



# **RAAA SUBMISSION**

**OFFICE OF TRANSPORT SECURITY  
DEPARTMENT OF INFRASTRUCTURE & REGIONAL DEVELOPMENT**

## **SCOPE OF AVIATION SECURITY IDENTIFICATION CARDS (ASICS)**

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*Serving regional aviation, and through it, the people and businesses of regional Australia*

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11 February 2015

Office of Transport Security (OTS)  
Department of Infrastructure and Regional Development  
GPO Box 594  
Canberra ACT 2600

Dear Sir,

## **RAAA SUBMISSION**

### **Scope of Aviation Security Identification Cards (ASICs)**

The RAAA is pleased to provide this submission in response to the Office of Transport Security - Scope of Aviation Security Identification Cards discussion paper.

#### **I. RAAA Background**

##### **The RAAA and its Members**

The Regional Aviation Association of Australia (RAAA) is a not-for-profit organisation formed in 1980 as the Regional Airlines Association of Australia to protect, represent and promote the combined interests of its regional airline members and regional aviation throughout Australia.

The Association changed its name in July 2001 to the Regional Aviation Association of Australia (RAAA) and widened its charter to include a range of membership, including regional airlines, charter and aerial work operators, and the businesses that support them.

The RAAA has 28 Ordinary Members (AOC holders) and 70 Associate/Affiliate Members. The RAAA's AOC members directly employ over 2,500 Australians, many in regional areas. On an annual basis, the RAAA's AOC members jointly turnover more than \$1.5b, carry well in excess of 2million passengers and move over 23 million kilograms of freight.

RAAA members operate in all States and Territories and include airlines, airports, freight companies, engineering and flight training companies, finance and insurance companies and government entities. Many of RAAA's members operate successful and growing businesses providing employment and economic sustainability within regional and remote areas of Australia.

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## **RAAA Charter**

The RAAA's Charter is to promote a safe and viable regional aviation industry. To meet this goal the RAAA:

- promotes the regional aviation industry and its benefits to Australian transport, tourism and the economy among government and regulatory policy makers;
- lobbies on behalf of the regional aviation industry and its members;
- contributes to government and regulatory authority policy processes and formulation to enable its members to have input into policies and decisions that may affect their businesses;
- encourages high standards of professional conduct by its members; and
- provides a forum for formal and informal professional development and information sharing.

The RAAA provides wide representation for the regional aviation industry by direct lobbying of Ministers and senior officials, through parliamentary submissions, personal contact and by ongoing, active participation in a number of consultative forums.

## II. RAAA Response to Scope of Aviation Security Identification Cards (ASICs) discussion paper

The RAAA views all the proposals as positive steps for reducing compliance obligations on regional airports.

While there is a small chance of confusion during the implementation period the benefits appear to far outweigh any downside issues.

Most of the proposed measures should see reduced compliance imposition for those regional airport tenants situated away from the RPT aprons.

The airports themselves will be able to manage their risk and ASIC requirements via more flexible and role based models. This should reduce the need for special visitor cards including personal escorts which has been an ongoing burden for many regional airports.

The more flexible risk based approaches being suggested by OTS are in line with perceived threat levels, as analysed by the government security agencies.

The suggested measures will require higher vigilance by airline staff and crew to ensure anyone servicing their aircraft is carrying a valid ASIC. This is an imposition but an acceptable one given the overall operational benefits.

The AVID suggestions are more complex but easing the need for non-RPT pilots to carry ASICS is a step in the right direction. This will naturally restrict certain apron use but the benefits again appear to outweigh any difficulties.

In the private GA space, particularly at regional airports, the need for ASICs has been seen as an expensive overkill for a considerable time. The proposed change is supported.

## III. CONCLUSION

The RAAA is grateful for the opportunity to provide our views on the discussion paper. If you would like further information about the items contained in this submission, or clarification on any of the points we make, the RAAA would be more than happy to assist. The RAAA looks forward to engaging further with OTS on these proposals.

Regards,



Paul Tyrrell  
Chief Executive Officer