

NUPE AVSEC Submission to the Ministry of Transport: Re Outsourcing Proposal

Introduction

This submission is presented by the National Union of Public Employees (NUPE) to the Minister of Transport, Simeon Brown, in response to the proposed outsourcing/privatisation of Aviation Security Services (AVSEC).

NUPE, established in 1992, is a Christchurch-based union representing a broad range of public sector employees. We are the largest union representing AVSEC members in the South Island, with members in Christchurch, Queenstown, Dunedin, and Invercargill.

In the consultation document, stakeholders, including unions, were asked to consider the current situation, the Australian model, and the possibility of outsourcing. NUPE has thoroughly reviewed these options in preparing this submission.

We conducted a survey of our members, gathering their comments about queues and queue management. As the public face of aviation security, AVSEC members are responsible for lane and queue management, dealing directly with passengers, airline personnel, and airport staff. A summary of this survey is enclosed as an appendix to this submission.

Current Situation

AVSEC was originally established in 1977, gaining increased prominence after the events of 2001. It is an agency of the Civil Aviation Authority (CAA), which was founded in 1990. AVSEC plays a crucial role in ensuring safety and security at Aotearoa/New Zealand's airports.

AVSEC's vision is to deliver world-class aviation security and provide a high-quality, responsive passenger experience. To achieve this, AVSEC collaborates closely with various border and government agencies, including the NZ Police, NZ Customs Service, Ministry for Primary Industries, Immigration NZ, Ministry of Transport, airport companies, and industry associations. AVSEC also engages with international organisations such as Airports Council International (ACI), the International Air Transport Association (IATA), and the International Civil Aviation Organisation (ICAO).¹

Currently, AVSEC staff are stationed at airports that offer international or jet flights, including Auckland, Wellington, Christchurch, Queenstown, Dunedin, and Invercargill. With Hamilton introducing international flights later this year, AVSEC personnel will also be required there.

¹ <https://www.aviation.govt.nz/about-us/what-we-do/>

AVSEC's duties and responsibilities are outlined in the CAA Act 1990 and the new Act, set to take full effect in 2025. These include, but are not limited to:

- Searching and monitoring sterile areas
- Screening high-risk flights and passengers
- Managing breaches of secure areas
- Emergency action planning and covert alarm activation
- Mobile patrols and random security spot checks
- Inspecting airport identity cards and licenses
- Escorting and patrolling aircraft
- Liaison and coordination with other organisations on security committees
- Providing security for navigational aids and screening items entering international sterile areas

Additionally, AVSEC is responsible for NPS (non-passenger screening). This involves the screening of Airport and Airline staff etc.

Although these responsibilities may appear straightforward in terms of their application, they are not. For example, the screening of high-risk flights and passengers involves:

- X-ray screening of all carry-on luggage in domestic and international
- Screening and checking of all PAX on domestic and international
- Screening of checked in luggage of Domestic and international PAX (HBS)
- Screening of oversized luggage through the outer gauges
- Screening Antarctic flights, including checked luggage carry on and PAX

These duties can be difficult and time consuming for AVSEC staff, especially when dealing with uncooperative and/or difficult passengers, airport staff or airline crew.^{2 3}

In addition to these mandated tasks, AVSEC also provides non-mandated services to other agencies upon request, including assisting the Police and other government bodies, provided it does not significantly impact their primary aviation security duties.

AVSEC should not be viewed as only a security organisation. The complexity and scope of its duties far exceed those typically handled by private security firms. The cost of failure is extremely high as an extreme security risk occurring on an aircraft would be a significant disaster, that would impact upon New Zealand and our international reputation.

Outsourcing to Private Firms

The suggestion that private security firms could manage aviation security services is based on the erroneous belief that their roles and responsibilities are similar. As outlined above, AVSEC

² <https://www.thepress.co.nz/nz-news/350149068/pilot-strips-protest-airport-security-screening>

³ <https://www.rnz.co.nz/news/business/511822/auckland-airport-queues-worsened-by-lack-of-aviation-security-staff-union>

staff carry out highly specialised tasks well beyond the scope of firms like First Security, Chubb, or Allied. The suggestions also fail to understand the risk of failure.

Private security firms operate under contractual arrangements, not direct taxpayer funding. They are subject to less regulation, oversight, and accountability than public agencies like AVSEC. As a result, private security services are frequently criticised for excessive use of force, inadequate training, and poor performance. These firms often have low barriers to entry, high turnover, and offer minimal wages and benefits.

