



**AUSTRALIAN FEDERATION
OF AIR PILOTS**

Australian Federation of Air Pilots

**SUBMISSION TO
The Director, Strategic and Economic Policy Projects
Data, Analytics and Policy Division
THE DEPARTMENT OF INFRASTRUCTURE, TRANSPORT,
REGIONAL DEVELOPMENT AND COMMUNICATIONS:**

THE FUTURE OF AUSTRALIA'S AVIATION SECTOR

13 November 2020

The Australian Federation of Air Pilots

Formed in 1938, the Australian Federation of Air Pilots (“the Federation”) is the industrial and professional association for commercial air pilots in Australia. The Federation is the largest pilot association in Australia with over 5500 pilot members. The Federation is also a foundation member of the International Federation of Airline Pilots Association (IFALPA), the global body representing commercial pilots worldwide.

The Federation’s membership coverage includes Virgin Australia pilots, Qantas owned subsidiary airline pilots (such as QantasLink and Jetstar), regional airline pilots, Australian pilots flying for overseas operators, general aviation pilots, flight instruction pilots, aero-medical pilots, corporate jet pilots, helicopter pilots and aerial agricultural pilots.

As a professional association, the members and staff of the Federation are active in promoting flight safety and improving Australian and global aviation standards.

The Federation’s diverse pilot membership base places it in a strong position to comment and make recommendations on ‘The Future of Aviation: Flying to Recovery’ and the Five-Year Plan.

Included in this document

1. **Recommendation 1: “Job Ready Pilots Program”** Keep Australian pilots ‘Job Ready’ to ensure a pool of skilled experienced pilots
2. **Recommendation 2:** Review of Australian government air service contracts and remove all categories of pilots from the skilled migration list (this includes helicopters)
3. **Recommendation 3:** Streamline airport security processes to align with current threats against aviation (AFAP White paper Known Crewmember proposal)
4. **Reference:** AFAP concurrent submission to the Senate Inquiry into: The current State of Australia’s General Aviation Industry

Recommendation 1 Appendices:

Appendix A – AFAP Survey Results - November 2020

Appendix B - AFAP/Ansett Aviation Training Job Ready Pilots proposal

Recommendation 2 Appendices:

Appendix C – AFAP letter (20201027) to Department of Education, Skills and Employment regarding removal of all categories of pilots from skilled migration occupation list – October 2020

Recommendation 3 Appendices:

Appendix D – AFAP Known Crewmember Draft White Paper as of 11 November 2020

Introduction: Recovery Prediction into 2025

The International Air Transport Association (IATA) predicts that aviation is not expected to return to 2019 levels until 2024. The AFAP understands that the strength and sustainability of the aviation sector recovery will require targeted assistance to avoid loss of essential connectivity.

As quoted in the 'Future of the Australia's Aviation Sector' issues paper 2020, "in 2018, the aviation sector directly contributed around \$20 billion to the economy (1% of GDP)", with a direct flow on effect in tourism, mining, manufacturing, higher education and airport businesses. At the core of a post pandemic recovery for the aviation sector is the challenge of successfully navigating the unique regulatory and safety proficiency challenges so that a retention of aviation skills and workforce development can be achieved within the industry.

There are several crucial areas needing proactive steps to ensure that there is a retention of Australian pilot's skills in a safe, secure, and commercially viable environment. A priority for the AFAP is identified as Recommendation 1, a "Job ready pilot program".

AFAP survey of pilot members: Recommendations Informed by Data

The results of a recent AFAP survey of member pilots demonstrates a present and looming risk of experience being lost from the aviation sector without the implementation of innovative industry specific steps to address this issue.

