

25 July 2014

By Electronic Transmission

Ms Alison Sommerville
A/g General Manager, Aviation Security
Office of Transport Security
Department of Infrastructure and Regional Development
GPO Box 594
CANBERRA ACT 2601

Email: alison.sommerville@infrastructure.gov.au

Our Ref: S05-0025
Your Ref: 14/2931

Dear Ms Sommerville,

Re: Review of the Aviation Prohibited Items List – Discussion Paper

The Australian and International Pilots' Association (AIPA) is grateful for the opportunity to review and comment on the Department's Aviation Prohibited Items List Discussion Paper.

AIPA takes an active role in the Australian aviation industry, participating in inquiries in the Australian aviation sector and contributing members to various industry forums. AIPA is also an active member of the global pilot body, the International Federation of Airline Pilots' Association (IFALPA), which represents over 100,000 airline pilots internationally.

AIPA has recently reviewed the discussion paper and is, in general, supportive of the Department's decision to align the Prohibited Items List with ICAO and other international practices; and welcomes the shift to a risk-based security.

AIPA recognises the implementation of security measures such as hardened cockpit doors has significantly reduced the risk of unauthorised access to the flight deck. However, risks remain for cabin crew and flight deck crew operating on aircraft without hardened cockpit doors installed. It should also be acknowledged that aircraft without hardened cockpit doors are those most frequently servicing airports that lack security screening procedures.

While amending existing procedures as proposed in this review is a good step, AIPA hopes it will be just the first in rationalising existing procedures. AIPA also wishes to highlight to the Department, the Association's continuing concern regarding screening of aircrew. We consider Australia's current approach to screening aircrew to be unnecessarily stringent, despite the Office of Transport Security (OTS) previously stating that this action is not based on a risk assessment, but rather simply conducted as a public display to engender confidence. AIPA has previously advised the OTS of concerns relating to the repetitive electronic screening and the inability to ensure the "random and continuous" procedure is being applied by contract screeners. OTS has previously asked AIPA for patience while security screening procedures are reassessed; hence as stated, we trust this is the first step only.

We also request the Department consider progressing towards a more efficient airside entry for aircrew based on enhanced crew ID measures.

AIPA looks forward to future opportunities to assist in achieving further efficiency improvements for security at our airports and on aircraft. Should you have any enquiries or wish to discuss this further, please do not hesitate to contact us on 02 8307 7777 or at safety.technical@aipa.org.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Shane Loney', written in a cursive style.

Captain Shane Loney
Vice President /Safety & Technical Director

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