



OPTIONS DISCUSSION PAPER

Scope of Aviation Security Identification Cards (ASICs)

ISSUED: DECEMBER 2014

Submissions to identitypolicy@infrastructure.gov.au

Contents

CONTENTS	3
OVERVIEW	4
KEY DRIVERS	4
PROVIDING INPUT	5
ASIC SCHEME OVERVIEW	6
WHAT OPTIONS ARE PROPOSED?	6
CURRENT ASIC REQUIREMENTS.....	7
OPTIONS	9
1. Better targeting airside ASIC display requirements.....	9
2. Considering ASIC display requirements in Landside Security Zones.....	10
3. Role-based ASICs – targeting high risk roles and activities	11
4. Security status of flight crew and aviation identification	14
APPENDIX A – LIST OF QUESTIONS FOR CONSIDERATION	16



Overview

The Department of Infrastructure and Regional Development (the Department) through the Office of Transport Security (OTS) implements a range of measures to strengthen transport security and safeguard Australians and Australia's national interests.

The role of OTS is to ensure Australia has a viable and sustainable transport security system through regulation that is designed collaboratively with industry and other government agencies. The aim is to ensure that the transport regulatory model operates efficiently and effectively while reducing unnecessary and costly burdens for industry.

This *Scope of Aviation Security Identification Cards (ASICs) Options Discussion Paper* provides industry and government stakeholders with an opportunity to consider ways to improve our collective ability to deliver security outcomes. Your feedback will improve our understanding of the impact of existing ASIC and associated regulations and help to inform alternative options for further consultation.

Key drivers

Future outlook

The anticipated growth across the transport sector is expected to continue in the next five to ten years. These growing volumes, together with major shifts in the patterns of trade and travel, will lead to an increasingly complex transport environment. We also expect to see the threats posed to transport systems by terrorism and other acts of unlawful interference endure and adapt in the future.

The Department recently released the [Transport Security Outlook to 2025](#). In response to this outlook, the Department is looking ahead—at how effective and efficient transport security can support industry. The outlook also highlights the increasing strain that a one-size-fits-all approach to regulation will face in the future. For the Department this means a greater need to increase our focus on risk-based, proportionate, efficient and cost effective approaches to maintain a sustainable and secure transport system.

Reform across the government sector is also driving a sustained reduction in regulation. In this context, the Department is responding to and supporting the Government's deregulation policy in consultation with industry. The Government has committed to reducing red tape as a way of boosting productivity and decreasing the regulatory burden for industry by at least \$1 billion per year.

Aviation Safety Regulation Review

In May 2014, the Australian Government released the report of the Aviation Safety Regulation Review (the Review). One of the review panel's 37 recommendations is:

The Australian Government amends regulations so that background checks and the requirement to hold an Aviation Security Identification Card are only required for unescorted access to Security Restricted Areas, not for general airside access. This approach would align with international practice.

The review panel saw Australia's requirement for background checks for general airside access as excessive in comparison to International Civil Aviation Organization (ICAO) standards. ASICs were a focus of

submissions from general aviation respondents. Key concerns raised were the ASIC's cost, renewal frequency, intent and benefit (particularly at smaller regional airports), and international consistency and duplication.

Providing input

We would like your feedback on how the Government might reform, enhance or amend the scope of the ASIC Scheme to better target areas of high risk. Feedback from this consultation process will help the Department to develop a number of policy options for relevant industry segments. These options will be provided to the Government for consideration with further consultation on the preferred options expected early next year.

Please review this paper and provide feedback on the options and issues identified. A number of questions have been included throughout the paper to help elicit comments and feedback. You may wish to focus your feedback on only those areas of direct relevance to you or provide broader comments across the scope of the document. Operational examples would be particularly useful, including known inefficiencies in the current system, and specific cost impacts associated with the options.

A full list of the questions is also available in Appendix A to assist responses.



Making a submission

Submissions should be emailed to identitypolicy@infrastructure.gov.au

An acknowledgement email will be sent to the sender's email address to confirm receipt of the submission. The closing date for submissions is 2 February 2015.

