

24/10/2009

The Chairperson  
Parliamentary Joint Committee on the ACC

Re: Aviation and maritime Security measures to combat serious and organised crime.

As an international airline pilot my knowledge relates to airside and ramp areas at Australia's international airports. I hold an ASIC card.

In general terms I feel a lot of the security measures are expensive, poorly targeted, ineffective and largely "for show".

- Hundreds of people get access to the flight decks of large airliners each day at Australian airports without an ASIC – namely the crew of foreign airlines.
- The ASIC system is onerously expensive for persons employed in the aviation industry
- The ASIC system in many cases is poorly targeted
- The ASIC renewal procedure is unnecessarily complicated
- The disregarding of certain spent convictions undermines the integrity of the ASIC system.
- Given the compromised nature of the ASIC system, poor security for airside entry through non-passenger channels gives opportunity for criminal activity
- An ASIC holder, should at minimal or no cost, be automatically issued to an MSIC holder upon application and vice versa, providing they have a need for one.
- The faults in the ASIC system listed above, whilst in many cases are not directly related to criminality, severely undermine respect for the system thereby encouraging slackness and cynicism and thereby reduce its effectiveness.

In summary we have a costly process driven system rather than a cost effective results driven system.

To expand on the above points:

- ❖ Crew of foreign airlines wear identity cards issued by either their government's Civil Aviation Authority or just by their Airline plus a passport. It is obviously impractical to issue ASICs to the crew of foreign airlines. Currently security does no identity check and Customs just processes the passport normally. We therefore have the ridiculous situation where the Pilot's 110 ml of toothpaste is taken away as a "security risk" yet no one checks his or her pilot bona fides to take control of that aircraft from behind an armoured door (not to mention the crowbars and crash-axes that are in there as well).

√ Solution: There is no need to subject pilots/crew to LAGs (liquid's/aerosols/gels) checks and "take off your shoes" aircrew are exempt from these aggravating<sup>i</sup>, delaying<sup>ii</sup>, resource consuming<sup>iii</sup> checks in most countries – after all once behind the armoured door the crew can kill everyone with the flight controls and their bare hands if they were so inclined. On the other hand the crew ID's should be checked and matched against the General Declaration (GD) for the flight – separately supplied by the airline to ensure that they really are the assigned crew for the flight. For example the Hong Kong government Immigration Department uses this independent ID check at HK airport at a separate crew channel while at the same time exempting crew from LAGs checks i.e the real risk – identity – is addressed and shaving cream is ignored.

❖ The ASIC system is onerously expensive. The cost for an ASIC is \$196 initial issue and \$186 on renewal every two years. This is in addition to other large Flight Crew Licence fees charged by CASA. AusCheck, who actually checks the information in the form, charges \$79-\$88. CASA, which is responsible for cost recovery only, then manages to inflate the cost of the issued card to the \$186-\$196 range. By contrast, Queensland Transport can produce a driver's licence for \$28.50. The hologram and thicker plastic on an ASIC should only cost a couple of dollars more than a drivers licence.

√ Solution: Require CASA to charge a reasonable fee for the issue of the card – similar to the charge for a drivers licence + AusCheck fee. We, the workers in the industry are not responsible for CASA's clerical costs when they are out of line with the real world.

❖ The ASIC system in many cases is poorly targeted: For example a grazier living on a remote property flies his Cessna 172, which weighs less than a Holden Commodore and carries less fuel than a Toyota Landcruiser, into Broken Hill airport to get supplies or even just to refuel. He must have an ASIC to be on the Broken Hill ramp since there is a QANTAS link Dash-8 service flying to Broken Hill tomorrow! What risk does this grazier carry to national security or airport crime fighting that justifies going through the whole costly and inconvenient ASIC procedure? Especially when anyone with malicious intent can access this usually unmanned airport by jumping the perimeter fence at these country airports.

