

## **Question on notice no. 81**

**Portfolio question number: SQ23-004863**

### **2023-24 Supplementary Budget estimates**

#### **Rural and Regional Affairs and Transport Committee, Infrastructure, Transport, Regional Development, Communications and the Arts Portfolio**

**Senator David Fawcett:** asked the Civil Aviation Safety Authority on 31 October 2023—

A senior aviation medical officer from CASA has indicated in written communication to CVD stakeholders (30 Aug 23) that:

1. "Passing Farnsworth and or CAD test is considered equivalent to a pass for PAPI practical test, noting only those pilots with severe CVD are offered ACVA because they cannot pass the desk-based test we are accepting as proxy for PAPI - especially the CAD".

a. In practice, this reliance on a desk-based assessment has occurred over some years regardless of a candidates flight experience (ie: many have no flight time when they do their medical) . What evidence is CASA relying on to apply restrictions on a pilot who passes on operational test (regardless of flight experience) where they have demonstrated that they can correctly interpret the visual cues provided by a real PAPI in a real operational environment?

b. How many CAD testing locations are available in Australia?

c. Is it the intent of CASA to change the 2020 provisions and require a candidate to undertake the CAD before having the option for an operational test?

2. "It is my view that in these mild to moderate groups there are potential safety concerns, borne out in the literature and accident records, but CASA will not be addressing this in the immediate future."

a. Does CASA support the imposition of restrictions on Australian citizens based on the "view" of a CASA employee?

b. Does CASA support the contention that accident records prove that mild to moderate CVD pilots who have passed an operational flight test are a potential flight-safety risk?

c. Which accident records provide an evidential basis that there is a causal relationship between CVD pilots and decreased aviation safety?

d. What operational evidence did CASA rely on to decide it would no longer support the position reached under Mr Carmody that "CASA has carefully examined all relevant safety issues and believes this new approach offers a practical alternative assessment for colour vision deficient pilots. We have listened to the views of pilots and made judgements based on research and evidence."

e. Does CASA intend to take future measures in respect of mild to moderate CVD pilots?

3. "Passing ACVA with severe CVD is one risk mitigation and the benefit is to allow progression to night flying and ATPL career, carrying passengers"

a. Does CASA support the contention that passing an operational test is just one step in a "progression" that involves a CVD pilot receiving a medical with restrictions that will be progressively reviewed and potentially removed?

b. How can this stated approach be reconciled with evidence at Estimate (23 Oct 23) that a candidate who passes an operational test will receive an unrestricted medical?

4. "It is clear that the PAPI is not the sole safety concern here, more work needs to be done and PIR with additional budget resources to investigate safety aspects of severe CVD in the flight environment. Recognition and Reaction time in particular."

a. Does CASA intend to provide funding to investigate other aspects of a CVD pilots performance such as recognition and reaction time?

b. What operational evidence exist to justify this approach?

**Answer —**

Please find answer attached

**Rural and Regional Affairs and Transport**

**QUESTION ON NOTICE**

**Supplementary Budget Estimates 2023 - 2024**

**Infrastructure, Transport, Regional Development, Communications and the Arts**

**Committee Question Number: 81**

**Departmental Question Number: SQ23-004863**

**Division/Agency Name:** Agency - Civil Aviation Safety Authority

**Hansard Reference:** Written (31 October 2023)

**Topic:** CASA - Follow up questions on written communication from CASA to CVD stakeholders

**Senator David Fawcett asked:**

A senior aviation medical officer from CASA has indicated in written communication to CVD stakeholders (30 Aug 23) that:

1. "Passing Farnsworth and or CAD test is considered equivalent to a pass for PAPI practical test, noting only those pilots with severe CVD are offered ACVA because they cannot pass the desk-based test we are accepting as proxy for PAPI – especially the CAD".

a. In practice, this reliance on a desk-based assessment has occurred over some years regardless of a candidates flight experience (ie: many have no flight time when they do their medical). What evidence is CASA relying on to apply restrictions on a pilot who passes on operational test (regardless of flight experience) where they have demonstrated that they can correctly interpret the visual cues provided by a real PAPI in a real operational environment?

b. How many CAD testing locations are available in Australia?

c. Is it the intent of CASA to change the 2020 provisions and require a candidate to undertake the CAD before having the option for an operational test?

2. "It is my view that in these mild to moderate groups there are potential safety concerns, borne out in the literature and accident records, but CASA will not be addressing this in the immediate future."

a. Does CASA support the imposition of restrictions on Australian citizens based on the "view" of a CASA employee?

b. Does CASA support the contention that accident records prove that mild to moderate CVD pilots who have passed an operational flight test are a potential flight-safety risk?

c. Which accident records provide an evidential basis that there is a causal relationship between CVD pilots and decreased aviation safety?

d. What operational evidence did CASA rely on to decide it would no longer support the position reached under Mr Carmody that "CASA has carefully examined all relevant safety issues and believes this new approach offers a practical alternative assessment for colour vision deficient pilots. We have listened to the views of pilots and made judgements based on research and evidence."

e. Does CASA intend to take future measures in respect of mild to moderate CVD pilots?

3. "Passing ACVA with severe CVD is one risk mitigation and the benefit is to allow progression to night flying and ATPL career, carrying passengers"
  - a. Does CASA support the contention that passing an operational test is just one step in a "progression" that involves a CVD pilot receiving a medical with restrictions that will be progressively reviewed and potentially removed?
  - b. How can this stated approach be reconciled with evidence at Estimate (23 Oct 23) that a candidate who passes an operational test will receive an unrestricted medical?
  
4. "It is clear that the PAPI is not the sole safety concern here, more work needs to be done and PIR with additional budget resources to investigate safety aspects of severe CVD in the flight environment. Recognition and Reaction time in particular."
  - a. Does CASA intend to provide funding to investigate other aspects of a CVD pilots performance such as recognition and reaction time?
  - b. What operational evidence exist to justify this approach?

**Answer:**

Following concerns identified in 2022 about the robustness and standardisation of operational tests that were being offered to applicants with severe colour vision deficiency (CVD), CASA is currently reviewing the policy and legal options for CVD. The goal is to have as many people as possible flying safely, with the minimum number of necessary restrictions.

CASA is undertaking a risk-based approach, taking into account the independent review completed in January 2023 to settle a policy position on this issue.

As the safety and policy considerations have not yet been settled by CASA, some of the questions asked are not yet able to be answered.

1.
  - a. The regulations which establish whether a medical standard for colour vision is met prescribe the option of two clinical tests. If a candidate fails those two tests, the regulations provide for "a test, determined by CASA, that simulates an operational environment".  
  
Following the suspension of the previous operational test (OCVA) due to a lack of standardisation and robustness, CASA has currently determined the Colour Assessment and Diagnostic (CAD) test to be the only alternative test.  
  
A replacement test for the OCVA has been developed but how it will be implemented is still being reviewed and will be the subject of consultation.
  - b. CASA is aware of four locations that offer the CAD test.
  - c. The policy is currently being reviewed.
2. CASA suspended the OCVA test in 2022 due to safety concerns about the robustness and standardisation of tests being conducted.

Since then, there has been work undertaken to develop a new test to assess pilots who are not able to pass prescribed clinical tests.

The policy for how the new test will be implemented is currently being reviewed.

3. Evidence provided at the 2023-24 Supplementary Estimates hearing on 23 October 2023 was that there are various conditions that can be put on a certificate, that if an operational test was passed there would be no condition of co-pilot, but that the full policies and implementation approach was still being settled.
4. No decisions have yet been made about further funding or investigations.