Phone: 02 6274 7820
Email: identitypolicy@infrastructure.gov.au
Website: www.infrastructure.gov.au
Mail: GPO Box 594 CANBERRA ACT 2600

ASIC Scheme overview

The *Aviation Transport Security Act 2004* (ATSA) establishes a regulatory framework to safeguard against unlawful interference with aviation and meet Australia's obligations under the Convention on International Civil Aviation (also known as the Chicago Convention). Under the ATSA, ASIC measures provided by the Aviation Transport Security Regulations 2005 (ATSR) help Australia to meet standards and recommended practices within Annex 17 of the Chicago Convention on measures relating to background checking and identity security.

The ATSR require unescorted persons that have a lawful purpose in secure areas at security controlled airports, as well as certain nominated personnel, to display an ASIC. This demonstrates the person has successfully completed the background checking process. The ASIC scheme provides nationally consistent background checking and corresponding proof of this check in the form of an identity card. It does not override or replace airport or employer specific access control systems, nor employee vetting or pre-employment checks.

Although background checks come at a cost, they help mitigate the risk of events such as sabotage or attacks against airports or aviation infrastructure, including trusted insider events. The ASIC alone does not provide complete assurance, however it operates as part of a layered preventative security framework.

What options are proposed?

Whilst the focus of this discussion paper is the ASIC, other identity security issues are also within scope of this review. These include Visitor Identification Cards (VICs), Temporary Aircrew Cards (TACs) and security status checking for flight crew (under the AVID scheme) which is managed by the Civil Aviation Safety Authority (CASA).

The following options are the focus of this paper.

1. Better targeting airside ASIC display requirements.
2. Considering ASIC display requirements in Landside Security Zones.
3. Role-based ASICs – targeting high risk roles and activities.
4. Security status of flight crew and aviation identification (AVID).

Exploring these options will aid our assessment of what levels of regulation and background checking best provide a risk-appropriate security outcome. An industry perspective on the feasibility of changes to current arrangements and associated costs will enable further scaling and refinement of options.

Considerations

In providing feedback, please consider the following.

Risk—how and if the options would significantly change the security risk at airports, ranging from the larger international airports to regional and remote airports and those servicing general aviation participants.

Implementation—potential obstacles and opportunities, or strengths and weaknesses in each option.

Cost benefit—would the changes lead to reduced or new costs.

The [Office of Best Practice Regulation's cost categories](#) may assist you in estimating cost impacts.

Current ASIC requirements

All non-exempt unescorted persons inside secure areas at security controlled airports around Australia are required to display a valid ASIC. This includes the entire airside area, including any designated Airside Security Zones, as well as any Landside Security Zones.

Zone-based ASIC

ASICs can be red or grey. Either colour allows unescorted use of Landside Security Zones and airside, but **not** Airside Security Zones. Only valid red ASICs allow unescorted use of Airside Security Zones, including *Security Restricted Areas (SRAs)*. Persons accessing parts of a sterile area, not generally accessible to passengers or the public, are also required to display either a valid grey or red ASIC.

Role-based ASIC

In addition to the zone-based ASIC requirements, four job roles require an ASIC outside of secure areas:

- a person facilitating passenger check-in (ATSR 3.12);
- a person facilitating the handling of checked baggage (ATSR 3.12);
- airport security guards (ATSR 5.04); and
- screening officers (ATSR 5.07).

Visitor Identification Card (VIC)

Individuals without an ASIC seeking to enter secure areas are required to obtain a VIC and be supervised by an ASIC holder.

VICs allow those who have not been background checked up to 28 days of access to the secure areas of a security controlled airport in any 12 month period. Should their need extend beyond this period of time; they must apply for an ASIC.¹

Temporary Aircrew Card (TAC)

Similar to the VIC, aircraft operators may also issue a TAC to employees or contractors who hold an ASIC but do not have it on their person, or who have applied for an ASIC but not yet received a card. TACs are valid for up to seven days and holders must be escorted where ASIC display is required.

