



15 June 2011

Ms Julia Morris
Committee Secretary
House of Representatives Standing Committee on
Infrastructure and Communications
PO Box 6021
Parliament House
Canberra ACT 2600

Email:

~~Dear Ms Morris~~ *Julia*

Re: Inquiry into the Ratio of Cabin Crews on Aircraft

I refer to your email of 27 May in relation to Qantas' attendance at the House of Infrastructure and Communications Committee's public hearing for its inquiry into the ratio of cabin crew members on aircraft.

Qantas is pleased to provide responses to questions taken on notice at our appearance before the Committee on 19 May. These responses are provided at the attached.

In providing these responses and following the broader discussion of this matter in the public hearings, we have also taken the opportunity to reiterate for the benefit of the Committee features of the current aviation safety regulatory system, both globally and in Australia.

The aviation industry has never at any time in its history been safer; more secure or technologically sophisticated than it is at this time. The highly specialised global regulatory framework maintained today through the Standards and Recommended Practices of the International Civil Aviation Organisation, and reflected in national laws and regulations, stands in sharp contrast to regulatory practices deemed appropriate for the industry in decades past. No regulator, airline or manufacturer would contemplate a return to less enlightened or less informed times.

The regulation and oversight of aviation safety today is highly transparent. Best practice is maintained globally by real time communication between regulators, manufacturers and airline operators. Few other industries are subject to such structured, complex and comprehensive safety scrutiny. Demonstrably it is not in the interests or indeed the scope of any member of this community to reduce or undermine safety standards. On the contrary, the evidence overwhelmingly



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demonstrates that the public interest and community welfare are substantially enhanced by transparent and open cooperation between each of these primary stakeholders.

In this highly sophisticated and transparent environment regulators, manufacturers and airline operators around the world have conclusively demonstrated that aircraft manufactured to specific, pre-determined standards can operate safely with cabin crew to passenger ratios of one to fifty. The majority of the world's fleet has operated safely in this category to these standards for many years. Regulatory reform rarely comes about lightly or quickly. Decisions are taken only after exhaustive scrutiny by regulators, manufacturers and airlines each of which has its own absolute commitment to the safety and security of the travelling public.

Airline operators in Australia and the Australian Government together have an uncompromising commitment to aviation safety. Australia has the best aviation safety reporting culture and support systems in the world. This practice has the overwhelming confidence of industry professionals and management protocols maintained by all major Australian airlines guarantee the protection of any person reporting safety concerns. Reports can also be made independently directly to the regulators without reference to an airline concerned. Since October 2006 when airlines successfully demonstrated to the Civil Aviation Safety Authority that certain aircraft could be operated safely at the one to fifty ratio no safety related incidents relating specifically to that decision have been raised either with the Qantas Group or, to our knowledge with the Australian regulators.

It is entirely appropriate that Australian safety regulatory standards be framed against world's best practice. Indeed this is the view of the Australian Government, a view with which we fully concur. In its Aviation Policy White Paper, one of the Government's principles in its approach to the regulation of aviation safety is that it will take account of and, where possible, be consistent with best international practice. It is also entirely appropriate that Australia's regulatory standards take into account decisions taken by European and US regulators, in exactly the same way that our regulatory experience can and does provide guidance in other jurisdictions. The very essence of the global commitment to ensuring that the highest possible levels of aviation safety and security are maintained is to be found in that commitment to international standardisation of regulatory practices.

It is against this background that the Qantas Group supports the decision of the Civil Aviation Safety Authority to amend the civil aviation orders to enable airlines to operate with a ratio of one cabin crew member for each unit of 50 passengers.

Yours sincerely

Tony Wheelens
General Manager Group
Government and Industry Affairs

ANSWERS TO QUESTIONS ON NOTICE

Page 26 Mr Neville

On the issue of the wording of the exemptions for the 737-800 and rules relating to number of crew required at every floor-level exit.

