Submission 010
Date received: 12/04/2011

Standing Committee on Infrastructure and Communications
Parliament of Australia
House of Representatives

INQUIRY INTO CABIN CREW RATIOS

Organisation: Flight Attendants' Association of Australia, Domestic/Regional Division

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Advisor: Guy Maclean
Government and Regulatory Affairs

Date: 8 April 2011

Standing Committee on Infrastructure and Communications
Parliament of Australia
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Terms of Reference:

1. The current aviation safety regulatory system for aircraft operators in relation to the application of the cabin crew to passenger ratio including current exemption provisions

Introduction

1. The Flight Attendants' Association of Australia (FAAA) is the body that represents the professional and industrial interests of Australian cabin crew. Cabin crew represent one of the largest single groups within Australian aviation. Contrary to the general marketing focus of airlines, the aviation role performed by cabin crew is best characterised as that of an aviation safety and security professional. This mandated safety and security role is made explicit within the Annexes to the Convention on International Civil Aviation.

2. Annex 6 of the ICAO (International Civil Aviation Organisation) Convention states that cabin crew are *'required on board an aircraft to effect a safe and expeditious evacuation of the aeroplane and to perform the necessary functions in an emergency or in a situation requiring emergency evacuation'* and;

   The security functions and obligations of cabin crew require cabin crew to be trained to '*minimise the consequences of acts of unlawful interference'* and to '*contribute to the prevention of acts of sabotage or other forms of unlawful interference'.*

3. In 1999 the Civil Aviation Safety Authority (CASA) agreed during a Regulatory Review process to retain the 1:36 cabin crew ratio. The advice of safety specialists in the industry provided at that review remains as relevant today, as it was then (Annexure A) - the Australian 1:36 crew ratio continues to provides a superior risk mitigation standard. No new evidence based safety case has been advanced that determines that reducing existing crew numbers will retain (or increase) existing safety and security outcomes.

4. In contrast, security incidents have occurred, which in fact, only support the retention (or even increase) of the current cabin crew ratio. As a consequence, when considering the cabin crew ratio it is equally as important to have regard to security as well as safety.

Previous Reviews

5. In 2003, airlines again challenged the higher Australian crewing standard. A second (more detailed NPRM) review was conducted by CASA. Again, CASA was unable to identify

shortcomings of the 1:36 rule. Following this, in circumstances outlined below, Parliament chose to retain the existing law as the appropriate safety standard for Australia.

6. At that time, airlines were proposing that the 1:50 passenger ratio represented the best-practice crew ratio standard and the Australian law was inappropriate. This contention was not true then, and it remains untrue today; the 1:50 crew ratio is the global *minimum* standard – the global best-practice standard is the Australian 1:36 passenger ratio. The FAAA is of the view that if informed about the proposal to reduce the standard, Australians would overwhelmingly support retention of the current 1:36 standard.

7. The FAAA highlights Australian people have always demonstrated a low level of aviation risk tolerance and subsequently, demanded commensurate safety standards. This was the basis of the Australian Parliament retaining the higher safety and security outcomes provided by the longstanding 1:36 rule when it was challenged in 2003. The important point is that Parliament recognised that the issue is not one of comparative or minimum safety standards, but specific requirements of Australia – a world leader in Aviation safety systems. If other nations choose to accept a higher level of aviation safety risk that is a matter for their judgment; but it essentially says nothing about the safety standard most appropriate for Australia.

8. Following a serious safety and security incident on board QantasLink 1737 in May 2003, the critical actions of the cabin crew were credited as undoubtedly ensuring the safety of the aircraft and applauded world-wide. This acknowledgement was reflected within the broad cross-party support of Parliament, resulting in the Government refusing to allow any reduction in crew numbers. Similarly, the public position of the Labor Party was that the proposed reduction should never have been considered in the first place. (Annexure B)

9. However, despite the clear Parliamentary consensus and the direct government decision to maintain the current crew ratio, CASA, without any stakeholder consultation or public notification, commenced granting exemptions (permissions) to the 1:36 rule in 2007. Thirteen (13) such exemptions are current in 2011 and cover the airline aircraft types widely used in regular public transport operations. This action has effectively undermined the existing law. CASA apparently believes that it is able to bypass the Parliament's laws and regulate by exemption.

10. Certainly, it would seem clear that having failed to convince Parliament to reduce the number of crew required by law, CASA decided to do so anyway using administrative [Select Legislative Instrument] procedures. Considering the clearly expressed and bipartisan support of Parliament, this appears to the cabin crew community to be a direct contravention of the spirit and intent of Parliament's decision.

11. Professionally trained cabin crew are the last line of defence. Cutting the numbers of crew on board an aircraft can only be viewed as a commercial cost saving measure. The regulatory change is not the issue *per se;* change is indeed a constant feature of aviation. However, change in safety regulation can only be predicated upon retaining or extending existing safety and security outcomes. Change that reduces safety margins for purely commercial reasons cannot be permitted.

12. CASA is proposing to implement a 1:50 cabin crew to passenger seat ratio for single-aisle aircraft configurations of between 20 and 216 passengers with approval being conditional upon an operator having in place 'a CASA approved safety risk management plan'. However, the ICAO 2008 Audit Findings Ops/11 stated**: '***There are no regulations in Australia that require an air operator to implement a safety management system acceptable to the State or to clearly define the direct accountability for safety on the part of senior management.'*

13. The FAAA raised objections to the process of exemptions granted due to the lack of transparency and lack of consultation (Annexure C). The Association therefore reasonably questions whether these exemptions were granted with appropriate Safety Management Systems as a prerequisite? Further, the FAAA believes that the process utilised did not meet CASA obligations as a regulator under the Legislative Instruments Act, which requires stakeholder consultation.

14. The FAAA therefore respectfully requests that the Standing Committee requires CASA to make public the results of the hazard identification, risk assessment and mitigation strategies that were performed before granting [secret–behind closed doors] exemptions to the current law. That CASA be compelled to do so is manifestly in the public interest as safety assessment and regulation cannot be permitted to become a covert activity conducted outside of public scrutiny. To do so risks tainting Australia's preeminent safety reputation with a perception of commercial conflict of interest.

15. Australia has adopted a policy of alignment with ICAO (International Civil Aviation Organisation) Standards and Recommended Practices (SARPS), under which formal Safety Management System (SMS) assessments are required whenever an operational change is proposed. The FAAA considers that to either disregard this long standing requirement or to do so only in secret, is unacceptable regulatory action by CASA.

16. In addition, CASA should make public the qualifications of those tasked with conducting and reviewing the risk analysis and mitigation process. As there are very few qualified technical experts in this specific area of hazard identification in this country, in our response to the NPRM, the FAAA raised the following questions:

    •How has CASA assured itself that the processes applied to determine equivalent levels of safety are adequate?

    •What is the experience level within the management of Australian air operators in conducting "risk assessments" and formulating "safety cases" to justify the reduction in cabin crew ratios?

    •Is the basis for these safety cases scientific and/or evidence based or subjective?

    •What is the experience level and training being provided to personnel within CASA who are responsible for assessing these "safety cases"?

17. Airlines are profit driven and management is assessed by Key Performance Indicators linked directly to profitability and efficiency measures. Therefore, there is an inherent bias toward these indicators. For this reason, the independent regulatory authority, rather than the airlines, must be responsible for regulating aviation activity to ensure the optimum level of safety for the travelling public. The apparent bias toward commercial outcomes and the lack of transparent process demonstrated to date raises serious concerns that CASA is not operating as an independent, arms-length regulator in accordance with Section 9 of the Australian Civil Aviation Act.

18. While commercial interests are clearly the imperative behind the proposed cabin crew ratio reduction, CASA requires the same vested interests [the airline operators] to demonstrate that there are no safety-significant differences between the current regime and their proposals, by providing their own Safety Risk Management Plan. Considering the

complete lack of transparency in this process to date, this raises serious conflict of interest concerns. The FAAA respectfully submits that the Standing Committee should fully examine this commercial conflict of interest aspect in order to protect the legitimacy of Australia's aviation safety oversight reputation.

Aircraft Evacuation Certification

19. The aircraft certification process is often cited as a demonstration of evacuation efficiency that can be used to determine "real world" evacuation efficiency and subsequent crew numbers. This is a completely fallacious argument. The certification demonstration of a particular aircraft is simply a benchmark comparison conducted under idealised conditions for the purpose of standardised comparison.

20. Emergency evacuation trials are conducted in very controlled environments and do not reflect an actual emergency evacuation as emergency conditions are not duplicated. The crew are tutored, prepared and practiced prior to the demonstration. The 'passengers' are fit, prepared, do not include children, the elderly, the frightened, injured, disabled or panicked. Cabin crew incapacitation/redundancy is not factored into an evacuation trial. There is no smoke or fire and the aircraft is upright and intact. If a failure occurs, there is a re-run. There are no practice runs when the real emergency occurs.

21. The world's minimum cabin crew ratios are aligned with the aircraft manufacturer's minimum certification demonstration standard. However, this standard is not the optimum level for safety. Rather, the manufacturer's evacuation demonstrations are required by the National Airworthiness Authority certifying the aircraft for the first time. It requires the maximum passenger configuration to be capable of evacuating within 90 seconds under idealised conditions. It is more a test of air frame capability; being fuselage, exit type and number. Certification demonstration does not represent the multiplicity of conditions or hazards found in a real evacuation and cannot be the basis upon which to determine the number of crew required under Australian law.