AFAP Survey Results, 12th November 2020 (1140 respondents)

Demographic:

- 51%** of AFAP members are airline pilots, approximately 2800
- 40%** have been commercial pilots for > 20 years
- 72%** have been commercial pilots for > 10 years
- 58%** aged between 30 – 49 years old

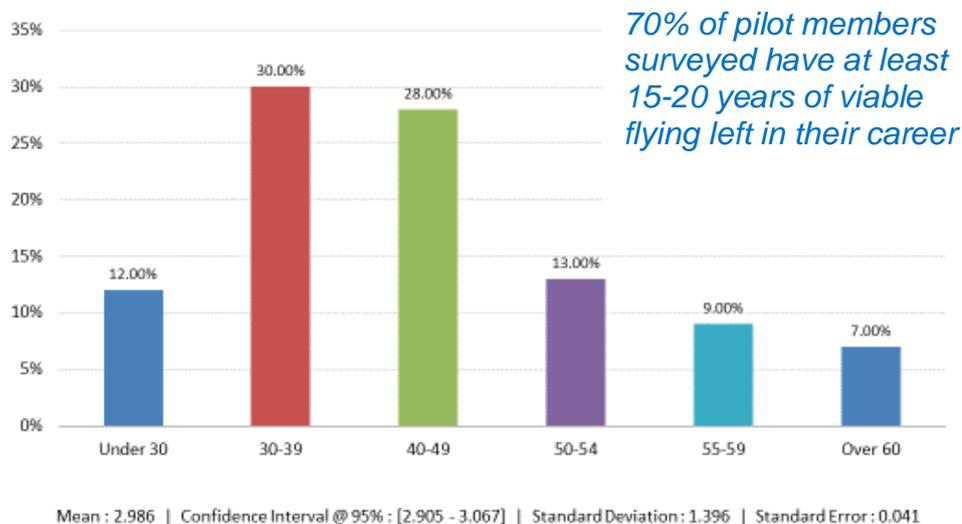
Loss of Experience:

- Approx. 23%** of surveyed AFAP members are already redundant
- 57%** are on full or partial stand down
- 13%** are not planning to return to flying

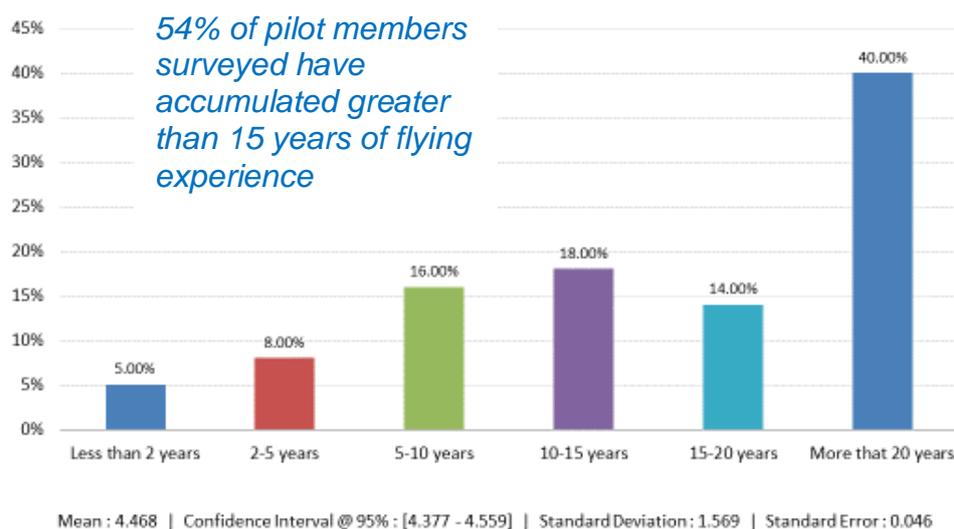
Significant results from the survey indicate that a majority of Australian pilots have flown for 20 years or more and still have 20 years of viable flying years left. Of this pool of pilot experience, 41% have secured employment outside the aviation sector and will struggle to remain 'Job Ready' within the next 5 years without assistance.

