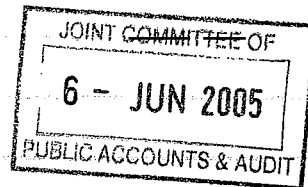


GRAHAM BAILEY.

1st June, 2005

Chairman,
JOINT COMMITTEE of PUBLIC ACCOUNTS and AUDIT,
REVIEW of AVIATION SECURITY IN AUSTRALIA,
R1-108,
PARLIAMENT HOUSE,
CANBERRA. A.C.T. 2600.

Submission No. 1



Dear Sir,

I wish to make a brief submission to the above inquiry. I am making two basic suggestions for consideration by the Committee; but firstly, some relevant background.

My Background.

I started my career with the Commonwealth Public Service, as a Cadet Civil Engineer, with the (then) Commonwealth Department of Works (CDW). I specialised in the field of heavy aircraft pavements and joined Department of Civil Aviation (DCA), in 1971.

During my career with the CPS, I was involved in every facet of the Planning, Design, Construction, Operation and Maintenance of Aerodromes.

I wrote many of Australia's Aerodrome regulations and standards, represented the Country at I.C.A.O, and was Counsellor Transport with the Embassy of Australia in Washington, U.S.A, for four years, 1977 to 1981.

In later years, I held Senior Executive positions within the Aviation Portfolio.

Deskilling Aviation.

This started with the Compulsory transfer of specialist staff from Melbourne to Canberra soon after the demise of DCA and the creation of the mega Department of Transport.

Reorganisation and disruption then became the order

of the day, until "reform" became serious with the creation of the Civil Aviation Authority (CAA) in 1988.

The infamous CAA Review of Resources followed soon thereafter along with the rhetoric of self regulation and "affordable Safety".

This period also saw the demise of the CSW design and construction expertise, which has subsequently been lost to Government.

The Commonwealth Government is now virtually bankrupt of these fundamental AIRPORTS skills.

The core business of our Civil Aviation Safety Authority (CASA), is to regulate the safety of Civil Aviation.

Key functional areas include rule making, standards, entry control and safety surveillance / compliance.

In terms of Professional skills, CASA has two remaining Airport Engineers, one of whom is on long service leave and approaching retirement! The Authority has no expertise in Airport Lighting, and survives at present by using the non-ongoing services of a former Departmental Lighting specialist. There appears to be no training or development schemes in place, for future generations.

In terms of Safety Surveillance, CASA employs around 13 Airport Inspectors to service the entire continent. One poor soul has responsibility for both Victoria and Tasmania. Nearly all of these officers are senior in age, and there doesn't appear to be any training / development schemes in place. Currently, the Engineer and the Inspectors are in different organisational areas of the Authority.

The Department of Transport and Regional Services (Do TRS), has no AIRPORTS specialist knowledge / skills within the Australian Transport Safety Bureau, or within the Aviation and Airports Division.

I doubt whether the situation is any better in the Office of Transport Security. They plan to keep it that way too!

Policy Advisor Roles in Airports were advertised by DoTAS in July 2004 and May 2005. In each case experience in a regulatory or Aviation environment was not considered essential.

Notwithstanding this, the Airports Act 1996 has the Minister approving Master Plans, Development Plans and Environment Protection Plans for Australia's "privatised" Airports.

The Parliamentary Standing Committee on Public Works (PWC) no longer has jurisdiction over these Airports, and the Minister looks after Public Interest without the need for specialist "AIRPORTS" people!

The functions of Airport Building Officer and (until recently) Airport Environment Officer, are contracted out, with the Department and Minister acting as an uninformed purchaser. All these issues relate to Airport Security.

Recent Concerns.

Hangar collapse at Canberra.

Runway Lights 'out' at Sydney.

Building induced turbulence at Canberra.

Boeing 737-300 bogged at Melbourne.

'Mystery' gas leak emergency at Melbourne.

'Leaking Sand' under third runway at Sydney.

Bird-hazard water feature, at Canberra.

The publicly reported security incidents, your media release

These incidents, and others before them, are genuine 'red lights' to someone with my background.

— Reflecting inter-alia, the Government deskilling outlined above, and the have of 'instant experts' in the Airport Industry.

Let me look at one AIRPORT Hazard; namely the hazard posed to Aircraft by BIRDS.

Prior to 1991, the (then) CAA had its own Bird Hazard Investigation Unit. This small, three person team played a key role in educating aerodrome operators and other sections of the Aviation industry in minimising the risk of birdstrike. Deskilling saw the entire unit declared surplus to requirements and disbanded. When this was allowed to happen, in 1991 the number of reported bird strike occurrences was around 350 annually. With closure of the unit, effective bird control measures are now the responsibility of individual aerodrome operators.

Alarming, total annual reported Birdstrikes have increased steadily, since!

year 2000	457	occurrences.
year 2001	513	occurrences.
year 2002	556	occurrences.
year 2003	639	occurrences.
year 2004	827	occurrences.

There is obviously a clear case for the Commonwealth to re-visit the need for a Bird Hazard Unit. In fact this is easier said than done; the skilled people dumped in 1991 are long since gone, and will be difficult to replace.

As a case in point, I have strong reservations about the magnificent water feature built at Canberra Airport. I always look at the "what-if" scenario. What if a passenger aircraft encounters turbulence and suffers a critical birdstrike on approach?

