

ALAEA

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Inquiry into developments in aviation security since its June 2004 *Report 400: Review of Aviation Security in Australia,*

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1. Preamble

The Australian Licenced Aircraft Engineers Association (ALAEA) represents approximately 4200 certifying Licensed Aircraft Maintenance Engineers throughout the Australian airline, Regional and General Aviation industries.

The ALAEA welcomes the opportunity to make this submission to the Joint Statutory Committee On Public Accounts And Audit.

The ALAEA welcomes the inquiry given the timeliness, appropriateness and relevance of conducting such a review with respect to current arrangements for security and policing at Australian airports. We believe it essential that security at all Australian airports requires significant improvement, including regional airports.

The Commonwealth Government needs to assume control of security at all Australian airports employing Australian Federal Police and where necessary the Australian Defence Forces, instead of private security companies, e.g., Chubb and Group 4.

The ALAEA would be pleased to appear before the Committee to answer any questions the Committee might have regarding this Submission and to provide further evidence and amplification if requested.

<u>Please note:</u> This Submission comprises a total of 22 pages.

About the ALAEA

• The ALAEA is an organisation founded in the early 1960s to advance the professional, technical and industrial interests of Aircraft Maintenance Engineers who are licensed by the Civil Aviation Safety Authority (CASA) to certify for maintenance work performed on aircraft within Australia. Licensed Aircraft Maintenance Engineers (LAMEs) are a vital and fundamental element in ensuring the on-going airworthiness of aircraft operating in Australian airspace. Currently the ALAEA has 4200 members employed in all sectors of the industry – in the major airlines as well as in regional operations and the general aviation sector.

The motto of the ALAEA is:

"To undertake, supervise and certify for the safety of all who fly".

2. <u>Executive Summary</u>

2.1 The Australian Licenced Aircraft Engineers Association, representing Licensed Aircraft Maintenance Engineers in the Australian airline and aviation industries, believes that Australia needs the highest possible safety and security standards in the aviation sector.

2.2 Due to Australia's vastness and its global location, distant from both its markets and visitors, the country is particularly reliant on safe, secure and well-serviced aviation and airline operations. A key factor in the industry being able to provide these operations is public confidence in the safety and security of flying within this country, as well as to and from international ports.

2.3 Security and policing, to be effective on a day-to-day basis, require awareness, vigilance and training of experienced airline employees as well as security personnel.

2.4 The national co-ordination of security should be given a high priority by the Federal Government and be placed in the hands of the Australian Federal Police (AFP). The AFP should examine, as a matter of urgency, ways in which the skills, knowledge and experience of professional aviation safety personnel – such as Licensed Aircraft Maintenance Engineers (LAMEs) – can be harnessed and used to more effectively counter any possible security threats to Australian airport infrastructure, aviation and airline equipment (including aircraft) and the travelling public.

2.5 As the key safety professionals in the industry, strong consideration should be given to ensuring that LAMEs can continue in their current role of ensuring the safety and airworthiness of aircraft flying in Australian skies. The presence of LAMEs on the tarmac as aircraft arrive at and depart from airports around the country should be enhanced. Airlines and other aviation operators must be required to retain LAMEs in their present safety-related functions rather than diminish this vital safety role merely for commercial cost-cutting reasons.

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2.6 The ALAEA has included eight Recommendations in this Submission (see section 4) and it believes the adoption and implementation of these Recommendations will assist in improving and enhancing the ability of the Australian Government and relevant policing and airport/aviation authorities and operators to counter and defeat efforts of ill-intentioned groups, including terrorists, to breach security and cause damage, injury and potentially catastrophic events in this vital transport sector.

3. <u>Submission</u>

3.1 Aviation Security Identification Card (ASIC)

All personnel requiring access to airside at all airports must be eligible to hold an Aviation Security Identification Card (ASIC), which allows access to restricted airside areas where maintenance and aircraft movements occur. The legislated requirements are contained within the Aviation Transport Security Act 2004 Part 3 Division 3 Item 35:

"(35 Requirements for airside areas)

