Submission to Parliament of Australia
Joint Committee of Public Accounts and Audit

Review of Aviation Security in Australia

Bankstown Airport Limited thanks the Federal Parliament's Public Account and Audit Committee for the opportunity to place its submission before the Committee.

1.   Context

For the Committees benefit, Bankstown Airport is a General Aviation Airport Procedures (GAAP) airport which is not captured within the strict terms of reference of the review. Based within the geographical confines of a metropolitan area it is not classified as a major airport as it does not support any form of Regular Public Transport (RPT) and the airport has limitations on the size of aircraft that can operate through it. Although Bankstown Airport has an operating environment aligned closer to a Regional Airport, because it is located in the metropolitan area it is not classified as a Regional Airport.

Our GAAP airport profile occurs at most capital cities in Australia and these airports facilitated over 1,070,000[1] movements in the 2004 calendar year with the majority of activity emanating from flying schools, charter operations, flying clubs and aero sports, with approximately 94% of activity involving aircraft weighing less 7,000 kilograms.

It is in this context that we believe the Committee should ensure their deliberations consider the unique situation of GAAP airports like Bankstown Airport and in particular the General Aviation (GA) Industry which operates from those airports. The Committee should note that the industry has over the last two years been in a state of accelerated decline[2].

Our submission will cover only areas of review which are applicable to General Aviation Airports, specifically:

- Current security arrangements
- Compliance
- Cost impost and the GA Industry
- ASIC's and Resource Implications
- Intelligence Sharing

2.   Current Security Environment

The Department Of Transport and Regional Services (DoTARS) has taken considerable steps over the past 18 months to improve and standardize security levels at airports throughout Australia. This has had a greater impact at airports which previously did not have a security regime in place.

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[1] http://www.airservicesaustralia.com/reports/
[2] Department of Transport and regional services, Bureau of Transport and Regional Economics, Report 111 General Aviation; An Industry Overview, April 2005

The catalyst for the change has been the *Aviation Transport Security Act 2004* and associated Regulations. It is our contention that the implementation of core elements of the legislation will not be completed until early 2006 and consequently at this stage the Act has had a limited impact on the General Aviation industry.

Our overall concerns with the current security environment are listed below including suggested practical measures to improve the current situation:

Concern	Support	Remedy
Perception at General Aviation industry level that the changes will not improve security.	• General Aviation industry in the main has not engaged with the legislation. • There is considerable apathy with this issue due to the lack of engagement and cynicism about additional regulation.	A targeted campaign to explain the purpose and reasoning for the changes.
Act & Regulations are designed and intended to cover 'major' airports and not commensurate with the risk at smaller airports.	• General Aviation stakeholders do not see a connection between proposed changes, current security environment and their operation.	As above and where practical apply measures which are more 'Regional' or 'General Aviation' based.
Great commitment but low levels of aviation experience in DoTARS.	• Large intake of staff has resulted in a shallow 'experience' pool in what is a specialized area.	Recruit from within the aviation and security industries. Formal on site industry training for new staff.
Lack of in situ 'face to face' briefings for industry participants.	• Not withstanding the Securing Our Regional Skies conference targeting airport operators, DoTARS has not yet briefed the pilots and operators at Bankstown Airport.	Program of briefings to industry and stakeholders. Accessibility to the Office of Transport Security staff Access via dedicated web sites.
Legislation delivery not practical.	• GA pilots frustration over Aviation Security Identification Card (ASIC) issuance and how CASA and DoTARS need for ID's can not be amalgamated • No template for ASIC program.	Publicize ASIC program and compliment with national briefing program for industry.
No formal protocols have been established for intelligence dissemination either through DoTARS or the NSW Police.	• No advice to date. • Secure technology not in place to support distribution.	Procure technology using Defence experience. Establish and promote protocols.

3.   Compliance

Bankstown Airport currently meets all the requirements of the Legislation. Based on its comprehensive and DoTARS approved risk assessment Bankstown Airport would be reluctant to increase security levels without strong intelligence to support that requirement.

In regards to the industry we have concern that some Aviation Industry Participants (AIP) may not be able to meet the current requirements of the legislation as their businesses are not structured to support the administrative and operational requirements of the legislation. As an example Bankstown Airport has received only two requests from potentially dozens of AIP's to have their business sit under the airport operators Transport Security Program (TSP) as opposed to create their own TSP. As the deadline for this requirement looms closer there is concern that AIP's will not comply with the regulated requirements.

