![AIPA Australian & International Pilots Association logo]

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Aviation White Paper
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To Whom It May Concern,

RE: Aviation Green Paper – Towards 2050

The Australian and International Pilots Association (AIPA) fully supports the Aviation Green Paper – Towards 2050 and are grateful for the opportunity to provide feedback and commentary.
AIPA represents around 2,300 professional airline transport category flight crew and we are a key member of the International Federation of Airline Pilot Associations (IFALPA) which represents over 100,000 pilots in 70 countries. AIPA maintains a dedicated Safety and Technical organisation, committed to protecting and advancing Australia's aviation safety standards and operations.

Much of this paper and, indeed the round tables, are concerned with sustainability. What that means in practice, is "Being Greener" (moving towards net zero and the use of sustainable aviation fuels (SAF)) and "Reducing Noise". Whilst these are admirable goals and appeal to the public, they do not address the myriad issues that need to be resolved if the aviation industry is to remain "sustainable" in economic, safety and operational terms.

These and other factors can only be addressed if not only the importance of aviation is acknowledged, but also its essential function in terms of the Australian economy and its role in providing connectivity throughout the nation.

Without a clearly stated National Policy and the underlying drivers (such as protection of airspace, an Aviation Workforce Strategy etc.), this White Paper will remain aspirational rather than fulfilling its purpose as the bedrock of a cogent and coherent plan that can unlock the benefits of a properly resourced and considered aviation sector.

The following response document addresses key areas of interest regarding the short- and long-term impacts of 'going' green in the aviation over the coming decades.

Kind regards,

Acting President
Jason Lipson

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1. Airports as Strategic Assets

Airports are vital national infrastructure assets. There continues to be strong growth in both the aviation passenger and freight sectors globally, nationally and regionally.

The Australian Government should consider a key priority or focus on regional airports and the supporting infrastructure such as roads and runways. These assets are particularly impacted by natural disasters, ongoing maintenance funding and planning.

The recent flood events have highlighted a persistent problem with our regional airports as they are impacted – are they flood-proof or flood-prone and/or are they 'fit for purpose' in the short and long term?

The Minister Catherine King during her Press Club address said:
I've already mentioned the Tanami, a project I visited, but it is impossible to overstate the impact of this project and our other investments in roads in remote communities across the Northern Territory. These roads are a lifeline for supplies and services, the things that all Australians take for granted, that they need to live a decent life. We know that building better, more resilient and more flood proof infrastructure has a significant contribution to make to closing the gap.

In AIPAs view, "better, more resilient and more flood-proof infrastructure" starts with regional airports. We have had widespread flooding across Australia that has highlighted the impossibility of flood-proofing all our roads and railway lines while highlighting the vulnerability of many of our population centers to isolation from flooding. Retaining a connection by air can significantly ease the hardship for those affected, particularly in more remote communities, and may well be the most cost-effective first step.

Emerging technologies are likely to stay in small scale proof-of-concept operations for some time, so an appropriate investment horizon for airports will be required.

AIPA is not aware of any strategic planning for airports at any scale that addresses the combined needs of Defence, population centers or emergency services. Neither DITRDCA nor CASA have provided any substantial information or advice to safeguard our major airport assets from developments that encroach on the safety, efficiency and regularity of our major air transport hubs.

2. Maximising Aviation's Contribution to Net Zero

Whether intended or otherwise, it appears that 'Net Zero' is the Government's highest priority. AIPA firmly supports the need for appropriate environmental protections and embraces that aspirational goal. We support the updated positions published by the International Federation of Airline Pilots' Associations (IFALPA)that underline the commitment of pilots worldwide to environmental protection and emissions reduction[1].

However, we also see it as an obvious distraction for some divisions of DITRDCA from dealing with a range of immediate issues that are hindering progress in the other areas of interest.
While noting her obvious passion and commitment to 'Net Zero', we nevertheless share the pragmatism expressed by the Minister's at her Press Club address:

Assisting our transport and infrastructure sectors to contribute to our net zero target is an enduring focus and one that underlined a detailed road map to guide our efforts. …while in the air we're working with industry to increase the use of sustainable aviation fuels ready to help that very difficult to abate transition to a cleaner future.

