

Cobham Aviation Services Australia
Regional Services
3 Valentine Road,
Perth Domestic Airport,
WA, 6105, Australia

18th Mar 2011

Ms Julia Morris
Committee Secretary
Inquiry into Cabin Crew Ratios

By email to: ic.reps@aph.gov.au

RE: Cobham Aviation – Regional Services Response to the - New Inquiry into Cabin Crew Ratios

Dear Ms Morris,

Following is our submission for consideration into the new inquiry that has been established to review Cabin Crew Ratios in Australian Aviation operations. We have tried to keep our response tight and to the point, as we understand you will have a lot to review and take in, however should you require us to expand on any points, please do not hesitate to contact me and we will do so in accordance with any request.

1. The current aviation safety regulatory system for aircraft operators in relation to the application of the cabin crew to passenger ratio including current exemption provisions;

- a. With the current hold on application approvals there is an unfair/uncompetitive disadvantage placed on operators that were in the process of application assessment/submission to CASA
 - i. Other operators in the same markets are operating to higher passenger to Cabin Crew ratios
 - ii. Reduced cost in their operations
 - iii. Not re-establishing this capability or removing current approvals places unfair cost burden on other operators
 - iv. In addition to domestic market 1:50 exemptions in place now, we are also subjected to unfair competition from International operators that have 1:50 capability (NZ/PNG – not limited to)

2. The role of the cabin crew in managing passenger safety and security;

- a. Cabin Crew and Tech Crew are responsible for safety at all times
- b. Cabin Crew and Tech Crew are also responsible for ensuring security, however:
 - i. On most occasions when there is a security event, able bodied passengers immediately volunteer or are actively requested to assist
 - ii. It is unreasonable to think that even at 1:36 passenger ratio that the Cabin Crew team could completely control a security event without passenger intervention
 - iii. During Safety events (By understanding where equipment/exits etc. are located) passengers are expected to assist, the same is expected to a certain degree during a Security event. During the 9/11 event and on many other occasions it can be demonstrated that passengers have stepped up to the plate to assist with security events
 - iv. From a risk management perspective:

1. **Regular Public Transport** (where passengers are "Unknown quantities") - the likelihood of a significant security threat on board an aircraft is considered to be extremely remote given:
 - a. The high level of security surrounding passenger screening prior aircraft boarding.
 - b. This is supported by a distinct lack of reported events since the security measures were enhanced post 9/11
2. **Closed Charter** (Fly in/Out operations) – The likelihood of a significant security threat on board an aircraft is considered to be extremely remote given:
 - a. Customer/Passengers are known quantities to employers/contractors
 - b. Pre-employment screening checks on employees
 - c. No alcohol policy on most closed charter operations due to OH&S requirements (Regular Public Transport has alcohol service)
 - d. Passenger behaviour on a closed charter is influenced by "Peer" pressure or the fact that their shift supervisor/Management representatives are on board the same flight
 - e. Passengers on closed charter flights will generally have their employment "At Risk" with poor behaviour (There are many examples of how Resource Companies have acted to dismiss employees who have made jokes about "Bombs in bags" at check-in) It is taken very seriously
- v. A change in cabin crew to passenger ratio is unlikely to mitigate, further, the risk of a significant security threat in the extremely rare likelihood that it were to occur
- c. Types of "Permitted AOC" operations should also be considered it may be that the 1:50 ratio is suitable for "Closed Charter" operations but not for "Regular Public Transport"

3. The factors that determine the cabin crew to passenger ratio;

- a. Safety
 - i. Being able to effectively coordinate the egress of passengers during an emergency
- b. Security
 - i. Passenger screening prior to boarding (Fit for flight review)
 - ii. Closed Charter Operations
 - iii. Regular Public Transport
- c. In flight service work load
- d. Fatigue Risk Management

4. International practice in respect of cabin crew to passenger ratios;

- a. NZ – CAA approved for 1:50
- b. PNG – CAA approved for 1:50
- c. USA – FAA approved for 1:50
- d. EU/UK – EASA approved for 1:50

5. Measures to enhance aviation safety that may be considered in future requirements on aircraft operators for safety risk management plan covering the cabin crew to passenger ratio;

- a. Level of Security training undertaken by staff (Full security courses not limited courses)
- b. Fatigue Risk Management appraisals on work performed
- c. Full safety cases including risk mitigation and change management plans
- d. Consider Industry specific approvals
 - i. Closed Charter Operations



ii. Regular Public Transport Operations

We remain available to attend in person any meetings or hearings that you feel we could add value to in assisting with this inquiry.

Yours sincerely,

Darren Moncrieff
General Manager
Cobham Aviation – Regional Services