- The regulations may, for the purposes of safeguarding against unlawful interference with aviation, prescribe requirements in relation to the airside area of a security controlled airport.
- 2. The following matters may be dealt with by regulations made under subsection (1):
 - 1. access to the airside area (including conditions of entry, the issue and use of security passes and other identification systems);
 - 2. *the patrolling of the airside area;*
 - *3. the provision of lighting, fencing and storage facilities;*
 - 4. *the identification or marking of the airside area;*
 - 5. the approval of building works within, or adjacent to, the airside area;
 - 6. the screening of people, vehicles or goods for entry to the airside area;
 - 7. the security checking (including background checking) of persons who have access to the airside area;
 - 8. the movement, management or operation of aircraft, vehicles and other machinery in the airside area;
 - 9. *the maintenance of the integrity of the airside area;*

- 10. access to aircraft (including unattended aircraft) from the airside area;
- 11. the management of people and goods (including the management of unaccompanied, unidentified or suspicious goods) in the airside area;
- 12. *the management (including the sale or disposal) of vehicles or goods abandoned in the airside area.*

There are guidelines available for obtaining an ASIC within the Department of Transport and Regional Services Aviation Security Facts Sheet on the website (DOTARS)

The ALAEA's position is that the requirements of the Aviation Transport Security Act and the Aviation Transport Security Regulations, fulfil a basic requirement for Australian Airport Security with the issuance of the ASIC for all airside employees, the screening of passengers and their luggage, and the screening of cargo. The ALAEA supports these measures.

We would, however, like to suggest certain positive enhancements in all these areas, which would significantly improve security at all Australian airports. These enhancements include:

- 1. The Federal Government assuming security control at all Australian airports including regional airports.
- 2. Mandatory optic scanning information to be an integral part of the ASIC for all employees who require airside access, similar to the requirements for Qantas flight crew passports (currently being trialled).
- 3. Employing Australian Federal Police (AFP) and/or Australian Defence Forces (ADF) personnel at all major and regional airports to enforce security.

3.1.1 ASIC Screening – AMEs and LAMEs

3.1.1.1 Australian AMEs/LAMES - The vast majority of AMEs and LAMEs working in Australia have been locally trained through the airline, private sector or defence forces apprenticeship trade system. In most cases, a typical LAME would have served an initial four-year apprenticeship and by the time

they attain a CASA-issued Licence would have, in most instances, served a further 4 to 6 years as a tradesperson; in all some 8 to 10 years in the aviation industry. A considerable amount of employees' and employers' resources – both time and money - is expended in gaining and maintaining these essential skills and qualifications. It is thus a significant investment and asset for the employer and employee. In general, most, if not all, would be Australian citizens (or have long-term resident status).

From time to time and based on a small percentage probability for this highly skilled workforce demographic an individual (as above) may be found to have committed an offence that may not pass an ASIC security screening assessment, when viewed on face value and not taking into account the particular circumstances of the case or work record of previous years of good service within the industry. Indeed the ALAEA is aware of examples where offences and convictions from the past are considered relevant – in some cases up to 15-20 years previously. The individual concerned on past security screening still holds an ASIC and has exemplary employment and community history but on current proposals in regard to tightening of ASIC screening would potentially suffer a grave injustice should his ASIC be revoked on the basis of having a "criminal" record.

- There should be a process of natural justice whereby an Australian citizen who is working as an AME or as a LAME can have recourse to an appeal tribunal or court of competent jurisdiction to have their particular circumstances taken into account. Such a process should be both expeditious and not impose an onerous cost burden on the individual.
- **3.1.1.2 Overseas Trained AME/LAMEs** In Australia there are a significant number of AMEs and LAMEs whose country of origin or citizenship is not Australian. Some may have been trained in Australia and some trained overseas. From time to time, depending on market demand in the global industry, they may work overseas or in Australia.
 - The mobility of this sector of the workforce presents additional problems associated with an appropriate security check for ASIC approval.

3.1.1.3 Airport Screening – Recently, upgraded screening of airport workers, particularly employees who require airside access, was introduced and companies were charged with enforcement of this initiative. Ever mindful of cost issues employers have introduced a degree of increased screening of randomly selected employees at airside entry points in some localities, while employees at other localities are screened through the same process as the travelling public. This procedure is not appropriate or practical, as, for example, in the case of engineers who take their toolboxes with them when they leave or arrive at work.

• Dedicated engineering screening points and checks should be provided.