Similarly, we embrace the need to prepare for and to facilitate the positive contribution of emerging technologies, but also recognise that the technologies emerging in the aviation space are not yet mature and not yet of a scale to disrupt the traditional air transport industry as we presently know it.

Nonetheless, we can already see the enthusiasm within DITRDCA for focusing on emerging technologies that also seems to be drawing resources away from dealing with current aviation issues, many of which are the result of either historical disinterest or inaction by DITRDCA.

See https://www.ifalpa.org/publications/search/?search=emissions

3. Airport Development Planning Processes and Noise

It is disappointing that this theme is couched in terms of noise management. AIPA recognises the political sensitivity of noise generally, and have consistently communicated our position that pilots are minimising both the emissions and noise footprint of the aircraft we fly within the capabilities of the technology.

Importantly, there are safety considerations that limit our attempts to maximise efficiency. Flight path management is constrained by the need to avoid excessive tailwinds or crosswinds or manoeuvres that compromise handling and performance margins.

Whilst recognising the amenity of a peaceful lifestyle, our immediate and most compelling duty of care is to our passengers, followed closely by that to people on the ground under the immediate flight path of the aircraft.

Noise is but one obvious element to be considered in airport development planning processes and consultation mechanisms. It is very difficult to avoid concluding that emphasising noise is just another way for DITRDCA to divert attention from the comprehensive failures inherent in both the legislation and the implementation of the framework by DITRDCA, aided and abetted by CASA.

AIPA believes that the proposed theme should be amended by removing the words "airport development" so that it now encompasses all facets of aviation system planning to embrace noise considerations.

The new theme would be "**planning processes and consultation mechanisms that consider the impact and changing nature of aircraft noise and related expectations on the role of noise sharing and curfew arrangements**".

An additional theme of "**how to improve the development and safeguarding of Australia's aviation infrastructure**" would then allow the examination of airport development planning, airport and airspace safeguarding and Commonwealth airport lease management free of the politics of noise.
It is useful to re-examine some legislative history in support of those proposed changes.

The *Airports Amendment Act 2010*

The Airports Amendment Bill 2010 was introduced into the House of Representatives on 30 September 2010 and was passed by the House on 25 October 2010. The purpose of the Bill was to bring into effect the legislative reforms announced in the 2009 White Paper, to improve the regulatory framework in relation to planning. The Senate Rural Affairs and Transport Legislation Committee conducted an Inquiry into the Bill and published its report in November 2010.

The Committee report records the laudable aims of the amendments that were, in large measure, to ensure that the leased Commonwealth airports retained their primary purpose as airports, that "incompatible" developments would be controlled and that consultation mechanisms would be improved by creating a more transparent regulatory framework that balances the interests of communities with the need for ongoing infrastructure investment on airport land. The Bill was enacted and received assent on 17 December 2010.

The *Airports Amendment Act 2018*

The Airports Amendment Bill 2016 was referred to the Senate Rural and Regional Affairs and Transport Legislation Committee (committee) for inquiry on 9 February 2017. The purpose of the Bill was to amend several administrative arrangements relating to MPs and MDPs, to offer 'more flexible, proportionate' and efficient regulatory responses. The Bill proposed to extend the Master Plan cycle and to increase the monetary threshold for Master Development Plans (MDPs) from $20M to $35M. The Senate Rural Affairs and Transport Legislation Committee conducted an Inquiry into the Bill and published its report in March 2018.

AIPA unsuccessfully called for a provision requiring an MDP to properly consider developments 'likely to have significant impact on operational risks to aircraft using the airport' and that may 'compromise the efficient operation of airports'. Such a provision would require operational risks to be assessed, regardless of development costs. In any event, the monetary trigger for MDPs was subsequently amended to $25M. The Bill was enacted and received assent on 21 September 2018.