Passengers Acting as Crew Members

22. CASA proposes that operators will satisfy the Authority that '*operations can be carried out safely using a cabin crew ratio of up to 1:50 passenger seats'*. The Airbus 321 has a current exemption that equates to a cabin crew ratio of 1:43. This means the forward right hand side primary exit door has no cabin crew member primarily responsible for its operation in an emergency.

23. The decision on whether an aircraft door is safe to be opened or not in an evacuation can only be reliably made by those who are trained. In aviation safety terms, a decision NOT to open a door can be even more critical than knowing how to open it. A passenger is not trained to recognise the potentially fatal consequences of opening a door into fire or water, debris or rescue vehicles. It is unlikely passengers would find the door operating handle in dark and/or smoky conditions. If they did manage to open the door they do not know how to assess the safety of an evacuation slide, or how to operate the backup inflation method, should it fail to inflate. What does an untrained passenger know about managing a ditching or the location or use of survival equipment provided with a life-raft?

24. During an evacuation, cabin crew controlling the evacuation ensure passengers exit via their optimal exit and do so as quickly as possible. Research has clearly shown that passengers travel further to exit and choose non-optimal exits when not guided by trained sufficient crew members (Galea; University of Greenwich, 2001). The safety of an exit is constantly assessed, if the conditions become unsafe, passengers will be re-directed to a useable alternate exit. Only a trained crew member can reliably conduct such critical functions within an emergency environment.

25. Lastly, crew members are now subjected to drug and alcohol testing. The Government implemented alcohol and other drug testing regulations in order to address the safety risk associated with human performance impairment from both legal and illicit substance use within the safety sensitive aviation environment. However, passengers do not fall under the program and, in fact, the consumption of alcohol onboard an aircraft is a very common phenomenon. It is therefore contrary to the safety principles underpinning the Australian aviation drug and alcohol risk program, that related [crew number] regulations be reduced and thereby require unscreened, untrained passengers operate primary safety exits, systems and equipment.

26. On these grounds, all exemptions to the existing 1:36 regulations granted by CASA to date are considered invalid by the FAAA and should lapse.

The role of cabin crew in managing passenger safety as well as security

27. The role of cabin crew, as safety professionals, encompasses maintaining the safety and security of the aircraft and its occupants at all times, onboard every flight, in-flight and on the ground. The FAAA's submission to the Review of Aviation Security in Australia in 2003 in 2005 (Annexure D) clearly articulated the mandated safety and security role of cabin crew.

28. Australian law requires that each cabin crew member comply with Civil Aviation Regulations (CAR's) and Civil Aviation Orders (CAO's) and demonstrate practical and theoretical knowledge of emergency procedures including, but not limited to:
    - Emergency evacuations on land and in the water;
    - Operation of emergency exits, evacuation slides and life rafts;
    - Operation of emergency equipment including oxygen, fire extinguishers, lifejackets;
    - Fire fighting;
    - Medical emergencies and First Aid;
    - Passenger handling including disabled;
    - Passenger control, both psychological and physical, including restraint;
    - Handling deranged passengers;
    - Threats to the safety of the aircraft;
    - Handling events of a hijack or attempted hijack;
    - Depressurisation;
    - Survival on land and at sea.

29. With a proposal to adopt the lowest crew to passenger ratio in the world, there will be less crew to assist passengers, less help for the disabled, the elderly, the frightened, parents with infants, or children travelling unaccompanied – research has demonstrated the high numbers of 'socially bonded' passengers who travel in aircraft. This has important implications for evacuation efficiency as such groups must be managed by trained crew members. Less crew to assist with turbulence related injuries and medical emergencies, less crew to provide a life jacket for a child. Finally, and perhaps most critically, less crew available to protect the flight deck.

30. Arguments have been advanced that improvements in aircraft design and safety systems are somehow a reason to reduce the number of cabin crew onboard. Cabin crew, on the other hand, understand that with a greater survival rate, there are actually more

passengers to evacuate from an aircraft post impact sequence. Despite the enhancement in crash impact survivability experienced over the last decade, post impact fire remains the critical danger to survivors.

31. Evacuation rapidity therefore remains the critical issue; passengers need to exit the aircraft wreckage before survivability is reduced by post impact fire – a window of opportunity that is accepted in regulations as 90 seconds. Research by the Greenwich University Fire Safety Research group has shown that trained crew members assist passengers to select the optimal exit and speed passage through the exit. Alternatively, this research confirms that without positive guidance passengers are much more likely to travel further to exit (i.e. longer) and thereby reduce their survivability prospects.

32. Findings by the Transport Safety Board of Canada into the Air France flight 358, July 2005 incident, stated that the evacuation was successful due to the training and actions of the crew, further, that the availability of **supplementary** cabin crew undoubtedly contributed to the success of the evacuation. The mix of passengers included children, infants, wheelchair passengers and the visually impaired.

33. CASA's proposal for aircraft to be operated with a further reduction in cabin crew numbers when operational need arise is simply unacceptable. Should such an important regulation be permitted to operate only at the airline's discretion then the precedent is established for any other safety standard to be set aside when it does not suit a particular commercial operation. Crew members have always sought to facilitate flexible and adaptive responses to unforeseen circumstances. However, aviation has inherent risk and there is a limit to what can be allowed under commercial expediency.

34. Allowing airlines to operate at 1:50 passengers in response to commercial pressure would take Australian ratios from the world's best to the world's lowest regulated standard in one foul swoop. This point must be understood clearly, 1:50 passenger ratio (as opposed to our 1:36 passengers or the US/EU 1:50 passenger seats) will allow the worst crew ratio in the world to be implemented at the sole discretion of the airline – the same organisation that will benefit commercially from this implementation.

35. The FAAA highlights the fact that this extreme change to 1:50 passengers (not seats) is requested by the airlines in order to provide operators with the flexibility of matching crewing levels to variable passenger numbers. However, they are not keen to point out

that the current Australian 1:36 passenger ratio already does exactly that. The operators are arguing for a passenger based flexibility that the existing Australian regulations already provide them with.

36. Lastly, it must be highlighted that CASA and the airlines are effectively requesting the FAAA and other supporters of the longstanding 1:36 rule to demonstrate its' merit and appropriateness. However, the Association respectfully summits to the Committee that this is not our role. In any case the ratio has demonstrated its appropriateness over 50 years of operational application and safety outcomes. Rather, it is the responsibility of those proposing an alternative safety standard to demonstrate that their proposal provides an equivalent (or higher) safety outcome. Quite simply, they must demonstrate that less crew members are as safe as or safer than more crew members. The FAAA contends that this is incorrect and has not been demonstrated.

It remains the case that less crew equals less safety

Security Aspects

37. CASA states it cannot rule on security matters. Cabin crew are trained safety *and* security professionals, they are the last line of defence. Exemptions allowing cabin crew ratios of up to 1:50 have been made without any consideration of security aspects of the cabin crew role. This is unacceptable.

38. In December 2009, the National Aviation White Paper set out the Government's commitment to continue Australia's excellent aviation safety record and to strengthen aviation security systems.

39. On the other hand CASA proposes to hand the airlines the right to reduce the number of safety professionals onboard at will. Cabin Crew are trained to monitor passengers in respect to the security and safety of an aircraft and its occupants. The risks are substantially increased when a smaller overall cabin crew complement is involved.

40. Since the attack on the World Trade Centres in New York (9/11), there has been a heightened importance of security. Key incidents since include the 'shoe bomber' with concealed explosives in the heels of his shoes, the attempt to blow up several aircraft over the Atlantic through the use of liquid explosives and the 'underpants bomber' who had explosive material sewn into his undergarments. The ramifications of the locked flight

deck door post 9/11 cannot be over emphasised. The cabin crew are the last line of defence, with pilots reliant on the cabin crew being their eyes and ears in the cabin.
Gone are the days the Captain puts his/her hat on and enters the cabin to speak to a passenger who is not complying with a crew member's instruction or acting in a manner that threatens the safety or security of his/her aircraft. The cabin crew are now on their own.

41. In a twelve month period (2008/9) the Australian Federal Police attended to 23,000 incidents at 11 major airports. The argument should, in fact, be for more cabin crew, not less to deal with passenger behaviour and incidents.

42. It is concerning that a major airline in this country has recently reduced the security recurrent training for cabin crew from once annually to every two years. It is vital that cabin crews' skills are practised and maintained for their own security as well as the passengers.

43. The safety and security risk levels associated with solo flight attendant operations in particular, would increase with an increase in passenger numbers from 36 to 50. The frequency of likely occurrence is a function of the increase in exposure to the hazard.

44. If the cabin crew ratio was changed to 1:50, consider the consequences of a Dash 8 300 series aircraft that currently has 50 passenger seats and 2 cabin crew. The safety and security professionals, overseeing those 50 passengers could be halved. How could that risk possibly be considered acceptable risk mitigation or maintaining current safety standards? What risk assessment management plan could justify such a reduction? Add to the security compromises, the fact these aircraft operate out of airports without security screening of those 50 passengers. Onboard the aircraft you would have a solo cabin crew member working in the galley at the rear of the aircraft, often with their back to the cabin, and the furthest distance from the flight deck door that cabin crew must protect at all cost.

45. Dealing with an incident is only one aspect, *controlling* 50 passengers single-handedly is not feasible from either a security or safety perspective. Not to mention the risk of crash impact incapacitation leaving 50 passengers without critical emergency evacuation management oversight discussed above.

