

Aviation White Paper November 2023

Submission of the Flights Attendants' Association of Australia



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1.0 INTRODUCTION

- 1.1 The Flight Attendants' Association Australia (FAAA) has represented cabin crew since 1956 and currently represents around 6,500 cabin crew. The FAAA represents crew employed by international, domestic, and regional carriers domiciled and holding Air Operator's Certificates in Australia (AOC, the Airlines). Cabin Crew make up the numerically largest group of employees engaged by AOC holders.
- 1.2 Our members work for airlines that provide essential travel services to every corner of Australia and the world.
- 1.3 Our role at the FAAA is to advocate for members on all matters such as conditions of employment, Work Health & Safety, legislation, and other regulations affecting the industry.
- 1.4 Earlier this year the FAAA made a written submission responding to the 2023 Green Paper's terms of reference (March submission). Following the release of the *Aviation Green paper Towards 2050*¹ (the Green paper) in September 2023 the FAAA attended and addressed the public consultations. Members and the FAAA welcome the opportunity to make further written submissions regarding the Green Paper.
- 1.5 The role of cabin crew is often misconstrued as a service role. For example, cabin crew greeting and directing passengers on boarding. Crew are assisting passengers to their seats and checking boarding passes. Crew are also reviewing passengers for anything unusual, the nature of cabin baggage, passengers who may be able to assist in an emergency, passengers who may require additional assistance and passengers who may appear substance affected.
- 1.6 The Green paper identifies the priority issue of ensuring access to flying for persons living with a disability. On board it is cabin crew who are assisting this group by aiding with transfer, toileting, and other issues as required. It's common for crew to assist passengers with the aftermath of air sickness and gastrointestinal issues. Our earlier written submission identifies the range of safety and service tasks performed by crew. Far from the glamorous 'trolley dolly' accessory myth that remains pervasive, cabin crew are essential to aviation now and into the future. A fit for purpose aviation system must have the capability of responding to cabin crews' health, training, and industrial conditions issues.
- 1.7 Professional service is part of the cabin crew role however the primary purpose of cabin crew is that of safety. Given that role the FAAA is concerned that the issues and

¹ *Aviation Green paper: Toward 2050*, Commonwealth of Australia, September 2023

recommendations raised in our March written submission including the absence of regulated cabin crew fatigue protocols, gender issues, conditions of employment and ultra long-haul flying were not included in or encompassed by the Green Paper.

- 1.8 There were 558.1 million aircraft trips in Australia in the year ending December 2022, a 51.8% increase from the year ending December 2021.² On each of these passenger trips there was a minimum of 1 cabin crew member³. The essential role of cabin crew is safety. The fatigue issues raised by the FAAA in our earlier submission require attention and address.

2.0 Trends to 2050 (Chapter 2 of the Green paper)

2.1 The Green paper did not identify the development of ultra long-haul (ULH) flights with non-stop flights from Australia to Europe in QANTAS' forward planning. These flights of 26+ hours will have an associated workforce impact. The FAAA's March submission identified that crew fatigue is already a significant issue. There appears little (no) recognition in the Green paper of how ULH will be dealt with and/or the impact on crew. Being on duty for plus 26 hours is not a standard working condition and requires regulated hours. Cabin crew cannot be expected to bargain for safe working conditions.

2.2 The FAAA's March submission (at 3.2) recommended the White Paper adopt and monitor implementation of recommendation 20 of the of Senate Rural Affairs and Transport References Committee Inquiry *Report on Pilot Training and Airline Safety; and Consideration of the Transport Safety Investigation Amendment (Incident Reports) Bill 2010*

Recommendation 20 stated:

*The committee recommends that, following the release of the International Civil Aviation Organization (ICAO) fatigue guidelines, the Civil Aviation Safety Authority (CASA) should expedite necessary changes and/or additions to the regulations governing flight and **cabin crew fatigue risk** management as a priority.*

2.3 The Government at that time responded to the standing committees' recommendation stating that CASA was currently conducting a standards