The Senate Committee report also included a relevant comment on the Essendon DFO accident:

4.45   The recently announced ATSB investigation into the building approval process for buildings around Essendon Airport, resulting from the Essendon crash, will play an important role in progressing discussions about aviation safety in relation to urban development. As previously noted, the findings of this investigation should be carefully considered in the context of legislative changes to airport planning laws.
4.46   The committee hopes that the important work of NASAG goes some way to addressing the concerns of stakeholders about building and structures near runways, and the impact these have on safe aircraft operation.
4.47   It appears to the committee that the encroachment of developments, be they residential or commercial, on and near airport land presents significant safety concerns. It is essential that safety in and around airports is given proper consideration at all times, without being overridden by commercial pressures.
4.48   The committee is of the view that a holistic approach should be taken to airport planning, and this should be reflected in the MP process. It should be incumbent on all airport lessees, developers and planners to do more than the bare minimum to adhere to airport planning legislation and frameworks, in order to give proper consideration to broader safety considerations.

Where are we now?

In relation to the ATSB investigation into the building approval process at Essendon[2], AIPA understands that the final report has been significantly delayed during the Directly Involved Parties (DIP) process by DITRDCA and CASA and that the investigation is no longer supported by the Chief Commissioner.

The first draft report was provided to DIPs in the last quarter of 2019, yet the anticipated completion date is this quarter of 2023. Although we had great expectations that the ATSB would provide valuable insight into the planning controls on Commonwealth leased airports, that is no longer the case.

Protection of the airspace at Essendon has been an abject failure. In our view, the Obstacle Limitation Surfaces (OLS) have been manipulated by the Airport Lease Company (ALC) to promote non-aviation development, watched by a profoundly powerless CASA and accepted by a disinterested DITRDCA. The approval of the iFly building revealed that NASF Guideline B studies were not required by the Airport Building Controller, DITRDCA or CASA despite what we estimated was a penetration of the OLS by several metres and its immediate proximity to the runway.

At Moorabbin, we have the general aviation industry being squeezed out by non-aviation-related activities as well as the creation of building-induced turbulence on the runways. Perhaps more stunningly, after having the proposed Master Plan rejected by the Minister, the ALC refuses to further

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[2]   ATSB AI-2018-010 *Aerodrome design changes and the Bulla Road Precinct development at Essendon Fields Airport, Melbourne, Victoria*

engage with stakeholders on the revised plan, apparently with the support of DITRDCA. In our strong view, nothing could be further from the aims of the Airports Amendment Act 2010 – instead of transparency, we now have secrecy and obfuscation writ large.

In Sydney, continuing concerns about turbulence from the activities in Port Botany has revealed that under the definition of a "controlled activity" in s182 of the Airports Act 1996 ships that sail into Hayes Dock are excluded from the ambit of S182(1)(c) because they are not "attached to, or in physical contact with, the ground" and, moreover, if a transiting ship penetrates prescribed airspace before docking, the act of mooring the vessel cannot change the nature of the existing penetration into a "controlled activity".

Apparently DITRDCA might consider whether ships are really obstacles when the current regulations sunset in 2024. That fact that both CASA and DITRDCA have known for the last three years that the very physical obstruction of the Queen Mary parked at the end of the north-south runways is legally invisible yet there has been no action by either agency on safety or any other grounds beggar's belief. It is emblematic of the systemic failure of airport and airspace safeguarding since 2009.

<u>What do we need to do?</u>

AIPA believes that the problems endemic in airport development planning processes and consultation mechanisms require an independent expert inquiry to examine the legislative and cultural failures and to reset the way forward.

In any event, airport and airspace safeguarding should not be left to guidelines that have no force of law in any jurisdiction and, even when there is some degree of legislative power, enforcement should not be left in the hands of the institutionally timid DITRDCA.

