

A personal response to the Issues paper
'Towards a National Aviation Policy Statement'

The issue of this paper is timely as a new Government is in power and it is an ideal opportunity to make a fresh start to a national approach to improve the efficiency and safety of aviation operations in Australia.

This response does not intend to answer the paper point by point as the issues listed in each section of the paper essentially amount to a list of every aviation activity and in many cases a wish list for the future.

This nub of the problem is contained in Section 3 item 4 of Aviation Safety. To quote in full:

'How can the Australian Government and Industry ensure CASA completes its long running regulatory reform process as soon as possible , to give clarity to industry and to clear the way for new approaches to meeting the regulatory challenge?'

In fact this reform process has been running for over ten years without any hint of a resolution. Without a clear set of rules to govern the whole field of aviation activities the rest of the document is rendered meaningless. This is because no changes can be made when there are no clear regulations to abide by in the implementation of such changes.

This failure is a consequence of the lack of action by previous governments to ensure that this reform is implemented. It is therefore recommended that the first and most important task is to implement this reform immediately. This requires the Government to direct the Management of CASA to solve the problem, without delay, by implementing the same regulations that are used successfully in similar aviation environments.

It should be kept in mind that the vast majority of countries' regulations are derived from the standards and recommendations laid down by the International Civil Aviation Organisation (ICAO). It appears that there have been attempts to incorporate United States and European regulations; however, both these aviation systems are much larger and more complex than that of Australia. An obvious choice of country's regulations would be Canada which has a very similar aviation environment to Australia. It is a large country with a relatively small population. In common with Australia, it has areas of intense aviation activity and also many larger areas of very little activity.

Only when there is a clear and non-prescriptive set of regulations in force is it possible to make progress in the many other areas of the aviation industry that need change and improvement.

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