



The Guild of Air Pilots and Air Navigators

Australian Region

Response to 2009 National Aviation Policy Green Paper

31 March 2009



The Guild of Air Pilots and Air Navigators (Australian Region)

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Introduction

The Guild of Air pilots and Air Navigators (GAPAN) is pleased that the Minister has given the opportunity to be able to respond to the National Aviation Policy Green Paper and therefore contribute to the formation of Government policy for Australian aviation.

In general, GAPAN supports the direction for change as set out in the Paper and supports the Government in their initiative to provide a plan for the future of aviation in Australia.

This document provides comment on various sections of the Paper. This submission has been developed from a wide range of GAPAN members covering the Australian aviation industry. GAPAN wishes to emphasise that while the Paper states that General Aviation (GA) is important, we consider that GA is vital to Australian aviation. **The success or otherwise of every industry depends to a very considerable extent on the quality, knowledge, skills & dedication of the members of that industry. Aviation, in so many ways, requires these attributes more than most especially for pilots & ground crew.** Australian GA is suffering due lack of Government support and our prime training air fields, such as Bankstown, are experiencing serious difficulties.

We thus urge, in the strongest terms, that Government policy recognize how vital the initial & fundamental training that GA provides to the Australian aviation industry is. Thus we submit that Government policy must include the Minister consulting directly with the GA industry, including GAPAN, to establish the support required for GA to provide the vital and fundamental training that is essential for Australian aviation to be successful in the years ahead. We make the point that existing Government policies give advantage for future careers as pilots to children of wealthy and privileged parents and discriminate against children of average and less privileged parents.

Comments on the Executive Summary

(Please note that for this section the original text from the Green Paper is shown "*in italics*" with GAPAN comments following.)

"Some of our major airports already operate at close to capacity during peak times; pilots, engineers and air traffic controllers are in short supply; aviation safety standards are becoming a focus of community attention; flight delays and cancellations have become more frequent; communities are increasingly concerned about the impact of aircraft noise; and aircraft account for a growing proportion of global greenhouse gas emissions."

Safety standards – where is the evidence of “focus of community attention”
Greenhouse gas emissions – what evidence of “growing proportion”?



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We support the Australian Government being committed to:

- **"Making** safety the number one priority for Government aviation agencies and the industry, and ensuring safety regulation is robust, effective and efficient;"

and that the level of regulation is appropriate for the level of risk in the aviation segment.

- **"Ensuring** that aviation security is appropriate in an era where planes and airports are still potential terrorist targets;"

currently Introduced systems at GAAP airports are excessive for the risk and the systems at rural airports have not been thought through.

- **"Providing** a regulatory environment conducive to appropriate investment in aviation infrastructure facilities at our airports and in our air traffic management systems to meet forecast traffic growth;"

this means flexible and quick to re-act to changing conditions - not something that Government bureaucracies normally achieve.

- **"Ensuring** an efficient aviation industry that supports growth in tourism and trade."

Australian Transport Safety Bureau (ATSB) to enhance the quality of their relationships

- **"Achieving** an international air services policy which serves our national interest and balances the needs of an Australian-based industry with international competitiveness;"

- **"Addressing** the shortage of pilots, aircraft engineers and air-traffic controllers;"

again requires flexibility and quick actions.

- **"Dealing** with planning issues around airports in an integrated, considered way, and providing a solution to the long term airport needs of the Sydney region;

- **Planning** for the issues arising from the growth of low cost carriers, such as the increased passenger numbers at secondary airports;

- **Promoting** a proper dialogue between airports and the communities around them on issues such as the impact of aircraft noise;

- **Giving** proper consideration to the importance of air freight to regional businesses, our export industries and our economic performance;

- **Ensuring** access to regular air services in regional and remote areas, where regular flights are essential for communities, regional development and social services;"

- **Establishing** an air traffic management plan which enables better long term planning and timely investment by government agencies and industry and addresses civil and military aviation requirements;"

including pilot training and general aviation. The increase in traffic has shown safety deficiencies within the Airservices area especially with regard to GAAP ops.

- **Using** satellite technology to improve safety and efficiency and reduce environmental impacts of aircraft operations;"

- **Strengthening** the governance arrangements for the Civil Aviation Safety Authority (CASA) and the with industry and the community"

We urge the developing of a positive, supportive culture within CASA to enhance the relationship with industry and thus achieved improved



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safety rather a "them and us" situation where we are out to get you which is how many in industry perceive CASA to be. We agree with the policy of a CASA board which in our view should have members covering the Australian aviation industry including the RAAF and non aviation commercial board experience.

- **"Ensuring** that a vibrant general aviation industry is able to prosper as the nurturing ground for future commercial pilots and aviation workers;"

This can only be achieved with the appropriate level of finance by government. User pays can no longer be used as the answer for the industry.

- **"Addressing** climate change, a focal point of transport policy for this and future generations."

1. Aviation Safety

Air traffic management

"Australia has one of the safest and most efficient air traffic management systems in the world."

In terms of airline operations we agree but we question this statement with regard to GAAP operations and lack of staffing in general aviation operations.