The proposed changes to the Obstacle Limitation Surfaces (OLS) as detailed in the ICAO State Letter are due to come into effect in November 2028. These surfaces include an Obstacle Free Surface (OFS) and an Obstacle Evaluation Surface (OES). The OFS is based on rigorous statistical analysis and rationale which is "justifiable and defendable". The OFS will be steeper, narrower and shorter in length allowing more airspace to be used for development. The stated aim, however, is that:

Obstacle Free Surfaces (OFS) shall not be penetrated, except for special considerations for existing terrain and obstacles – (approach, transitional and balked landing surfaces are to be categorised as OFS).

Airspace Protection exists only in name and is limited to Federal Leased Airports. The NASF needs to be legislated in every State and Territory (as was the undertaking) rather than relying on them as Guidelines, which has not worked in practice. Proper zoning needs to be enforced to prevent residential properties being built close to airports or under known or future flight paths. Finally, a better mechanism needs to be established to prevent permanent penetrations of the Obstacle Limitation Surfaces. The new ICAO OLS Standards and Recommended Practices are scheduled to be implemented in 2028. Without a "Head of Power", such as the Part 77 (used in the US and NZ), abuses of the system will continue and with the reduced OLS dimensions, the situation will be worse than today.

The aforementioned "special considerations" are existing terrain and obstacles, the latter to be considered after an aeronautical study which may result in their removal or the requirement for (additional) mitigation. New obstacles should not be allowed. This new surface, however, will be meaningless, without a "Head of Power" to enforce it, such as the Part 77- SAFE, EFFICIENT USE, AND PRESERVATION OF THE NAVIGABLE AIRSPACE, as exists in the USA and New Zealand. Without this, the new OFS will have reduced the airspace for aviation without protecting it and there will continue to be frequent penetrations of the OLS being approved, as is presently the case.

ICAO proposed a "standardised" OES but provides the flexibility for airports to tailor it to their operations. An aeronautical study will be triggered if the OES is penetrated and, although the criteria is laid out in the PANS-Aerodrome, there are no "rules" on who will perform this study and who will be the arbiter. Without strict oversight, these "performance-based regulations" will enable abuses and further encroachment into the so-called protected airspace.

The onus should be on the proponent to provide the safety case, whilst the overriding priorities must remain the safety and regularity of flight.

The White Paper needs to commit to a complete overhaul of the management and safeguarding of vital Commonwealth assets.

4.   General Aviation

General Aviation is of interest to AIPA, as it is one of the important sources of future airline pilots, both by providing the ab-initio training and opportunities for pilots to develop their skills and experience.

As such, it is imperative that this sector is supported by Government. The Green Paper will aim to address skill shortages, but without a coherent policy, such as a national aviation college and/or scheme to provide sponsored training, the cost of obtaining a Commercial Pilots Licence coupled with limited career prospects will see pilot shortages worsen.

The challenge in resuscitating general aviation is in recognising that infrastructure is not enough – there must be a realistic demand for general aviation services in the first place.

There are supply side issues that are directly within the control of government. CASA has opportunities to reduce costs by embracing scalability and being alert to areas that can be subject to a much lighter regulatory touch without unnecessarily increasing public risks.

DITRDCA could also embrace the concept that it is the servant of the Australian public rather than the partner of developers and ALCs. The latter is critical, particularly regarding our secondary airports where we observe to varying degrees the squeezing out of general aviation by a range of subtle tactics while pretending to comply with both the letter and the spirit of the Commonwealth leases.

The proximity of secondary airports to population centres is a particularly crucial factor in any strategy aimed at encouraging demand. Convenient access is powerful as an incentive, but pales into insignificance compared with the disincentive of inconvenient access.

Future secondary airports will require greenfield sites, so there is a need to ensure that existing urban sites are protected, and general aviation businesses are encouraged to stay by ensuring that expansion remains a realistic proposition. Every business that leaves a general aviation airport or closes its doors due to lack of demand for its services or lack of space or a suitable site to conduct business has a degenerative effect on the remaining businesses.

As mentioned earlier, AIPA made detailed submissions to the Senate Rural and Regional Affairs and Transport Standing Committees' inquiries into the Current State of Australia's General Aviation Industry and into the Future of Australia's Aviation Sector.

