

**From:** Simon Miller [<mailto:Simon.Miller@afap.org.au>]

**Sent:** Wednesday, 8 March 2017 10:29 AM

**To:** Chambers - Gostencnik DP

**Cc:** Simon Lutton; Joanne Janes; Marcus Diamond; Patrick Larkins; James Mattner; Cate Larkins; Kathy Srdanovic ([kathy.srdanovic@ashurst.com](mailto:kathy.srdanovic@ashurst.com)); Ruchi Bhatt ([ruchi.bhatt@aigroup.com.au](mailto:ruchi.bhatt@aigroup.com.au))

**Subject:** 4 Yearly Review of Modern Awards - Air Pilots' Award 2010: Casual Employment

Dear Associate,

We refer to the email below from Ashurst Australia regarding Item 13 of the *Revised Summary of Submissions - Technical and Drafting* (as published by the Commission on 14 February 2017).

We confirm that we have considered the position expressed on behalf of the Qantas Group regarding the treatment of casual employment under the *Air Pilots' Award*.

We maintain our position, as expressed in our previous submissions to the Commission dated 30 June 2016 and 6 December 2016, and in conference before Deputy President Gostencnik on 9 February 2017, namely that 'flight time', consistent with clause 3.19 of the pre-reform *Pilots' (General Aviation) Award 1998*, should be defined as meaning time on duty as a crew member in an aircraft and is calculated from chock to chock.

It should also be noted that pilots and/or their employers are required to record flight time for Civil Aviation regulatory purposes. This is commonly done via a pilot's log book and/or employer's rostering software. The flight time recorded for this regulatory purpose is "chock to chock". We believe any award definition of flight time should, as much as possible, be consistent with any regulatory definition of flight time.

Yours sincerely,

**Simon Miller**  
Industrial Advisor



**AUSTRALIAN FEDERATION OF AIR PILOTS**