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Dear Kate,

AUSALPA COMMENTS ON THE CLASS 5 MEDICAL SELF-DECLARATION POLICY CONSULTATION

The Australian Airline Pilots' Association (AusALPA) is the Member Association for Australia and a key member of the International Federation of Airline Pilot Associations (IFALPA) which represents over 100,000 pilots in 100 countries. We represent more than 7,100 professional pilots within Australia on safety and technical matters. Our membership places a very strong expectation of rational, risk and evidence-based safety behaviour on our government agencies and processes and we regard our participation in the work of the Australia's safety-related agencies as essential to ensuring that our policy makers get the best of independent safety and technical advice.

AusALPA welcomes the opportunity to contribute feedback on the Class 5 self-declaration policy proposal. In summary, AusALPA is unable to support this policy in its current form however, if the following concerns were addressed, we'd be prepared to revisit our positions.

AusALPA's Reservations

AusALPA believes that this proposal represents a lowering of existing safety standards. Our representatives and members have concerns about the concept of outright self-declaration for medical fitness and the risks inherent in operating in the same airspace with Class 5 medical holders. Many of them operate into busy airports and in varied and complex airspace with unsuspecting members of the public on board.

We have had experience with some pilots that would self-declare inappropriately, including involvement with some members that have been unaccepting of CASA determinations made of their medical status and where we have had our own concerns for their health status suitability.

We're concerned about this policy being used as a backdoor workaround instead of it truly being a means of being necessary relief to unnecessary regulatory and cost imposts.

Policy Improvement Opportunities

AusALPA suggest the following deficiencies and improvements to address:

- The policy should only be implemented on a trial basis.

- A Class 5 medical, where it is also an initial medical should not be one obtained by a self-declaration. As per the UK, the initial medical certificate must be an examination by a (any) medical practitioner.
- Data should be collected on the use of Class 5 medicals. The dataset should address matters such as, frequency of use (hours flown on a Class 5), the experience level of the Class 5 holder (e.g. ab-initio or ex professional etc.) and demographic of the Class 5 holder, particularly age.
- A representative sample size (e.g. 30%) of pilots utilising the Class 5 medical should be audited to ensure the integrity of the dataset.
- The dataset must inform a Post Implementation Review, including considerations for the viability of the continuance of the scheme.
- CASA should be transparent with their intentions of scheme audits – what is going to be audited? How often? We ask that the audit process be very structured.

Access to Class C and D airspace for Class 5 Certificate Holders

AusALPA has provided a submission to the Discussion Paper consultation regarding access to Class C and D controlled airspace for sport and recreation aircraft. Some relevant extracts from that submission for this consultation include:

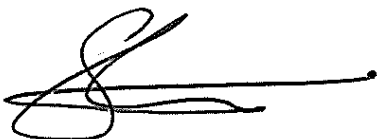
- AusALPA believes that medical standards criteria for access to Class C and D airspace should be risk-based.
- Airspace that has been classified as Class C or D is due to the identified higher risk mitigation needs of that airspace and its users (when compared to lesser classifications). Therefore, the priorities for airspace access need to be considered with the principles of access and equity – minimisation of restriction while maximising system performance – but also within the context of a risk-based approach to ATM.
- Airspace users and aircraft operators should understand that airspace access *rights* need to be understood as access *responsibilities* too.

Our View / Summary

AusALPA has strong concerns with the Class 5 policy proposal in its current format and believes that it could lead to a degradation of safety standards below acceptable thresholds.

AusALPA asks CASA to pause progress on the implementation of this policy until necessary improvements can be included and a subsequent consideration can occur.

Yours sincerely,



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Safety & Technical Director AusALPA

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