The complexities surrounding the state of the general aviation sector as well as its contribution to the overall health of our aviation industry have been well canvassed and should provide more than adequate grist for the mill in the development of the Green Paper. Our positions outlined in our submissions have not changed.

5.   Emerging Technologies

The use of drones (Remotely Piloted Aircraft Systems/Advanced Air Mobility) have increased exponentially. Should the plans of the many companies involved in this space come to fruition there will be considerable drone operations and associated vertiports in the centre of cities. This will have significant safety implications, as well as potentially affecting nearby airports and flight routes. . AIPA agrees with Boeing (Green Paper Page 134) that this subject must be viewed holistically.

The AC on Vertiports, for example, only considers the design aspects (Physical Characteristics, OLS, and Visual Aids) but does not cover social and environmental issues, operational requirements, fire protection, occupational health and safety issues and so on.

Our concern is that the generally well-ordered and regulated legacy aviation sector will be required to accept these new entrants into its operating areas without the same rigour being applied to the consideration and formation of appropriate regulation.

The commercial pressure to accommodate these AAMs will be enormous. It is incumbent upon the Department and the various groups it has set up to provide meaningful outcomes to protect traditional crew-based operations, particularly in the integration of airspace. The proposals in the Paper seem piecemeal and, instead, should form part of the CASA's Australian Future Airspace Framework, rather than an adjunct.

It is disappointing that the first of the "high-level principles" for the development and implementation of UTM is to "minimises costs for end-users where possible" rather than safety.

As highlighted in the Paper, security will remain an ongoing issue. Again, this emerging threat is running ahead of legislation, regulation, and enforcement. The Paper continually states that "work is underway", but the framework should already have been in place. Like many other areas, pre-planning and proper consultation would have made Australia better prepared to meet these security threats.

6. Fit-For-Purpose Agencies and Regulations

The slowly improving Consultation Hubs are a step in the right direction, but the industry needs to be able to see the history, submissions and reasons for decisions at any time in the future as a matter of public record.

Parliamentary inquiries provide good examples of how to create open and transparent decision-making. Agencies should be reminded that the privacy and information legislation was never intended to be used as a shield from public scrutiny.

One major step forward would be a regime where applications for regulatory approvals, exemptions, permissions etc. that require safety cases and risk analyses would be made public. While there are often claims of commercial confidentiality, the safety cases and risk analyses relate to public rather than private risks.

AIPA is of the view that the public has the right to see both the proposed justification as well as the reasons for the decision when an agency decides to set aside a pre-existing requirement.

The White Paper should provide a revitalised commitment by the Government to transparency and accountability in the activities of the portfolio agencies.

DITRDCA

We have already commented extensively on the fitness for purpose of several parts of DITRDCA. Our criticisms are not new. The positions we established in our response to the Modernising Airspace Protection Public Consultation Paper on 28 February 2017 remain unchanged.

We also proposed machinery of government changes in our response to the National Strategic Airspace - National Aviation Policy Issues Paper in July 2021. Rarely do submissions generate any feedback and it is difficult to identify any changes following consultations.

Given some lack of institutional transparency, it is equally hard to foresee how DITRDCA measures its own fitness for purpose or benchmarks its activities. Given that DITRDCA controls the narrative and oversees the other agencies, there should be some commitment in the White Paper to periodic independent external benchmarking.

ATSB

AIPA considers it entirely appropriate that the ATSB should investigate agency decisions that have safety consequences, such as the still-unreported issues at Essendon. Such an investigation provides some of the transparency requirements that feature in almost every one of our submissions.

The DIP process should not become a vehicle to delay reports or to attempt some sort of institutional obfuscation of inappropriate decision-making. The White Paper should include a government commitment to allow the ATSB to conduct safety investigations of agency decisions as a proactive measure to prevent excessive risks due to inadequate standards, procedures or decision making.

Safety Recommendations made by the ATSB should be acted upon unless there is an overwhelming reason to the contrary. Cost should not be the primary determinant.

