



8 July 2024

Pip Spence  
Chief Executive Officer  
Civil Aviation Safety Authority

Sent via email only: [Pip.Spence@casa.gov.au](mailto:Pip.Spence@casa.gov.au)  
CC [Nicole.Forbes@casa.gov.au](mailto:Nicole.Forbes@casa.gov.au) & CASA Unions Reps.

## Re – Enterprise Agreement Commitments, Consultation & Disputes

Dear Ms Spence,

The Australian Federation of Air Pilots (**AFAP**) write to the Civil Aviation Safety Authority (**CASA**) regarding matters relating to the *Civil Aviation Safety Authority Enterprise Agreement 2023-2026* (**the Agreement**).

The AFAP, along with other unions have expressed concerns about CASA's commitment to consultation on various matters which may result in potential ongoing industrial issues. The AFAP has attempted to utilise regular catch ups with CASA People and Culture (**P&C**) and the consultative mechanism(s). The AFAP provide additional information to our concerns below with the intention to address issues and opposing views on various issues.

### FWA & CASA Undertakings in EA

1. The Agreement includes CASA undertakings in clause 77, as provided below.

#### **77. Workforce planning**

##### **77.1. Method for determining aviation technical workforce resource requirements.**

*77.1.1. CASA recognises the need to ensure it has the required workforce to meet statutory obligations under the Civil Aviation Act 1988, ICAO standards and government expectations.*

*77.1.2. During the life of the Agreement, CASA, in consultation with the technical unions, will establish a method for determining staff resource requirements in relation to the aviation technical workforce. The intent of the method is not to decrease the size of the*

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*inspectorate/technical workforce rather to inform the composition, capacity, performance, responsiveness and culture of CASA's workforce to achieve CASA's goals and priorities in the short and longer term.*

*77.1.3. The focus of the method will be the development of workforce composition profiles addressing CASA's aviation technical workforce requirements, considering the aviation community regulatory oversight requirements, ICAO requirements, risk factors, location, the number of Authorisation holders, workforce structure, workload considerations and work requirements.*

*77.1.4. The process to establish the method will commence no later than 3 months following the commencement of the Agreement.*

*77.1.5. CASA will implement changes resulting from the established method, following the consultation requirements as per clause 72.*

*77.1.6. Prior to the commencement of the implementation of the method there will be no reduction in the number of current technical or inspectorate roles in place at the commencement of this Agreement.*

***77.2. Work level standard review for the ASR2, ASR3, FO2 and FO3 classifications.***

*77.2.1. CASA, in consultation with the TCC, will commence a review of the work level standards for the ASR2, ASR3, FO2 and FO3 classifications within 12 months of the date of commencement of this Agreement.*

*77.2.2. The purpose of the review is to ensure that the work value differences for the ASR2, ASR3, FO2 and FO3 classifications are clearly defined and clarify the career progression pathways for employees in the ASR and FO classifications.*

2. The AFAP has requested CASA provide evidence of the undertakings in Clause 77.1 and 77.2, to date there is no positive response, and we are now seeking that positive response.

## **Workforce Planning**

3. The Agreement clause 77.1.2 refers to consultation with technical unions, noting this is a separate and additional undertaking by CASA to the consultation in clause 77.1.5. Therefore, that engagement with the AFAP (and other technical unions) regarding the “*method for determining staff resource requirements in relation to the aviation technical workforce*” is well overdue.

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4. The AFAP seek all relative material to evidence the current planning and seek that the AFAP (and other stakeholders, identified as technical unions) be included in this process, and allow time for our members to review, and further to allow for paid time for Workplace Delegates to undertake further discussions in the workplace.
5. The AFAP seek CASA provide a proposal in 14 days of this correspondence in its approach to addressing the concerns raised above, regarding the undertaking in clause 77.1 of the Agreement.

