

# **Submission to House of Representatives Standing Committee on Communications, Transport and the Arts.**

## **Inquiry into managing fatigue in transport.**

My name is Alan Terrell and I am the Chief Executive of the Regional Airlines Association of Australia Ltd.

This submission concerns itself only with the question of fatigue as it applies to the regional airlines section of the transport industry.

### **Technical aircrew**

Pilots, Navigators and Flight Engineers operate within a set of regulations governing duty periods which is extensive and complicated. These have been approved by the Regulator, the Civil Aviation Safety Authority, and are defined in Civil Aviation Orders (CAO's).

Within, and usually more restrictive than the regulations, are a number of further requirements applicable to individual airlines and groupings of aircrew. These are contained within industrial agreements.

There are also occasions when aircrew and their employers agree to ask for concessions against the regulations to allow specific operating patterns. These will be approved by the regulator only if they do not affect the safety of flight.

These rules are in process of being redefined by the regulator, who has the Parliamentary authority to do this and the Association believes that this process should not be altered.

### **Other aircrew**

Flight Attendants comprise the majority of this group, however a variety of other categories are used in the aviation industry. These range from animal handlers, pursers, public relations personnel, off duty aircrew and others.

There is no specific proscribed regulation controlling duty periods for these groups, however where they are performing duties in flight, industrial agreements define that they work within similar rules as those applying to technical aircrew.

Again the Association believes that this practice is sound and should not be altered.

### **Maintenance Engineers and staff in direct contact with aircraft**

No specific set of rules governs the duty periods of this group. Normal rostering practices provide shift hours and these are within industrial norms.

There are, however, occasions when extended periods of duty become necessary in order to return aircraft to serviceability. In these cases, overtime payments are made, but fatigue can become a problem.

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The Association believes that in order to continue to ensure the normal high levels of safety associated with airline operations in this country, that the supervisors who finally inspect and authorise any work done on an aircraft should have prescribed duty periods.

Broadly speaking, these should limit a duty period to no more than fourteen hours without adequate rest.

### **Other Ground Staff**

Unless the safety of an aircraft or of its passengers can be affected by a ground based employee, the Association believes that there need to be no restriction on his or her duty periods other than those normally applying in similar activities

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