Airservices Australia

Airservices Australia (AsA) resource commitments to the OneSky program appear to drive other decisions, especially around airspace redesign. The so-called Airspace Modernisation Program lacks cohesion and we continue to express concerns about the proper consideration of operational implications when transiting the various classes of airspace.

We believe that AsA has a self-induced manpower problem that affects its capability to control existing airspace, and which should be independently investigated. While CASA is the relevant regulator, there is no transparency around their supervision, and we do not believe that portfolio agencies should be afforded privacy and confidentiality protections as if they are private businesses.

Covid has exacerbated the situation resulting in the "normalization" of Temporary Restricted Areas (TRAs)/Traffic Information Broadcast by Aircraft (TIBA). Steps should be taken to ensure that this controller shortage does not continue.

ASTRA

The Australian Strategic Air Traffic Management Group (ASTRA) Council was considered by most stakeholders as one of Australian aviation's leading consultative forums. ASTRA was responsible for the development, consultation and reporting of industry policy in relation to air traffic management (ATM) matters and provided an expert and focused voice to Government. It was dependent upon AsA, the primary recipient of its advice, for secretarial support. The key to its success was that all the portfolio agencies participated in its working groups and main forum, allowing maximum transparency and accountability. AsA withdrew its support some five or six years ago and reverted to generalised public consultations. Those consultations removed the visibility of all agency ATM efforts as well as avoided any accountability to the stakeholders most affected by AsA decisions.

AIPA believes that ASTRA should be re-established as a matter of importance. Furthermore, AsA's lack of commitment to ASTRA must be reversed and, if necessary, be replaced as the sponsoring agency by DITRDCA.

CASA

AIPA has concerns regarding CASA's airspace protection and airport safeguarding, safety advice to NASAG, the implementation of Fatigue Risk Management Systems (FRMS) and consultation around noise abatement rules. Lack of transparency is a key issue.

While there are several issues around consultation about FRMS in general, a path forward has been identified but not yet eventuated. A greater concern is the way CASA applies its processes to smaller operators – scalability (and related costs) is apparently not embraced by CASA despite that being a key intention of the legislation.

While CASA is subject to external audits, such as those by ICAO, they are very high-level audits that provide little insight into actual practices at working level. AIPA believes that the Government should contemplate an independent process that examines the appropriateness of certain processes and procedures post-implementation.

Bureau of Meteorology

AIPA supports the position set out in AusALPA's comments on the drafts of the State Safety Programme 2021 and the National Aviation Safety Plan 2021 submitted to DITRDCA on 21 May 2021 that recommended that a machinery of government change to separate the roles of aviation meteorology regulator and the service provider.

"Both Airservices and the Bureau of Meteorology (aviation weather) are funded primarily through customer charges with the international carriers (pre-Covid traffic) paying 50% of those charges. The pandemic has highlighted the flaws in this system and has indirectly led to the shortage of controllers through the Retirement Incentive Scheme (RIS) which was used by AsA to reduce its overheads and to retain young ATCOs and those in training.

The more rapid recovery than predicted has resulted in reduction of tower hours and the use of TRAs and TIBA as a "band aid" solution. A much more resilient funding model is required.

Both roles are held by the Bureau of Meteorology (BoM). AIPA recommends that Australia should follow the UK model where the CAA is the Meteorological Authority, and the Met Office is the service provider - CASA should be the designated ICAO Met Authority for Australia and BoM should revert to being the meteorological service provider.

There is a practical impediment to the provision of BoM services at airports that needs to be addressed in legislation. BoM equipment has ICAO-defined site requirements that often compete with other land uses at airports and in many cases the airport operators seek commercial lease rates for those sites despite the importance of the services provided. Rather than disputes, cost escalations or denial-of-service ultimatums, AIPA takes the view that airports legislation should include a requirement or standard that appropriate sites be made available at a reasonable lease cost for the provision in the national interest of aviation meteorological services.