The instrument (CASA 320/09) requires a minimum of four cabin crew on the Boeing 737-800 aircraft in all circumstances as the cabin crew number is determined by the number of seats, rather than the number of passengers. An extract from the instrument is below:

"In spite of subparagraph 6.1(b) of Civil Aviation Order 20.16.3 (CAO 20.16.3), the operator may operate an Australian registered Boeing 737-800 series aircraft with a type data certificate that provides for a maximum seating capacity of 189 passengers if there is 1 cabin attendant for every 50 passenger **seats** (emphasis added) or part of that number.

Note: *CAO 20.16.3 applies in all other respects to an aircraft referred to in this section."*

Notwithstanding the revised cabin crew ratio, the remaining sections of CAO 20.16.3 which refer to the carriage of persons including cabin seats, seatbelts, seat adjustments, smoking and stowage of loose articles continue to apply to air service operations.

As the requirement of one cabin attendant for each floor level exit applies to aircraft carrying more than 216 passengers (CAO 20.16.6 section 6.1c), it is not applicable to the B737-800 aircraft.

Page 27 Mr Stephen Jones

When you have moved from 35 to 50 has there been a significant pass through to the travelling public?

Changes in cabin crew to passenger ratios will have resulted in a measure of cost savings for the Qantas Group. The degree of saving will vary across the Group and will ultimately have been reflected in the range of tariffs available to the travelling public. Air fares are determined by a complex and volatile matrix of constantly changing variables and it is not possible to quantify the individual contribution made by "smaller order" savings such as those derived by changes to cabin crew ratios. At all times commercial considerations are absolutely subordinate to our commitment to the safety and security of our passengers and staff and to our regulatory obligations.

Page 28 Mrs Prentice

What is the cap for children under the age of two?

Changes in air travel over the last decade have seen significant increases in the number of people travelling on air services in Australia. This has included increases in the number of children carried as travel has become more affordable for families. The overwhelming numbers of children travel in the company of parents or other adults. Within this group we do not distinguish children in the various fare types and consequently cannot identify the absolute numbers of children actually carried.

We do not carry unaccompanied children under the age of two. When children are accompanied and held in the lap of adults, we limit the numbers to 10 passengers per flight on a Boeing 737-800 aircraft.

Page 31 Mrs Prentice

Did you use handicapped and elderly people in that trial [evacuation]?

No disabled or handicapped passengers are required to be evacuated during an evacuation demonstration. Civil Aviation Order 20.11 (CAO 20.11) part 15.1 requires the aircraft evacuation capability to be demonstrated in accordance with criteria set out in the United States Federal Aviation Regulations (FAR 25.803). Appendix J to FAR Part 25 sets out the demonstration criteria and requires the following demonstration passenger load:

A representative passenger load of persons in normal health must be used as follows:

- (1) At least 40% of the passenger load must be female.
- (2) At least 35% of the passenger load must be over 50 years of age.
- (3) At least 15% of the passenger load must be female and over 50 years of age.
- (4) Three life-size dolls, not included as part of the total passenger load, must be carried by passengers to simulate live infants 2 years old or younger.
- (5) Crewmembers, mechanics, and training personnel, who maintain or operate the airplanes in the normal course of their duties, may not be used as passengers.

Page 31 Mr Symon

To Qantas' knowledge, has anyone done any work on the one to 36 ratio and its effect on safety in the aviation world?

We have been unable to discover evidence of studies done on the 1:36 cabin ratio or its effectiveness. That ratio, as best we can establish, was mandated over fifty years ago in response to circumstances relevant at that time. In contrast, volumes of information are readily available supporting the 1:50 ratio, which has been the subject of detailed, extensively documented assessment by regulators, manufacturers and airline operators around the world.

Have you noticed or do you have records of an increase in the number of people with disabilities carried by your airlines?

We do not record the number of people with disabilities carried on our services as our reservations systems do not differentiate between these passengers and others with special needs. With changes in air travel over the last decade and greater mobility opportunities for the disabled community air travel accordingly is likely to have increased.

