

# Aviation Green Paper: Towards 2050

## Submission from the TWU to The Australian Government

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## ABOUT THE TWU

The Transport Workers' Union of Australia (TWU) represents 70,000 workers in Australia's aviation, oil, gas, waste management, road transport, passenger vehicles and freight logistics industries. With well over one hundred years' experience, the TWU has been proactive in establishing industry standards that improve the lives and safety of transport workers, their families and the wider community.

The TWU represents all workers in the aviation industry, including in ground and baggage handling, fleet presentation, airline catering, airport screeners, refuellers, cabin crew and pilots.

## INTRODUCTION

The TWU welcomes the opportunity to make a submission to the Australian Government's Aviation Green Paper (Green Paper). This submission complements the TWU's submission to the Aviation White Paper and should be read together. The TWU will provide feedback on several matters in the Green Paper including the workforce, competition, net zero, fit for purpose agencies and regulations, emerging technologies and international aviation.

The TWU commends the Government's commitment to a safe, productive and sustainable aviation future and understands the purpose of the Green Paper is to assist the Government develop the right policy levers to set the industry up for the future. The Green Paper must properly analyse and acknowledge the past failures in policy, particularly in relation to the aviation workforce, and ensure that the mistakes made are not repeated into the future.

Transport workers are central to a safe, efficient, sustainable, productive and competitive aviation sector. Aviation workers in particular must have a strong collective voice in all aspects of government aviation policy because labour standards and participation have widespread implications for policies impacting competition, net zero and international aviation and new technologies.

Aviation workers are present in every aspect of the aviation supply chain, they understand their jobs as well as the opportunities and challenges through the lens of fairness and sustainability. Yet for decades they have been remarkably absent from having a voice in nearly all aspects of aviation policy. Instead, there is an expectation that workers simply accept their conditions in the interests of competition and productivity.

The Green Paper must ensure that the interests of workers are front and centre of all discussions relating to aviation policy. There are currently multiple ministers, agencies and policy areas that are involved in aviation with competing interests and priorities. As a result, the negative impact these policies have on the aviation workforce become deprioritised or minimised. Only a strong, safe and stable workforce will be equipped to deliver a level playing field for competition, ensure the safety and security of the customers and a just

transition to Net Zero. Finally, the TWU recommends the government takes the lead and establishes an independent body to work with industry stakeholders to set enforceable standards taking multiple policy areas into account and make recommendations to the Australian Government that ensure the industry's safety, sustainability and security now and into the future.

## FUTURE INDUSTRY WORKFORCE

Workforce matters only comprise 10 pages at the end of the Green Paper and then only refers to pilots and engineers. It contains no exploration of the issues with a singular focus on future skill needs. This is far too narrow and is contrary to the White Paper Terms of Reference and the recommendation by the Senate Select Committee's report into *The future of Australia's aviation sector, in the context of COVID-19 and conditions post pandemic*, recommendation two which states:

*The committee recommends that the Australian Government urgently works with industry, unions professional associations, and aviation sector experts, to prepare a comprehensive white paper on the future of the aviation sector post-pandemic, including aviation workforce issues such as: the ongoing impacts of job insecurity, wage decline and the erosion of safe work conditions on the aviation workforce, in the context of the pandemic and the sector's recovery; measures to lift wages, conditions and standards at airlines and airports around Australia, including aviation workers performing the same job are entitled to the same pay, and holding airlines and others at the top of aviation supply chains responsible for standards throughout the chain; options for lifting workforce supply to support the projected growth in aviation activity; and approaches to ensuring that workforce growth results in the creation of a sustainable, highly-skilled and secure workforce for the long-term.<sup>1</sup>*

Other than skills challenges for pilots and engineers and suggesting migration as the potential solution, the Green Paper appears to consider the Government's *The Fair Work Legislation Amendment (Closing Loopholes) Bill* (the Bill or Act at the time of sending this submission), specifically the same job same pay provisions, will resolve workers and their unions' concerns about the aviation workforce.

The TWU applauds and is supportive of the Labor Government's efforts to close the loopholes. It will go some way to resolving labour hire and some contracting issues in the industry. However, it does not deal with many of the issues the TWU raised in the White Paper TOR submission and at Roundtables. Critically, it does not address the industry's responsibility for all supply chain participants to lift and enforce standards. Nor does the Act contain provisions to embed labour standards across its aviation polices. There remain deep seated structural issues that can't be resolved by industrial relations changes alone.