Funding Windshear and Turbulence Warning Systems

There are known issues with turbulence and windshear at several Australian airports. In Perth, the problem is mechanical turbulence from the hills to the east of the airport. In Canberra, the problem is on-airport development to the west of the main runway. In Sydney, the problem is off-airport operations at Port Botany. In adverse weather conditions, there are elevated flight safety risks. AIPA believes that appropriate Low Level Windshear Alert Systems (LLWAS) should be considered as risk mitigators.

DITRDCA[3] has taken the view that "LLWAS is not CASA-mandated aviation safety equipment at or in the vicinity of an airport, and its installation would be a decision for individual airport operators, in consultation with relevant stakeholders". We do not share the notion that the various Governments are not stakeholders - the risks certainly affect the private interest of the airport operators, but also the economic interest of the host State/Territory and the broader national interest.
AIPA believes that appropriate Low Level Windshear Alert Systems (LLWAS) should be cooperatively funded by the airport operators with subsidies from both State/Territory and Commonwealth Governments.

Independent scrutiny

Time limits on Senate Estimates have limited the capability of Senate Committees to conduct any detailed examination of agency behaviour short of a formal Inquiry. Currently, if AIPA has issues that it cannot resolve with the head of a particular agency, the only paths to seeking resolution are to apply to the Courts in very limited circumstances or to appeal to the Minister. In the latter case, the Minister may well be advised by the very agency that is the source of the problem, a process that could be perceived as lacking of independent advice.

In our view, the Government should consider including in the White Paper a process to generate an external independent expert investigation of important systemic aviation issues to properly inform the Minister.

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[3]   DITRDCA *Aviation State Safety Programme (SSP) and National Aviation Safety Plan (NASP) consultation – Stakeholder issues and responses* 19 October 2021

7. Future Industry Workforce

AIPA has been alerting the Government to air pilot shortage concerns since 2010 via the Senate and most recently at the Minister's Aviation Jobs and Skills Pre-Summit Roundtable on 23 August 2022.

Key amongst these is the lack of skilled personnel in every sector of aviation and the absence of a coherent national plan, such as an Aviation Workforce Strategy. The latest reiteration of the VET Sector (Joint Skill Councils) is unlikely to deal effectively with the skills shortages, ranging from short term to long term. Aviation needs to have far more prominence in the VET Sector if it is to deal with such issues, as the duplication of the CPL (A) Diploma and CASA examinations. The Green Paper makes some general comments concerned with the transition to new skills but does not address the short to medium shortages.

The Roundtable canvassed many of the workplace issues, although the official summary glossed over many of the details as well as the clear division in the room between the major airlines and the rest of the industry.

The major airlines were in denial about the flow-on effects of their actions on the rest of the industry, but the point was made that the major airlines do not pay their fair share of the costs of producing qualified staff.

The reduction in general aviation activity levels means that there are far fewer job opportunities than in years previous and many potential aviation personnel are lost to industry due to the availability of far less capital-intensive career paths.

While the pandemic provided the ideal opportunity for some major operators to clean up unfunded liabilities through early retirement and redundancy schemes, very few of those pilots have resurfaced in general aviation.

A significant amount of aviation experience throughout the system has been lost. The recent frantic backfilling of jobs as we exit the pandemic has stripped many general aviation operators of their personnel, despite the extraordinary efforts made by the smaller companies to look after their staff when times were at their worst. While we would argue that the commoditisation of pilots and engineers and the blatant productivity grabs for no reward have made the roles far less attractive than in previous years, the relative attractiveness of jobs at major operators compared to general aviation remains strong.

The other current issue is that we are losing lots of general aviation pilots to American companies. Those companies are prepared to put together employment packages, residency support and substantial promotion prospects that emphasise what their Australian competent can't or won't match. Of the approximately 600 pilots that we estimate have taken up those offshore opportunities, many will not return. Rather than an immediate issue, the problem will become a generational problem.