### Work Level Standard Review

6. The Agreement clause 77.2 refers to a process of work level standard review, required to have commenced prior to 1 March 2025, there is no evidence that CASA has commenced this review, and no consultation to date.
7. The AFAP note that CASA has commenced positions descriptions reviews and consultation, including changes to these documents.
8. On face value it appears that all new documents are being compared to an outdated work level standard (already agreed as in need of review). These inefficiencies are of concern if all new position descriptions will be subject to review against new work level standards.
9. As per the CASA correspondence the AFAP has sought the utility of the CASA P&C catch ups and forums with CASA to try address these concerns, but it has been unsatisfactory.
10. The AFAP seek all relative material to evidence the current review of work level standards as per clause 77.2 of the Agreement be provided within 14 days of this correspondence.
11. Further, we would like an undertaking in 14 days of this correspondence that CASA agree to (as necessary or requested) re-open discussion on positions description (including purported consulted positions descriptions), required to be reviewed by the updated work level standards.

### Consultation on Position Descriptions

12. As above, the AFAP has requested additional information via CASA meetings including the previous documents that are changing, and/or other working documents outlining the proposed changes.
13. The AFAP above note the issue of the updating of work level standards impacting on this process.
14. The AFAP continue to seek copies of relative documents for all Flight Operations Inspectors positions previous position descriptions as part of the consultation, we are of the view '**consultation has not commenced**' (emphasis added) until the relevant information has been provided.

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15. The AFAP seek an undertaking by CASA to agree to consult on any updated positions descriptions, including those purported to be finalised (as required), due to a lack of relative information provided, and as per above without the work level standard assessments with agreed updated work level standards to be reviewed against.

## Recruitment

16. The AFAP raised in nearly all catch ups with the P&C during 2024 & 2025 the concerns about recruitment strategies in CASA acknowledging the market competition in aviation skills in Australian and globally has increased between 2022-2025. This concern was not appropriately addressed in the previous enterprise bargaining negotiations. CASA P&C in discussions highlighted the conflict of the entry level issues in CASA compared to the industry/market rates, classification, work level standard development and mechanisms for attraction/retention to be utilised by CASA to achieve desired workforce planning.

17. The AFAP were informed this may be reviewed in 2026, however interim measure(s) may be worth exploring and aligning to the current workforce planning initiatives. We request CASA to provide more information on strategies and mechanisms to attract/retain skilled individuals due to not having an agreed mechanism in the Agreement.

18. This information and further discussions may compliment the agreed undertaking regarding the methodology of the workforce strategies in clause 77.1 (yet to be undertaken).

## Consultation on Flying Qualifications Training Manual

19. The AFAP sought to collaborate with CASA on Flying Qualifications Training Manual and changes in policy. The AFAP were of the view as indicated by P&C there would be an out of session meeting to discuss.

20. To date even though there remain to be interested stakeholders form the Technical Consultative Committee (**TCC**) it was later reported that it may not be discussed. It remains uncertain what are the next steps are, and communication has stopped.

21. The AFAP are seeking updates, clarification on the planned steps in consultation, engagement in consultation, and generally improved communication from CASA within 14 days of this correspondence.

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## Consultation on Flexible Work Agreements Policy

22. As per correspondence sent on 3 July 2025 by the AFAP to the CASA Director of People and Culture, there are concerns that CASA policies are not in scope to the Agreement.
23. The AFAP at the time of this correspondence are continuing to engage with CASA people and culture on these issues how have offered to revert to the AFAP on the concerns. So far, the P&C establishing 30-minute meetings are not genuine consultation.
24. The AFAP are not confident CASA P&C are seeking to resolve concerns and/or disputes and seek reassurances from CASA disputes will be appropriately engaged as per the Agreement.

## Summary

25. In response to your letter the AFAP advises matters we are engaging with P&C are not resolving.
26. The AFAP seek to narrow the current issues and opposing views by engaging with CASA prior to any escalation, however we reserve all rights to escalate any matter in accordance with Agreement.
27. The AFAP view that the CASA P&C may have been making assumptions that higher level discussions via online notice boards, meetings or forums are sufficient and effective. This is a common error where that important and sensitive matters will require genuine engagement on the issues and has therefore resulted in various concerns and disputes.
28. A response is sought to the requested information, documentation, and proposal(s) outlined above to be provided to the AFAP within 14 days of this correspondence via email to [jason@afap.org.au](mailto:jason@afap.org.au).

Regards,

Jason Newell  
Senior Industrial Officer

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