



COMMENTS ON AVIATION SAFETY REGULATION REVIEW

by

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After reading the Aviation Safety Regulation review I felt compelled to comment.

I have been associated with the Aviation industry for over 40 years. In that time I've been fortunate to fly for a few airlines and work in a management capacity in flight operations for a major airline. I gained experience in SMS management and in auditing during this time. Unfortunately I've also seen the demise of General Aviation in Australia.

I've seen a number of Regulators come and go during this time. I remember the high esteem that DCA was held in during my early years in the industry. I was very proud to have a DCA Pilot Licence.

I have read your report with great interest. It is pleasing that someone has taken a detailed and almost forensic look at the state of the current aviation Regulator in Australia. In my current capacity as an aviation safety auditor and SMS trainer, I have been concerned for sometime at the growing number of issues between aviation operators and the Regulator in this country.

I have felt quite disturbed when I have seen senior managers of Aviation organisations so emotional and close to tears with frustration with Regulator. I wish to congratulate the authors of the report on the superb job that they've done.

I'm impressed with the list of recommendations in the report. I can see a great starting point for improvement from the current situation coming out of this report. The recommendation relating to Key Performance Indicators the service delivery functions of CASA is way overdue. Additionally, the recommendation for a stakeholder survey every two years is also overdue.

I note that recommendation number 16 addresses training of CASA staff in areas such as communication, decision-making, good regulatory practice and in **auditing**. As a trainer of qQMS and aviation safety auditors and as a Lead Auditor for a number of years, I am most pleased with this recommendation. Auditing is a skill, which must be learnt and developed overtime. It is pleasing to see that this recommendation includes auditor training to address the often-heard shortcomings of CASA inspectors in this role. It would seem from some of the submissions you received that auditing skill is lacking with some CASA staff. This situation requires urgent rectification.

Another area of concern to me as an aviation safety auditor is that CASA has delivered papers and been involved in discussions to water down the concept of a Just Culture. I feel strongly that Just Culture is an extremely important concept for the Regulator to continue to support. Without Just Culture, reporting will be massively affected. Equally important is the correct understanding of what Just Culture actually means. This applies to both the Regulator and industry.

Recommendation 21 is most important. The recommendation that CASA change is organisational structure to a client-oriented output model is important. I believe CASA can be far more effective if it assists industry with achieving compliance rather than focusing on punitive of action for non-compliance. Assisting with opportunities for improvement is far more constructive than punishment for non-compliance.

I refer to recommendation 24. In my opinion this is a great idea. As a practising aviation safety Lead Auditor and a trainer of Lead Auditors I find it amazing that this is not standard practice already. I accept what your report says in relation to this and believe that CASA is putting its interests before those of the industry by not disclosing audit findings in some cases until delivery of the audit report. I've heard this complaint on many occasions from a range of aviation operators. There should not be nasty surprises in audit reports. It is unethical and unfair to operators.

I'll also like to strongly endorse recommendation 27 of the report. I have been engaged as an auditor undertaking a third party audit of an operator for CASA on a number of occasions. In my opinion the operator was far more open and the audit process more successful than if CASA Inspectors had undertaken it. This operator had a particularly difficult relationship with the Regulator over a period of time. As an independent safety auditor I was able to obtain open, frank and full disclosure of all the information required in order to complete my audits. This recommendation should assist greatly in recovering the relationship between industry and CASA in many cases. I strongly believe that this recommendation will be most effective, particularly in the Corporate and GA sectors of the industry.

Again, congratulations on a constructive, well written and researched report.

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