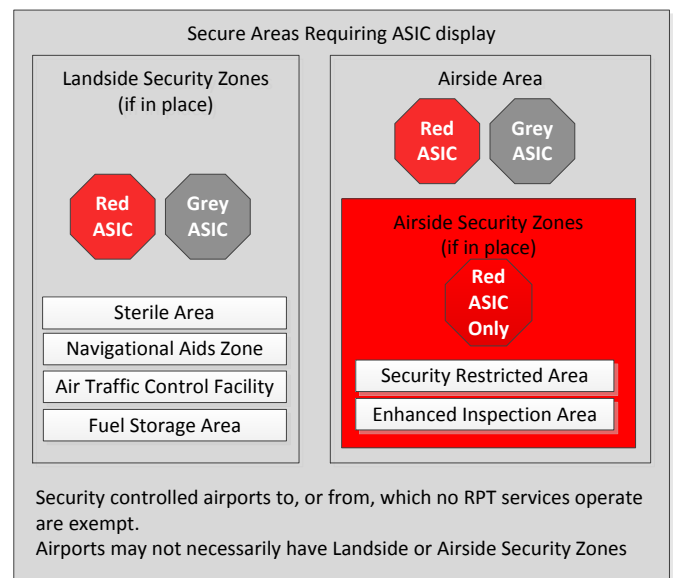


Figure: current ASIC display requirements

¹ For the purposes of this paper, changes to ASIC requirements would apply to VIC requirements by extension. The requirement for Special Event Zones, often necessitated by ASIC requirements, may also be affected by amendment of ASIC requirements.



Demonstrating an operational need

Prior to being issued an ASIC, applicants are required to demonstrate an operational need.² This can be determined in consultation with airport operators and/or employers which control secure areas. Those considered to have an operational need are:

- persons undertaking certain identified roles regardless of need to access a secure area; and
- persons who require frequent unescorted access to a secure area of an airport where persons are required to display an ASIC, and are either:
 - involved in the operation of an airport or aircraft; or
 - require access because of their occupation or business.

Furthermore, ASICs (and VICs and TACs) do not automatically grant access to any area. They indicate that the person has passed a government mandated background check, signifying they are unlikely to present a threat of unlawful interference. Once a person holds an ASIC, parties controlling secure areas, for example airport operators, may grant ASIC holders access to a secure area.

² ASIC Issuing Body staff directly involved in the issue of ASICs need to be *eligible* for an ASIC, even if they do not have an operational need for the card (ATSR 6.17)

Options

1. Better targeting airside ASIC display requirements

This option would reduce the broad airside requirement for ASIC display to a smaller Airside Security Zone in which Regular Public Transport (RPT) aircraft and related services are directly accessible—corresponding to the current Security Restricted Area (SRA).

How does this differ from current arrangements?

No ASIC (or VIC) would be required for unescorted access outside of prescribed security zones. The option would require red ASICs only for Airside Security Zones.³

For many airports, this would mean ASIC display requirements only for an SRA. If an airport had Landside Security Zones, for example screened sterile areas, the requirement for either red or grey ASICs would be maintained. Reducing airside ASIC requirements may also ease the need for temporary airside Special Event Zones, for example areas declared to allow maintenance of airside areas and facilities.

What would this mean for airports?

- A reduction of airside ASIC requirements to SRAs may pose questions for risk management at larger international airports.
- It would likely free up movement of private aviation activity, with little change in the residual risk anticipated, for smaller airports or those with higher volumes of general aviation.

Considerations

Three key issues relating to SRAs arise from this option.

- Enforcing new boundaries of an SRA (with distinct ASIC requirements) from those of general airside, where an ASIC would no longer be required. Here, current boundary requirements (for example ATSR 3.16) may be amended, or further supported by measures such as: signage; a line across the tarmac; a prescribed distance; access controls and card checking; CCTV or other surveillance; regular security patrol or checking; and/or increasing the penalties applied for breaches of the regulations. If such changes were applied to Australian capital city and major international airports, current face-to-ASIC checking arrangements for airside access would need to be revised.

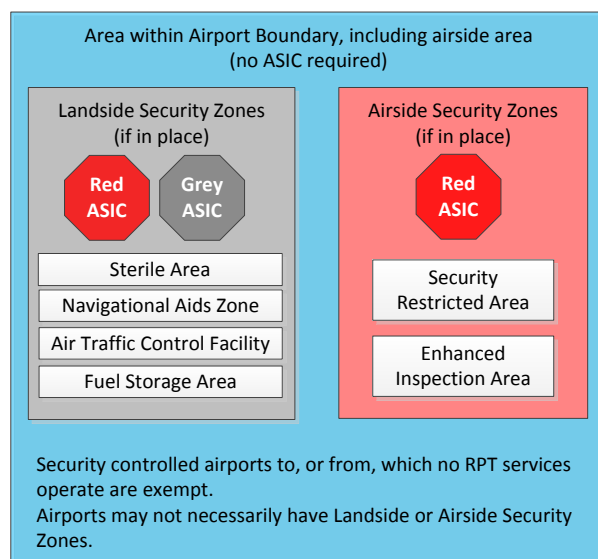


Figure: concept for ASIC display requirements as recommended by the Aviation Safety Regulation Review

³ Airside Security Zones include the (a) Security Restricted Area and (b) Enhanced Inspection Areas. The Department is separately undertaking a review of Enhanced Inspection Areas, which will be conducted taking into account the current project investigating the scope of ASIC requirements.