- ***List of Cabin Crew Security Responsibilities***

Security issues must be factored in when determining Cabin Crew Ratios. The security responsibilities of cabin crew include, but are not limited to:

- Maintaining security awareness at all times in and around the vicinity of an aircraft;
- Challenging persons within secure areas if a current Aviation Security Identity is not visible;
- Security checks of an aircraft for concealed weapons, suspicious articles or prohibited items pre-flight;
- Boarding passengers, checking each has a valid boarding pass, ensuring no person enters the aircraft without producing a pass. Assessing passengers' behaviour and suitability to board. Raising concerns of any suspicious behaviour. The newest technology at airports allowing passengers to self check-in, actually removes another point of contact where behaviour could previously be observed by ground staff;
- Maintaining security in the vicinity of the flight deck door, whilst entering and exiting the flight deck, at all times throughout the flight;
- Continuous assessment and awareness of passenger movement and behaviour throughout the flight;
- Recognising and dealing with a dangerous goods incident should a prohibited item be discovered during flight;
- Restraining passengers in the event of disruptive behaviour;
- Managing in-flight violence incidents and alcohol and other drug related behaviour;
- Ensuring regulations pertaining to the carriage of persons in custody are adhered to;
- Safeguard the aircraft and passengers in the event of a threat of sabotage, bomb threat or attempted hijacking;
- Retaining control of the aircraft cabin during a security incident.

Less crew equals less security

2. The factors that determine the cabin crew to passenger ratio

46. Civil Aviation Order (CAO) 20.6.1 (b) requires the airline operator to carry at least 1 cabin crew member per 36 passengers or part thereof (1:36) for aircraft carrying between 20 and 216 passengers.

47. It should be noted that a further prescription (to 1:36) exists for aircraft carrying more than 216 passengers with 2 aisles. There must be a cabin crew member for each floor level exit (CAO – 20.6.1 (c)

3. International practice in respect of cabin crew to passenger ratios

48. Australia has the world's best practice and should not be 'harmonised' downward to the global minimum standard (1:50). The Canadian ratio of 1:40 was not 'harmonised' with the United States when it was challenged in 2006.

49. International practices do not mesh. There are differences in requirements, licensing, even restrictions on the number of aircraft types a cabin crew member can operate on. Minimum crew number regulations cannot be compared in isolation as many countries that use a lower standard than Australia's have other safety policies in place that may provide a level of mitigation (for example, legislated duty hour limitations, rest times and fatigue rules for cabin crew)

4. Measures to enhance aviation safety that may be considered in future requirements on aircraft operators for a safety risk management plan covering the cabin crew to passenger ratio

50. Flight and duty time limitations for Australian cabin crew are not legislated. This significant safety threat has been specifically recognised by ICAO in the Final Report on the Safety Oversight Audit of the Civil Aviation System of Australia (February 2009) – Audit Finding OPS/04. CASA regulates fatigue risk management systems (FRMS) and flight duty limitations for pilots, but not for cabin crew. This is also in contradiction to Australia's obligations under the Convention on International Civil Aviation. Annex 6, part

1, Chapter 12 requires signatory states to have crew fatigue mitigation systems in place. Australia is required to either comply with ICAO SARP or notify ICAO of a difference. The FAAA understands Australia has done neither.

51. There should be appropriate standards to which all airlines operating in Australia must comply. The 'Modern Award', Aircraft Cabin Crew Award 2010, incorporates increased maximum planned flight duty, increased disrupted flight duty, a reduction in planned and unplanned rest requirements. (Annexure E)

52. Any reduction in crew numbers must not be looked at without proper consideration of this critical matter of flight and duty time limitations.

    Operator-audited FRMS's for cabin crew typically score sleep/wake hours, not an aviation/altitude-related human factors model. Also not taken into account are the physical demands, and the cumulative effects of multiple flight sectors.

Conclusion

Safety is not isolated to emergency evacuation, the measure being used to determine the cabin crew ratio.
The regulatory authority, the Civil Aviation Act, allows CASA to only make determinations on safety related matters.
Security matters must be considered by the Department of Infrastructure and Communications.
The Australian Government is urged to make the determination that there be no change to the Cabin Crew Ratio in this country, retain the current 1:36, and cancel existing exemptions.

To even consider reducing the cabin crew ratio, in particular, removing a trained crew member from a primary floor level exit door, not factoring in the absence of regulated duty hour limitations and rest times and allowing individual airline operators to 'self manage' safety management systems for cabin crew is an accident waiting to happen.

To assure the Australian public that their safety and security will not be compromised, CASA should not revisit the matter until an evidence based argument can be presented

that determines OVERALL safety and security standards are not reduced by reducing the number of trained crew members on board aircraft in Australia.

Less Cabin Crew + Increased Duty Hours + Decreased Rest Times = Less Safety And Security For The Travelling Public

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Annexure A

Version: 29/03

The Case for 1:36 Cabin Attendant/Passenger Ratio

Introduction

The following document is in response to NPRM 9809RP which outlines a proposal to adopt the European standard in relation to the number of cabin crew carried. The intention being to discard the current Australian CAO 20.16.3.6 which requires " at least one cabin attendant for each unit of thirty-six passengers or part thereof" and replace it with JAR-OPS Subpart O which requires one cabin crew for every 50 passenger seats.

Regulatory Review Process

At the commencement of the regulatory review process CASA established Technical Committees and Project Teams to allow consultation with individuals in industry who have expertise or interest in a particular technical subject area. Although the Cabin Safety/Carriage of Persons project team recommended retention of the status quo in answer to the proposed 1:50 cabin crew/ passenger ratio, the following response was given:

"this recommendation does not accord with the CASA Board policy of implementing regulations which ensure the lowest possible cost while resulting in proven levels of safety"

Considering the proposal for change has come from within CASA, where is the justification for the change and where is the evidence showing that it will not impact on the level of safety currently maintained under the 1:36 requirement? It is acknowledged that the requirement for harmonisation is listed as one of the regulatory criteria's, but is this to be achieved at any cost?

It is also recognised that most regulatory authorities are working towards harmonisation wherever possible, but it is also true that many differences still exist. As a country with a reputable safety record, it is necessary to ensure that we do not fall into the trap of "harmonising for harmonisation sake". Where a valid argument for maintaining current Australian safety standards can be made, taking into consideration the equivalent foreign regulations, the Australian regulatory body has a duty to the travelling public to ensure that standard is maintained. Australia and CASA should not rely on overseas regulatory bodies to set the standard - we should be as proactive as any in the development of standards to further enhance aviation safety.

Other regulatory criteria outlined by CASA for guidance in the Regulatory Review process clearly recognises the safety emphasis:

Regulations must be focused on safety:

The first Regulatory Criteria as stipulated by CASA states "Regulations must be focused on safety" and "CASA's **first** priority is the protection of fare paying passengers". The proposal for the flight attendant/passenger ratio to be changed to 1:50 does not satisfy the criterion.

Annexure B

Submission 010
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Martin Ferguson MP

Federal Member for Batman
Shadow Minister for Regional Development,
Transport, Infrastructure and Tourism

MEDIA RELEASE

2 June 2003

ANDERSON BACK ON TRACK ON CREW NUMBERS, BUT STILL IN DENIAL ABOUT REGIONAL SECURITY

Labor welcomes the Minister for Transport belated agreement to rule out any reduction in flight crew numbers, but he is still in dangerous denial on security at our regional airports.

A reduction in the crew to passenger ratio should never have entertained in the first place. The shocking events of last week and the important safety and security role of the crew drove this point home.

While the Minister has answered our call on flight attendant numbers, he roundly rejected Labor's call to spend the Ansett Ticket Levy surplus to improve aviation security in regional Australia.

Senate Estimates revealed last week that the Government has collected at least $240.2 million from the Ansett ticket levy. The Minister won't dump this tax although not one more cent will go to Ansett workers entitlements.

Airports like Burnie, Albury, Port Macquarie, Gove, Tamworth and Devonport still have no passenger screening, despite tens of thousands of travellers passing through each of these airports each year.

Aviation security is an issue for all airline passengers, not just those who travel between the capital cities.

Regional Australians deserve better treatment.

For further information:
Blythe Hamilton 02 6277 4753 or 0407 099 104

Annexure C

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FLIGHT ATTENDANTS' ASSOCIATION OF AUSTRALIA

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28 August 2007

The Hon Mark Vaile MP
Deputy Prime Minister and Minister for Transport and Regional Services
PO Box 6022
House of Representatives
Parliament House
Canberra ACT 2600

COPY

Dear Minister,

Re: CASA Disallowable Instrument approvals 321/06, 172/07 and 222/07

I am writing to you regarding recent approvals given to Australian operators by the Civil Aviation Safety Authority (**CASA**), which permit a reduction of the number of cabin crew members on board certain Australian airline transport category aircraft.

As the professional Association representing Australian cabin crew, the FAAA believes this issue to be a matter of considerable importance that clearly has the potential to impact upon the safety of the fare paying travelling public and their confidence in the appropriate regulatory oversight. As a consequence, we wish to bring to your urgent attention grave concerns this Association holds in relation to both the basis upon which these approvals have been provided and the legislative process CASA has utilised in granting them.

In regard to the first matter (the unsound technical basis of these approvals) you will recall that the issue of crew numbers was fully examined in 2002 - 2003 as part of Notice of Proposed Rule Making (**NPRM**) 0211 OS. At that time the no safety case was provided to support changing the current Australian ratio of 1 (one) cabin crew member per each 36 passengers to the lower international minimum standard of 1 (one) crew member per each 50 passenger seats. This change from Australia's world's-best-practice to a global minimum standard was apparently being sought by some operators on the basis of efficiency gains and commercial considerations.

