

PILOT SAFETY MEETINGS REPORT-BACK

Recently your member-led TWU Flight Safety Committee met with the ATSB, CASA and Airservices in Canberra to discuss your questions around investigation processes, FRMS and airspace issues.

Below, you can find an overview of the responses from agencies, and how your Flight Safety Committee is responding. We know some of these responses may not reflect what is happening at airports. Together, we will continue to push regulators to take these matters seriously. You can see the full answers here.



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CASA

Is CASA concerned that productivity-based pay systems could lead to pilots flying (to raise their income) when they're not fit to fly?

There are obligations on Flight Crew Members (FCM) not to commence a duty if they may not be fit for duty due to fatigue, and on AOC holder /operators not to assign FCM for flight duty if they believe the FCM is unfit for duty.

How does CASA monitor the application of current airline FRMS systems (audits?) and the growing practice of airlines using duty limits as targets?

CASA must be satisfied with duty limits and the principles that underpin them before they can be approved.

Limits cannot be changed without CASA approval. CASA audits FRMS holders for compliance with the approved FRMS manuals and effectiveness of the FRMS procedures.

What process is in place if CASAs finds an airline's FRMS application is creating more fatigue and potential safety risks than it's mitigating? Are airline managers personally liable in the event of incidents?

If CASA receives information that an operator has introduced fatigue risks by scheduling practices that are not FRMS-compliant, a Response Surveillance activity (special audit) may be conducted. **Accountability rests with the operator unless there is wilful, deliberate or reckless action on the part of the employee.**

TWU: Following reports from members on these FRMS issues, we are monitoring and will report any alleged breaches, and work with management to ensure rostering practices comply with regulations and are practical around fatigue management.

Submit fatigue reports and contact your TWU Flight Safety representative at flightsafety@twu.com.au in the event of a fatiguing/potentially fatiguing duty. Fatigue reports provide a basis upon which problematic pairings can be reviewed and changed at company FSAG/pairing review meetings.

ATSB

If a primary cause of a safety event is fatigue, what weight of responsibility would be assigned to company management?

The finding would likely be at the level of the individual if there was evidence of:

- The individual working two jobs
- The individual not taking advantage of rest opportunities

There would likely be a finding/safety issue for the operator if there was evidence of:

- The issue being more widespread
- Rostering practices were found to be fatigue-inducing

Can an ATSB safety report be amended after submission as additional information is remembered?

In short, yes, ATSB reports can be amended following receipt of additional information. [More info on amending ATSB safety reports.](#)

Can ATSB investigate scheduling practices within company FRMS to identify if they're having an adverse effect on pilots' mental health/wellbeing due to fatigue?

Yes, but the investigation wouldn't usually start at that point. The ATSB model considers elements in the order of: **the occurrence, individual actions, local conditions, risk controls** (like scheduling practices) and organisational influences. To investigate the **risk controls**, there would therefore need to be an evidentiary trail that led to it. [More info on investigation processes.](#)

AIR SERVICES

The recent increase in TIBA has many airline crews concerned. Will this continue and if so, for how long?

Although unplanned absence has been higher than expected, we continue to provide services at 99.9% of published service levels. [More info.](#)

TWU: Your Flight Safety Committee will be calling on Airservices to continue monitoring staff levels to ensure full ATC services are provided to keep the skies safe.

Why is it taking so long to implement a tower at Ballina Airport, considering there is such a high RPT presence, combined with light aircraft?

The CASA Office of Airspace Regulation (OAR) has been consulting on an airspace review and we await the determination. We implemented a Surveillance Flight Information Service (SFIS) and gave a proposal to CASA to provide an approach service to the ground which was included in the review.

TWU: TWU Flight Safety is contacting CASA OAR requesting further information about:

- Establishment of a tower at Ballina Airport
- Utilisation of a discrete frequency at Proserpine and Shute Harbour
- Implementation of SIDs and STARs at Launceston
- Status of the Pilbara basin airspace review

Why is the Unicom operator at Ballina/Byron based in Brisbane and not on site at Ballina? Why do they not at least have a camera at the airfield to monitor the movement areas?

The service provided at Ballina is not a Unicom and provides a Flight Information Service (FIS) using surveillance, which is best provided from Brisbane Centre. The aerodrome and airspace continues to be non-controlled. Cameras would potentially need to be included as part of an aerodrome service.

Why are the control towers at YBCG, YBSU, YBHM closed so early?

YBCG: we are working on getting new controllers fully endorsed and expect a return to ERSA hours in Jan

YBHM: operation hours are promulgated by NOTAM as described in ERSA. We endeavour to provide the service to meet RPT needs but are also constrained by travel to and from the island each day.

What is being done to address the threat created by the volume of high-capacity traffic passing through Pilbara mining Ports?

CASA-OAR published a draft review of the Pilbara Basin Airspace in March 2021. We believe this has not been finalised but it did not make any determination to amend the airspace within the region.

TWU: TWU Flight Safety is writing to Airservices requesting implementation of VHF coverage below 7000' at Boolgeeda.

Your Flight Safety Committee will continue to engage in dialogue with the various agencies, and follow up on members' concerns. To have an active say, [join the TWU Flight Safety Committee.](#)