



7 June 2011

Committee Secretary
House of Representatives Standing Committee on
Infrastructure and Communications
PO Box 6021
Parliament House
CANBERRA ACT 2600

Dear Committee Secretary,

**House Standing Committee on Infrastructure and Communications
Inquiry into the Ratio of Cabin Crew Members on Aircraft**

The RAAA and its Members

The Regional Aviation Association of Australia (RAAA) was 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 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 26 Ordinary Members (AOC holders) and 57 Associate/Affiliate Members. The RAAA's AOC members directly employ over 5,000 Australians, many in regional areas. On an annual basis, the RAAA's AOC members jointly turnover more than \$1b, carry well in excess of 2 million passengers and move over 23 million kilograms of freight. Annex A lists the Ordinary Members of the RAAA.

RAAA members operate in all States and Territories and include airlines, airports, 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 areas.

Some examples of RAAA members' presence in regional Australia is the REX hub in Wagga Wagga, SkyWest in WA, Sharp Aviation in Hamilton, Airnorth, Chartair and Vincent Aviation Northern Territory networks, West Wing Aviation in Mt Isa and Skytrans operations from Cairns, to name a few.

Serving regional aviation, and through it, the people and businesses of regional 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.

Inquiry into the Ratio of Cabin Crew Members on Aircraft Supplementary Response

The RAAA presents the following points in support of an Australian acceptance of the 1:50 Cabin Crew Ratio international standard:

ICAO Annexes 1, 6, 8, 11, 13 and 14 require that the acceptable level of safety (ALoS) to be achieved shall be established by the State. This is repeated in the Department of Infrastructure and Transport document Australia's State Aviation Safety Program that was published in January 2011.

ICAO defines acceptable level of safety as the minimum degree of safety that must be assured by a system in actual practice.

The international standard for achieving an ALoS for cabin safety is a crewing ratio 1:50 and this standard is used in aircraft certification.

Part 21. of the Civil Aviation Safety Regulations (CASR) 1998 which was approved by the Australian Parliament, requires CASA to accept the aircraft certification standards exercised by the United States and European National Airworthiness Authorities and those standards are based on a cabin crew to passenger/seat ratio of 1:50.

CAO 20.16.3, which supports the Civil Aviation Regulations 1988, requires a cabin crew to passenger/seat ratio of 1:36 and is in conflict with the newer Civil Aviation Safety Regulations (CASR) 1998.

Australian aircraft have been operating safely under both the CAR 1988 (1:36) and CASR 1998 since 2006.

Mandating the retention of the 1:36 rule will require Australian airlines to increase their cabin crew complement by between 50% and 100%. This will be in significant conflict with the Government's policies on productivity.

To justify such a reduction in productivity and the increase in costs to the airlines plus the consequent increases in airfares to the travelling public it will be necessary for the inquiry to demonstrate to the Parliament that the international standard of 1:50 does not provide an acceptable level of safety.

Similarly the inquiry will need to provide to the Parliament a safety case with the data and analyses that establish that 1:36 does provide an adequate level of safety.

Retention of the 1:36 policy will result in job losses amongst the Cabin Crew and Pilots as the airlines move their AOCs to overseas authorities in order to control costs. The principal beneficiary of the transfer of AOCs will be New Zealand.

Consequent to the government ruling that a cabin crew ratio of 1:50 does not provide an acceptable level of safety the Government will have an obligation to place a warning on the Smartraveller website advising Australian citizens not to travel on overseas airlines as these airlines do not provide an acceptable level of safety due to insufficient numbers of flight attendants.

If the RAAA can be of any further assistance in this matter please don't hesitate to contact me.

Regards



Paul Tyrrell
Chief Executive Officer

Annex A: RAAA Ordinary Members