Extracts from APPENDIX A: AFAP Member Survey November 2020

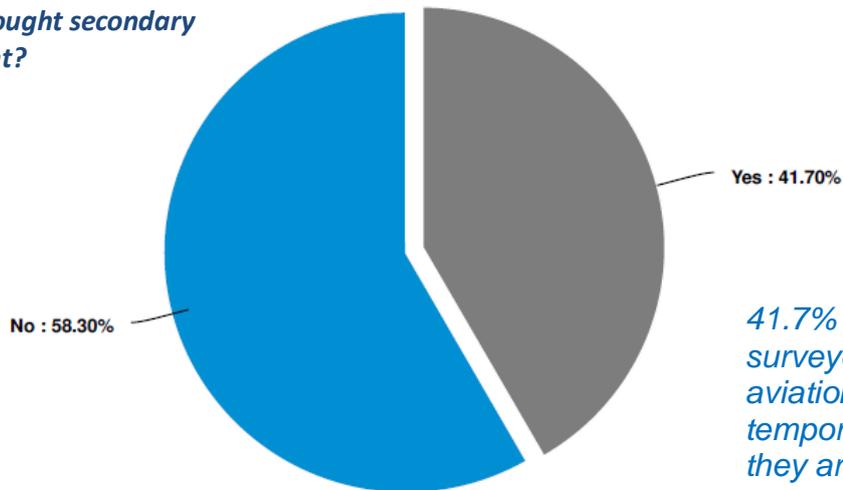
What is your age bracket?



How long have you been working as a Commercial Pilot?

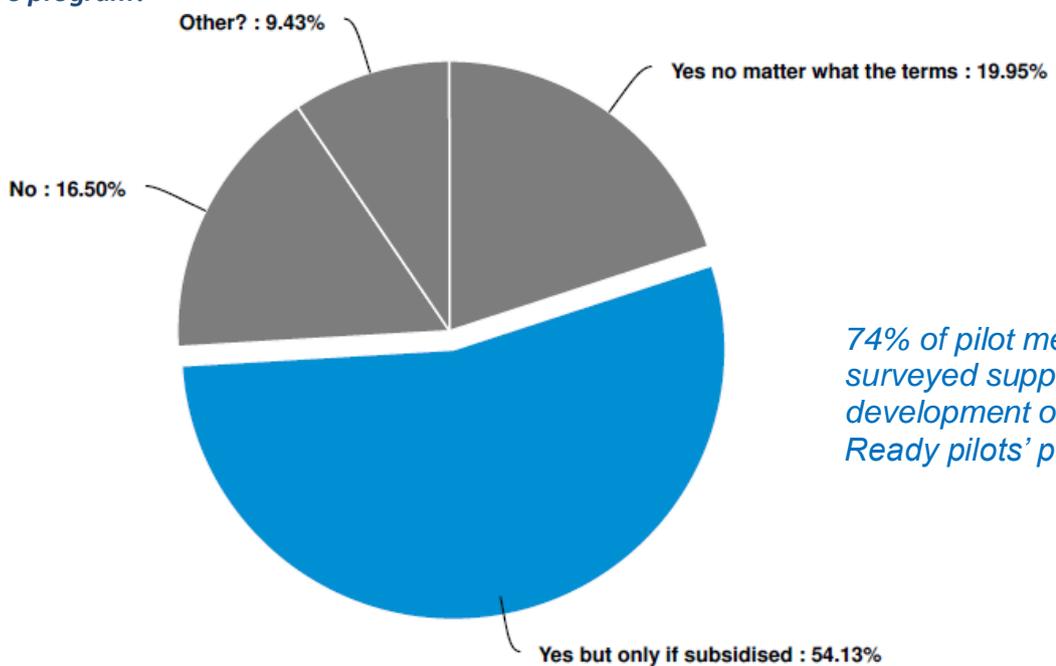


Have you sought secondary employment?



41.7% of pilot members surveyed have left the aviation sector temporarily. This means they are at risk of not being 'Job Ready' to reactivate the aviation sector without assistance.

Do you support a Job Ready Pilot's program?



74% of pilot members surveyed support the development of a Job Ready pilots' program.

RECOMMENDATION 1

Keep Australian pilots 'Job Ready' to ensure a pool of skilled experienced pilots

The longer a pilot is away from active flying duties, the higher the cost and longer the timeline to reactivate them to 'Job Ready' status. A 'Job Ready' pilot is one suitable to be fast tracked back into an airline/operator. Normally, a new or returning pilot candidate can take many months to be inducted and cleared to line. To maintain a high level of safety, pilots need to meet regulatory targets in flight standards and flight recency, which for many is often contained within a cyclic program in an airline environment.

Pilots are one of the most scrutinized workforces compared to other professions and experienced pilots form part of an airline's Safety Management System. If a pilot is made redundant, they can no longer participate in their airline's Part 61 Checking and Training system leaving them to seek an alternative option, which is cost prohibitive to individuals. Currently there is no program available outside a pilot's former airline without creating an approved solution, resulting in the inevitable loss of currency and any job ready status.