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<sup>1</sup>[https://parlinfo.aph.gov.au/parlInfo/download/committees/reportsen/024656/toc\\_pdf/ThefutureofAustralia'saviationsector,inthecontextofCOVID-19andconditionspostpandemic.pdf;fileType=application%2Fpdf](https://parlinfo.aph.gov.au/parlInfo/download/committees/reportsen/024656/toc_pdf/ThefutureofAustralia'saviationsector,inthecontextofCOVID-19andconditionspostpandemic.pdf;fileType=application%2Fpdf)

The aviation industry has remained remarkably silent in discussions to improve working conditions, simply describing the workforce challenges as about post-Covid recovery or a skills shortage that is limited to pilots and engineers. For example, both the Green Paper and the LEK consulting White paper scenario analysis describe the challenge of pilots leaving the industry due to the competitive labour market yet doesn't draw the logical conclusion that this means conditions need to improve in Australia. Government and industry talk about the benefits of competition and the infrastructure required to support a fair competitive landscape yet when it comes to the labour market it becomes an anathema to even consider the need to improve pay and working conditions to attract pilots back to Australia. For TWU members, there are many solutions to the workforce challenges not explored in the Green Paper.

The Green Paper acknowledges the uncertainty surrounding the supply of skilled aviation workers due to the declining attractiveness of working in aviation or overseas. The TWU would argue that this extends to other aviation workers in ground handling, catering, security, refuelling and cabin crew. The TWU's submission to the White Paper TOR explores these issues in detail and should be read in conjunction with this submission. It is attached as Appendix A.

Skills shortages and workforce issues are not only a problem in sectors that are considered highly skilled like pilots and engineers. Even though workers in other aviation sectors are seen to be more easily 'replaced' it is dangerous to assume that high turnover and the lack of experienced staff above and below the wing does not impact the safety, security and viability of the industry now and in the future. Everyone in Australia saw the chaos, security and safety breaches caused post-pandemic at airports by not only a shortage of workers but a shortage of *experienced* workers. Thousands of aviation workers were abandoned by their government and employers like Qantas even while receiving taxpayer funded subsidies. Many chose not to come back, finding better jobs and respect in other industries. Aviation is a cyclical industry with peaks and troughs, and it would be myopic to dismiss the chaos as something that was caused by the pandemic. The TWU recommends that a proper analysis of the aviation workforce and how it intersects with other matters in the Green Paper is completed.

### Above the wing workers

The TWU conducted a survey of our pilot members on the policy areas addressed in the Green Paper to ascertain the underlying issues that need to be addressed to attract and retain staff.

The survey results are clear: while pilots did not object to improvements in skills and training or better alignment of training and licensing, it is clearly not the main or even a priority issue when asked what can be done to address the pilot shortage. For pilots, and this is applicable to our wider aviation membership, it is fundamentally about pay, conditions and having a strong collective voice in matters like fatigue management and rostering. It is simply not the case that stakeholders aren't able to identify any clear solutions to the issue. Rather, too much weight has been given to the stakeholders who prefer to blame external policies or to characterise workforce challenges as a 'skills shortage' instead of examining their part in

driving down standards over decades and refusing to listen to their workers. The TWU recommends that the voice of aviation workers is preferred to that of employers claiming to know what workers want.

### **Green Paper Survey**

Below is some of what pilots have to say on the pilot shortage:

#### **Quotes from TWU Pilot Members:**

*It comes down to money. Why spend over \$100,000 to become a bare-boned commercial Pilot to then earn less than \$60,000 pa. Only those with a true passion even take that risk. Then you face the 6 monthly challenges to keep your licence in the form of check flights and annual medicals. Pilots are constantly being bombarded with ways to lose their livelihood/licence/medical.*

*Australian companies are not addressing the core issue behind the shortage of skilled and experienced pilots. Rather than set pay and conditions on par with global standards to encourage experienced pilots to stay, airlines continue to pursue a recruitment program focussing on inexperienced pilots at reduced costs. Profits over safety.*

*I am owned by my company 24/7. I have no real say to my days off or what hours of the day I work. I would like to see companies required to listen to employees rostering needs.*

*Fix the pay, it's been reducing in real terms for about 30 years. Stop companies penalising pilots for trying to do what is safe.*