- SRAs – currently generally limited to the area around the RPT terminal – may need to be redefined to ensure higher risk airside areas are appropriately managed. Such areas include those within the ICAO Annex 17 definition of the SRA – cargo sheds, mail centres, airside catering and aircraft cleaning premises.
- Any change in security requirements should be scalable – to provide a best fit for the range of plausible risks, and the size and complexity of airport infrastructure around Australia.
 - A larger airport may feature numerous points of access to RPT operations and other sensitive infrastructure, thus requiring more comprehensive access controls and ASIC requirements.
 - On the other hand, a lower risk airport hosting few RPT operations may be able to address plausible (and likely lower) risks by implementing less complex, though nonetheless effective, measures.

Questions

- Q. 1 Would reducing airside ASIC/VIC requirements change the security outcome for your operation?
- Q. 2 Should ASIC/VIC requirements airside be proportionate—allowing different requirements at different types of airport? If so, what arrangements might be appropriate for different types of airports? How would this be communicated to ASIC holders and crew travelling between airports?
- Q. 3 If airside ASIC requirements were to change, what changes would be required to maintain integrity of a security restricted area?
- Q. 4 What factors would inhibit or enable reduction of airside ASIC display requirements? For example, periods of RPT traffic, airport layout or other security measures.
- Q. 5 Would changes to airside ASIC display requirements lead to reduced or new costs? In your response, please be specific about the likely difference in costs from current arrangements.

2. Considering ASIC display requirements in Landside Security Zones

In addition to reviewing airside requirements, this review is extending consideration to other ‘grey areas’ – meaning Landside Security Zones (LSZs) where, as with general airside, either a red or grey ASIC suffices. LSZs include sterile areas, navigational aid zones, fuel storage areas, and air traffic control facilities. Though not all airports have Landside Security Zones, sterile areas are an identified concern for this review.

Specified LSZs serve to protect critical facilities, and the risk to such zones may differ from that of other facilities at an airport. For example, the consequences of unlawful interference with an air traffic control facility performing critical airspace safety functions may be significant, even though such a facility may be located at an otherwise ‘lower risk’ airport that may be an unlikely target.

Landside ‘grey areas’, including sterile areas, may also feature a range of integrated or complementary safety or access control measures. The extent to which different airports put such measures in place varies. Zones such as fuel storage areas likely require integrated measures to ensure safety is maintained and that access is only provided to authorised users.

Utility of grey ASICs in sterile areas

Sterile areas may feature many complementary security measures for example, screening, CCTV, monitoring and patrols. Therefore there may be less relative value provided by a grey card within areas where staff, passengers, and the general public are screened upon entry. In addition, enforcement and monitoring of ASIC display requirements is difficult when ASIC holders are mixing with non-ASIC holders (security screened passengers) throughout the area.

ASIC use in sterile areas currently meets international obligations, as contracting States are obliged to ensure background checks for those granted unescorted access to SRAs (under standard 4.2.4), and all commercial aviation passenger departure areas between the screening checkpoint and the aircraft remain within the ICAO SRA definition. Here, total removal of ASIC requirements, especially at international sterile areas, may compromise the security outcome and Australia's ability to meet its international obligations.

Accordingly, one improvement option may be to maintain the requirement for background checks, but change the requirements for displaying the card to better suit particular operations or areas. For example, for some areas, a 'display on demand' approach may be more suitable than 'display at all times'. While such an approach may alleviate compliance requirements, its net-benefit for both security and cost is unclear.

In seeking industry input on landside security zones, we are particularly asking for your views on domestic sterile areas and ways in which to support productivity and appropriately tailor identity security requirements to the different security risk contexts.