NPRM 0211 OS recognised the importance of the cabin crew as members of an integrated operational safety team and the subsequent reliance of flight crew upon them to conduct numerous safety critical tasks. NPRM 0211 OS therefore proposed to significantly increase many of the regulatory requirements of cabin crew emergency training and associated operational requirements, and conducted a full safety analysis

Jo-Ann Davidson, Divisional Secretary

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Annexure D

Joint Committee of Public Accounts and Audit

Review of Aviation Security in Australia

SUBMISSION COVER SHEET

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&
Daryl Watkins – Divisional Secretary (Dom/Reg Div.)

Date Authorised: 2 September 2003

Annexure E

Comparative Table
Minimum Standards
Domestic Operations - Duty Hour Limitations, Rest Times

DA **Flight Attendants (Domestic Airlines) Award 1999**
Modern Award **Aircraft Cabin Crew Award 2010**

Daily Maximum Hours

	DA Award	Modern Award	INCREASE
Planned	9 hours	12 hours*	33% Increase
Unplanned	12 hours	15 hours	25% Increase

* Daily maximum hours can increase to 14 hours (planned) and 16 hours (unplanned) in circumstances where a Flight Attendant **does a combination of** non – flying duties and flying duties**.**

Monthly Maximum Hours

	DA Award	Modern Award	INCREASE
Planned	120 hours	144 hours	20% Increase
Unplanned	140 hours*	NO CAP**	% Infinity Increase

***** Under the **Flight Attendants (Domestic Airlines) Award 1999** there a limited exceptions to this cap, including voluntary swap of rostered duties.
****** The **Modern Award** states 'reasonable additional hours'

REST AFTER A DUTY OF 8 HOURS OR LESS – AT HOME

	DA Award	Modern Award
Planned	12 hours	12 hours
Unplanned	10 hours*	10 hours

***** By agreement between the Cabin Crew member and employer only

REST AFTER A DUTY OF MORE THAN 8 HOURS BUT LESS THAN 14 HOURS– AT HOME

	DA Award	Modern Award	DECREASE
Planned	15 hours	12 hours	20% decrease
Unplanned	12 hours	10 hours	16.4% decrease

REST AFTER A DUTY OF MORE THAN 8 HOURS BUT LESS THAN 14 HOURS – ON AN OVERNIGHT

	DA Award	Modern Award
Planned – At a Flight Attendant base	12 hours	12 hours
Planned – a port where flight attendants are not based	10 hours*	10 hours

* If a Flight Attendant received less than 12 hours rest, then the following day will be limited to 6 hours unless: a Flight Attendant is returning to permanent base or no replacement crew are available

REST AFTER A DUTY OF MORE THAN 14 HOURS 1 MINUTES BUT LESS THAN 24 HOURS

	DA Award	Modern Award
Planned	N/A*	Equal to duty hours
Unplanned	N/A	12 hours

***** Under the **Flight Attendants (Domestic Airlines) Award 1999** a Flight Attendant **can not** work more than 12 hours and therefore there is no provision for rest in these circumstances

Submission 010
Date received: 12/04/2011

Review of Aviation Security in Australia

Comments by the Flight Attendants' Association of Australia on the Cabin Crew Perspective of Australian Aviation Security

Introduction and Background

The Flight Attendants' Association of Australia (FAAA) is the body representing the largest single professional group within Australian air transport. In representing this group the Association believes its role in relation to safety and security issues is most properly that of an independent quality control mechanism.

The FAAA contends that in contrast to the service orientated focus of airline marketing, the aviation role performed by cabin crew is best characterised as that of aviation safety and security professional. This mandated safety and security role is made explicit within the Annexes to the Convention on International Civil Aviation.

Annex 6 (chapter 12) states that cabin crew are "*required on board an aircraft to effect a safe and expeditious evacuation of the aeroplane and to perform the necessary functions in an emergency or in a situation requiring emergency evacuation.*" The security functions and obligations of cabin crew are further detailed in Chapter 13 of Annex 6, which requires that they be trained to "*minimise the consequences of acts of unlawful interference*" and to "*...contribute to the prevention of acts of sabotage or other forms of unlawful interference.*"

In recognition of these obligations ICAO Annex 2 specifically identifies cabin crew as a 'safety-sensitive' group. This primacy of safety and security is further reflected within ICAO's documentation such as the Cabin Crew Safety Training Manual, which states that "*cabin crew training is about safety ...their duties and responsibilities in air transport operation are safety related and their training should clearly reflect this*".

Considering that the number of flight deck crew has been reduced to two members within the majority of the world's air transport category aircraft, while the size and capacity of the modern aircraft cabin has simultaneously continued to grow — and that the cockpit door is now permanently locked — the cabin crew role has clearly evolved to higher levels of individual responsibility for safety and security outcomes. Within the modern aviation system cabin crew are now vital members of an integrated operational safety and security team.

The primacy of the cabin crew safety and security role has been confirmed by the U.S. the House of Representatives. A House Subcommittee inquiry into Aircraft Cabin Safety Staffing Standards concluded that:

> *"Clearly, safety is the one and only reason flight attendants are necessary on passenger carrying aircraft, not to be waiters and waitresses. These service aspects of flight attendants' responsibilities are simply a feature added by air carriers for the convenience of passengers."*

The Association is therefore firmly of the view that cabin crew are primary participants who should be considered necessary and valuable consultation partners in the development of aviation security provisions, legislation and regulations. Although incidents such as the QF1737 alleged hijack attempt on 29 May 2003 clearly demonstrated the critical safety and security role of cabin crew, airlines and Government have for many years appeared reluctant to explicitly declare the primacy of crew members' safety and security obligations over customer service duties.

1. Aviation Security Consultation Issues

Aviation workers such as cabin crew are major stakeholders in their industry and their lives are as much at risk as those of passengers in the event of accidents, incidents, and unlawful interference. Cabin crew members carry a heavy responsibility for the performance of their safety and security duties and the lives of passengers may lie directly within their hands. These responsibilities must be matched to meaningful consultation rights.

Recognising the right of aviation employees to be independently consulted and to comment upon security requirements would significantly enhance a system of checks and balances. In this context cabin crew are part of an essential quality control process and have a direct and personal interest in the security of the air transport industry. Such checks and balances help ensure that safety and security concerns remain at the centre of aviation decision-making.

The FAAA agrees with the inclusive sentiment expressed within the Joint Committee Chairman's comment that "... *All components of the aviation industry have a part to play in aviation security, including check-in staff, screening staff, baggage handlers, the airlines, the airports, and the regulators and security staff.*" This sentiment is also clearly reflected within the Transport and Regional Services Minister's second reading speech to parliament for the Aviation Transport Security Bill (2003) that "*The ... Bill recognises the responsibilities of all aviation security participants, from the largest airport operator down to the ordinary passenger. We must all be involved in aviation security.*"

The FAAA concurs completely with these views, however despite such rhetoric we do not to yet see their spirit or intent actually reflected in the consultative arrangements of Government or industry in relation to the development of aviation security provisions, legislation or regulations. For example, the Aviation Transport Security Bill (2003) and Consequential Amendments, was developed without any consultation with cabin crew, despite their specialist knowledge of the cabin operating environment and the intimate involvement they will have in applying, and being subject to, the legislation's security requirements.

In regard to the consultation airlines believe is appropriate with the aviation workers who will implement security provisions, the FAAA notes that the submission by Qantas to the Joint Committee contains multiple references for the need for Government to consult with industry. However, the only recognition the airline provides on the role to be played by cabin crew in developing Australia's aviation security framework is the obligation for unions and staff associations to encourage full compliance by their members with all aviation security regulations and requirements.

The FAAA does indeed encourage its members to comply fully with aviation security regulations and requirements; however as aviation professionals and the end users of security provisions the proper role of cabin crew is far wider than this single dimension. In the post September 11 environment aviation workers can no longer simply be

directed to comply with security instructions; they must now be accepted as key stakeholders and be actively encouraged to fully contribute. Meaningful consultation is the only way to elicit the full contribution of *all* system participants.

2. Impact of Commercial Factors on Aviation Security Outcomes

The FAAA believes that within the current increasingly deregulated national and international aviation environment commercial factors are steadily gaining primacy over operational safety and security. In response to commercial pressure air carriers are placing a higher priority than ever before on the need for differentiation of the airline product. An organisational response to this need can be seen in the shift of responsibility for the operational control of cabin crew within Qantas from the flight operations department to the marketing department. Considering that cabin crew are primary aviation personnel the FAAA's view is that the safety and security consequences of such organisational changes are not always positive. Within the airline environment control of cabin operations should be retained as a core flight operations department responsibility.

The safety and security issues arising from high levels of competition within the air transport industry are especially acute for cabin operations as airlines and aircraft manufacturers now simultaneously seek to introduce product innovation and new features into the passenger cabin far more quickly than in any other area of aviation. The Association's experience is that cabin design and customer service initiatives often have important implications for aircraft safety and security.

In response, new security requirements often need to be developed as hazards which may arise from product innovations may not be adequately addressed within the existing aviation regulatory framework. However, the government's lack of recognition of the primary status of cabin crew has not to date facilitated a coordinated response to such potential security risks. For example, despite the unquestioned relationship between cabin operations and safety and security outcomes there are still no cabin safety specialists within the standards branch of the Civil Aviation Safety Authority (CASA). Within CASA cabin specialists are confined to the compliance division. Additionally, the Aviation Safety Forum (ASF), set up by the Government to provide strategic advice to the CASA board, does not have a member with specialist cabin safety expertise.