*Improvement in pay and conditions. Unfortunately, the white paper is primarily concerned with competition and sustainability which I believe further aggravates the race to the bottom.*

*Employers seem to have a very aggressive approach to employee relations and don't value or respect their pilots.*

When asked what will have the most impact in addressing the pilot shortage 98% said pay and conditions alongside managing fatigue, rostering for better work life balance and being treated with respect at work. Further, reducing training requirements and costs will not resolve the issues and will adversely impact safety:

- **88%** of pilots think reducing minimum requirements for flying hours will not address the skills shortage.
- **89%** say it would affect safety.
- **74%** of pilots did agree that reducing training costs may encourage new entrants. However, they did not believe it will help retain pilots if pay and working conditions didn't improve.

Put simply, aviation used to be a highly desirable and attractive industry to work in with good labour and safety standards where pilots were respected by management. This is not a skills shortage caused by mythical market forces. To attract and retain pilots the industry needs to fix its relationship with pilots and lift labour standards.

## Fatigue Management

### Quotes from TWU Pilot Members:

*"In 30 years of flying I have never been so fatigued as I am right now."*

*"The amount of fatigue also damages my relationships with my family and is the biggest reason I am considering leaving the industry."*

*"FRMS has become a target for rostering, not a limit."*

*"I'm worried that CASA's FRMS does not address the fatigue build up after multiple concurrent long duties."*

*"Management appear more concerned with prosecuting people who submit fatigue reports or make errors rather than fixing the main problems."*

These quotes are from a recent TWU fatigue survey of over 500 pilots and cabin crew after members continually raised fatigue as one of the most important issues impacting their jobs. This is another example of an issue that goes beyond industrial relations and the bargaining framework. The findings are alarming and clearly demonstrate the need for government and CASA intervention. It also reveals another underlying cause to the skills shortage.

The survey reveals significant concerns around fatigue, safety and dangerous rostering with workers saying it has reached crisis point and they've never seen the industry in this position before. It is important not to dismiss these findings as post-pandemic recovery challenges because it has been an ongoing issue in the industry even before the pandemic.

### TWU Fatigue Survey Results:

- 86% of pilots and 97% of cabin crew saying fatigue is worse now than before the pandemic.
- 82% of pilots and cabin crew say management don't take fatigue seriously
- 85% say long duties are the leading cause of fatigue
- 93% of pilots and cabin crew say fatigue protocol and processes don't adequately address the cause of fatigue
- 75% of pilots and 87% of cabin crew say they are going to work fatigued because they can't afford to lose money.
- Pilots were particularly concerned that rosters were consistently extended to their limits, and that extensions were becoming a rostering protocol rather than a last resort. They're also concerned FRMS is being used by companies to increase hours over and above CAO48.1.
- 67% of cabin crew and 49% of pilots are concerned they'll be performance managed if they report fatigue multiple times.
- 57% of pilots said they'd used sick leave instead of reporting fatigue so they don't lose income.

In summary, pilots and crew are currently working unsafely at a risk to their health and well-being and the travelling public. There have already been numerous minor incidents that should be taken as a sign the government and employers need to do more. Instead, workers are silenced and if the industry doesn't structurally change it will only be a matter of time before a major incident occurs. This is about the future of the industry. There is no point talking about what skills are needed or the impact of automation and decarbonisation if workers are leaving the industry in droves. It will only exacerbate these challenges.

## Safety

### Quotes from TWU Pilot Members

*On the surface the industry looks safe but major issues are just under the surface. If the general public knew about the systemic fatigue and safety related issues in this industry they'd be appalled.*

*If they [customers] knew we operate aircraft when we shouldn't be operating a motor vehicle I have no doubt they would be horrified!*

*Cheap fares generally don't mean safer skies. When the tickets are cheap where are they cutting the costs from?*

*The under reported levels of fatigue are a serious threat to the aviation industry, now more than ever as companies continually seek productivity gains and government intervention is the only solution.*

The safety implications of fatigue and unsustainable rosters (including the use by airlines of roster optimisation software to extract the maximum efficiency and productivity out of their workforce) comes at a significant professional and personal cost to pilots and crew. It is passed off as productivity and efficiency gains resulting in outrageous executive bonuses instead of investment back into the workforce. Many of these 'gains' are paid for elsewhere in the economy and have contributed to the cost-of-living crises.

