

On behalf of the Asia/Pacific Cabin Safety Working Group, I submit this paper for your consideration. The Group welcomes the opportunity to participate in the International Air Service Inquiry.

The Asia/Pacific Cabin Safety Working Group is an initiative of the Australian Society of Air Safety Investigators. The Group comprises ninety cabin safety specialists from airlines, labor, aviation safety professionals and others interested in advancing cabin safety.

Recommendations

- It is recommended that if the Australian Aviation System is deregulated that the Civil Aviation Safety Authority is restructured to operate in the same manner as the Canadian Civil Aviation Safety Board.
- It is recommended that the Civil Aviation Safety Authority be resourced to ensure that standards are met.
- It is recommended that the Civil Aviation Safety Authority should have a dual role:-
 - Define and implement Cabin Safety Standards
 - Conduct regular audits of service providers

The Rationale for the Recommendations

1. Regulatory Framework-Cabin Safety-Background

The Civil Aviation Safety Authority is responsible for establishing and administering the regulatory framework in relation to aircraft cabin safety.

Aircraft cabin safety involves all aspects of cabin risk management including such topics as:

- cabin baggage standards
- cabin interior layout standards
- emergency procedures refresher training
- flight and duty times for cabin crews
- inflight violence
- maximum numbers of types crews may operate at one time
- passenger briefing requirements
- training of cabin crews

The Civil Aviation Safety Authority does not have any trained cabin safety professionals to amend, administer or audit the cabin operations of Australian registered aircraft.

There is historical background to this situation. In the days when aviation in Australia was regulated the airlines voluntarily adopted and in some cases established “world best practice” in their cabin safety management. There was little need for a regulator.

The situation changed dramatically with the onset of deregulation. People from outside the aviation industry replaced operational people at management levels. With this change came a new approach to resource allocation particularly in the area of safety and specifically in cabin safety. Instead of adopting procedures because they represent best safety practice, the new philosophy requires the adoption of what is required by regulation and nothing more.

The rationale used to justify the new approach is economically based. The airlines argue they are service providers and not the setters of safety standards. Adopting any procedure that is not required by regulation involves the allocation of resources by one airline that are not necessarily being allocated by the opposition airline and as such the airline is at a cost disadvantage. Profits also suffer when funds that could be used to finance additional capital equipment are allocated to safety initiatives that are not income generating or required by legislation.

Because of the Civil Aviation Safety Authority’s low priority in administering its cabin safety responsibilities, the airlines in Australia have effectively been “self regulating” since deregulation.

Let us review the results of “self regulation” in the period since deregulation.

2. Regulatory Framework-Cabin Safety-Airline “Self Regulation”-Results

In order to measure the results of cabin risk management since deregulation one needs to use a yardstick. Canadian aviation has many similarities to Australia and is often used for comparison.

The Canadians in the last few years have enacted cabin safety legislation and provided a regulatory framework to support the legislation that is “world best practice”.

Areas covered in the initiative include:

- Cabin baggage control
- Combined cockpit and cabin emergency procedures training
- Crew resource management training for crews
- Flight and duty times for cabin crew.
- Safety auditing
- Syllabus development for initial and recurrent training

The topics included in the Canadian legislation address high-risk cabin management issues. These issues are not new and have been known to the industry for an extended period.

Canada is not alone in looking after the travelling public in this manner. South Africa and Singapore to name two near neighbors have legislative requirements for a similar standard.

Until the commencement of the Australian Aviation Regulatory Review in 1997, there had been no industry review or adoption of safety initiatives like those identified above. In the last five years the Civil Aviation Safety Authority has not enacted any of the Bureau of Air Safety Investigation recommendations in relation to cabin safety, nor required the industry to adopt overseas practices introduced by foreign regulators.

Some Australian airlines have adopted some of the foreign initiatives like crew resource management training, with varying degrees of commitment and success.

We have observed in non regulated safety environments that risk management drifts towards the lowest common denominator. Australia is an example of this trend. The playing field in Australia is not level and the umpire is not on the pitch. Therefore, passengers flying in Australian aircraft do not have consistency in cabin safety practice or management.

Canadian Cabin Safety Management

The Canadians have a deregulated aviation policy in relation to the commercial aspects of the operation. In relation to safety, the approach adopted in Canada is one of close control with well-defined regulations to establish the playing field and sufficient inspectors (umpires) to ensure everybody plays by the rules.

The rules in Canada in relation to cabin safety are very comprehensive and at “world best practice” standard. The International Civil Aviation Organization has acknowledged the quality of the Canadian regulations by adopting the standards for flight attendant training as a recommended text.

In addition to the rule making aspect of regulation the Canadians provide an inspection and auditing function to complement the former. In Canada there are nineteen cabin safety inspectors to ensure the standards are achieved and maintained. By contrast there is not one qualified cabin safety inspector in all of Australia.

Summary

- In this short paper we have demonstrated the need to establish a level playing field in relation to matters of aviation safety and in particular cabin safety.
- We have seen that rules alone are insufficient to ensure that standards are achieved and maintained.

- We have demonstrated the need to ensure that in the deregulated aviation environment the Regulator must accept the role of rule setter and ruler enforcer.
- We have demonstrated the need to ensure the Regulator is provided with sufficient human resources to do the dual tasks required.
- Finally, you are asked to support the recommendations made at the beginning of this paper.