(annual birdstrike occurrences are significant at Canberra.)

Cries for Help.

Reference is made to the November 2003 House of Representatives Standing Committee on Transport and Regional Services Report titled "Making Ends Meet", following an Inquiry into Regional Aviation Services, in Australia.

The Recommendations in this timely report include a new Airport Subsidy scheme similar to the Aerodrome Local Ownership Plan (ALOP), which the Federal Government walked away from, progressively since around 1986.

Importantly, the Report talks about the lack of management and technical skills and the reduced pool of affordable expertise in Airport Operations and Maintenance.

Recommendation 28, calls on the CASA to place greater focus on activities to assist industry players.

This Report has implications on the cost impacts of security upgrades for Regional Airports.

The Government has yet to respond to the Committee Recommendations.

It is worthwhile remembering, before deskilling, the ALOP provided both financial and technical assistance to Local and Regional Aerodromes.

Aviation Security in Australia.

In practical terms Aviation Security means AIRPORT SECURITY. Airport security comprises the measures taken to protect the activities, facilities and equipment on the aerodrome from any unlawful interference. Together with airline security, it forms the major role of ensuring the safety of passengers, staff and the public involved with civil aviation.

Airport Security is in fact an integral part of Aerodrome planning, construction and operations.

Before deskilling, Airport Standards were promulgated in the Airport Engineering Instructions (APEI's) and later in a publication known as Rules and Practices for Aerodromes (RPA). (Much of the hard earned COW/DCA CORPORATE KNOWLEDGE by then.... LOST!)

Until the creation of CAA in 1988, the R.P.A.'s included a complete Chapter on the subject of Aerodrome Security.

Topics included:

- The Aerodrome Security Program as part of the Aerodrome Manual.
- The Aerodrome Security Committee to coordinate security measures at the aerodrome.
- Appointment of a Security Officer (at larger aerodromes).
- Security Control Centre.
- Security barrier, security fences, secure access points.
- Passenger processing.
- Terminal Buildings, International and Domestic.
- Off-Airport facilities.
- Security during aerodrome works.

With vesting of the CAA, the Agents of Change decided to split the functions. CAA would be responsible for AIRPORT SAFETY, but DOTRS would be responsible for AIRPORT SECURITY.

In the latest CASA Rule Making covering CASR Part 139 "Aerodrome Certification and Operation" the associated Manual of Standards (MOS) includes the following ludicrous statement as part of the Introduction.

"This MOS includes standards and procedures relating to the prevention of inadvertent entry of animals and people to the movement area. These standards and procedures are intended for aviation safety only. This MOS does not address Aviation Security, i.e. the safeguarding against acts of unlawful interference as the subject matter is under the purview of the Federal Department with Carriage for Transport. (I am quoting from the Notice of Proposed Rule Making.)

Who decides whether those security incidents now part of our daily news; are "inadvertent" or "unlawful"?

I spare a thought for all those instant experts

involved with the operation and management of our privatised and Regional Airports. Trying to do the right thing in terms of meeting Regulatory requirements these people could rightly expect their obligations and responsibilities to be spelt out in CASR Part 139 and the MOS. Not so; with regard to Security, which is central to Aerodrome Planning, Design, Operation and Management.

Suggestions for the Joint Committee.

My suggestions are twofold.

Firstly, that the Committee consider the current Agency responsibility arrangements relating to AIRPORT SECURITY.

In my view AIRPORT SAFETY and SECURITY should be administered and regulated by the SAME Agency; that is both by CASA, or both by DoTRS.

I am unimpressed by arguments that the Status-Quo should continue, because Security is a separate Annex to the ICAO Convention.

Secondly, I suggest that the Committee inquire into the assertions I have made at page 2 of this submission; namely that the Commonwealth Government is virtually bankrupt of "AIRPORTS" skills and experience. When I speak of 'AIRPORTS' skills, I am talking about people with qualifications and significant genuine experience in AIRPORT Planning, Design, Construction, Operation and Maintenance.

I recommend that the Committee examine the need to "Re-Skill" the Department or Agency responsible for AIRPORT SAFETY and SECURITY. A Re-Skilled Public Service would also offer greater credibility to decisions made by the Minister, under the AIRPORTS ACT, 1996.

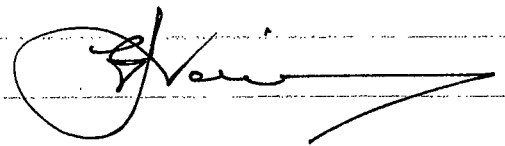
(Weekend AUSTRALIAN 23 April, 2005 "Rumbles on the Runways" - Airports have enjoyed an extraordinary strike rate; more than 200 Development Plans submitted, none rejected !!!)

In making these suggestions, I also have in mind the unfinished business arising from the House of Representatives "Making Ends Meet" Report, mentioned at page 4 of this submission.

A Reskilled CASA or Department would be better placed to offer much needed technical support to Australia's Regional and Local Aerodrome community.

I thank the Joint Committee for the opportunity given to me, to raise these concerns. The submission has of necessity been hand written, in haste, due to pressing family commitments. If necessary and appropriate, I am happy to discuss the issues directly with Members.

Sincerely,



(GRAHAM BAILEY)