If this proposal is successful, it will be developed with the relevant stakeholders, including the simulator training centres, the airlines/operators, the pilot associations, and the pilots. We anticipate additional costs ancillary to the program will include,

1. Pilots not domiciled where Simulators are located
2. Administration and Compliance cost to the manage programs

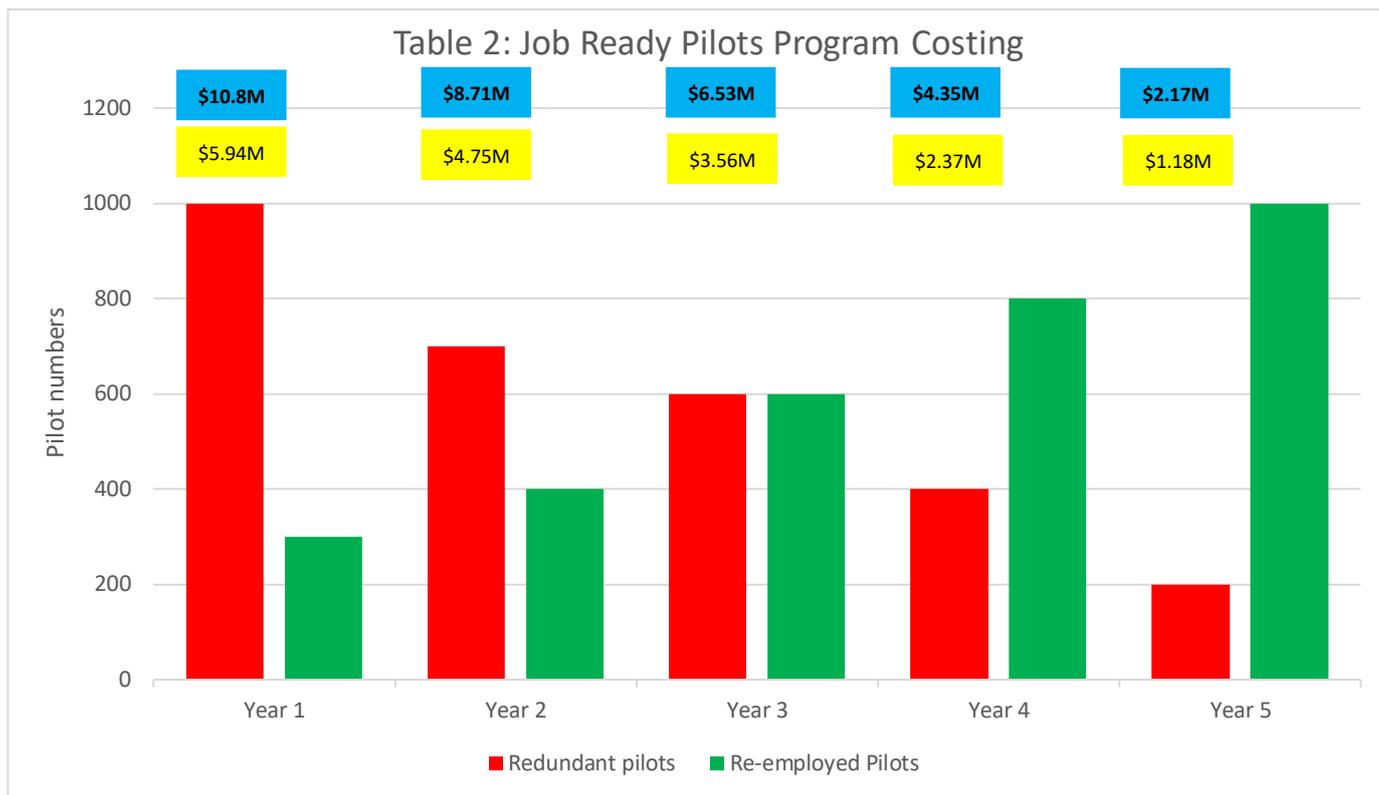
We would expect to have training and syllabus support from the relevant airlines/operators and CASA approval.