Qantas has standard operating parameters for the number of passengers who require wheelchair assistance but are not required to travel with, and are not travelling with, an escort/carer that will be accepted for carriage per flight. These parameters are based on emergency evacuation requirements in relation to the ratio of cabin crew members to passengers who require assistance in the event of an emergency situation, the aircraft type, the number of doors available, minimum crewing levels and refuelling requirements.

Where the maximum number of non self reliant passengers requiring wheelchair assistance without escorts/carers per flight is reached, extra cabin crew or an additional escort/carers can be arranged for the flight.

Page 32 Mr Symon

On the issue of advancements in safety standards – “Is there some data that backs up that statement for all of the sections of those sentences”?

Aviation safety standards are in a constant state of continuing examination and improvement. It is not possible, because of volume constraints, to supply the data set that demonstrates the changes in safety since the 1:36 ratio was first established fifty years ago. However, with respect to the cabin environment and management practices an indicative list of improvements would include:

- Seat cushion fire blocking
- Floor proximity lighting
- Lavatory smoke detectors and automatic fire extinguishers
- Halon fire extinguishers
- Class E cargo compartment fire extinguishers
- Class C & D cargo or baggage compartments. (Smoke detection capability)
- Improved cargo liners
- Crew member Personal Breathing Equipment for flight attendants
- Heat release-interior materials
- Smoke density-interior materials
- Fuel system crash resistance
- the introduction of technologies that mitigate impact forces and delay incapacitation from smoke, heat, and toxic gases

These measures have been complimented with significant changes to evacuation standards and protocols:

- Demonstrated capacity to complete aircraft evacuations in less than 90 seconds.
- Aircraft must be equipped with automatically deployed egress assist devices. (Slides)
- Crew members must be able to open half the exits and achieve usable slides within 15 seconds.
- Criteria for passengers seated in exit rows.

Do you have information on incidents arising out of those sorts of things (mental health issues; are cabin staff are reporting anxieties and various issues that they might be dealing with?)

We do not track that information specifically. At Attachment 1 is a Table which itemises behavioural issues which might include anxiety related incidents. It is important to note that these incidents remain relatively rare (10.03 incidents per million passengers carried in 2009; 15.45 in 2010, and 32.96 to May 2011). The growth is attributed to a sharp increase in incidents related to mobile phone usage. All other categories have remained relatively stable in absolute terms during the period under review. Judged against these criteria the number of issues which might be attributed specifically to mental health or anxiety is relatively low.

Page 35 Mr Chair and Mr Neville

Incident on Melbourne - Hobart flight

The attempted hijack of the flight between Melbourne and Hobart in May 2003 was the subject of a detailed investigation by the ATSB. We refer the Committee to that investigation. Insofar as it may assist the Committee in its examination of **the Ratio of Cabin Crews on Aircraft** we would be happy to provide any supplementary information the Committee may require.

Page 36 Mr Neville

Why was the distinction made in the two different types of exemption for 737-800s?

Both instruments (CASA 320/09 and 321/09) require four cabin attendants on the Boeing 737-800 aircraft. The distinction between the instruments was made to ensure for operations with reduced passenger numbers (i.e. 50 or fewer passengers), over-wing exit row evacuation capability was maintained at an appropriate level.

For example, the instrument for 50 or fewer passengers (CASA 320/09) contains additional safeguards to ensure that a certain number of Able Bodied Passengers (ABPs) are seated at each over-wing exit row that is intended to be used during an evacuation. The instrument therefore specifies certain additional requirements to ensure that this capability is maintained, including special preflight safety briefing and seating requirements when not all over-wing exit rows can be appropriately manned with ABPs (due to light passenger load or lack of ABP availability).

For loads greater than 50 passengers, the instrument assumes (and requires) that each over-wing exit row be appropriately manned with ABPs, requiring no modification to preflight briefing. Additionally, the instrument restates the overarching requirement that the operator must ensure (through its policies, procedures and otherwise) that the aircraft can be evacuated in 90 seconds.