The FAAA suggests that a clear example of the impact of commercial factors upon operational safety, and of the results of this type of Government safety and security policy vagueness, can be seen in the current Qantas proposal to install self service bar units within their Longhaul aircraft fleet. The FAAA is strongly of the view that the active promotion of passenger self service of alcohol is inappropriate within the security sensitive aircraft environment and that evidence before the Association clearly suggests that access to alcohol onboard aircraft should, in fact, be reduced rather than increased. The Qantas marketing department on the other hand, says that the bar will provide a stylish environment where customers can choose to socialise or where they can pour themselves an alcoholic drink, while an article in the Australian newspaper's travel section on 29 August reports that '*the business class cabins will also have stand-up bars for guests wishing to indulge in a little mile-high networking.*'

The Association believes that the security of the aircraft, its passengers and crew would be impacted should passengers be permitted, and indeed encouraged through such promotional activities, to freely serve and access alcohol on an aircraft in flight. The FAAA contends that in line with longstanding US and Canadian laws, and proposed Australian Civil Aviation Safety Regulations (CASR), alcohol must only be consumed on an aircraft if the beverage has been directly served by a cabin crew member. Only in this way can an aircraft's crew maintain direct and positive control of a clearly identified security risk factor.

3. Security Screening Provisions

The FAAA believes that all persons accessing an aircraft and the airside areas must be fully and positively security screened. The Association does not believe that current screening provisions applied to support staff such as cleaning and catering personnel are sufficient. Screening requirements should apply equally to support ground staff as they currently do to all air crew members. Any person who has access to an aircraft after it has been security checked by its operating crew and declared sterile must be subjected to this level of security clearance.

The Association remains concerned that passengers are permitted to carry on to aircraft containers of liquid, such as bottles of mineral water. Should, for example, a one litre bottle contain an accelerant rather water we are advised that an aircraft

could be destroyed if this material was ignited as the subsequent fire would be extremely difficult, if not impossible to control. Security staff should therefore remove such items from passengers or confirm their contents as a standard screening action.

The Association is concerned that not all airports, for example Mt. Hotham, have security screening facilities. In such regional locations passengers are screened when they disembark at a major airport, however, because they are already airside and may have ongoing connections this represents a serious security concern.

4. Biometric Technology

Qantas International cabin crew are currently utilising the biometric Smartgate system for customs clearance at Sydney international terminal. The FAAA's International Division was consulted during the development and implementation stages of the program and was subsequently provided with an opportunity to add value to the system and to encourage the Association's cabin crew membership to participate in its trial. As a direct consequence of their union's endorsement over 96% of cabin crew have enrolled in the project and are enthusiastic and comfortable with the use of this technology.

The FAAA's International Division therefore supports the implementation of biometric technologies, however, the Association's preference is for the facial recognition methodology. Cabin crew find facial recognition less physically invasive, which is an important issue when considering the repeated exposure of cabin crew to it and the use of such devices in an environment such as the SARS crisis.

The Association notes the potential for serious privacy concerns in relation to the utilisation of biometric technology. In this respect the inclusion of a privacy commissioner on the Customs Service staff is a welcome response to such concerns. The FAAA reiterates the strong need to continue to consult with labour stakeholders on issues such as privacy as biometric systems are evolved.

Aviation workers are clearly prepared to play their part in the development of such worlds best security systems such as Smartgate. However, the Association highlights that the evolution of such systems are an infrastructure issue to which the Commonwealth should contribute appropriate funding as they directly facilitate the safety of air transport and provide a vital additional layer of aviation security.

5. Minimum Safety and Security Competency Standards

In response to the increased security obligations and responsibilities of cabin crew an ICAO working group is currently rewriting the ICAO Cabin Crew Training Manual in order to incorporate the wider security responsibilities contained within the ICAO Manual on the Implementation of the Security Provisions of Annex 6 (Doc 9811 AN 766 Restricted).

ICAO therefore clearly accepts the increased security role of cabin crew within the post September 11 aviation environment. Additionally, as indicated previously, ICAO identifies cabin crew as a 'safety sensitive' group. However, of the four groups broadly defined as safety sensitive (pilots, ATC, LAMEs and Cabin crew) the only group not required to demonstrate their safety and security proficiency to an internationally agreed minimum standard is cabin crew.

As a consequence of the critical safety and security nature of the cabin crew role the FAAA believes that evaluation of such minimum international competency standards should be undertaken by ICAO. The Association notes that the issue of cabin crew licensing is at an advanced stage internationally and is currently being currently before the US Congress and House of Representatives and being evaluated by the European Joint Aviation Authority. The FAAA requests that Australian Government support the creation of an ICAO working group to investigate the issues relating to the development of an internationally standardised system of cabin crew licensing, under ICAO oversight.

6. Unruly/Disruptive Passenger Behaviour

a) The FAAA finds that the service levels that airline marketing programs promote are increasingly difficult for cabin crew to actually deliver due to the interrelationship between expanded product levels, maximised passenger configurations and the utilisation of minium crewing levels. Potential service shortfall and misalignment between the expectations of customers and the level of service cabin crew are able to consistently deliver may result in a level of customer dissatisfaction that increases the potential for unruly/disruptive passenger behaviour.

b) The trend towards minimum crew complements has important implications for aviation safety and security. Due to minimum crew numbers and expanded cabin service requirements all crew members may be forward of the wing during bar and meal service resulting in significantly reduced safety and security oversight of passengers in the rear of sections of an aircraft (for example, in the aft galley of aircraft such as the B767) at these times. The Association has received numerous security reports of crew returning to the rear galley to find passengers standing there smoking or dozens of discarded meal trays (over 40 in one instance) across the floor and wedged in every available space. On another reported occasion crew returned to find a passenger unconscious on the floor of the rear galley.

c) The FAAA, through close consultation with the International Transport Workers' Federation (ITF), contributed to the ICAO working group's development of guidance material on the legal aspects of unruly/disruptive passenger behaviour, which concerned national legislation on certain offences committed on board civil aircraft. The 33rd ICAO General Assembly unanimously adopted this model legislation in Resolution A33-4.

The FAAA fully supports ICAO Resolution A33-4 and the associated guidance material, which facilitates its implementation. This Association notes that the model legislation contained within the guidance material clearly defines a hierarchy of certain offences committed on board civil aircraft, which places assault and other acts of interference against a crew member as the most serious offence.

The FAAA considers Australia to be a world-leader in terms of domestic legislation and policy relating to unruly/disruptive behaviour. However, we remain concerned with the jurisdictional issues which may arise in relation to offences committed on board international aircraft within Australian airspace or onboard an Australian aircraft transiting/arriving in foreign States.

For these reasons the FAAA strongly urges the Australian Government examine in detail the Resolution's guidance material, to implement Resolution A33-4 and to influence other States to also do so.

7. Funding of Aviation Security Infrastructure

The FAAA agrees with the points raised by the Qantas submission that the funding for aviation security programs should reflect the division of responsibilities for the implementation of aviation security and that this should guide the distribution of the associated security costs.

The FAAA is strongly of the view that the provision of aviation security is an issue of infrastructure provision that is primarily a matter for funding by the Commonwealth. In this respect the Association notes that the activities of terrorists are not generally directly associated with service provision dissatisfaction, but rather are directed towards air transport assets in response to Government policy.

8. ASO Program

The FAAA supports the ASO program. The Association's view is that ASOs provide a valuable additional layer of security and are an asset onboard Australian registered aircraft. This view is reinforced by the current locked flight deck door policy which may require cabin crew to protect passengers with their lives. Within such extreme circumstances the possible assistance of an ASO would be a critical actual benefit or a potentially potent deterrent.

The Association has had close consultative links with the ASO program and found this to be a valuable opportunity to add value to the program's outcomes. The FAAA does however consider that an aircraft's operating aircrew must clearly retain the primary responsibility for the conduct of flight, the functions which facilitate the control passengers and of the factors contributing to safety on board an aircraft in flight. These obligations are made explicit in the ICAO Annexes and must not be diminished or assigned to other groups outside of the operating aircrew.

9. Chemical and Biological Incident on Aircraft in Flight

The FAAA notes the concern of the CSIRO in relation to the release of biological agents on-board an aircraft that could contaminate large number of travellers. The Association draws the Committees attention to our concerns regarding the adequacy of current mechanisms to address the discovery of Biological or chemical substances within an aircraft in flight. The Association does not believe it is

appropriate to discuss further operational security issues in the public domain, however we would be happy to discuss this portion of our evidence in-camera with the Committee.

10. Civil Aviation Legislation Amendment (Mutual Recognition with New Zealand and Other Matters) Bill 2003.

The Civil Aviation Legislation Amendment (Mutual Recognition with New Zealand and Other Matters) Bill 2003 has been presented to Parliament for consideration. A similar Bill mirroring the New Zealand component of this agreement is currently before the New Zealand Parliament.

The Bill provides for mutual recognition of aviation related certification between Australia and New Zealand (beginning with Air Operator Certification [AOC]) on behalf of air transport carriers operating pursuant to Single Aviation Market (SAM) arrangements. The principle underpinning this Bill is the Government contention that the Australian and New Zealand aviation systems, while utilising different processes, offer equivalent total safety and security outcomes.

The Flight Attendant's Association of Australia does not agree with this view or with the basis upon which it has been determined.

The evidence before this Association clearly indicates that in key operational areas the New Zealand regulatory compliance framework provides for a lower level of mandated safety and security hazard mitigation than does Australian law. For example, New Zealand registered aircraft are permitted to operate with less than 1 crew member per floor level exit and utilise a minimum crew/pax ratio that is not only inferior Australian requirements, but to US, EU and Canadian law as well. The FAAA believes that the fundamental premise of equalised total safety and security outcomes between the Australian and New Zealand aviation systems is invalid and a distortion of the concept of safety equivalence.

