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Our Ref: S20-0014

Dear Richard,

## **AIPA COMMENTS ON DIRD OPTIONS DISCUSSION PAPER: SCOPE OF AVIATION SECURITY IDENTIFICATION CARDS (ASICS)**

The Australian and International Pilots' Association (AIPA) is the largest Association of professional airline pilots in Australia. We represent nearly all Qantas pilots and a significant percentage of pilots flying for the Qantas subsidiaries (including Jetstar Airways Pty Ltd). AIPA represents over 2,100 professional airline transport category flight crew and we are a key member of the International Federation of Airline Pilot Associations (IFALPA) which represents over 100,000 pilots in 100 countries.

AIPA, through its Safety and Technical Sub-Committee, is committed to protecting and advancing aviation safety standards and operations. We are grateful for the opportunity to comment on the Department of Infrastructure and Regional Development (DIRD) Options Discussion Paper *Scope of Aviation Security Identification Cards (ASICs)*.

Coincidentally, we recently made a submission to the Senate Rural and Regional Affairs Transport References Committee in relation to their Inquiry into certain aspects of Airport and aviation Security. In pertinent part, we concluded:

AIPA has a clear vested interest in adequate aviation security. We have maintained a constant position on the need for risk-based security and have been critical of the 'one size fits all' model used in Australia.

and

AIPA believes that we need to urgently redress the inadequacy of screening applied to people who gain airside access other than through the terminal secure area and that we need to adequately secure the apron areas against unlawful entry.

We consequently recommended, *inter alia*:

AIPA recommends that the Committee emphasises the need to urgently redress the inadequacy of screening applied to people who gain airside access other than through the terminal secure area and the need to adequately secure the apron areas against unlawful entry.

Our full submission will be published in due course by the Committee, but we believe that the above quotes adequately encapsulate our general position. Both IFALPA and AIPA are primarily concerned with the safety and security of the aircraft, not only for the health and wellbeing of the passengers and crew, but also to ensure that the aircraft will not be used as weapon against people or property on the ground.

In that regard, AIPA is at one with the Office of Transport Security (OTS) in regards to Australia's aviation security policy requiring that no person gains access to an aircraft, from landside or airside without in-depth screening appropriate to the potential risk that the person poses as a consequence of that access. We know that currently there are significant gaps in implementing that policy and we are well aware of the politics of the cost-benefits in the aviation space, as are ICAO, IFALPA and IATA.

AIPA members predominantly operate in Landside and Airside Security Zones as well as Security Restricted Areas (SRAs). The very nature of our representative demographic means that our members will always be subject to the highest levels of security scrutiny as a function of the airport geography through which we transit to do our job. Our interest, apart from eliminating the unnecessary screening of highly supervised security-assessed aircrew, is to ensure that the relevant Landside and Airside Security Zones are not compromised by inadequate or weakened controls.

As a general comment, the report of the Aviation Safety Regulation Review (ASRR) creates something of a conundrum for AIPA.

In many ways, the type of operations that our members undertake will remain as the most regulated and the ASRR will not change that situation. We are also aware that much of what we accept as normal is both expensive and inefficient in the GA space. However, finding the balance is a much more complex scenario than some of the more simplistic recommendations of the ASRR would suggest. The final part of the conundrum for AIPA is the philosophical support versus practical application of "international standards".

In regard to the ASIC commentary by the ASRR, we advised the Minister as follows:

**Recommendation 36**

36. [The Australian Government amends regulations so that background checks and the requirement to hold an Aviation Security Identification Card are only required for unescorted access to Security Restricted Areas, not for general airside access. This approach would align with international practice.](#)

AIPA has a continuing concern about a number of facets of the aviation security procedures in Australia. In particular, we are concerned that existing security checks on persons entering Security Restricted Areas (SRAs) are inconsistent and unreliable, placing far more emphasis on checking flight crew (who, almost without exception, will be on board the "scene of the crime") than on those who have access to the aircraft or the items to be loaded on board and who, almost without exception, will not be on board the aircraft at risk.

While we recognise the issues at minor airports and for the GA sector in general, AIPA must reserve further consideration until such time as the practicalities of implementation become clearer

Until such time as we are able to assess how OTS intends to positively and actively protect the Landside and Airside Security Zones to prevent unlawful interference with aircraft, AIPA will continue to reserve further consideration of any proposed changes. Notwithstanding, our position remains that policy changes designed to offset the inconveniences suffered at minor airports and for the GA sector in general must not compromise the security envelope for the majority of air transport operations.