ATTACHMENT 1

Summary of reported incidents from Qantas' Australian Quality Database

OCC_QTY		Pax Behaviour - Smoking	Pax Behaviour - Verbal	Seating - Pax Interference	Door - Pax Interference	Pax Behaviour - Physical	Other Pax Behaviour	Pax Behaviour - Alcohol	Pax Behaviour - Mobile Phones/PED	Pax Behaviour - Sexual	Pax Behaviour - Non-Compliant	Passenger Behaviour	Total	Total Rate (1M Pax Carried)
1	Jan-07	1	7	1									9	
2	Feb-07	1	3		1	1							6	
3	Mar-07	1	1				1	1	2	1			7	
4	Apr-07	2	1		1	2					1		7	
5	May-07		1	1			2		3		1		8	
6	Jun-07	1	2	1		2	1		1				8	
7	Jul-07	2	3		1				2				8	
8	Aug-07	2	4			3	2		4				15	
9	Sep-07		2		2		3				1		8	
10	Oct-07		2				2		3				7	
11	Nov-07	2	3			1			2				8	
12	Dec-07	3	1	1	1	3	3		2				14	
13	Jan-08	4	3	1	1	1	7		3				20	
14	Feb-08	1	1			2	3		2				9	
15	Mar-08	2	2		1	2	1		2				10	
16	Apr-08	3	4			1	3		2				13	
17	May-08	3	2		1	1	3		4				14	
18	Jun-08	4	3				4		2				13	
19	Jul-08	3	4			1	2		3				13	
20	Aug-08	5	1			1	10		1	1			19	
21	Sep-08	3	6	1		2	5		4	1			22	
22	Oct-08	3	3			4	7		6				23	12.35
23	Nov-08	4	4				2		1				11	6.54
24	Dec-08	4	4	1		1	5		1				16	9.19
25	Jan-09	2	4			1		3	2	1			13	8.01
26	Feb-09	2	10	1		3	1	2	1		1		21	14.27
27	Mar-09	2	5	1		2	1	1	4	1			17	9.97
28	Apr-09	3	3		1		2	3	4		1		17	9.99
29	May-09		5			4	2	4	2		1		18	11.37
30	Jun-09	2	1			1	6	2	4				16	10.31
31	Jul-09	2	2	1	1	1	1		1		1		10	5.79
32	Aug-09	1	6		1	2	3		2				15	8.94
33	Sep-09	2	5			2	1	2	6		1		19	11.17
34	Oct-09	1					3	1	4		1		10	4.60
35	Nov-09	10	2	1		1	2	2	5				23	11.56
36	Dec-09	2	2		1	1	6	3	9		7		31	15.32
37	Jan-10		3			2	2	1	6		1	1	16	8.44
38	Feb-10	3	1	1		1	3	3	8		2		22	12.09
39	Mar-10	4	7		2	1	2	3	8		9		36	17.53
40	Apr-10	2	6	2		4	9	1	12	2	1	1	40	20.00
41	May-10	5	1	1	1	2	3	3	17	1	2	2	38	19.82
42	Jun-10	2	3			3	8		13		4	1	34	17.12
43	Jul-10	4	1	1			6	2	11		7		32	14.60
44	Aug-10	2	2			1	8	3	7		3		26	12.42
45	Sep-10	5	4			1	5	4	14		5		38	17.54
46	Oct-10	2	8			1	3	2	11		2		29	12.95
47	Nov-10	4		2			2	5	12		3		28	13.53
48	Dec-10	1	1			4	6	6	18		3		39	19.12
49	Jan-11	1	5		1	2	8	4	19	1	7	1	49	25.58
50	Feb-11	3	3		2	2	12	1	39		2		64	35.05
51	Mar-11	3	3	1	1		4	6	52		1		71	34.85
52	Apr-11	7				2	5	4	67		5		90	44.36
53	May-11	3	4	1		2		4	33		2	1	50	24.72