3.2 Aircraft Security & Inspection

3.2.1 Current Measures

Whilst the focus has been on security checks and screening for employees and terminals no additional measures (with the exception of cockpit door modifications and inflight security officers) have been introduced to address the risk to passengers on an aircraft or to ensure that aircraft are not rendered unsafe by maliciously intentioned individuals or groups. The specific measure already introduced are, in essence, passive or defensive measures designed to reduce the harmful effects of an incident when it occurs and while these measures may contribute to the safety of pilots and passengers they do not in themselves assist in ensuring the safety of the aircraft and passengers from risk of malicious attack or activity. Preventative measures are also required.

It is a generally accepted risk management principle that "prevention is better than the cure". In general, prevention for damage or destruction, injury or sickness is founded on effective inspection of the machinery (aircraft), equipment, environment and the individuals concerned.

These preventive measures include:

In relation to airport and passenger security:

Inspection of individuals at various check-points e.g. passenger check in, X-ray at gates, Customs, bag checks. Inspection of the airport and perimeter through police and security officer patrols.

In relation to aircraft:

Inspection of aircraft (machinery) and equipment through checks by competent maintenance personnel e.g. Licensed Aircraft Maintenance Engineers. In addition, the aircraft's pilot performs a "walk around" visual inspection, however pilots are not trained in the details of the construction, maintenance repair or maintenance inspection of aircraft.

• It is paramount that the aircraft is safe to fly and secure from threat. The procedure that is currently in place at Australia's major domestic and international airline provides for a comprehensive pre-flight safety check to be conducted by a suitably qualified engineer before each flight. (Further detail on this procedure is set out below in <u>3.2.2</u> - <u>Aircraft Safety Inspections</u>.)

3.2.2 Aircraft Safety Inspections

Currently for all overseas aircraft arriving and departing in Australian ports it is mandatory under the Civil Aviation Act Regulations (CARS) for a Licensed Aircraft Maintenance Engineer to perform an inspection and certify that the aircraft is in a safe condition to fly. These checks are conducted within the normal aircraft turnaround time. However, this requirement does not apply to all domestic aircraft operations (i.e., aircraft flying within Australia). At some minor and regional ports, where aircraft arrive from and depart to major airports, no such inspections are performed. The aviation regulations, as currently formulated, permit this to occur.

There is a risk to the safety of airports, aircraft and the public in allowing uninspected, potentially unsafe and unsecured aircraft to fly into major airports.

As well as the lack of pre-flight inspections giving rise to safety concerns with respect to aircraft serviceability and airworthiness, serious questions also arise in relation to risks to security as LAMEs are the 'front line' for aircraft safety inspection and possess comprehensive and detailed knowledge of aircraft structural and flight essential equipment. They constitute a prime asset in the detection of the out-of-place or threatening and will be able to quickly identify any suspicious, potentially harmful items, substances or activities on or in the vicinity of an aircraft. Most LAMEs have well over 10 years engineering experience and are statutorily qualified and authorised under the aviation regulations to inspect, maintain, repair and certify the aircraft structure and the various systems and components. They are trained and experienced to identify if there is anything untoward or amiss or if there are foreign devices or equipment present.

The nature of the training required and the competency assessment set by statute to obtain a CASA-issued licence ensure LAMEs are highly trained specialists who know the precise detail of componentry and equipment on the aircraft. LAMEs work on dismantling and disassembly of aircraft down to its most basic structure. LAMEs are therefore, by training and experience, more practised and astute in knowing whether something is out of place, not working properly due to the presence of a foreign object and, importantly, the locations on an aircraft where something might be put to avoid detection. The LAME is the last competent person available to inspect an aircraft with respect to its compartments and what is inside those compartments. It has been stated that LAME pre-flight inspection is the last line of defence in the preparation of an aircraft for flight.

Currently LAMEs perform pre-flight safety inspections on most aircraft that fly domestically and internationally. This system has worked well for the airworthiness and safety of the general public in Australia for the major airlines. However the smaller operators and private operators do not have such a regime and their safety incidence statistics reflect this fact in that most of Australia's fatalities related to aircraft have occurred in that sector of the industry. With regard to the larger airlines, i.e., Qantas, Virgin Blue and Jetstar, a typical transit check and safety inspection carried out by a LAME on a Boeing 737 or an A320 arriving at a domestic airport is:

• The LAME would set up the bay 10 minutes prior to the aircraft arrival. He/she takes appropriate equipment required with him/her and checks the arrival/departure bay area for foreign objects that could cause damage to the aircraft.