Finally, we are cautious about how “international practice” is used as justification for change. As a general rule, both IFALPA and AIPA strongly support the widest adoption of ICAO SARPs, particularly where international aviation is involved and specifically when the justification for a national difference is not valid. However, ICAO SARPs are minimum requirements thoughtfully crafted for the benefit of nations where compliance is generally problematic – reducing policy requirements back to the minimum requirements of ICAO SARPs requires very careful consideration when a more demanding and perhaps more risk-relevant policy is already in place.

The current ICAO SARPs set out in Chapter 4 of Annex 17 were not drafted in contemplation of the rise, for example, of IS and can never be sufficiently responsive to cope with such an emerging threat. While according appropriate respect for the work of the ASRR, AIPA generally requires more specific reasoning than that provided in the ASRR Report to revert to ICAO SARPs when existing national rules are not obviously inappropriate as distinct from occasionally inconvenient.

With the above context in mind, AIPA offers the following responses:

### Questions

**Q.1** Would reducing airside ASIC/VIC requirements change the security outcome for your operation?

Potentially. Currently, a person in a security zone without overt ASIC display stands out as an exception. Variable display requirements will lead to a general loss of security awareness.

**Q.2** Should ASIC/VIC requirements airside be proportionate—allowing different requirements at different types of airport? If so, what arrangements might be appropriate for different types of airports? How would this be communicated to ASIC holders and crew travelling between airports?

Yes.

Identify what assets and infrastructure need to be protected, establish a security zone, an access protocol and identify the resources to implement it.

Put it in ERSA etc

**Q.3** If airside ASIC requirements were to change, what changes would be required to maintain integrity of a security restricted area?

It depends upon the changes. The underlying principle remains: Identify what assets and infrastructure need to be protected, establish a security zone and access protocol and identify the resources to implement it.

**Q.4** What factors would inhibit or enable reduction of airside ASIC display requirements? For example, periods of RPT traffic, airport layout or other security measures.

The underlying principle remains unchanged. Don't compromise security for a few individual's convenience.

**Q.5** Would changes to airside ASIC display requirements lead to reduced or new costs? In your response, please be specific about the likely difference in costs from current arrangements.

AIPA has not undertaken any relevant cost analysis.

**Q.6** Are ASIC and VIC display requirements for Landside Security Zones, including sterile areas, appropriate to risk? Why / Why not?

ASIC/VIC are part of multi-layer defences. We are not party to the full risk assessments so any response would be mere speculation.

Q.7 Are there different risks associated with international sterile areas and domestic sterile areas? Do differences warrant accordingly different ASIC or VIC requirements (noting that for domestic sterile areas, members of the general public, once cleared, have access, while visitors need to obtain a VIC).

Yes.

A determined intruder would not be dissuaded by different ASIC or VIC requirements (not sure what the note is attempting to convey).

Q.8 What challenges currently exist for managing compliance and monitoring of landside ASIC display requirements?

Not our area of expertise.

Q.9 Would changes to landside ASIC display requirements lead to reduced or new costs? In your response, please be specific about the likely difference in costs from current arrangements.

AIPA has not undertaken any relevant cost analysis.

Q.10 Would specifying further roles requiring ASICs improve security arrangements? Why? / Why not?

Is the role list a proxy for an access list? In our view, security is about access.

Q.11 What roles should hold ASICs and/or undergo background checks? (Refer Attachment A)

As for Q10 above.

Q.12 Do you agree that roles should be used in lieu of zones at airports without SRAs or significant traffic? Why / Why not?

As for Q10 above.

Q.13 What compliance and monitoring challenges might stem from further role-based ASIC requirements? Can you provide details of specific cost impacts of such a change?

Not our area of expertise.

Q.14 What complementary security measures serve to lower identity security risks, which could potentially reduce the need for ASICs?

Biometric scanning can be used for controlling access but is of no value for identifying intruders within restricted areas.

Q.15 Should pilots not operating at security controlled airports require a background check? What types of pilots should require background checks?

How do you propose to stop an unscreened pilot from operating to a security controlled airport? At what size and fuel capacity do you deem an aircraft no longer worth considering as a weapon?

Q.16 Should the AVID remain a separate to the ASIC? Or should flight crew requirements be integrated into the ASIC scheme as for other aviation participants? (For example, with specified types of flight crew as ASIC roles)

Are the purposes of the AVID and the ASIC similar or mutually exclusive? Does either document achieve its intended purpose? See our response to Q15 above.

As a general comment on the questionnaire, AIPA wonders whether pilots are necessarily aware of the details of the security problem and the intended scope of the implemented defences to the depth that the majority can comment at a system rather than personal level.

From our perspective, the public display of identification documents that allow peer scrutiny to identify intruders in restricted areas is an important security layer. Further, we would prefer enhanced identification and tracking systems that allow more efficient access processes.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Shane Loney', is displayed within a light grey rectangular box.

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