### Below the wing workers

It is a similar story for aviation workers in ground handling, catering, refuelling and security – only they are further down the aviation supply chain and with less control. The TWU has documented the race to the bottom in these areas in our Aviation White Paper TOR submission.

The TWU is concerned that there appears to be little by way of formal consultation or submissions from the key employers below the wing. This sector of the aviation industry are broadly price-takers squeezed on both sides by airports and airlines with its workforce bearing the consequences. Airports are dictating rents and the conditions under which they operate at the airport. For security services, airports are responsible for selecting the contractor with the government regulating security obligations, but both maintain a hands-off approach regarding labour standards with contracts often cut to the bone. Job security for aircraft refuellers is now non-existent with contract changes as often as every 12 months



contributing to the pressure to cut their pay and conditions to keep contracts and employers unable to bargain meaningfully with their workers due to their contractual obligations. It is unsustainable, unfair and unsafe.

Airlines have been able to drive down prices and safety in ground handling, catering and check-in services. There is little to no government oversight when it comes to ensuring that companies operating in aviation supply chains can recover their costs and ensure that there are decent labour standards. This leaves the aviation workforce bearing the cost and pressures experienced in the industry. The TWU appreciates the government's efforts to improve consumer and community monitoring and protections in the Green Paper. The TWU urges the government to do the same for the workforce, so their future is a sustainable one.

The TWU is also alarmed that the proposed solution to the immediate skills shortage is to allow for more visa holders to plug the gap with no assurance on standards, conditions or industry commitments to work towards a sustainable workforce. It is well documented that temporary migrants – skilled or otherwise - are vulnerable to exploitation from their employer particularly when they are tied to their employer and have no pathway to permanency. It also allows employers to absolve themselves of any responsibility for the situation they created. Until the industry improves standards, migration will only exacerbate the situation.

This is another example of where there must be a shift in the culture of siloed decision making particularly in agencies like the ACCC, CASA, DHA, DFAT, PC and DITRDCA where worker and workforce issues as well as safe and sustainable standards are barely taken into consideration or overridden by productivity and competition concerns.

Pay and conditions are not just in the realm of enterprise bargaining or industrial relations. There is tangible link between pay, working conditions and safety. Unless these are dealt with together the pilot shortage and turnover of aviation workers will continue with disastrous consequences. These issues will continue to impact the industry out to 2050 unless they are dealt with now.

The aviation supply chain is such that the economic employer – those at the top being the government, airports and airlines - are able to make decisions that impact aviation workers they do not directly employ. Leaving it to the market has failed workers. Enterprise bargaining has failed workers. The privatisation of airports and airlines alongside open skies policies pursued by successive governments have failed workers. The Act will assist in deterring undercutting in parts of the industry but there is still no mechanism to lift and enforce standards.

The industry is in distress and aviation workers are bearing the brunt of this. Pilots have overwhelmingly – **87%** said that they believe the government is responsible for lifting and ensuring fair, safe and sustainable labour standards. It is time for the Australian Government to take the lead and create an independent umpire that can work with all stakeholders to find solutions on these intersecting issues and set enforceable standards. Only then will there be a safe, sustainable, secure and fair aviation industry.

## COMPETITION, CONSUMER PROTECTION & DISABILITY ACCESS

### **Quotes from TWU Pilot Members on the question of what consumers should know about the aviation industry**

*Prices need to be set in order to ensure a safe operation. It should be a collaborative approach as neither exists without the other. If the level of corporate greed wasn't so ridiculous, both might be more sustainable.*

*It's hard to defend the current price gauging that depend on monopolies in the regional centres. Some services are no doubt subsidised by others.*

*The public has been duped for years with unrealistic airfares after a raft of ridiculous price wars which do not adequately cover how much it actually costs to run an effective airline where everyone is compensated fairly for the responsibility and expertise their jobs require.*

*Operating aircraft is a very expensive past time. And doing it safely costs money. When you can fly places for less than an interstate bus fare, you have to ask yourself, how? And what is being skimped on to do that? In the first instance it is the pay and conditions of the staff operating it. At the worst it is the maintenance on the aircraft. Are you willing to spend what it costs to have a safe aircraft with a well-trained and engaged crew, or do you just want the cheapest airfare possible?*