In contrast, AVSEC members receive rigorous training specific to the tasks they perform. They are highly knowledgeable about both the advanced technology used in aviation security and the legal frameworks mandated by national and international law. It would take years of additional training for private security personnel to reach the competency levels that AVSEC staff already possess, and that the safest delivery of this service requires. New Zealand needs our security staff to be invested in and to remain in their roles. This is how the safest most efficient service will continue to be delivered.

The alternative would be to lower security standards, allowing private firms to provide only a minimal presence at airports. Such a decision would severely impact both domestic and international flight safety and security and Aotearoa/New Zealand's international reputation and obligations.

Australian Model

The Minister's proposal suggests that New Zealand follows the Australian model for aviation security services, where airports and commercial contractors deliver security services. In Australia, the state's role is limited to setting broad guidelines for airports and contractors to follow.⁴

However, there are significant differences between Australian and New Zealand airports in terms of administration and size. Australian airports are large entities processing millions of people daily and are run by individual states. This reality makes the business a more attractive and potential profitable organisation than the smaller reality of New Zealand. The size and flight schedules also mean ability to offer full time employment, this is significant when looking at New Zealand airports. The different and separate operations in Australia have led to a decentralised and fragmented aviation security industry. In contrast, New Zealand's airports are smaller, have lower operating costs, and are geographically closer to one another and most importantly are not as busy in terms of flights. This means a private operator will have to factor in down time and this makes the reality less attractive. A private operator would struggle to recruit and retain staff would what is likely to be less than full time work and this is simply not viable in most of the New Zealand airports.

The Australian model, established in 2002, has been the subject of numerous complaints and reviews. These include criticisms of inconsistency in security enforcement and outcomes, as

⁴ <https://www.homeaffairs.gov.au/about-us/what-we-do/travelsecure/security-screening-at-airports>

well as concerns about cost-effectiveness. The system has also been plagued by controversies, including allegations of corruption.⁵

The 2015 parliamentary inquiry into the Australian model noted that:

“A number of submissions made to the PJCLE strongly supported the creation of a government-run, centralised security force at airports. It was hoped such an approach would reduce issues such as high turnover and poor wages, while providing harmonised and improved training to security staff.”⁶

By comparison, the New Zealand model is simple, comprehensive, coherent, and cost-effective. There is no confusion or conflict over roles, operations, or authority. The New Zealand AVSEC model can legitimately claim that potential conflicts are recognised and managed to the greatest degree possible within the current legislation, and no adverse outcomes have arisen to date.⁷

Airlines and Airports

"One final thing that I forgot to mention is the idea of airlines doing security. I cannot think of a bigger conflict of interest. Airlines want to get away on time and not pay more for being stuck at airports due to delays. Imagine them screening bags and doing security when a flight needs to leave, or passengers are running late. Do they speed the process up by cutting corners? To me, that is asking for trouble."

– Christchurch ASO

The proposal also suggests that airlines and airports could independently or jointly manage aviation security services, with the Government providing broad guidelines. This idea is central to the Australian model.

We believe such an arrangement would not be effective or efficient in terms of costs or security service provision.

NUPE is aware that some international airlines operate quasi-aviation security groups. However, these organisations do not meet AVSEC’s standards. Their security screening operations are minimal, and in 2017, they prevented the then Minister of Foreign Affairs, Murray McCully from boarding a flight due to a misunderstanding of the legislation.⁸

In Australia, the costs of passenger processing are shared between airlines and airports, which has led to an inconsistent and expensive system that benefits neither party in the long term. One of the major concerns with the Australian system is the lack of a centralised

⁵https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Rural_and_Regional_Affairs_and_Transport/AviationSecurity45/Report/c02

⁶ Ibid. pg.13.

⁷ Briefing to the Incoming Minister 2020. Pg. 16. <https://www.beehive.govt.nz/sites/default/files/2020-12/Civil%20Aviation%20Authority.pdf>

⁸ <https://www.rnz.co.nz/news/national/329689/airport-company%27s-powers-questioned-after-search-blunder>

approach, particularly concerning the processing cost per passenger. Airports charge varied fees, leading to accusations of monopolisation and price gouging.⁹

AVSEC's centralised approach allows for a fixed processing cost per passenger across all airports. This standardised fee structure is more cost-effective for both airports and passengers.

Most airports do not have the time or resources to administer a comprehensive security system. The costs of doing so would place additional financial strain on them and create conflict with airlines, whose priorities are to minimise overhead costs. Furthermore, airlines and airports often subcontract services, which can lead to a dilution of security standards—a major source of complaints in Australia.