√ Solution: Remove the requirement for licenced pilots (we always have to carry our licences) to have an ASIC unless you are on the Regular Public Transport apron (can be defined by paint lines) This will remove the compliance requirement where the risk is low

❖ The ASIC renewal procedure is unnecessarily complicated: For example you must list (every two years on renewal) all your places of residence for the last ten years – the first eight years of which were obviously covered in your previous application. The list of people who can certify your documentation include random people like optometrists and bank clerks of five years service but as the holder of an Airline Transport Pilot Licence for twenty five years and an ASIC card, I cannot

certify my co-workers photograph or passport copy or even ask my company's Chief Pilot to do it!

√ Solution: Remove all unnecessary duplication from ASIC renewal forms and allow responsible people that may actually be located at our workplace (airports) to certify documents.

❖ Disregarding certain spent convictions undermines the system: If you have done less than 30 months in prison and not been convicted (i.e. caught) in the last 5-10 years (depending on age) your criminal history is disregarded when granting an ASIC. Many crimes that your committee are dealing with in relation to airports i.e. offences relating to drugs, weapons, people smuggling & violence carry sentences of less than 30 months. Many of these people are not suitable to be working airside or in security sensitive positions – with out further checking or at least interview. As the Captain of the aircraft, I can have my 110 ml of toothpaste confiscated at security and then, minutes later, meet a convicted drug smuggler carrying a sharp, stainless steel knife on the flight deck of my airliner. Leatherman tools, Swiss Army knives and other tools can be carried through non-passenger security gates used by caterers, ground engineers etc. These tools are necessary – it is matter of trusting who you can give them to.

√ Solution: Review the type of spent convictions that are disregarded with a view to other sorts of airport crime besides terrorism.

❖ Given the compromised nature of the ASIC system, poor security for airside entry through non-passenger channels gives opportunity for criminal activity.

√ As seen above people who should not be allowed airside are being granted ASICs therefore at the very least bags should be checked and possibly sniffer dogs used on the way in and out for those entering through non-passenger security gates at major airports. These gates plus apron vehicle access gates needs to be the focus for crime fighting as passenger channels are already adequately policed. State police perhaps with an AFP liason officer would be best equipped to deal with general criminality which often overlaps the state jurisdiction that the major airport is located in.

❖ An ASIC holder, should at minimal or no cost, be automatically issued to an MSIC holder upon application and vice versa, providing they have a need for one.

√ Since the types of crimes that ASICs and MSICs are designed to prevent are the same, it would be desirable from a jobs, employment & labour mobility point of view that an ASIC holder could be issued an MSIC (or vice versa) for the remaining validity of their current card without going through the whole costly rigmarole of an initial or even renewal application.

The faults in the ASIC system listed above, whilst in many cases are not directly related to criminality, severely undermine respect for the system encouraging slackness and cynicism and thereby reduce its effectiveness.

I believe the ASIC system and aviation security in general needs to be reformed to Make it simpler, more effective in targeting real risks, removing complexity and compliance where the risks are low and removing or drastically reducing the financial the burden on workers who are required to comply with this system mandated by government policy. This can be done by consulting airlines, professional associations (pilots, engineers etc), active duty airport police and unions. These people are the end users of the system who know what is happening on the ground. The current system was designed in a rush post 9/11 by administrators and officials remote from the coalface. It doesn't work well.

Submitted by  
Captain Gordon Ramsay

---

<sup>i</sup> Aggravating as it serves no purpose – all crew members have access to the flight deck either as pilots or the cabin crew who serve food, or otherwise need to visit the flight deck for operational reasons. LAGS checks are not applied to catering supplies, airside shopping items or non-passenger airside access (e.g. engineering & catering staff).

<sup>ii</sup> Aircrew who are operating long flights or multi-sector days are often critical on legally mandated flight duty periods. Airlines emphasise on time performance and demand this from their crews. For this reason pilots normally have only one hour from sign on to departure. Anything that uses up time unnecessarily detracts from flight planning and pre-flight preparation and therefore flight safety.

<sup>iii</sup> Extra time taken for other than a weapon check scan clogs up often overburdened security checkpoints.