

AVIATION SAFETY REGULATION REVIEW SUBMISSION

As a retired front line CASA airworthiness inspector I wish to make a submission to the Aviation Safety Regulation Review panel based on my concerns for the significant shortcoming of the CASA regulatory oversight of Qantas. My experience as an airworthiness inspector from 1987 to 2008 involved over 10 years regulating General Aviation from the Bankstown airport office and another 10 years regulating Qantas with other regional airlines from the Sydney airport office. Unfortunately in my time there were a number of major restructures to the organization and from my observations it has only been the dedicated inspectors working at the coalface, despite ever changing politics and ineffective management of DOA, DOT, DOTC, CAA and CASA, that has kept the Australian aviation industry to even a reasonable level of air safety.

For many of my years working at the Sydney airport office I headed up the airworthiness inspection team to oversight Qantas and I found the limited resources and minimum unrealistic audit regime set by CASA management for the organisation almost beyond belief. At every endeavour when a head office manager from Canberra visited and engaged in an open question forum at the Sydney office I presented my concerns, as the head airworthiness inspector working at the Qantas coalface, but to no avail. After my retirement in 2008 I also made a formal submission to the Senate inquiry hearings on CASA management to again express my concerns regarding the lack of Qantas airworthiness audits, but from the information I have received recently the current regulatory oversight by the Sydney office may have been degraded even further.

As an example of my concerns, during my tenure at the Sydney office the CASA Surveillance Manual provided all airworthiness audit requirements, however the matrix in the manual to determine the size of a Certificate of Approval holder, which dictated the type and frequency of audits required was limited to a provision for either above or below 55 staff. There was no separate provision in the manual for Qantas with over 6000 engineering staff and this resulted in the minimum number of audits required in the manual being totally unrealistic for Qantas, given the massive scale of the organisation across Australia and it's numerous overseas line stations. For the majority of my years at the Sydney office the total number of inspectors dedicated to the Qantas airworthiness team was only four, resulting in a very small audit sample of the organisation and most of the 24 Qantas overseas maintenance line stations rarely received an audit.

Also adding to my concerns is many of the Qantas audits and surveillance requirements took place at Sydney airport where the CASA office was located. Since my retirement the office at Sydney airport has been closed and all front line inspectors have been amalgamated with the Bankstown airport office inspectors to an office building in the Sydney Central Business District, as a CASA cost cutting measure to reduce overheads in administration.

However as established in a 2012 Senates Estimates hearing the move into the CBD has been found to actually increase CASA costs. The productivity now lost in travel to achieve the same audits and surveillance on each airport would be incalculable, not to mention the surveillance oversight benefits that are lost in not having a permanent CASA regulatory presence on site.

Trusting the members of the Safety Review Panel will give my submission due consideration towards improving the regulatory oversight performance and accountability of CASA under the "Safety related matters" terms of reference.

Yours sincerely,

David Klein

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