



Submission No: 33

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30 June, 2005

JOINT COMMITTEE OF
- 4 JUL 2005
PUBLIC ACCOUNTS & AUDIT

Mr. Russell Chafer
Committee Secretary
Joint Committee of Public Accounts & Audit
Parliament of Australia
Parliament House
CANBERRA ACT 2600

Dear Mr. Chafer,

REVIEW OF AVIATION SECURITY IN AUSTRALIA

I write in response to your letter dated 03 June 2005, inviting the Australian Airports Association to make a written submission to the Committee's current inquiry and insodoing, address the specific terms of reference.

The Australian Airports Association is a non-profit organisation founded in 1982 and represents the interests of over 260 airports Australia-wide, from the local country community landing strips to the major international gateway airports. The Charter of the Association is to facilitate co-operation among all member airports and their many and varied partners in Australian aviation, whilst maintaining an air transport system that is safe, secure, environmentally responsible and efficient for the benefit of all Australians.

The Association has encouraged all member airports to make their own individual submissions to the inquiry and to address the terms of reference relative to their own local perspective. This submission from the Association is to provide a more general overview for the benefit of the Committee.

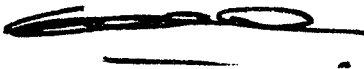
It has always been the consistent view of the Board of the Association that all costs associated with airport security arrangements should be borne by the Commonwealth Government as an integral and important part of their overall community service policing obligations. Airports should be treated no differently to any other established transport infrastructure and airlines no differently to any other modes of public transport.

The attachment highlights some of those more general relevant issues associated with the specific terms of reference. I should also make it quite clear that the views expressed may not necessarily be shared by all airports around Australia, rather the majority of airports. Should any airport have a contrary view, no doubt they will make their own submission in their own right, as they have been advised to do within the prescribed timeframe.

The Australian Airports Association would welcome the opportunity for its 'executive' to meet with the Committee and discuss in detail the issues which may emerge through the submission process. I await your further advice in due course should this suggestion be considered in any way helpful to the Committee with its assessment process.

In the meantime I thank you for the opportunity to make a submission and wish the Committee well with its deliberations.

Yours sincerely,



Ken Keech
Chief Executive Officer

attach



*SUBMISSION TO
JOINT COMMITTEE OF PUBLIC ACCOUNTS AND AUDIT
REVIEW OF AVIATION SECURITY IN AUSTRALIA
30 JUNE, 2005*

a) *Regulation of Aviation Security by the Commonwealth Department of Transport and Regional Services, and the Department's response to aviation security incidents since June 2004.*

The Department of Transport and Regional Services (DoTaRS), through the recently-established Office of Transport Security, has attempted to bring a balanced, commonsense approach to addressing "aviation security incidents" since June 2004. The actual number of genuine "aviation security incidents" since that date has been minimal and relatively minor. Unfortunately, politicians of all persuasions, the media and now the confused general public, cannot really discern between what constitutes aviation security versus what constitutes community criminality.

The incidence of criminal activity (as reported in the media during the past twelve months) that supposedly takes place at some of Australia's airports is no different to any other workplace employing large numbers of diverse ethnic groups over a wide range of aviation-related trade and professional disciplines. All of the foregoing ingredients have created a difficult, and at times contrary, environment for DoTaRS to respond in the appropriate manner to 'genuine' aviation security incidents as distinct from incidents that are really a community policing and jurisdictional matter.

We would like to make one other comment with regard to DoTaRS and its Office of Transport Security. Unfortunately, the career path development program within the Commonwealth Public Service does not necessarily mean that knowledgeable and experienced officers in any given discipline are retained within any department for any particular pre-determined length of time. In this regard, DoTaRS is no different to any other Commonwealth Government Department or agency. However, aviation is a complex and in many ways a somewhat dysfunctional industry which requires a high level of expertise and practical working knowledge. Unfortunately, at the present time there are too few people within DoTaRS with such experience and knowledge.

b) *Compliance with Commonwealth Security Requirements by Airport Operators at Major and Regional Airports*

Currently all 'major' and 'regional' airports comply with the security requirements as determined by the Commonwealth and administered by DoTaRS. All 'security-controlled' airports are now required to have a DoTaRS' approved Security Program in accordance with the Aviation Transport Security Act 2004. These security programs are to be developed on a security risk assessment process consistent with the Australian Standard (ASA) 4360/1.