The FAAA understands that New Zealand law does not permit the carriage of armed Air Security Officers (ASOs). The Government contends that the non-deployment of ASOs by New Zealand does not lead to the conclusion that Air New Zealand has an inadequate aviation security program for their operations in Australia, however the FAAA does not accept this response. The New Zealand Government is not a high level target as Prof. Clive Williams of ANU has publicly identified

Qantas and Australia. The New Zealand Government has therefore not been required to apply the same level of security planning and oversight to its national aircraft. The Association believes the non carriage of ASOs on New Zealand registered aircraft operating within Australia would be reasonably expected to represent a softer target for terrorist actions.

FAAA Recommendations

In relation to aviation security within the Australian air transport system the FAAA makes the following recommendations to the Government and the Joint Committee of Public Accounts and Audit:

- The Government explicitly recognise the critical safety and security based nature of the cabin crew role and the evolving higher levels of safety and security responsibility of cabin crew members;

- The Government explicitly recognise the status of cabin crew as primary aviation participants and necessary consultation partners in the development of aviation security provisions, legislation and regulations;

- The Government recognise the impact of commercial factors on the ability of cabin crew to effectively perform their mandated safety and security responsibilities and provide legislative and regulatory support for the conduct of these critical duties;

- The Government ensure that all persons with access to an aircraft and airside areas be screened to the same standard as an aircraft's operating crew;

- The Government commit to fund the continued development of biometric technologies and to ensure the concerns of aviation labour stakeholders and addressed within the development process of such technologies;

- The Government support the evaluation by ICAO of internationally agreed minimum standards of cabin crew safety and security competence through the development of a cabin crew licensing regime;

- The Government actively support, and encourage implementation where necessary, ICAO's Resolution A33-4;

- Government commit to fund aviation security infrastructure where the division of security responsibilities indicates that the Commonwealth has carriage of this responsibility;

- The Government not permit the importation of inferior foreign safety and security standards and require that all aircraft operating within Australia comply with Australian safety and security standards.

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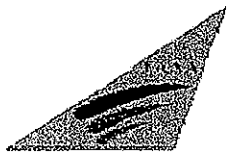
Submission 010
Date received: 12/04/2011

Joint Committee of Public Accounts and Audit

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

SUBMISSION COVER SHEET



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Date: 20 July 2005

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Review of Aviation Security in Australia

Updated Comments by the Flight Attendants' Association of Australia on the Cabin Crew Perspective of Australian Aviation Security

Background

The FAAA reintegrates the points raised previously within our submission to the Joint Statutory Committee of Public Accounts and Audit (2 September 2003) and again highlights the vital safety and security basis of the cabin crew role.

The FAAA contends that while customer service duties form an important component of the modern cabin crew role, its primary nature is best characterised as that of aviation safety and security professional. The reduction of the airline flight deck crew to two members on the majority of the world's air transport category aircraft, while the size and capacity of the aircraft cabin continues to grow, has increased the vital role of cabin crew as members of an integrated operational safety and security team.

The safety and security functions and obligations of cabin crew are clearly detailed within the Convention on International Civil Aviation[1], which requires that cabin crew members be trained to "*minimise the consequences of acts of unlawful interference*" and to "*...contribute to the prevention of acts of sabotage or other forms of unlawful interference.*" *In recognition of these obligations Annex 2 to the Convention specifically identifies cabin crew as a 'safety-sensitive' group*[2]

This primacy of safety and security is further reflected within the ICAO Cabin Crew Safety Training Manual, which states that "cabin crew training is about safety ...their duties and responsibilities in air transport operation are safety related and their training should clearly reflect this"[3].

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[1] International Civil Aviation Organisation, (2001). *Annex 6 to the Convention on International Civil Aviation, International Standards and Recommended Practice - Operation of Aircraft*. Part 1: International Commercial Air Transport – Aeroplanes (eighth edition). ICAO, Montreal: Canada.
[2] International Civil Aviation Organisation, (1990). *Annex 2 to the Convention on International Civil Aviation, International Standards and Recommended Practice – Rules of the Air* (ninth edition). ICAO, Montreal: Canada.
[3] International Civil Aviation Organisation, (1996). Cabin Attendants Safety Training Manual (second edition). Doc 7192-AN/857 Part E1. ICAO, Montreal: Canada.

Submission 010
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1. With respect to Recommendation 5 of the Review of Aviation Security in Australia (Report 400), the FAAA wholly concurs with the necessarily to create a robust security culture that seeks to elicit the full participation of all aviation personnel.

2. The key to eliciting the inclusive sentiment required to create a robust security culture is, however, the full consultation and inclusion of all stakeholders - including cabin crew. The FAAA believes that the efficiency of this process is hindered by the lack of a formal mechanism for the representatives of cabin crew members to liaise with the Department of Transport and Regional Services (DoTaRS). Since the Committee's report was published no such formal consultation has taken place.

3. Cabin crew will always inform the relevant regulator or operator of any security concern of which they become aware, however, formal consultation between this association and DoTaRS may be an important aid to this process.

4. As human operators such as cabin crew members are fundamentally the most flexible and valuable components of any complex socio-technical aviation system the FAAA again highlights the value of eliciting the full contribution of cabin crew members toward developing a robust security culture.

5. Cabin crew members represent a vital quality control mechanism within the Australian aviation security system. Cabin crew are intimately familiar with the aircraft cabin environment and as such will quickly recognise any security anomaly.

6. In an airborne security incident it is the cabin crew who carry the responsibility for direct action to neutralise a cabin security incident. The lives of passengers may therefore lie directly within the hands of cabin crew in both the safety and security contexts.

7. As cabin crew members are not responsible for the design or oversight of aviation security systems they are not required to defend the efficiency and utility of such systems. The FAAA is therefore in the position of being able to simply inform the Committee as to whether, from the user's perspective, the aviation security system is functioning adequately.

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of the appropriate crew ratio for inclusion within the new Civil Aviation Safety Regulation (**CASR**) Part 121A.

At that time those seeking to have the international minimum crewing standard adopted criticised the higher Australian requirement as having been initially adopted on the basis of an uncritical acceptance of an early aircraft configuration. While this may indeed have been so, this argument is beside the point; the safety case supporting the Australian cabin crew standard is centred on almost 50 years of demonstrated safety outcomes. The safety of the crew regulation has been proved—how it was first determined is irrelevant. Nevertheless, this anecdotal criticism continues to be the main basis upon which the [commercially motivated] reduction of Australian cabin crew numbers is proposed.

In submissions to NPRM 0211 OS, the FAAA and other stakeholders provided detailed evidence of the higher levels of demonstrated safety of the existing Australian regulation in critical areas such as crew member redundancy, security oversight and emergency evacuation efficiency. This evidence included research conducted by the Greenwich University's School of Numerical Processing (Fire Safety Research Group) confirming that higher crew numbers provided for safer emergency evacuations. Ongoing research since conducted by the university's Fire Safety Research Group, utilising a more advanced database, continues to support this conclusion.

As a consequence of the NPRM 0211 OS analysis and review, Minister Anderson advised Parliament on 2 June 2003 that the Australian cabin crew ratio regulations would not be changed. This declaration was firmly supported by the Opposition and Minor Parties. It was clearly the will of Parliament that the safer Australian cabin crew to passenger ratio be retained.

However, despite the NRPM 0211 OS safety review, and parliament's subsequent decision to retain the Australian cabin crew ratio , CASA appears to have recently bowed to commercial pressure and approved operations utilising less crew members (on particular aircraft) than the law requires. As the aircraft types covered by these approvals (Boeing B737-800 & Airbus A320) constitute a large portion of Australia's airline fleet, this regulatory action by CASA has significantly undermined both the decision of the parliament and the maintenance of the higher Australian standard. It is difficult to see how the uncritical basis of this approval cannot be exploited to demand that it flow on to all other Australian airline transport category aircraft.

Considering the public importance of this issue, the FAAA is alarmed that CASA's consideration these approvals was conducted in absolute secrecy [between the applicant and CASA,] with no consultation with any stakeholders such as the FAAA or the CASA/Industry Standard Consultative Committee (**SCC**). At no time was CASA's consideration of this matter notified on the CASA website or in any way flagged publicly. Due to this secrecy the FAAA had no reasonable prospect of becoming aware of that CASA was considering reducing crew numbers or, subsequently, that approval 321/06 had been placed before parliament as a disallowable instrument. As a consequence,

the public (including this Association) was only advised of this matter once it had completed the parliamentary disallowance process and was subsequently published on the CASA website. Unfortunately, the horse had already bolted.

This inappropriate secrecy and complete lack of transparency was purposely utilised by CASA despite the regulator being well aware of the contentious nature of this issue, its importance and the very high level of debate that occurred during the NPRM 0211 OS review of crew numbers. This reflects very poorly on CASA (and subsequently, if not addressed, upon the government) and should be considered unacceptable regulatory action in an advanced democracy such as Australia.

As a consequence of their being no external specialist input, the FAAA believes that these approvals have been granted on an unsound basis that places efficiency gains for airlines and commercial imperative ahead of public safety. The FAAA highlights that it is human system operators such as cabin crew that are fundamentally the most valuable and flexible safety components of any complex socio-technical system such aviation. As the aviation industry seeks to minimise cost by the introduction of minimum standards in many operational areas, critical safety and security oversight by professional crew members must not also be simultaneously reduced.