Table 1 and 2 below contain estimated cost of a suitable Job Ready Pilots Program and 5-year projection to recovery. Table 1 outlines indicative yearly costings for a basic proficiency package and airline ready package. Table 2 outlines projected costings for 1000 Australian pilots across the aviation industry, the number of pilots in the program is reduced annually as the industry recovers and pilots are re-employed.

Table 1 (below): Outlines inclusions and costings per pilot for a Job Ready Pilot Program at the Ansett Aviation Training centres.

SERVICES/INCLUSIONS	BASIC TRAINING PACKAGE (BTP)	BTP + PROFICIENCY (AIRLINE READY)
Computer Based Training via CPAT or online learning	✓	✓
Aircraft Manufactures Manual Suites including FCOM's, FCTM's, QRH	✓	✓
online learning classes conducted by the Ansett Training Department	✓	✓
Skills and Industry forum(s)/ Webinars / Seminars -Min of 4 per year	✓	✓
1 x Ground School Day for IPC preparation and Systems refresher	✓	✓
TAILORED AIRLINE SPECIFIC: 1 x 4-hour Full Flight Simulator session annually (as a crew) for IPC Preparation	✓	✓
TAILORED AIRLINE SPECIFIC: 1 x 4-hour Full Flight Simulator session annually (as a crew) for IPC	✓	✓
Accessibility to Aviation Mental Health experts (Medicare Reimbursable mental health plan) along with Welfare and Aviation support programs	✓	✓
TAILORED AIRLINE SPECIFIC: Online HFNTS and Dangerous Goods Training, additional modules available upon application		✓
TAILORED AIRLINE SPECIFIC: 1 x Full Day Ground School annually		✓
TAILORED AIRLINE SPECIFIC: 2 x 4-hour Full Flight Simulator session annually (as a crew), these will include one Loft and one Manoeuvre based session programmed to maintain recency and proficiency		✓
Estimated cost per pilot per year	\$5,400 plus GST	\$9,900 plus GST

Table 2 following is an estimated baseline projection of the cost of maintaining a pool of 1000 skilled and experienced redundant pilots over the next 5 years. If pilots are kept proficient, a long term saving in cost and time will be achieved for the industry.



The amount in **yellow** is for the Basic Program which will only maintain minimum qualifications for a pilot.

The amount in **blue** is for the Basic Package Proficiency which is designed to keep pilots fast track Airline Ready.

Recommendation 1: Government assistance to develop a 'Job Ready Pilots Program'

The AFAP, in collaboration with Ansett Aviation Training, propose to develop a joint stakeholder currency and proficiency program for pilots with two levels that will keep eligible pilots 'job ready' with the added benefit that they will be lower-cost to reemploy in the next 5 years as the industry improves. The AFAP has had feedback from some airlines that this would be of direct assistance to the speed at which pilots can be re-employed.

This program will keep pilots connected with the aviation industry and keep them "job ready" and can be expanded to all Australian Aviation training centres.

The AFAP also proposes that pilots have "a tax recognition" for costs involved in maintaining pilot licences. i.e. medicals, CASA licence fees and proficiency, whilst not employed as a pilot.

Refer to Appendix A and B for expanded information.

RECOMMENDATION 2:

Review issuing of government contracts and remove pilots from the skilled migration list

Currently, Australian pilots are excluded from being considered for firefighting contracts by regulatory restrictions. Additionally, overseas contract operators require their pilots to have very restrictive specialised experience on top of expensive “Type ratings”. CASA exempt these overseas pilots to operate in Australia. The AFAP is encouraged by the findings of The Royal Commission into National Natural Disaster Arrangements, particularly the findings at 8.107 to 8.109 of the report calling for a sovereign aerial firefighting capability.

<https://naturaldisaster.royalcommission.gov.au/publications/royal-commission-national-natural-disaster-arrangements-report>

The AFAP wholeheartedly agrees with the Royal Commission’s recommendation: *“These capabilities should be maintained through procurement and contracting strategies that support the Australian-based aerial firefighting industry.”* The AFAP further clarifies that a sovereign fleet should be crewed by Australian pilots after necessary training.