Recent scenarios put to the industry by DoTaRS to supposedly improve upon security at certain regional airports have not been based on any current risk assessments and in real terms will do nothing to enhance security at those affected airports.

In fact, if these proposals were to proceed as presented, it will have an extremely adverse effect imposed upon many regional communities under the guise of 'security'. The Committee must ensure that the real needs of regional Australia, and security arrangements at their airports are commensurate with the assessed level of threat, and are given every consideration because it is simply not a 'one size fits all' situation.

c) *Compliance with Commonwealth Security Requirements by Airlines*

For obvious reasons this question is best addressed by the airlines. However, we would wish to make one comment. From our experience, there is no doubt whatsoever that airlines have a shared awareness and commitment to aviation security. It should also be clearly understood that the level of commitment, as such, is soundly-based on the level of risk as rightly determined by the appropriate assessment process.

d) *The Impact of Overseas Security Requirements on Australian Aviation Security*

This is perhaps one particular area where we believe that the greatest opportunity for compromise of Australian aviation security exists. Anecdotally speaking, some neighbouring countries, despite their best of intentions and assurances, do not have the same degree of effective security arrangements and monitoring in place as Australia. Accordingly, the Committee should seek the views of the international airlines on this particular issue as it is not really one on which the Association should, or can, make meaningful comment.

e) *Cost Impacts of Security Upgrades, Particularly for Regional Airports*

In very simple terms, no matter the operational and geographic definition of the airport – the cost impacts of security upgrades will ultimately be passed on to the airline passenger. In most instances, these cost impacts have not arisen as a result of an assessment process, rather as a mistakenly perceived need to increase aviation security as a knee-jerk reaction to 'do good' politicians and an ill-informed, headline-hungry media.

The long-term funding arrangements for the Rapid Response Deployment Teams needs to be addressed, particularly post 2008, when we assume the regional aviation industry will probably be expected to meet the costs. What risk assessment process in the first place determined the requirement for these teams in support of regional Australia, and given their location, just how effective would they be if called to respond to a 'security incident' in regional Australia?

The Regional Airports Funding Program (RAFP) was a Commonwealth Government initiative and cost to enhance security at rural and regional airports with non-jet scheduled airline passenger services. It was not an initiative in response to any overall threat assessment process. Accordingly, some in the industry may reasonably ask the question if this is money well spent in the name of aviation/airport security.

Presently there are proposals being 'floated' by DoTaRS as to costly and unnecessary infrastructure initiatives that are likely to be imposed upon regional airports with jet aircraft services. It is outrageous that these initiatives are even being considered, when no individual airport by airport threat assessment has been undertaken, let alone a cost benefit analysis on behalf of those regional communities likely to be affected. Regional Australia simply cannot afford to absorb more and more layers of costs to maintain their continuing access to air services. All additional arbitrarily imposed costs, under the guise of 'aviation security' need to be subjected to the closest of scrutiny.

e) *Privacy Implications of Greater Security Measures*

No doubt the Government, its departments and agencies, have sought the proper and appropriate advice on this matter to ensure no-one in the Australian aviation industry is in any way unnecessarily compromised or disadvantaged as a result of the new regulatory environment.

g) *Opportunities to Enhance Security Measures Presented by Current and Emerging Technologies, Including Measures to Combat Identity Fraud*

The Aviation industry, by its very nature, is at the leading edge of technology. As an observation, DoTaRS and the industry in general are always assessing the impact and costs of new and emerging technology. Identity fraud is not an issue confined to the Australian aviation industry!

h) *Procedures for Security of Baggage Handling by Airlines and Airports at International, Domestic and Regional Airports*

In almost every instance, baggage handling at Australia's airports is conducted by the airlines themselves, or in some instances, through locally-contracted personnel. It could be argued that airports are responsible for the infrastructure and facilities by which this function is carried out by the airlines. Security for passengers and their baggage is the clear responsibility of the airlines and in the public arena it is about time some of the airlines openly accepted responsibility for the actions of their employees. It is unreasonable and unfair to have airports nominated and named in the media as having responsibility for 'hosting' criminal activity (as distinct from security breaches) when in fact those allegedly involved work for another legal entity outside of the direct control of the airport.