The approvals granted by CASA acknowledge, and attempt to retain, this critical human safety element by [the approval's requirement for] mandatory co-option of passengers to conduct trained crew member functions at overwing aircraft exits. This forced reliance/co-option of passengers is manifestly inappropriate. CASA apparently believes that simply providing a 30 second briefing to a passenger on how to open an emergency exit will provide an equivalent level of safety to having sufficient numbers of trained crew members present to control exits and manage the evacuation. This could not be further from the truth and actually reduces rather than enhances safety—the critical requirement is not when/how to open an exit but rather when *NOT* to open an exit. Opening an exit into fire will kill all passengers in that location; this critical assessment can only be reliably made in an emergency situation by a trained professional crew member.

Another technical factor of the CASA approvals which is of grave concern to the FAAA is that they do not refer to (or appear to have considered) the vital issue of crew member redundancy. The Greenwich University study cited above found that crew members are likely to be incapacitated in as many as 44% of aircraft accidents and therefore to play no role in the subsequent evacuation. In addressing this factor the Australian crew ratio was demonstrated by this study as providing a higher level of crew member redundancy and therefore a correspondingly higher level of safety.

Likewise, the CASA approvals do not mention (or appear to have considered) the critical security functions of crew members. Reducing security oversight of an aircraft by reducing crew numbers is in fundamental contradiction of the general security policy of the Australian [and international] governments and will have serious implications for aircraft safety. As was seen in the Launceston incident, the ability of the crew to

maintain control of an aircraft is critical to the safety and survival of the passengers. The relationship between the ability of the crew provide security oversight and the US 9/11 events needs no explanation. Why has CASA not considered this factor?

Had CASA conducted appropriate consultation with such specialist stakeholders as the FAAA, technical issues such as evacuation efficiency, crew member redundancy and effective security oversight would have been highlighted, resulting in a higher quality decision that was more in the public interest. The regulator would then not have exposed itself (and the government) to the perception of commercial bias and inappropriate regulatory action. As you will be aware, this is a charge that is being increasingly levelled at CASA.

However, the technical and commercial biases of CASA's actions are not this Association's only reservation. The FAAA also has grave concerns regarding CASA's compliance with its obligations under the Legislative Instruments Act (**LSA**) 2003. Part 3 of the LSA also requires CASA to consult on the use of Disallowable Instruments, however, as noted above, CASA did not seek the submission of the FAAA as required under Section 3 (17) (3) of the Act and therefore has not met this important legislative obligation. Similarly, none of the provisions of Section 3 (18) (2) of the Act, detailing when consultation is unnecessary or inappropriate, exist to obviate the need for CASA to have consulted in relation to these approvals.

Additionally, the first approval (CASA 321/06) has not included a Consultation Statement as required by Part 3 of the Act or detailed why consultation was considered not necessary. Subsequent approvals (CASA 172/07 & CASA 222/07), which are currently still before the parliament for disallowance, do contain Consultation Statements; however, there are several significant errors. The Consultation Statements for CASA 172/07 and 222/07 state that consultation was not required as they are based on a previous similar approval (i.e. the initial Virgin approval 321/06). This approval, which does not itself meet the requirements of the LSA, is therefore being utilised as the basis for avoiding consultation on all subsequent approvals. The FAAA considers this to be inappropriate [legislative] action by CASA.

The consultation statements included within Instruments CASA172/07 and CASA 222/07 make the incorrect statement that the issue of crew numbers has not been reviewed for 47 years, indicating that this was a contributory factor in supporting the granting of the approvals. As indicated above in the discussion of NPRM 0211 OS, this is a false statement and provides no basis for supporting the CASA approval decision.

Parliament considers the issue of Regulators consulting on the development of Disallowable Instruments to be so significant that the Senate Standing Committee on Regulations and Ordinances has recently produced a report specifically on this issue. The FAAA has reviewed this report (Interim Report 113) carefully and brings to your attention that the Committee was highly critical of regulators not acting in accordance with the consultation requirements of the Act [and in a manner exactly as CASA has acted in relation to these instruments]. The FAAA will be bringing the actions of CASA to

the attention of the Committee and requesting that it reviews the appropriateness of CASA's actions with respect to these instruments.

The FAAA believes that CASA's actions in regard to these approvals and disallowable instruments has significantly undermined the intentions of parliament, the sustainable basis for continuing Australia's current world's-best-practice crew ratio regulations and have not complied with the regulator's obligations under the Legislative Instruments Act. Considering these facts we therefore request that you review the appropriateness of Instruments CASA 321/06, CASA 172/07 and CASA 222/07, and CASA's actions relating thereto, as a matter of urgency.

The FAAA makes this request based on our strong concern that the inappropriate regulatory and legislative actions of CASA have, potentially, placed the safety of fare paying passengers at risk and undermined confidence in the government's regulatory and legislative actions.

Yours Sincerely,

Jo-Ann Davidson
Secretary, FAAA Domestic/Regional Division

Regulations should be based on risk management

"Level of regulation should take into account the risks inherent in an activity, the control of individuals over those risks, and the likelihood and consequences of an accident occurring"

There are numerous incident/accident investigations where the number and actions of cabin attendants has influenced the success and speed of passenger egress. Three well known examples are

- Air Canada CRJ Fredericton 16 December 1997
- TWA Lockheed L1011 New York 30 July 1992
- Continental DC-10 Los Angeles 01 March 1978

The National Transport Safety Board (NTSB) has expressed concerns to the FAA in the past over the reduction of the number of flight attendants through exemption and proposed rule changes. The board stated that

1. "The Safety's Board accident files are replete with examples of the importance of the flight attendant role in emergency evacuations but, as the present proposed rulemaking indicates, it has had little effect on the FAA"

and

2. "a program for the collection of appropriate supporting data is required before rule changes can be supported, and such a program should also include a study of flight attendant redundancy as a factor in ensuring availability of leadership in emergency situations"

1. & 2. National Transportation Safety Board, Statement of James B King (Chairman) Regarding Aircraft
Cabin Safety Staffing Standards

International Research

Cranfield University has conducted research into the contribution of cabin crew to passenger egress in an emergency. The factors which affect the post crash survival rate were broadly classified into four groups. One of those groups termed "Procedural" included reference to the number of flight attendants. The conclusions at the end of the research stated:

3. "The behaviour and number of flight attendants significantly influences the speed at which passengers are able to evacuate in an emergency."

Further studies in computer modelling techniques which would assist in identifying the effects of the number and positioning of cabin attendants in an evacuation, is being conducted by Ed Galea at the University of Greenwich, London. Decisions made in the past in relation to regulatory changes on cabin crew compliments have been based on opinion rather than hard data.

Changes in Cabin Crew Duties and Responsibilities

The following summary of changes to the aviation industry highlights the need for increased numbers of cabin crew

- narrow-bodied to wide-bodied aircraft
  Differences in procedures, including the increased complexity in cabin surveillance and passenger management, and controlling two passenger flows instead of one, are a result of the development of wide bodied aircraft. The proposed regulations do not reflect this
- reduction in the number of flight deck crew
  Developments in aircraft technology has introduced a reduction in the number of flight crew required on the flight deck. The cabin attendant can no longer rely on flight crew being able to assist in a cabin emergency
- longer routes and flight times
  New aircraft types operating longer routes requires levels of alertness and performance to be maintained for longer periods of time which reach, and in some cases overstep physiological limits

3. Cranfield University, Professor Helen Muir PhD (Head of Department of Applied Psychology), Contribution of flight attendants to passenger egress in an emergency

- increase in passenger load factor
  Worldwide average passenger load factor has increased from 52% in the seventies to approx 70% in 1997. For cabin crew this means a higher workload for each individual both in normal and emergency conditions. When this is considered in relation to longer routes, as is the case in some international operations, potential for fatigue is also increased
- passenger profile
  Aircraft occupants now include a wider variety of people ie. cultural and social background, ages, flying experience, medical and other special needs. Managing such diversity in a confined area requires an increasing number of skills and time
- passenger behaviour
  The well documented increase in disruptive and unruly behaviour adds another complexity to cabin crew duties and their handling of emergency situations. There can be no doubt that the safety of the aircraft and it's occupants is at a higher risk where there is only one cabin attendant for every 50 passengers. The proposed regulation change would rely upon other able-bodied passengers to intervene and assist cabin crew, when faced with an incident of "air rage". This cannot be relied upon, nor can the flight deck crew be relied upon, or is it desirable for them, to leave the flight deck to assist.
- solo flight attendant operations
  Some of the issues listed above are even more critical on those operations where the aircraft capacity is close to or exactly 50. On an aircraft like the F50 you would have one cabin crew responsible for operating 4 emergency exits. The potential for congestion and inability to get to those exits to increase passenger flow, is a very real and unacceptable risk. In addition, one cabin crew member responsible for controlling 50 passengers during an in flight emergency such as fire, unruly passenger or a severe medical case, is a disaster waiting to happen.
- marketing vs. safety
  Increased competition puts pressure on operators to cut costs while simultaneously increasing the services provided. This results in an increased operational workload for cabin crew and an emphasis on service rather than safety. Reducing the number of cabin crew carried reflects this philosophy.

Summary
Improvements in aircraft reliability, design and performance are given as justification for reducing cabin crew requirements ie. the aviation environment is safer. Far from negating the role of cabin crew, these advances in technology combined with evolving cabin safety issues such as unruly/disruptive passengers, reinforces the need for well trained cabin crew in sufficient numbers to handle the ever increasing passenger numbers and their demands. Improved occupant survivability in accidents equates to a greater number requiring assistance in evacuating an aircraft. Then there are the evolving safety challenges to be considered eg.