It is not the role of the Government to determine the conditions of service of aviation employees outside the safety net awards. However, the Government should be particularly mindful of the inequitable distribution of costs in determining how best to revitalise general aviation. Government should also be alert to the fact that creating pilot and engineer training facilities that service only the major operators' needs does nothing for the health of general aviation.

AIPA notes that there is considerable activity overseas where regulators are rushing to enact rules to support aircraft manufacturers' efforts to reduce required pilot numbers, apparently motivated by the pressures facing operators in recruiting enough pilots.

The reduction in the attractiveness of a career as a pilot is a function of operators attempts to maximise productivity and reduce costs – a self-generated crisis of sorts – and the irony of the attempts to permit fewer pilots, in some cases only one or perhaps none, is that even fewer people will be interested in flying as a career option.

AIPA is concerned that the inherent safety of software is often overstated and under-tested, potentially leading to adverse situations that will exceed the capacity of minimum crew or single pilots to resolve.

While we traditionally place great faith in the certification activities of the US and EU regulators, the Boeing 737 Max debacle is a timely reminder that Australian regulators need to be particularly watchful. Reducing crew complements to solve a perceived economic problem does not match our commitment to safety first.

The Green Paper needs to be premised on the continuing need for pilots, engineers and technical specialists for the foreseeable future. Replacing those human specialists with coded machines is a fool's paradise when safety is properly considered.

8. International Engagement

The Green Paper states that "it remains strategically important for Australia to maintain our active participation and aviation leadership globally. Australia has maintained a strong record of aviation leadership and is well regarded as a global leader that provides important, valued, and high-quality assistance to regional partners."

AIPA supports an active engagement both at ICAO and Regional Levels, but this should not be limited to environmental or climate change issues. The Paper further states that "The Australian Government proposes to continue its program of international and regional aviation engagement including capability and capacity building in the Asia-Pacific. The Australian Government will also consider additional opportunities to provide support, such as a targeted Pacific program that collaborates closely with other countries and Pacific aviation organisations."

Despite this undertaking, there have been incidences where individuals have been prevented from attending the ICAO Regional Office to participate in a safety workshops and forums, which would have been of benefit to our Regional areas and promoted Australia's commitment.

There are other areas, such Fatigue Risk Management (FRMS), Runway Safety, Wildlife Hazard management and "Go Teams", where Australia should provide its expertise in a much more coherent fashion.

9. International airport designation and development

The Paper only discusses this issue in respect of border services. We have previously mentioned Essendon Airport. Essendon has all the characteristics of an International Airport but is not designated, as such, as this is determined by the Minister.

The result has been that the MOS Part 139 Standards that should apply to an international airport are not required to be implemented leading to the many safety concerns outlined in previous paragraphs and highlighted frequently by the AusALPA, AIPA and AFAP. If airport operators are to benefit from a redesignation, which may also be in the "national interest", as described in the Paper, the regulations applicable to an international airport should be enforced in accordance with the Part 139 and MOS 139.

Concluding Remarks and Recommendations

AIPA believes there is a need to prevent border closures from again decimating the aviation industry and to better protect airports and airspace. Aviation connectivity must be preserved. Listed below are several suggestions and/or recommendations:

1. We have Constitutional constraints in resolving some issues.
2. We need to seek binding agreements and harmonisation between the Commonwealth and the States and Territories on aviation matters.
3. We need to strategically examine the location of our airports, protect our inter-urban secondary airports and floodproof our regional airports.

4. We need to ensure that ALCs comply with the terms of their leases and preserve the airports as airports capable of expansion to meet emerging aviation needs.
5. We need to commit to transparent and accountable decision-making and better consultative processes and accessible records.
6. We need a formal process for the conduct of an independent expert post-implementation review.
7. We need a general aviation industry, but it will be shaped by demand. The costs of specialist manpower production must be equitably distributed. Supply will be governed by market conditions set by operators here and overseas.

The fitness for purpose of our agencies can only stem from an institutional commitment to openness that will deserve and retain trust from all stakeholders.

Finally, we recommend that the government should consider increasing the use of external independent expert investigations of important systemic aviation issues.