally done by sensationalising trivial events, to make the mundane seem dramatic, but this is a very poor basis on which to base regulatory changes. Furthermore, with the exception *removing* existing provisions of the regulations such as those suggested above, I urge the committee not to recommend any new measures unless they are convinced those measures will improve aviation security *outcomes*. I am almost certain that no such measure will be considered by the committee.