By aiding and requiring Australian operators through training subsidies and contract conditions and by removing pilots from the skilled migration list, more Australian pilots will be retained within the 5-year post-pandemic recovery period. This includes both Australian fixed wing and helicopter operations. Any Australian Government contracts for air services should stipulate the hiring and training of Australian pilots.

Recommendation 2: Review of Australian government air service contracts and remove all categories of pilots from the skilled migration list

Specify within Government contracts support for Australian operators employing Australian pilots including specialty training and induction

Remove pilots from the skilled migration list. Foreign pilot labour should not be approved.

Refer to **Appendix C** – AFAP letter to Department of Education, Skills and Employment regarding removal of pilot from the skilled migration occupation list – October 2020

RECOMMENDATION 3

Streamline airport security processes to align with current threats against aviation

In the post pandemic recovery, it is imperative to regain passenger confidence and ensure the aviation workforce can operate in a safe and secure environment. The aviation sector cannot afford any other threats in terrorism or health. Since airport screening was originally introduced, the threat to aviation safety has changed in two ways. Initially the threat was considered to be a **carried object** but since 2001, the predominant threat is now **untrustworthy individuals with hostile intent**. An additional threat, in the post pandemic

normal, is the risk that clusters of passengers pose within an airport, this is most likely to occur at airport security screening points.

In the review and development of screening protocols for relevant stakeholders, the AFAP suggests that it is beneficial to identify and segment a person who either poses a behavioural or medical threat, and that security could be enhanced, and resources deployed to manage individuals who pose the greatest threat. We suggest that moving the more biometrically trustworthy persons through an airport faster will result in a decrease of congregation events, reduce outlays and personal privacy intrusions, while aligning with COVID-19 protocols.

Pilots are the most scrutinized workforce group with recurrent background checks. By positively identifying pilots through a biometric based system, they become part of the security system and not an object of it, and thus, should be permitted to access aircraft and security restricted areas segregated from passengers.

To address and articulate these ideas further, the AFAP is currently preparing a white paper submission with a proposal for the development of a Known Crewmember protocol in Australia based on the successful introduction of a similar program in the United States.

Recommendation 3: Develop a biometric based system to counter the current threat to aviation

Develop a joint stakeholder 'Known Crewmember' protocol for pilots and segment from passengers to assist in the reduction of clusters, increase efficiency and minimise cost allowing a focus on persons that constitute a higher hostile or medical threat risk.

Refer to **Appendix D** attached to this submission for further information

Companion AFAP submission: Submission to Senate Inquiry into Australia's General Aviation Industry

The following is a summary of the AFAP's submission for an RRAT Committee Senate Inquiry, which has been submitted concurrently.

AFAP submission to the Senate Inquiry into Australia's General Aviation Industry:

- Focus on safety by amending the Civil Aviation Act to include an obligation that CASA must: "... *take into account that civil aviation is a system of safety.*" (As per our existing position paper). The Act currently does not address this.
- Identifying that the widespread concerns by aviation stakeholders that CASA is causing extra costs and creating confusing regulation are symptom-problems, i.e. they are problems, but they are symptoms of the underlying systems-based problems.
- GA is more susceptible to any cost or regulatory impost than other sectors of the industry and GA is crucial for the connectivity of regional and remote communities, and for training and career path establishment.

- Governance and Accountability matters related to CASA
 - Freedom of Information laws are insufficient to allow genuine industry-based accountability of CASA to occur.
 - The composition of the CASA Board is lacking professional pilot representation.
 - The premier consultative panel to CASA has never had a participant from a member-based association, such as the AFAP.
 - The structure of the CASA Industry Complaints Commissioner (ICC) reports to the CASA Board, but the CASA DAS/CEO is a Board member. The CASA DAS/CEO is ultimately the person responsible for all CASA decisions and outcomes. Therefore, the ICC should rightfully report to a body higher than the Board.
- CASA resourcing, structure, and deterioration of the expertise of the Inspectorate staff needs to be addressed.

https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Rural_and_Regional_Affairs_and_Transport/GeneralAviation

Written by the **Australian Federation of Air Pilots** and authorised by:



Captain Louise Pole

President
Australian Federation of Air Pilots



AUSTRALIAN FEDERATION OF AIR PILOTS

LEVEL 4, 132-136 ALBERT ROAD
SOUTH MELBOURNE VIC 3205

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