"Airports and airlines often contract out services such as catering, cleaning, and the screening of passengers and baggage. Under the regulatory model, the department is required to hold airports and airlines accountable for the actions of their contractors. However, in its 2003 report, the ANAO found repeat aviation security breaches, many of which were due to contractor actions. The ANAO concluded that the department should 'properly hold airports and airlines accountable for their actions' and ensure that they, in turn, hold their contractors accountable."¹⁰

The fact that airlines struggle to manage their own baggage and booking systems does not bode well for their ability to manage a comprehensive security framework.

Safety for flying should not be an add on but is in itself a priority.

AVSEC's Monetary Efficiency

The proposal also discusses queue management and the overall monetary efficiency of AVSEC.

Historically, AVSEC has been a cost-effective organisation. It is funded through airport and airline levies/fees, allowing it to operate independently. This changed during COVID when AVSEC required public funding to supplement its finances, as airports and airlines became largely non-operational. Since then, previous funding streams have been gradually restored, and AVSEC is expected to regain full financial independence by 2025.

AVSEC's pay rates include both salaries and penal rates for its members. These are built into salary scales which means that the wages and salary costs are very straightforward and there are no substantive additional wage costs.

Establishing a trained, competent and reliable workforce is essential to retaining staff and delivering the best and safest security for the travelling public across New Zealand and for

⁹ <https://www.abc.net.au/news/2024-03-26/australias-monopolistic-airports-overcharging-airlines/103634144>

¹⁰ https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Rural_and_Regional_Affairs_and_Transport/AviationSecurity45/Report/c02

international travel. Retaining staff in delivering excellent security is essential and the belief that anyone can do this is simply not true and in fact a dangerous belief. The risk to the travelling public and to New Zealand internationally to our reputation if we get this wrong is simply too high.

Additional Duties of AVSEC Staff

In addition to its primary role of airport security, AVSEC staff are often called upon to assist during civil emergencies, supporting other agencies such as the Police and the Army. This occurred during the Christchurch Earthquakes in 2011 and the COVID-19 pandemic in 2020, when AVSEC staff were deployed to manage various sites and assist in Managed Isolation and Quarantine (MIQ) facilities. As an example, in addition to their core responsibilities, AVSEC staff accompanied Police Officers to patrol supermarkets, isolation and quarantine centres, and provided support to other agencies during the COVID-19 pandemic.¹¹

These sorts of situations were stated in the 2020 briefing to the Minister:

"The Authority has played a crucial role in the national response to COVID-19, initially by providing the assistance of Aviation Security Officers (ASOs) to support Police during the initial lockdown period. ASOs are still deployed to support the All-of-Government COVID-19 response at managed isolation and quarantine facilities across the country. As of October 2020, ASOs are continuing to provide assistance at 21 managed isolation and quarantine facilities across the country." ¹²

AVSEC staff were readily deployed as part of New Zealand's managed isolation system in response to the pandemic. The New Zealand government were able to access and redeploy competent and reliable staff already working to a code at short notice.

Suggestions for Improving Queues

NUPE has gathered several suggestions on how to better manage queues and improve efficiency within the system. These suggestions come from discussions with ASOs and team/shift leaders who manage the queues, incorporating their experiences and insights.

AVSEC has recently made significant investments in new screening technology. Staff have been trained to use these new machines, which have improved the process by allowing passengers to keep laptops and other electronics inside their bags, as the machines can scan the entire bag. However, this has also led to passengers placing more items in their bags, which sometimes causes delays.

Airline Practices:

Queues often arise due to airlines not enforcing their own policies and responsibilities,

¹¹ <https://www.police.govt.nz/news/release/aviation-security-and-police-still-working-together-ensure-safety-communities>

¹² Briefing to the Incoming Minister 2020. Pg. 18. <https://www.beehive.govt.nz/sites/default/files/2020-12/Civil%20Aviation%20Authority.pdf>

particularly around baggage and ticketing. AVSEC staff note that a considerable amount of time is wasted because airlines do not consistently weigh bags or adhere to carry-on weight limits—specifically the 7 kg limit. These bags take longer to pass through the machines and be assessed by staff. Additionally, some AVSEC staff have sustained injuries from handling excessively heavy baggage that passengers attempted to carry on board.

This issue could be easily resolved by airlines enforcing their own rules on baggage weight, which is currently done on an inconsistent, ad hoc basis. Air New Zealand is a frequent offender in this area, while Jetstar more consistently checks baggage weight.

Another issue is that passengers often carry prohibited items in their luggage due to lack of awareness. Removing these items takes time, and passengers frequently object to their confiscation.