- significant increase in traffic
- an ageing population
- increase in number and frequency of incidents/accidents due to increase in aviation activity ie. even if the accident rate remains constant the frequency of accidents will increase in direct relation to the increase in aircraft movements
- operation of very large transport aeroplanes (VLTA) carrying up to six hundred passengers, on yet even longer routes and flight times eg. the development of the A3XX by Airbus

4. "While the changes that have occurred in the last fifty years in aircraft design and performance, air traffic, passenger behaviour and economic environment are fully recognised, the influence of these changes on the safety duties and responsibilities of cabin crew is scarcely mentioned."

Harmonisation should not be used as the justification for taking cabin safety standards down to the lowest common denominator. The Australian regulations which are developed now need to take into consideration future developments in aviation and then must place emphasis on protecting the fare paying passenger and crews.

4. Cabin Safety Conference '99, Betty Lectouturier (Chair - ITF Cabin Crew Committee, SNPNC France), A Cabin Crew Perspective of Safety Issues for the Years 2000.

Submission 010
Date received: 12/04/2011

Specific responses to the proposal

Your response to any of the following specific sections of the proposal would be appreciated.

Provide an avenue for an air operator to conduct operations using the number of cabin crew members used in an aircraft's successful evacuation demonstration up to a ratio of 1 cabin crew member for every 50 passenger seats or part of that number. The proposed change will be applicable to aircraft with a passenger seat configuration of more than 36 but not more than 216, engaged in charter or regular public transport operations

○ ◉ Not acceptable under any circumstances

There are a number of important reasons why CASA should not be considering the proposed decrease in numbers of cabin crew on board aircraft operating in Australia.

It is evident from the NPRM that a number of factors have not been considered and that the proposed changes have not been put forward with an increase in safety in mind.

One of the first points that should be made is that any change to the regulations should not increase the risk to air safety. The Civil Aviation Advisory Publication draft CAAP 208-1(0) Para 6.1 published as part of this package of proposed rule change identifies an increased risk if cabin crew numbers are reduced.

The Australian Bureau of Statistics shows that the Australian population mean age will increase by 11.3 years between 2000 and 2050. This increase will be larger than both North America and Europe – the standards used by CASA for comparisons for National Airworthiness Authorities.

The Australian Bureau of Statistics also records upward trends in obesity in Australian adults in the 10 years up to 2005 in the order of up to 12%. The trends indicate that as each year passes an additional 1% of the population moves into the obese or overweight category.

The proposal to reduce required numbers of cabin crew fails to take into account and provide for future risks associated with RPT operations. There is no recognition of the expected increase of the average age of the Australian population, nor any consideration into the noted upwards trend in obesity and overweight people. Both of these factors alone increase the difficulty in evacuating an aircraft safely and in a timely manner.

This combination of both an aging and overweight population needs to be considered most seriously when identifying the emerging risks to cabin evacuation and this NPRM does not do his.

The NPRM does not adequately address or place emphasis on security inside an aircraft cabin. There have been a number of incidents in Australian skies in the past few years where cabin crew have been seriously assaulted and it was other cabin crew that were required to disarm and restrain the attacker. In a case such as this and operating with minimum numbers

the incapacitation of a crew member reduces below the minimum the number of cabin crew available for safe evacuation of the aircraft in the event of an emergency.

Consider the explosion of an oxygen cylinder on board a Qantas flight in 2008. The cylinder narrowly missed a cabin crew seat and had the potential to cause harm or death to a crew member had they been stationed there at the time of the explosion. This explosion also disabled an entry door and caused a rapid decompression of the cabin. Is this the sort of situation that would be desirable to have minimum numbers of cabin crew available?

The current numbers of cabin crew required as a minimum, although possibly higher than the minimum required to evacuate an aircraft under ideal circumstances, are active layers of safety in the whole risk management process. Although it may not be evident in the majority of day to day operations where aircraft operate without incident it may become very evident when the inevitable does occur.

The proposed changes to cabin crew numbers do not adequately address human factors issues. Despite CAAP 208-1(0) 6.6 advising that crew workloads and duty rosters are a crucial part of a Safety Risk Management Plan (SRMP) the practical application of this is not something that can be managed to a required safe level when the system has been scraped back to its bare minimum. There will always be situations whereby human factors issues that are not directly related to rosters or duty cycles will arise and will fall outside an SRMP. These cannot be planned for, and cannot be ignored. In all areas of an airlines business there is always a culture that operational needs will override true human factors. This is unavoidable as airlines run on timetables with financial penalties for not meeting targets. Despite circumstances beyond their control, pressure will always be put on the engineer to explain why an aircraft was delayed, on the pilots for not leaving the blocks on time, on the cabin crew for late boarding of passengers The only way to adequately allow for a safety margin in these situations and to override operational temptations to push the margins is to build a buffer into the system. In the case of cabin crewing this is by providing enough crew resources to manage in an emergency when one or more crew members are down. This can only be done by the regulations taking into account minimum numbers for evacuation and then adding a safety margin. This should be the sacred number – a no go area for business to increase profits.

Cabin Crew duty times and roster cycles are set down in the Modern Award – Aircraft Cabin Crew Award 2010. The workloads and duty times and roster hours for the purpose of this newly modernised award are based on the current crewing arrangements of 1:36. A move to 1:50 will not tie in with the circumstances that were used to set the maximum hours and workloads and will cause increased fatigue and stress on cabin crew working under the proposed changes. In the past CASA has stated to the ALAEA (during discussions related to fatigue and duty times for maintenance personnel) that they rely on industrial awards and instruments to set duty times and rest periods. If this is true then this appears to be a case of the tail wagging the dog. Any changes to these arrangements need to be discussed correctly in the right forum with due consideration of the effect that award changes or regulation changes will have on the other instrument.

It is now a commercial money spinner to offer overwing escape seats to those who are prepared to pay a premium for the extra leg room. Insufficient attention has been paid to the ability and quality of those passengers that occupy those seats to be able to react in an emergency. The temptation of a passenger to embellish their actual capacity to react in an

emergency in order to secure more comfortable flying conditions has not been addressed. The only people that can be relied on in an emergency are those that have been trained and assessed as competent. Those people are professional cabin crew.

It can be reasonably argued that when all of the above factors are combined with the reduction of cabin crew numbers they introduce an unacceptable number of latent failures into the system. At some stage some or all of these latent failures will align and unsafe conditions will exist. Whether this leads to an incident or not is largely irrelevant. It is CASA's job to ensure that the opportunity for latent failures to find their way into the system are minimised.

Note that the absence of an accident does not necessarily mean that safe conditions exist.

Below is a direct quote from the Director of Aviation Safety John McCormick from the March 2010 CASA Industry briefing relating to safety based legislation and commercial considerations.

"I recently reminded CASA staff of the importance of keeping CASA's role as an aviation safety regulator clearly at the forefront of our thinking. This is important because there can be other factors that may seek to influence CASA's decision making. One of these factors can be economic or commercial considerations. CASA is not an economic regulator, and we have no authority to allow economic or commercial implications to influence the safety-related decisions we are obliged to make. It is only after a safety-related determination has been made that the economic or commercial consequences of that decision must be considered. CASA does have an obligation to look at the impact on the aviation industry and broader community of our decisions and actions, but safety must come first."

This statement by John McCormick appears to be at odds with the purposes of the proposal to change. Although the NPRM or Annex A or B does not directly say that the reason we are changing the legislation is to allow lower staffing levels on aircraft neither does it say that a safety problem has been identified and we are amending legislation to rectify that.

CAAP 208-1(0) 5.3 reads,

> "Efficiency benefits must not compromise safety benefits and it is necessary to demonstrate that there are no safety significant differences between the current regime and the one proposed by the operator. Outcomes must involve a demonstrated equivalent level of safety or better."

This will be an almost impossible task for any airline considering the change to 1:50. How could they possible demonstrate that a reduction of available crew resources is as safe if not safer than current practices?

If an operrator can demonstrate that improved procedures and training make a safer operation then the obvious question is "Why have you not implemented those changes now with existing crew numbers?" The answer to this is also complex as the required Safety Management Systems (SMS) that have been adopted by operators should have already identified any improvements to procedures and training and those improvements should have already taken place with the existing crew resources. To reduce crew numbers now would be to increase risk and reduce safety. Or to make the admission that there is room for improvement is an admission that their adopted SMS is not functioning.

Change the term "cabin attendant" to "cabin crew member", and the term "cabin attendants" to "cabin crew" to align with international standards

(•) No comment
( )

Require the carriage of cabin crew on aircraft with more than 19 passenger seats installed, instead of the current requirement of more than 15 passengers. This would align with international standards, and proposed CASR Part 121

( ) (•) Not acceptable under any circumstances

Refer above comments. It is noted that there are already 19 Seat aircraft operating without cabin crew. This amendment is simply to justify those exemptions already made without public consulation.

Require an operator to submit a safety risk management plan (SRMP) which includes the identification, treatment and monitoring of the risks associated with the operator's proposal to operate with a cabin crew ratio of 1 cabin crew member for every 50 passenger seats or part of that number. Guidance on the preparation of an SRMP will be available in a CAAP

( ) (•) Not acceptable under any circumstances

Refer above comments

Provide for an aircraft to be operated with one less cabin crew member in the event of an injury or illness sustained by a cabin crew member during a tour of duty, if a ratio of 1 cabin crew member for every 50 passengers on board (or part thereof) can be maintained, and subject to strict conditions including reporting to CASA

( ) (•) Not acceptable under any circumstances

Refer above comments

Your response to the draft amendment to CAO 20.16.3 (Annex A)

( ) (•) Not acceptable under any circumstances

Refer above comments

Your response to the draft CAAP 208-1(0) (Annex B)

○ ◉ Not acceptable under any circumstances

Refer above comments