*Demand based pricing models and sale fares that are well below the true cost of the travel only serve to confuse the travelling public. Airfares today are well below the cost of fares 20 yrs ago when compared to the average wage. Pilot salaries have declined with respect to the average wage over the last 30 yrs. Airlines are paying lower wages, expecting higher productivity of their staff, all in the interests of significant profits for shareholders and grossly overpaid executives.*

*Corporate gouging both at the airports and airlines is rampant, They both have been very successful in hiding massive profits while pay and conditions drop and airfares increase.*

The quotes above are intended to provide some context to the competition and consumer issues raised in the Green Paper. There are nuances to balancing the reasonable expectation from the public for accessible and affordable airfares, particularly in regional areas, the cost of flying safely and sustainably and the price gouging from airlines to shareholders and executives. This is why it is critical that an independent body is established to determine real travel costs that don't risk labour and safety standards; and where airlines and airports are accountable and transparent to these standards.

The TWU would welcome more transparency on competition in airports and airlines as well as government decision-making on cabotage and air services agreements. These policies and arrangements, without proper thought being given to labour standards, have cost workers dearly. Pursing open skies, air liberalisation and competition above all else has not led to a more productive, efficient industry let alone a safe and sustainable one.

The TWU would support the extension of monitoring to airlines. Further, we expect that both airport and airline monitoring should include the monitoring of labour standards that are developed with industry. This may mean that the ACCC may not be the best placed agency to do this or may need to work in conjunction with the appropriate agency and experts.

It is not worth considering any changes to cabotage until such time as the workforce issues raised in this submission are properly considered and addressed. In the TWU survey referred to above pilots strongly flagged their concerns over security, safety and the downward pressure this will have on already declining pay and conditions. There must be genuine consultation with workers on the decision-making framework and the related issue of bi-lateral arrangements. The TWU also recommend that labour standards be included in air services agreements.

## NET ZERO & EMERGING TECHNOLOGY

The TWU supports and recommends the government adopts a Just Transition approach for aviation. The International Transport Workers Federation (ITF) of which the TWU is a member has developed a plan that can be adapted to Australia. While much of Australia's aviation industry is now privatised, the government having an equity stake should be considered as a mechanism to secure the industry's future. The ITF has stated that public ownership models should be developed and promoted in key parts of the industry, including airlines, airports and air navigation operations.

The ITF sees a Just Transition strategy as involving several key characteristics such as:

- Establishing a jobs plan for the aviation industry
- Ensuring adequate employment security
- Ensuring access to decent work
- Establishing equality for women and young workers
- Establishing robust health and safety protections
- Improving worker representation and voice by establishing Just Transition Committees with worker representation on all levels
- Increase investment into fossil-free fuels for aviation (such as SAF)
- To “leave no-one behind”, by changing the way that the current aviation industry does business in order to begin the journey towards making everyday aviation operations more sustainable.

From these principles, the ITF has made several policy recommendations that the TWU urges the government to explore:

1. To conduct a global industry wide aviation employment study to understand the impact of climate change policies and new aviation technologies on jobs and to support better planning.

2. To establish strict measures on health and safety, to be built into the design phase of new propulsion systems such as hydrogen or battery powered aircraft.
3. To strengthen existing pathways for career progression and decent work for young workers, in apprenticeships and training pathways.
4. To find out if there are any gender-specific impacts of new technologies in the aviation industry and how these can be addressed.
5. The establishment of Just Transition Committees made up of workers at the national policy, corporate and airport-governance levels.
6. The establishment, at an international level, of a Just Transition Civil Aviation Task Force, with representation from workers, their unions, employer groups and governmental bodies.
7. To increase public investment into decarbonisation in the aviation sector and to increase public ownership of the aviation sector.
8. For the governments and employers of the Global North to finance sustainable aviation efforts across all regions and for these governments and employers in the Global North to accept lower growth rates and allow other countries in the Global South, higher growth rates.
9. To ensure that the aviation industry does not rely on carbon offsets, carbon capture or storage technology.
10. To encourage cooperation between governments, employers, investors and workers to immediately ramp up the production and usage of Sustainable Aviation Fuels.
11. To introduce new taxes to severely curb the use of private jets and introduce flight restrictions for any carbon-emitting private flights after 2030.
12. To cease all development of commercial supersonic flights.