Further, it has been noted that groups of people often go through the security lanes to see off travellers, causing confusion and delays. In the past, airlines would prevent non-ticketed individuals from entering the lanes, but this practice has largely ceased.

Proposed Solutions:

- Airlines should enforce baggage weight should weigh carry on at check before going through screening, at least for a period of time as part of educating the public.
- Queue combing and Boarding Pass checks before passengers enter the queues – ensures only those travelling or working airside go through screening point.
- Passengers need better education about their responsibilities and obligations regarding security and prohibited items. Perhaps when they book their flights.
- Airlines should make earlier announcements and encourage earlier check-in times to reduce last-minute congestion.
- Airlines must ensure those checking in online also understand the importance of allowing time to be properly screened to travel.
- Create express lanes for passengers with minimal or specific types of luggage. This lane would enable the business or overnight traveller with little or no carry on progressing quickly through security.

Lanes:

Members have raised the issue of lane congestion. Lanes are often full, with families and individuals carrying significant amounts of baggage, which slows the process compared to individuals or groups with minimal luggage. It has been suggested that a dedicated lane could be set up for passengers with little to no carry-on luggage, which would speed up the process for everyone.

Conclusion

In conclusion, the National Union of Public Employees (NUPE) firmly opposes the outsourcing proposals outlined in the consultation document concerning Aviation Security Services (AVSEC). The roles and responsibilities undertaken by AVSEC staff extend far beyond the capabilities of private security firms, involving specialized training, legal adherence, and

international compliance that cannot be replicated by outsourcing to private firms. The Australian model, often referenced as an alternative, has faced numerous criticisms regarding its cost-effectiveness and operational consistency, demonstrating the inefficiencies and risks of privatized aviation security.

Furthermore, allowing airlines and airports to oversee their own security poses significant risk and potential conflicts of interest, especially concerning the prioritization of commercial operations over safety and thorough security processes. AVSEC's central, government-backed approach ensures consistent, accountable, and effective security at New Zealand airports. Moreover, any attempt to outsource these services threatens not only domestic safety but also New Zealand's reputation for world-class aviation security on the international stage.

NUPE remains committed to advocating for the retention and improvement of AVSEC as a public entity. The professional and impartial nature of AVSEC staff ensures a high standard of safety and security that cannot be guaranteed under privatized models. Instead of outsourcing, NUPE supports enhancing AVSEC's capabilities through improved queue management and technological advancements that further streamline security processes without compromising safety.

Retaining AVSEC in its current form, with ongoing improvements with continued new technology and practices, is the most cost-effective, reliable, and secure option for New Zealand's aviation sector. It would be wrong and a costly mistake to compromise safety on the belief that a cheaper service by providers with potentially other vested interest is the way forward.

Safety must be the single most important factor in delivering this service. The impact of getting this wrong in New Zealand is vastly significant and cannot be underestimated.

In summary, NUPE firmly believes that there is no justification for changing the ownership or delivery of aviation security. We maintain that service efficiency can be improved through adjustments to existing systems, with the collaboration of airlines and airports. Additionally, we find the current arrangement to be both cost-effective and efficient. We strongly oppose airlines or airports assuming a primary role in security delivery, citing their past and ongoing failures in other service areas, both domestically and internationally. Their potential to create security risks, driven by cost-cutting or time-saving pressures—as evidenced by the situation in Australia—further underlines our position.¹³¹⁴

We request the opportunity to meet with the Minister to discuss this submission either in person or via TEAMS.

¹³ <https://www.thepress.co.nz/nz-news/350150340/pilots-riled-ankle-boot-checks-airport-screening>

¹⁴ <https://www.theguardian.com/australia-news/2017/aug/03/australian-government-defends-airport-security-after-criticism-by-pilots>

Quentin Findlay

Organiser

NUPE

On behalf of NUPE members working at AVSEC.

Appendix 1**Avsec Survey Results (Summary)**

214 Members responded to the Survey.

Question 1:

What position do you hold at Avsec?

ASO:	183	(85.51%)
Team / Shift leader:	19	(8.88%)
Dog Handler:	4	(1.87%)
Trainer:	4	(1.87%)
Other:	4	(1.87%)

Question 2.

Which station are you located at?

Christchurch:	108	(50.47%)
Queenstown:	73	(34.11)
Dunedin:	19	(8.88%)
Invercargill:	13	(6.07)
Other (Wgtn):	1	(0.47%)

Question 3.

How long have you been working in your current role?

Less than 6 months:	4	(1.87%)
6 months to 1 year:	14	(6.54%)

1 year to 3 years:	70	(32.71%)
3 years to 5 years:	28	(13.08%)
More than 5 years:	98	(45.79%)

Question 4.