Questions

- Q. 6 Are ASIC and VIC display requirements for Landside Security Zones, including sterile areas, appropriate to risk? Why / Why not?
- Q.7 Are there different risks associated with international sterile areas and domestic sterile areas? Do differences warrant accordingly different ASIC or VIC requirements (noting that for domestic sterile areas, members of the general public, once cleared, have access, while visitors need to obtain a VIC).
- Q. 8 What challenges currently exist for managing compliance and monitoring of landside ASIC display requirements?
- Q. 9 Would changes to landside ASIC display requirements lead to reduced or new costs? In your response, please be specific about the likely difference in costs from current arrangements.

3. Role-based ASICs – targeting high risk roles and activities

Australia's largest airports each have between 10,000 and 15,000 on-site jobs⁴. Of course, some job roles are more vulnerable to exploitation for the purposes of unlawful interference than others. Therefore, targeting ASIC requirements on higher risk roles may provide advantages in assuring background checks are conducted on those performing security sensitive activities, regardless of whether the function is conducted within a regulated area.

⁴ BITRE Information Sheet 46: Employment Generation and Airports, 2013.

Specifying job roles that require an ASIC

The sample of job roles below all have some level of access to sensitive infrastructure and/or operations. However, each role's capacity to facilitate unlawful interference would differ, resulting in a different risk profile. Therefore the need for a background check may be more critical for some roles than others. At some airports, such roles may be performed by staff with varied responsibilities.

Four roles are currently required to display an ASIC (shown in red). ASIC issuing staff must also be eligible to hold a card. Pilots without ASICs are subject to five-year AVID security status checks, which does not show operational need for access and cannot be used in place of an ASIC.

Direct access to aircraft (RPT, cargo, or charter) <ul style="list-style-type: none"> Airport and airline staff – operational, corporate, and executive. Airport and terminal management Flight crew: Pilot-in-Command, First or Second Officers, Check and Training Captains, Flight Engineers Flight Attendants (Licensed) Aircraft Maintenance Engineers (LAMEs and AMEs) and Avionics technicians Refuellers Baggage handlers Check-in staff Catering drivers Cargo handlers Load control Aircraft cleaners Sewage collection vehicle drivers Emergency services IT personnel Government and law enforcement: for example Defence, Customs and Border Protection, Civil Aviation Safety Authority, Airservices Australia.⁵ 	Access to landside areas but not airside <ul style="list-style-type: none"> Management, retail and sales Unaccompanied baggage agents Tradesmen, labourers, and technicians
	Front of House Access <ul style="list-style-type: none"> Unaccompanied baggage agents Transport operators: taxi, bus, etc.
	Ability to facilitate access <ul style="list-style-type: none"> Access control personnel Airport / airline supervisors and rosterers, and security employees ASIC issuing body staff
	Access to aircraft parts, stores, or airport machinery <ul style="list-style-type: none"> Stores staff, suppliers and administration Off-airport maintenance
Direct access to SRA but not to aircraft <ul style="list-style-type: none"> Airport security guards Screening officers Airside transport and escort drivers Tradesmen 	Access to aviation supply chain <ul style="list-style-type: none"> Catering (administration, production and supply) Cargo (Regulated Air Cargo Agent (RACA) and Accredited Air Cargo Agent (AACA) roles)
Airside access but not SRA <ul style="list-style-type: none"> Gardeners General Aviation (GA) aircrew and leisure pilots 	Access to critical IT systems <ul style="list-style-type: none"> IT personnel and service providers Reservations, call centres, and travel agents Aircraft Scheduling and flight planning Weights and Balance

⁵ For some such roles, the need for ASIC display indicating a person's authority to be in a certain area may be alleviated by measures such as uniforms, official identity card or badge, and corresponding employment vetting.

Potential benefits of a role-based approach

A number of benefits may be achieved through further use of role-based ASIC requirements.

- A role-based approach may better target the types of activities which present the greatest risk, rather than relying on physical location. Accordingly, if activities are undertaken in a secure manner by each role, then this could allow each industry participant to manage more dynamic zone-based security to suit local conditions.
- Roles could support scaled requirements to suit different types of operations, for example where specified roles could manage security risks without necessarily having a SRA in place. This might be feasible for airports with less complex RPT or charter services that could be managed securely without reliance on SRAs to discourage unauthorised access to sensitive infrastructure or aircraft. For example through demonstrated robust access provisions (outside of the ASIC scheme) and other security practices, including for example, security layers such as personnel security, fencing and controlled entry points.
- More precisely identifying the types of roles which pose the most plausible risk of unlawful interference. For example, more explicitly identifying the types of flight crew – perhaps Air Transport Pilots and Commercial Pilots – that should require an ASIC background check by default.