Most TWU pilots have said it is very important for aviation workers to be consulted on decarbonisation policies with many offering practical suggestions that don't just depend on technological developments. These include:

- Fuel burn through improved departure and arrival procedures.
- More efficient air routes.
- Incentives to operate more efficient fleets.
- An engaged pilot workforce will have a large measurable impact on fuel efficiency, carriage, and burn.

With regards to emerging technologies, the TWU urges the government to prioritise safety and testing when assessing any benefits toward the transition to Net Zero and use of new technologies. Many of TWU's pilot members have expressed safety concerns with the use of drones and their potential to cause an air crash. While we support the need to transition, safety must be the priority and new technologies must be introduced in consultation with industry with safety and labour standards in place.

## FIT FOR PURPOSE AGENCIES AND REGULATIONS

The TWU has already outlined our concerns with the many of the government decision making bodies in relation to aviation and recommends the government establishes an independent body that can bring all stakeholders together to set and enforce safe, sustainable and fair aviation standards. We also call on the government to implement fair procurement standards on routes that are subsidised by the Australian Government and, after providing the sector with billions of dollars' worth of subsidies during and post pandemic with little accountability, ensure that any future aviation funding is subject to safe, sustainable and enforceable labour and safety standards.

## CASA

The TWU is of the view that there should be substantive changes made to CASA's remit and operations. Pilots and cabin crew do not feel it is currently fit for purpose or that their interests are being represented and taken into consideration by the body. TWU's pilots survey found that **63%** are unaware of the Aviation Safety Advisory Body within CASA and **only 9%** feel represented by it. Many pilots don't see CASA as an independent body because they are reliant on airline funding.

The TWU urges the Australian Government to listen to what pilots and crew have said about the body and reform the agency in consultation with aviation workers:

*CASA seems to be a bit toothless. They do not have enough industry experienced people. They also still seem to be fragmented. ie different offices will give differing interpretations of the same rule.*

*They [customers] are safe in spite of CASA and the government and not because of them.*

*CASA are letting the companies interpret the law as they see fit. It's making a mockery of safety and fatigue.*

*CASA appears to want the industry to self-regulate and empowers them to do so with internal fatigue management systems. How can a for-profit corporation place limits on its operations that impact profits?*

*CASA need to look at the application and misuse of 'self-regulated' programs like the FRMS. There is also no acknowledgement of the safety implications of crews being stressed, fatigued and the like in the current industry environment.*

*CASA also ought to consult with unions/pilot bodies rather than having airlines manipulate proposed rule sets.*

*CASA should stand up against airlines actively employing foreign pilots to do Australian jobs. The standards are falling. There have been many close calls for aircraft losses recently. Substandard management = less training = degraded safety. Foreign pilots need proper training systems...CASA and the ATSB need to properly audit the safety compliance with major airlines. They are cutting corners, not reporting properly...*

## CONCLUSION

*We are treated with total disrespect. Much like the passengers but worse.*

*Hard working employees are out there doing their best despite cost cutting, minimum wage support staff and aggressive antagonistic management.*

The TWU can only hope these final two quotes from our pilot survey are at the forefront of the Australian Government, policy makers and the industry's minds during the development of White Paper.

The TWU supports the overarching objectives of the Australian Governments White and Green Paper. It presents an opportunity for the industry to reset and engage in much needed reforms to prepare for the future. For the TWU and its members, government agencies like the ACCC, Department of Infrastructure and Transport, CASA and PC must start to prioritise labour, IR, skills, training and WHS matters to create and maintain a safe, sustainable and viable aviation industry. It must listen and act on the advice of aviation workers. Government decision making in aviation has failed customers and workers for decades because decisions seem to be made in isolation of one another with competing responsibilities, duties and priorities. In addition, a worker-led just transition strategy will ensure a smooth and proactive transition to the ambitious net zero objectives.

For all these reasons and to achieve the Government's stated objectives for the aviation industry, the TWU's key recommendation and what the aviation industry needs is the establishment of an independent body that can act and make recommendations with the overarching objective of developing a safe, sustainable and viable aviation industry that balances the interests of all stakeholders in the aviation supply chain, that can provide the best service for all Australians including passengers while ensuring there are safe and secure jobs for all aviation workers.

## APPENDIX A

TWU submission to the Australian Government's Aviation White Paper Terms of Reference is attached to this submission.