

The Secretary
Senate Standing Committee on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Secretary,

Inquiry into the Administration of the Civil Aviation Safety Authority (CASA) and related matters

As a former airworthiness inspector, who retired recently from the Civil Aviation Safety Authority on 29 February 2008, after 20 years of service, I would like to make a submission to the subject inquiry, in relation to the regulatory oversight of Qantas Airways.

As an airworthiness inspector I was based in the Sydney Airline Operations office from November 1998 to February 2008 and for a majority of that time I was the principal CASA contact for Qantas in a team of four airworthiness inspectors, that reported to an Airworthiness Team Leader. During many of those years working at the Qantas coalface I attended various CASA forums attended by senior management and voiced my concerns about the unrealistic audit frequency level and very limited airworthiness resources being allocated in Sydney to oversight Qantas, as a Certificate of Approval (COA) holder in Australia and overseas.

Two of the most significant points of my airworthiness concerns with Qantas Airworthiness oversight that were raised to CASA management at several forums were:

1. Qantas, as a CASA Certificate of Approval holder has over six thousand technical staff, an Executive General Manager, four Group General Managers, ten General managers and almost one hundred Line Managers. The CASA Surveillance Procedures Manual (SPM) compliance audit frequency requirement calls for only "one audit per year" for Airline COA holders with above 50 technical staff, which also captures Qantas with over 6,000 staff. I believe this was an attempt by CASA management to make "one size fit all" in the SPM, leaving Qantas with a totally inappropriate frequency level of airworthiness compliance audit, to meet the limited resources available in the Sydney office.
2. Qantas has around 24 overseas ports where aircraft line maintenance is conducted and is supported by it's own engineers in less than half of those ports, with the remainder being handled by overseas agents. Due to financial constraints imposed on airworthiness overseas travel by management, barely 20% of the ports have been audited by CASA

in the past five years and total faith has been placed in the Qantas internal audit system for regulatory compliance. It should be noted that due to a number of significant CASA audit findings in the various areas of Qantas engineering maintenance locations, the rigor of their internal audit process has been reviewed.

In summary, after almost 10 years of Qantas airworthiness oversight experience, it's my view that the level of COA audit and Sydney Airline Office airworthiness resources in terms of manpower and financial support are totally unrealistic, given the massive scale of the organisation with the logistics of travel requirements throughout Australia and overseas. The CASA introduction of Air Transport Inspectors to compliment airworthiness inspectors at Airline offices, with a focus of top level Safety Systems Management is not the ideal solution and a much greater oversight using on-site presence, with far more inspectors covering all Qantas maintenance locations is required.

Yours sincerely,

David Klein

06 June 2008