Considerations

This approach may present new or difficult issues for implementation and compliance. For large airports, extended role requirements may significantly overlap with current zones in place, meaning the change may have small practical difference in overall ASIC use, depending on the roles identified. For smaller operations, extension of role-based requirements may complement smaller SRAs or mitigate risks in lieu of an SRA—where smaller RPT traffic volumes or airport layout are not conducive to fortification of zones.

Industry feedback will help identify the set of roles that pose the most plausible risks to operations, and whether requiring ASICs by virtue of role would result in greater compliance burden or increased efficiency. Some combination of both zones and enhanced role requirements may help provide clarity and flexibility to ASIC arrangements, and achieve better security outcomes while reducing cost.

Questions

- Q. 10 Would specifying further roles requiring ASICs improve security arrangements? Why? / Why not?
- Q. 11 What roles should hold ASICs and/or undergo background checks? (Refer Attachment A)
- Q. 12 Do you agree that roles should be used in lieu of zones at airports without SRAs or significant traffic? Why / Why not?
- Q. 13 What compliance and monitoring challenges might stem from further role-based ASIC requirements? Can you provide details of specific cost impacts of such a change?
- Q. 14 What complementary security measures serve to lower identity security risks, which could potentially reduce the need for ASICs?

4. Security status of flight crew and aviation identification

In addition to background checks under the ASIC scheme, flight crew who do not hold an ASIC are required to undergo a *security status check* (ATSA Part 4, Division 9). CASA flight crew licences are *security designated authorisations* under the ATSR (Division 6.7). This means that pilots applying for a CASA licence require a security status check under the Aviation Identification (AVID) scheme. Pilots holding an ASIC, with an operational need to meet zone-based requirements at security controlled airports, do not need an AVID. However, an AVID is not an acceptable substitute for an ASIC to meet zone-based ASIC requirements at security controlled airports.

The other major differences between the AVID and ASIC are:

- an AVID is only issued by CASA; ASICs are issued by a range of issuing bodies;
- an AVID costs \$152, and is valid for five years; an ASIC costs \$200-250, and is valid for two years;
- unlike ASIC *background checks*, the AVID's *security status checks* do not fall under the AusCheck regulatory framework; and with some exceptions, criminal offences recorded before 10 March 2005 do not impact AVID eligibility.

Ninety five per cent of pilots hold an ASIC rather than an AVID, reflecting significant use of Australia's security controlled airports which require ASIC display. Approximately 300 AVIDs are issued each year, most likely to pilots who operate only at non-security controlled airports, or those operating at security controlled airports which do not have RPT services (which do not require ASIC display).

AVID considerations in relation to ASIC zones and roles

A reduction of airside ASIC display requirements (discussed earlier in Option 1) may result in increased demand for AVIDs from general aviation airport users. Here, general aviation (GA) or recreational pilots using facilities outside the SRA may no longer need an ASIC, but would still be required to hold an AVID.

Currently, AVIDs apply equally to all types of flight crew licences. A more role-based or targeted approach would identify specific types of flight crew to require background checks, in accordance with the risk posed by each role type. In a way, the current zone-based ASIC requirements achieve such an outcome by proxy. Pilots in command of RPT flights obtain an ASIC to allow unescorted entry to secure areas, whereas a private pilot flying solo in rural areas and not accessing security controlled airports only requires an AVID.

If airside ASIC display requirements were to reduce, a corresponding increased reliance on AVIDs may in effect draw away from some of the benefits delivered by the ASIC scheme, such as the background checking standard delivered under the AusCheck framework. Further, the use of dual background check schemes, one for pilots, one for anyone working at security controlled airports, raises other issues for consideration, including:

- the potential for efficiency gains from streamlining or removing the AVID;
- the rationale or security risk basis for using two contrasting validity periods and systems; and
- whether there is merit in maintaining or enhancing two tiers of background check, potentially expanding a tiered approach for other roles or areas.



Questions

- Q. 15 Should pilots not operating at security controlled airports require a background check? What types of pilots should require background checks?
- Q. 16 Should the AVID remain a separate to the ASIC? Or should flight crew requirements be integrated into the ASIC scheme as for other aviation participants? (For example, with specified types of flight crew as ASIC roles)

Appendix A – List of questions for consideration

Questions

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