Are you aware of the government's proposal to consider outsourcing AVSECS duties?

Yes:	204	(95.77%)
No:	3	(1.41%)
Unsure:	6	(2.82%)

Question 5. Common Findings:

Please list your key tasks that you currently undertake in your role.

All duties including NPS BDF

- 177 (Including but not limited to, screening, foot patrol, mobile, xray, hbs, pat down, load pao.)

Team management

- 26 (Including but not limited to, training new staff, scheduling the training, and overseeing it investigation reporting.)

Question 6.

Does the new equipment result in a faster more efficient screening.

203 people responded to the question

11 people did not respond.

- Yes: 74 said yes
- No: 90 said No.
- Unsure: 39 were unsure

Common responses why the new equipment does not result in better outcomes:

- Not enough time to examine well.
- Bad understanding of everyday items or sizes.

- Equipment is slower working.
- Equipment is unreliable and breaks down.
- Slowed everything down
- Queues are long because of the long-time the 3D takes
- Efficiency is bad because of the scanning procedures taking too long.

Common responses why the new equipment does result in better outcomes:

- Processing passengers has sped up
- Tech is amazing
- Faster with the 3D imaging
- Much better security checking

Unsure: Common Themes:

- According to some AIT is better, Screening is bad
- Could be better with a little tweaking.
- Dependant on the person on whether it is better or not.
- Screen more items in bags,
- System is efficient but the processes with it are not
- 2D images have better definition but the 3d images there is more features that make the search faster
- The tech is great but the time frames allocated to the staff is not enough for it to be as good as it could be
- Good because of the faster screening process but there needs to be more limitations to the public's bag allowance
- The cost of time efficiency means you are losing safety
- Faster for the staff, slower for passengers
- Faster when the machines don't have problems

Question 7.

What improvements / suggestions can you make to ensure shorter screening queues?

Common Themes/Suggestions

- Multiple screeners per x-ray
- Less carry-on luggage per person allowed

- Tactical loading of trays
- Express lane for people with less bags
- 1 bag on tray at a time so the machine would have less time outs
- 2 screeners per lane looking at bags at the same time
- Better training
- Notify passengers of the process so it goes smoother and faster
- Speed up machine belts
- Earlier announcements and check in times.
- Open more screening points. / Lanes
- Enforcing Passengers follow the rules and do not bring anything over 7kg
- Pax arriving earlier.
- Roster more QCs / to assist
- Space flights out

Question 8.

Describe other challenges you face in your duties

- People not understanding airline baggage policy
- Portable x-ray machine is not good in terms of quality
- Not enough staff
- Dealing with angry customers on little sleep
- Poor communication in management
- Heavy cabin bins
- Being slack on passengers with their luggage is a problem toward health and safety
- Not removing outer garments (blazers, hoodies etc)
- Poor staff/lazy performance
- Passengers not being familiar with regulations
- Rostering
- Not enough space at screening point
- Breaks being set at unrealistic times
- Staff not getting to points in time
- Lack of training, (Poor staff)
- Level 4 room causes problems toward health and safety
- Fatigue (Shift work)
- Toxic work environment
- Broken equipment
- Exposure to lots of illnesses

Question 9.

Any additional comments?

- The pressure that is on AVSEC about the screening times is bad as it will neglect safety.
 - Top management spends funds recklessly
 - We need better communication with the public to avoid any disputes and conflicts.
 - More efficient roster is needed
 - Enforce less bags per passenger
 - Difficulty getting time off work because of the amount of sick staff.
 - Worried about losing job
 - Should be checking coming through the auto gates
 - Safety and speed are contrary to each other, you can't have both unless they are held to a lower expectation
 - More police presence, less hesitation on calling them to help, easier way to contact them
 - Management needs to experience time on the floor before making altering decisions to staff
 - Domestic lane is poorly laid out
 - Private companies will not retain staff with pay cuts, if there were another pandemic the private company would likely go broke
 - Allow more time to screen bags, safety is more important than efficiency
 - Breaks need to be managed and treated better (spread evenly)
 - Propose a different style of hours
 - Rostering should be unique according to each station and not centralised in Auckland
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- *AVSEC is a professional organization which performs an essential role in the NZ aviation industry. We have comprehensive training which is ongoing, and we take our roles seriously in protecting both aircraft and the public.*
 - *I think on [the] whole we as an organisation do a fantastic job in sometimes very trying situations. As shown during the pandemic we demonstrated great*

flexibility and assisted the government in their response. I would hate the government to compromise people's safety for the sake of saving money.