• The LAME assumes control of the direction of the aircraft and nose in guidance system while aircraft taxis to its stopping point

• From this point on the LAME 'owns' the transit. He/she communicates with the flight crew to receive a verbal report on the flight status of the aircraft.

• The technical log, defect reporting log detailing in-flight problems is retrieved, viewed and assessed for further action if required.

• At a time determined by the receiving LAME clearance for all sundry staff i.e. baggage handlers, catering staff, cleaners etc, is given to approach the aircraft and begin their duties.

• The receiving LAME carries out a visual detailed inspection of the exterior of the aircraft including landing gear compartments looking for possible in-flight damage, hydraulic and engine oil leaks, tyre damage and any abnormal situations with the aircraft.

• On arrival of the fuel truck, the LAME confirms the fuel uplift required and confirms the total quantity on board at completion of refuelling.

• At the conclusion of the transit, the LAME carries out a final safety inspection whereby landing gear compartments are rechecked. All doors are checked closed, all open areas are checked clear of foreign objects, all panels that were required to be opened during the transit are checked closed and ensure appropriate paperwork is on board. A thorough detailed inspection of all external surfaces and componentry is carried out to ensure no damage has been sustained during the loading activities and other activities during the transit.

• The LAME then certifies in the Tech Log carried on board that the aircraft may be returned to service.

• The LAME then ensures safe dispatch of the aircraft by giving clearance to start engines and directly overseeing push-back of the aircraft to its taxi start point. During this phase the LAME remains in direct headset contact with the aircraft's technical crew.

Such a transit check is mandatory for each flight of the Prime Minister's Government aircraft the Boeing BBJ. This aircraft also has as additional safety and security a LAME who travels on board the aircraft.

The same process is not in place at all airports as companies continue to seek to cut costs with a view to eliminating pre-flight safety inspection by LAMEs on aircraft prior to each flight. There is also significant lobbying of the Regulator by the general aviation sector operators to lower safety inspection standards to cut costs rather than improve the safety of a sector of the industry which has the worst safety record of aircraft industry sectors in Australia.

Some of the potential risks that may be present during a transit are:

- The refueller may be a part-time employee and unknown to the LAME has he/she fulfilled his/her obligation of providing the correct type of fuel and the correct quantity?
- Has the aircraft been tampered with by anyone during the transit process?
- Are there any foreign devices or equipment present?
- Has any ancillary worker caused any damage to the aircraft and not reported it?
- Have all workers in the vicinity of the aircraft been vigilant in noticing strangers?

3.2.3 Potential Threats to Aircraft Safety and Security

A recent example of an airport intruder being spotted and later apprehended was reported on ABC News on Saturday, July 16, 2005 where, "About 8:30pm AEST on Thursday, a man wearing a black backpack and beanie managed to penetrate the airport's perimeter fence without detection. He walked approximately 300 metres on to the tarmac and passed several planes, before reaching Gate 20, which is virtually in the middle of the airport, when a Qantas baggage handler spotted him. While his backpack contained no suspicious items, unions say the incident highlights just how easy it is to get close to a plane without detection at Sydney Airport".

Should the intruder not have been seen, and should the intruder have placed a device on an aircraft with the current pre-flight safety inspection arrangements in place it is more than likely that a LAME in performing a pre-flight safety inspection would have detected such a device.

It is axiomatic in the airline and aviation sectors that any diminution of the safety inspection regime for aircraft will increase the risk to the travelling public.

Some airlines, small domestic carriers and private aircraft operators are lobbying CASA to support watering down the Civil Aviation Act's Regulations to eliminate safety inspections on aircraft before flight. Since the advent of Low Cost Carriers (LCCs) many airline companies around the world including airlines within Australian are examining ways to remove safety inspections by competent Licensed Aircraft Maintenance Engineers (LAMEs) from aircraft about to fly. This is being pursued simply as a cost cutting exercise.

The ALAEA believes that any diminishing of regulatory standards that would enable airlines to escape a comprehensive aircraft pre-flight safety inspection by statutorily authorised and licensed aircraft maintenance engineers will significantly downgrade safety and security at a time when the identified threats around us require an ever-increasing vigilance and human intervention and inspection to prevent avoidable catastrophes from occurring. The requirement for such inspections should be strengthened and extended to every domestic aircraft that flies either into or out of a major airport.