² <https://www.bitre.gov.au/statistics/aviation/domestic>

³ Current CASA regulations provide for 1 cabin crew per 50 passenger seats. No cabin crew are regulated for airplanes with 19 or less seats.

development project relating to fatigue and further expected that CASA would be providing a regulatory proposal for public comment early in 2012 for flight crew **and by mid-2012 for cabin crew.**

Our submission (Chapter 4, and Attachment 3) identifies the sorry flight of the proposed CASA fatigue regulation (CAOA 48.2) for cabin crew. The draft regulation Working Group has not met since November 2014 and cabin crew have no prescribed fatigue standards setting a benchmark for companies applying a fatigue risk management system (FRMS).

2.4 Our March submission (for example paragraph 4.1.3 and 4.1.4) notes that The Australian Safety Transport Bureau (ATSB) is constrained when investigating reports from cabin crew. Our submission points to several ATSB investigations where CASA's response was that *"CASA has reviewed the (Report) and notes that there are currently no Australian civil aviation regulations governing duty times and rest requirements for cabin crew."*

2.5 Cabin Crew are caught in a Catch 22 where the agency responsible for delivering the regulation responds to ATSB investigations stating that there are no regulations. This is a safety issue for the general and flying public and all onboard. Acceptable fatigue management standards, outstanding since 2012, need to be addressed in the white paper.

3.0 Role of Government and Agencies (Chapter 8 of Green paper)

3.1 We've noted above the role of CASA in ensuring safety and the provision of acceptable fatigue standards. Chapter 8 does not include any reference to the outstanding project of cabin crew fatigue and the finalization of CASR 48.2. Our March submission (4.2.4, Attachments 4 and 5) identifies that the FAAA wrote to CASA in 2019 and again in early 2023 seeking information on the status of cabin crew fatigue regulation 48.2. CASA's response to our request was that quote, *'activation of the cabin crew fatigue project is under active consideration, but no decision has been made to proceed'* (CASA response 14 March 2023, Attachment 5).

3.2 Our March submission (3.1, 3.2 and 3.3) calls for the work to be completed and that CASA be appropriately funded to achieve this outcome. In mid-November 2023 the FAAA was advised by CASA personnel that, following a review of CASR 48.1, it is anticipated that in 2024 CASA will commence a project developing

appropriate fatigue risk management standards applicable to cabin crew. This is good news for cabin crew and the industry, however, the commencement of such a project should be an action required by the forthcoming White Paper. This matter cannot be shelved again and needs to be included in the white paper.

4.0 Future Industry Workforce (Chapter 10 of Green Paper)

4.1 There is one reference to cabin crew in the Green Paper (on page 174) and that is that QANTAS and Jetstar intend to engage more crew coming out of the covid period. Whilst recognising the scope of the Green Paper, as the numerically largest group of aviation workers, cabin crews' role and requirements demand White Paper recognition. Our occupation continues to suffer from outdated and repugnant attitudes that it is a service role, ancillary to the main business of being a pilot (mainly male) or engineer (mainly male). Cabin crew are emergency workers, they are first responders and their training needs and working conditions should reflect their critical safety role.

4.2 Much of Australian industry is captured by training qualifications which are fully portable. Cabin Crew training is overwhelmingly done in-house by the AOC holders. The AOC holders are not registered training organisations and do not issue certification or qualifications. The Certificate III Aviation (Cabin Crew⁴) has a decreasing enrolment rate with an apparent covid impact (refer Attachment '1'). To ensure safety, recognition and to attract strong candidates more must be done to ensure cabin crew training is certified and portable and that the needs of employers and employees are met within the White Paper. The FAAA recommends that *Industry Skills Australia* is requested to conduct a project reviewing the current take up and completion rates of the Cabin Crew qualification and barriers to AOC holders utilizing the qualification. This is consistent with recommendation 6 of the March 2022 Senate Rural and Regional Affairs and Transport Reference's Committees' report *'The Future of Australia's Aviation sector, in the context of covid-19 and conditions post pandemic.'*