It is suggested that DoTARS produce a simplified TSP template for AIP's and that it is promulgated throughout the industry as a matter of priority.

4.   Cost Imposts and the General Aviation Industry

The General Aviation industry is currently in decline and has very little or no margin for absorbing additional security costs. Analysis by the Bureau of Transport and Regional Economics indicate a 20% decline in business flying and rising costs in all areas of the industry[3].

Not withstanding the current Regional Airports Funding Program which has assisted airports with capital expenditure the industry is now focusing on the continuing operating costs which have stemmed from changes in operating parameters and the additional equipment and infrastructure. These costs will eventually be reflected in increased aeronautical charges to operators placing further pressure on operator.

We would seek a commitment from the government to continue and enlarge the subsidy for security to cover both capital and operating expenses on the same basis as present, that is, substantiate a need and apply for a grant.

The Committee should also note that the increased costs and complexity created by the changed security measures have created a trend in the industry towards ultra light sports aircraft[4] and a move of industry participants to unregulated airports in the Sydney region, such as Wedderburn, Warnervale and The Oaks. This in turn creates additional security and safety risks for the industry and reduced profitability for the GAAP airports.

5.   ASIC's and Resource Implications

The current Regulations quite appropriately do not require Bankstown Airport or other GAAP airports to issue or use ASIC's. If ASIC's are required for these airports there will be significant resource and cost implications for the GA industry.

Any costs associated with the implementation of ASIC's at Bankstown Airport will have to be passed on to the users of the Airport, effectively making it unaffordable for the majority of the current users. The physical structure of the Airport does not suit the creation of

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[3] Department of Transport and regional services, Bureau of Transport and Regional Economics, Report 111 General Aviation; An Industry Overview, April 2005
[4] ibid.

isolated ASIC areas and consequently current operations would have to be curtailed or considerable costs incurred to create appropriate secured zones.

If BAL becomes an issuing authority we will need to meet current Privacy Act requirements. There is a concern with information disseminated when a negative record check is received as part of the ASIC process. Bankstown Airport Limited is small organisation which will not be able manage the fiscal and resources cost of having to defend determinations either privately or via the legal system.

We urge that a central ASIC issuance authority be established with adequate funding and resources which can then professionally manage all privacy matters related to ASIC issuance.

6.   Enhancing Security Measures via Technology

There is a concern that at non major airports sharing of information through technology is not occurring. The local police may not appreciate the value their current role can add to the aviation security responsibilities of DoTARS and Airport Operators with regard to security matters. While the local Bankstown NSW Police Command has joined the Airport Security Committee, there is no formal protocol to allow the sharing of routine or risk targeted intelligence. Consequently the Police resources may not be aligned with airport operations. This has the potential to lead to resource issues including insufficient resources to meet incidents or inaccurate targeting of security activities.

Even if protocols for intelligence sharing were established, there is no secure technology in place at the GAAP airports to allow timely and protected access to the security information, and the senior Airport managers do not have appropriate security clearances.

We suggest that NSW Police be engaged in matters relating to aviation security, with additional Federal resources dedicated to intelligence work via proven technology.

Airport security teams need appropriate security clearances and protocols to allow them access to current national intelligence issues which might impact on the airports.

7.   Summary

Bankstown Airport Limited understands the governments desire to improve security across the national airport network.

The legislation attached to this objective has been structured to capture major airports due to their complexity and risk. This has not always aligned with the needs and risks of Regional and General Aviation airports. From our business perspective we believe this is the fundamental reason why the intent of the Act has lost focus and why it does not carry the credibility in the General Aviation that it should.

Any changes to the current legislation or Regulations should focus on developing specific risk based protocols appropriate to the GA, GAAP and Regional Airports, and be complimented with a comprehensive education program for the industry. This must target the individual operators, in situ at their GA and Regional Airports.

Government will also need to examine ongoing funding to meet the cost of both operating and capital security costs, as many smaller airports do not have the traffic (movements and

or passengers) to disperse the significant expenses attached to security. This might include targeted intelligence sharing protocols and technology.

We understand and support the governments' initiatives with transport security however we do not wish to see our business base diminish through mandated requirements which have little creditability and can not be affordably implemented.

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