Airlines around the world, Qantas, Virgin Blue and Jetstar are no exception, are contracting out more and more services. The 'fly–by-night' contract companies appear under the umbrella of "ground handling services", which includes services such as baggage handling and "meet, greet and depart" services. These organisations employ casual contract labour. Contract casual labour staff is frequently employed by more than one employer because of low hours of work and low wages. Due to the nature of contracting job security

does not become a positive motivator for loyalty to the company nor an understanding of or respect for the culture of safety vital to the airline industry. These employees may become vulnerable and may be subjected to outside influence. Security checks for such organisations should be ongoing and are imperative.

3.3 Regional and General Aviation Airports

There is a significant number of aircraft departing from both Regional and General Aviation airports around Australia on a daily basis which transit major airports at some point in time. These movements are increasing in numbers almost daily.

The Enhanced Aviation Security Package announced by the Department of Transport and Regional Services (DOTARS) outlines the requirements for airport owners and operators to develop a system of security relevant to the category of airport they operate. Security at airports has no boundary and therefore should be uniform across Australia and any feeder airport where an aircraft's journey originates should not be excluded. Once an aircraft has entered an airport's airspace, the aircraft and its occupants have access to security-controlled areas. Therefore, if an aircraft began its journey at an airfield without appropriate security arrangements in place, the security of the arrival port has been violated. The extensive and detailed security measures in place have been violated

Security at most, if not all, regional airports requires significant improvement. Current security measures would not prevent a malicious party entering a regional airport and depositing packages in an aircraft (particularly a person with a some aircraft knowledge) thus creating catastrophic consequences. All aircraft are manufactured with non-lockable inspection panels at various points on the external skin of the aircraft, many with access to areas where packages large and small could be very easily deposited and concealed. Not only is there serious concern with respect to concealed packages, but serious concerns exist with respect to passengers boarding aircraft at regional airports who do so without undergoing adequate screening. These passengers alight at major airports and, although, in most cases, are escorted into the terminal, the possibility exists for unknown persons of malicious intent to cause damage to aircraft or to harm other passengers and/or employees.

3.4 Security at Major Airports

Security at major Australian airports remains open to infiltration due to the expanse of land and the limited numbers of security staff available to patrol perimeters.

In addition to the security breach at Sydney airport as detailed in 3.2 above, recent events at Adelaide airport saw four persons enter the airport perimeter in the vicinity of the new terminal and remained unapprehended for several hours. These two events are not isolated. There have been other incursions into security-sensitive areas at various airports around Australia. Fences, however constructed, serve only to keep honest people out.

A document prepared by the Transport Security Administration of the USA Department of Homeland Security, titled "Security Guidelines for General Aviation Airports", dated May 2004, states:

"3.3.3. Perimeter Control

To delineate and adequately protect security areas from unauthorised access it is important to consider boundary measures such as fencing, walls, or other physical barriers, electronic boundaries (e.g. sensor lines, alarms), and/or natural barriers. Physical barriers can be used to deter and delay the access of unauthorised persons on to sensitive areas of airports. Such structures are usually permanent and are designed to be a visual and psychological deterrent as well as a physical barrier. They also serve to meet safety requirements in many cases.

The choice of an appropriate security boundary design is not only affected by the cost of equipment, installation, and maintenance, but also by effectiveness and functionality, that is, its ability to prevent unauthorised access. Fencing will not discourage a determined intruder. However, it can serve to alert airport management to the presence of unauthorised individuals.

The physical security barrier provided by a fence provides the following functions:

- Gives notice of the legal boundary of the outermost limits of a facility or security sensitive area.
- Assists in controlling and screening authorised entries into a secured area by deterring entry elsewhere along the boundary.
- Supports surveillance, detection, assessment, and other security functions by providing a zone for installing intrusion detection equipment and closed-circuit television (CCTV).
- Deters casual intruders from penetrating a secured area by presenting a barrier that requires an overt action to enter.
- Demonstrates the intent of an intruder by their overt action of gaining entry.
- *Causes a delay to obtain access to a facility, thereby increasing the possibility of detection.*
- Creates a psychological deterrent.
- Optimises the use of security personnel while enhancing the capabilities for detection and apprehension of unauthorised individuals.
- *Demonstrates a corporate concern for facility security.*
- *Provides a cost effective method of protecting facilities.*

3.5 National Interest – Security and Cheap Labour

The ALAEA prepared a Submission to the Joint Standing Committee On Migration titled "Inquiry Into Skills Recognition, Upgrading and Licensing" dated June 2005. Part of the submission stated: "Aviation security remains one of the most important standards Australia can maintain. Our safety record is testament to the excellent system of regulation we have enjoyed in this country. With strict adherence to the provisions in the Civil Aviation Act (CAA), International Aviation Security Policy through the International Civil Aviation Organization (ICAO) Aviation Security Panel and Industry participant awareness, we can maintain the standards expected by the travelling public of Australia."

