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SAFETY MANAGEMENT SYSTEMS FOR AERODROME RESCUE AND FIREFIGHTING AND AIR NAVIGATION SERVICE PROVIDERS – (PP 2618SS)

Submission by the Australian & International Pilots Association

About the Australian & International Pilots Association

The Australian & International Pilots Association (AIPA), a federally registered organisation, is a professional Association that represents the industrial, professional and safety interests of Qantas Group pilots in airline operations within Australia and around the world. AIPA currently has over 2,500 members, based in different locations throughout Australia.

AIPA's core objectives include providing industrial representation and services to its members as well as advocating for aviation safety at national and international levels. AIPA also advocates for aviation safety as a member of the Australian Aviation Unions Alliance (AAUA) and through our membership in the Australian Airline Pilots' Association (AusALPA), which is in turn a member of the International Federation of Air Line Pilots' Associations (IFALPA).

Opportunities, risks and implementation challenges with the proposed policy to replace the SMS requirements currently contained in Parts 139.H, 171, 172, 173 and 175, with a new Part 5?

The Australian & International Pilots Association (AIPA) welcome the opportunity to provide feedback on the proposed policy to replace the SMS requirements currently in Parts 139.H, 171, 172, 173 and 175, with a new Part 5.

AIPA's members are the operators of the aircraft that rely on the providers of Part 139.H, 171, 172, 173 and 175. They work within the system everyday and carry the consequences of decisions about safety directly.

The replacing of the SMS requirements in Parts 139.H, 171, 172, 173 and 175 with a new Part 5, offers an opportunity to drive consistency in safety management and alignment with ICAO Annex 19.

A single CASR Part for safety management could reduce duplication for organisations operating under several Parts. However, there are differences between services, and an SMS needs to be tailored to the size, complexity and safety risks of the operation. Part 5 needs to drive consistency whilst able to account for differences between service providers.

The most significant impact is to Airservices, which is a provider under all the Parts of the proposal. Whilst the proposal could deliver efficiencies, there are concerns and risks associated with the timing of the proposed changes. Airservices is already under significant and faces a large change program.

Moving to a consolidated Part 5 could consume substantial specialist resources, diverting them away from day-today safety management activities. The timing of the implementation and transition needs to be carefully considered to ensure that additional risks are not introduced, particularly for Airservices.

More broadly, affected organisations may need to map existing requirements to Part 5, revise manuals and procedures, update reporting systems, train staff and review assurance arrangements. CASA should provide a detailed mapping of existing requirements to the new framework, identify substantive changes separately from administrative changes, and publish practical guidance and sector-specific examples. The transition should be supported by early availability of the final regulation, MOS and guidance so organisations can plan against stable requirements.

Implementation should recognise existing compliant SMS arrangements and avoid unnecessary reapproval or duplication. CASA should clarify how compliance will be assessed during transition and apply consistent interpretations across the affected sectors. A staged approach, with a gap assessment, implementation plan, staff training and verification of effectiveness, would help organisations maintain safety throughout the change. Overall, the proposal offers potential benefits, provided implementation is proportionate, preserves effective sector-specific controls and focuses on measurable safety outcomes rather than paperwork alone

Comments on the proposed SMS reforms?

The proposed SMS reforms offer a constructive basis for a more consistent framework aligned with ICAO Annex 19. However, the benefits will depend on the detail of the final Part 5 regulation and Manual of Standards, and on how CASA implements and oversees the change.

The final requirements should be proportionate to operational size, complexity and risk, with clear recognition of existing SMS arrangements that already meet the new standards. Harmonisation should preserve effective sector-specific controls rather than require unnecessary redesign.

Potential impacts on affected organisations include a gap assessment, revisions to SMS manuals and procedures, staff training, changes to safety reporting and information-handling arrangements, and updates to internal audit and compliance activities. These changes may require additional staff time and expenditure during transition, even if a common framework reduces duplication over the longer term. CASA should distinguish genuinely new obligations from changes in terminology or legislative location, provide a requirements-mapping guide, and avoid duplicate approval processes. Operational safety activities should remain the priority throughout implementation.

The proposed protection of safety data, safety information and related sources is welcome in principle. The final framework should clearly explain what is protected, who may access or disclose information, the permitted purposes of use, and the applicable exceptions. Practical examples would help organisations update reporting policies and explain the protections accurately to staff.

The transition should be supported by timely publication of the final regulation, MOS and implementation guidance, with clear milestones and consistent compliance expectations. CASA should consult affected sectors on the practicality of the transition arrangements and review

implementation outcomes to identify unintended costs or safety impacts. Organisation-specific impacts cannot be quantified here; they should be assessed against the final requirements and each organisation's existing SMS. Overall, the reforms should be judged by improved safety management and clearer, proportionate compliance obligations, not simply by the completion of new documentation.

Additionally, AIPA supports the long-term goal of transiting all aviation sector's SMS requirements to Part 5, as was originally envisaged

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