4.3 Training qualifications and minimum award rates have been aligned from 1989 because of the Award Restructuring process. An AQF III qualification is linked to the base trade rate, or equivalent skill level in Awards of the Fair Work Commission (the

⁴ <https://training.gov.au/training/details/AVI30219>

FWC). There is only one rate for cabin crew in the *Aircraft Cabin Crew Award 2020* and that rate is 2% below the trade rate (AQF III rate) in other Awards. The FWC is currently undertaking a project⁵ looking at the issue of female dominated occupations and whether there are indicia of systemic undervaluation represented in Awards of the FWC. The FWC has limited its examination to occupations which are 80% female and engage more than 10,000. The flight attendant occupation is 76.1% female and because of covid has fallen to a 2021 census estimate of 6,600⁶. The FAAA recommends that given the safety sensitive role of cabin crew and aviation's central role to Australian security and supply chains, the White Paper include a recommendation that the FWC assess the Airline Cabin Crew Award 2020 for systemic gender base devaluation within the scope of their current review.

4.4 QANTAS' declaration of engaging more staff needs to be considered in the light that extra cabin crew will be flying on the Company's aircraft however they won't be employed directly by Qantas Airways Limited or Jetstar Airways but via a multitude of internal, external, and overseas based labour hire agencies.

4.5 Our March submission (1.7) stated that many of the themes raised in the white paper had been canvassed in earlier reviews, for example the March 2022 Senate Rural and Regional Affairs and Transport Reference's Committees' report *'The Future of Australia's Aviation sector, in the context of covid-19 and conditions post pandemic.'*

The recommendations of that report were included at Attachment 2 in our March submission and go to the issues of labour hire and outsourcing, job security, in the aviation industry.

The White paper would waste an opportunity if it did not adopt the significant work and ensure the implementation of the reference committee's report recommendations.

5.0 Recommendations for White Paper inclusion:

- 5.1 CASA commence the development and implementation of fatigue risk management regulations for Cabin Crew
- 5.2 The FAAA recommends that *Industry Skills Australia* is requested to conduct a project reviewing the current take up and completion rates of the Cabin Crew qualification and barriers to AOC holders utilizing the qualification. This is consistent with

⁵ [President's statement – Gender Pay Equity Research \(fwc.gov.au\)](https://www.fwc.gov.au/president-statement-gender-pay-equity-research)

⁶ [Gender-based Occupational Segregation: A National Data Profile \(fwc.gov.au\)](https://www.fwc.gov.au/gender-based-occupational-segregation-a-national-data-profile), p.89

recommendation 6 of the March 2022 Senate Rural and Regional Affairs and Transport Reference's Committees' report *'The Future of Australia's Aviation sector, in the context of covid-19 and conditions post pandemic.'*

- 5.3 The White Paper recommends to the FWC that the *Aircraft Cabin Crew Award 2022* be included in the FWC's current review of Award based systemic gender based undervaluation.
- 5.4 Adopt the recommendations of March 2022 Senate Rural and Regional Affairs and Transport Reference's Committees' report *'The Future of Australia's Aviation sector, in the context of covid-19 and conditions post pandemic.'* (Attachment 2 of FAAA March submission)

END

Certificate III Aviation (Cabin Crew)**ATTACHMENT 1**

Year	2018	2019	2020	2021	2022	RTOs Delivering CERT III
Enrol*	372	387	440	193	206	Aerospace Training Services Pty Ltd, Trading as: Aerospace Training Services Pty Ltd
Com**	285	258	247	107	126	Airways Aviation Education Pty Ltd, Trading as: Chopperline Flight Training Education, Airways Aviation AUSTRALIA ACADEMY INTERNATIONAL PTY LTD, Trading as: National Institute of Australian Airline Pilot Academy Pty Ltd South Metropolitan TAFE Technical and Further Education Commission, Trading as: TAFE NSW William Angliss Institute of TAFE

*Enrolment

**Completions

Source: Supplied on request by Industry Skills Australia, 14/11/2023