The Submission further stated: "Licensed Aircraft Engineers undergo the most stringent security checks and this is for good reason. The need for LAMEs to have ready access to aircraft enables them unsupervised, unlimited exposure which, if abused, could be a serious national safety and security risk. The same must also be said of family members. There are no such security checks carried out on unlicensed aircraft maintenance workers who are employed at Maintenance Repair Organisations (MROs), including contractors around the world. It is only the licensed engineer who is heavily scrutinised."

LAME presence on the tarmac is an essential and vital asset at all times.

3.6 Conclusion

While significant steps have been taken in relation to increased safety and security at Australian airports over recent times, more needs to done. We have witnessed terrorist activities recently at various locations in London where security cameras, surveillance equipment, high police visibility, as well as considerable public presence, have caused catastrophic damage and considerable loss of human life. Terrorists can and will infiltrate in order to cause harm in any way possible.

Appropriate levels of Government, industry and employee organisations and employees need to work together in a coherent and cohesive way to minimise the risk. Allowing the airline industry to contemplate and, untimately, effect the removal of LAMEs from the front line, particularly at this time of heightened security risk, is an action contrary to the national interest as it reduces an important set of final checks and balances prior to an aircraft departing from an airport.

A simple, easy-to-use, published procedure needs to be developed and published complete with training for all LAMEs and tarmac employees who may be in a position to discover any form of suspect device and/or illegal or malicious tampering with aircraft.

Enhanced ASIC-style security checks of all airline employees, particularly unlicensed maintenance workers at various MRO and contract establishments both within Australia and overseas, need to be initiated.

4. <u>Recommendations</u>

- **4.1** The ALAEA believes the Federal Government should assume total security control at all Australian airports, including Regional airports.
- **4.2** Mandatory optic scanning information to be an integral part of the ASIC for all employees who require airside access, similar to the requirements for Qantas flight crew passports.
- **4.3** Increase the role of the Australian Federal Police and Australian Defence Force personnel at all airports, including Regional airports.
- **4.4** The role of the Civil Aviation Safety Authority (CASA) in the scrutiny and security checks of all airline and aviation personnel, not just LAMEs, working in the industry, be enhanced.
- **4.5** The ALAEA strongly recommends that Australian safety and regulatory standards be maintained at a suitably high standard to ensure the safety of the Australian public. Any lowering of any standards in Australia, based on cost considerations, would be prejudicial to the national interests and well-being of the Australian travelling public.
- **4.6** A simple, easy-to-use, published procedure and appropriate training package needs to be developed for all LAMEs and tarmac employees who may discover suspect devices within the bounds of an airport and/or illegal or malicious tampering with aircraft

- **4.7** LAMEs, being the last line of safety defence, must be retained on tarmac areas to perform pre-flight checks on all turnarounds of regular public transport aircraft at manned airports. There should be a requirement to retain LAMEs at those airports where they are currently stationed and measures introduced to increase LAME safety presence at Regional airports.
- **4.8** LAMEs, particularly LAMEs who actively and regularly perform work on the tarmac, should receive basic training in initial counter-terrorism response, together with security aspects as provided to security staff who screen passengers.

5. <u>References</u>

- <u>"Aviation Transport Security Act 2004 Part 3 Division 3 Item 35"</u>.
- <u>"Security Guidelines for General Aviation Airports" produced by the</u> <u>Transport Security Administration department of the USA Department of</u> <u>Homeland Security published May 2004.</u>
- <u>"Inquiry Into Skills Recognition, Upgrading and Licensing" produced by the ALAEA as a Submission to The Joint Standing Committee On Migration dated June 2005.</u>

6. <u>Authorship</u>

The ALAEA has formed a sub-committee to examine this issue and prepare a Submission to the Joint Statutory Committee On Public Accounts And Audit.

The sub-committee members are:

Mr Kevin Dadge Mr Frank Coghlan Mr Gary Norris Mr Chris Ryan

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