"However, sustained industry growth is placing unprecedented demands on an ageing system. Infrastructure renewal, including the replacement of our radar and navigation aids network is required. We need to make effective use of new technology and plan to ensure we have the skilled people to build and maintain an international best practice air traffic management system for the twenty-first century."

A modern air traffic management system must be able to clearly define the roles of government agencies, airlines and other aviation users in maintaining a safe and efficient airspace environment."

"Sound governance is important to delivering safe air traffic management. To this end, the Government will maintain Airservices Australia as a fully Government-owned statutory authority with safety its most important consideration."

This is only half the story - safety is an important consideration AND providing this safe service to pilots in all areas of flying not just the big end of town.

" Airservices will focus on delivering core air traffic management, rescue and fire fighting services. The Government will also ensure it meets its broader responsibilities to the community in relation to the environmental impacts of aircraft operations."

"Good inter-agency cooperation is crucial to implementing air traffic policy. The Aviation Policy Group, comprising the heads of the Department of Infrastructure, Transport, Regional Development and Local Government, Airservices Australia, CASA and the Air Force, will continue to oversee the development and implementation of the air traffic policy, in consultation with industry."

Consultation with industry needs to include all sectors of the Industry. We further suggest that the ATSB also be considered.

"To meet these challenges, the Government is committed to the adoption of newer, satellite-based technologies, such as Automatic Dependent Surveillance-Broadcast (ADS-B) to enhance air traffic navigation and surveillance. As a high priority, government agencies are finalizing a proposal for the wider application of ADS-B in Australia's air traffic navigation and surveillance management."



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We suggest that Government policy need's to be sure that the technology is affordable for all sectors of aviation to make it truly work over the whole of Australia.

2. Aviation security

"Australia's decentralized airport network presents a challenge to ensure security outcomes are both effective and commensurate with the security risk at each location."

This area has not, to date, been thought through. Security Implementation seems to be haphazard and costs and resources are not matched to the risks.

5. General aviation

"The industry is emerging from this period with strong growth in such sectors as recreational flying, training and charter activity. There is some anecdotal evidence that rationalization is contributing to improved business skills in many areas. Innovation in aircraft and navigation technologies have created new opportunities as well as transitional challenges".

Transitional challenges - are these challenges for the regulator that is not able to be responsive and flexible?

"To assist Australia's GA industry, the Australian Government will ensure priority is given to finalizing CASA's regulatory reform process. Removing regulatory impediments to the viability and growth of the GA sector is important as is maintaining the highest levels of safety. In addition, the Government will consider options to help address the burden of regulatory charges, including charge on the GA sector."

Good news!

6. Industry skills and productivity

"The Government has established the Productivity Places Program under the Skilling Australia for the Future initiative with a commitment of more than \$2.1 billion over five years to fund up to 701,000 new training places across all industries. Commercial aeroplane and helicopter pilots, aviation maintenance engineers and airport security screeners are key aviation skills that are eligible for federal funding for the first time under this program."

Again good news but we wait to see what exactly occurs! We are, however, most concerned that there are sufficient skilled pilot instructors throughout Australia especially for the future as many of the current senior and highly experienced instructors will be retiring within the next decade. We submit that Government policy must address the question of ensuring that not only are there sufficient instructors but they are appropriately trained and experienced. To this end we consider that the concept of a national pilot training school for senior instructors is deserving of consideration.

8. Airport investment – planning for responsible growth

"The encroachment of city development around airports, particularly the secondary airports at capital cities, has increased the pressure for airport land to be used for other purposes with potentially higher commercial returns. The Government respects the right of the airport operators to a reasonable return on capital invested, but will not support proposals for the site



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to be used for commercial purposes which prevent the site from reaching its full potential as an airport."

It is not just the use of land for commercial purposes; it is the increased charges and restrictive policies for current tenants at airports that prevent the site from reaching its full potential.

"Our aviation infrastructure will no longer be viewed in isolation from national infrastructure planning. The Government will work closely with Infrastructure Australia to ensure the development of major airports is considered as part of Australia's broader infrastructure strategy."

This is good news.

Pricing of airport services

We submit that this must include GAAP airports, not just international airports.

9. *Aviation emissions and climate change*

"Civil aviation currently accounts for about two per cent of global emissions and this is expected to increase due to predicted growth in the aviation sector. While aircraft are 70 per cent more fuel-efficient than 40 years ago, future improvements in fuel efficiency will not be sufficient to counteract the extra emissions generated by a growing industry."

We ask where does this evidence come from?

"Air traffic management initiatives which increase operational efficiencies will help to reduce emissions. The Government will ensure Airservices Australia remains at the forefront of efforts by air navigation service providers to introduce cooperative working arrangements and innovative approaches to reducing emissions, including flexible flight paths and continuous descent approaches."

We agree and also suggest that arrangements are put in place to ensure that Air Traffic computer systems are able to cope with flexibility so that services can be provided to all pilots - not just to airlines.

Further GAPAN comments on specific sections of the Green Paper:

Summary of proposed policy initiatives section

The Government proposes a range of initiatives for short, medium and long-term policy and regulatory reform and direction. The initiatives follow four key principles:

- 2. *"The aviation industry is a key driver of broader economic prosperity and a strategic approach based on properly-functioning, competitive markets is required to secure the industry's future and promote the best interests of the travelling public and businesses that rely on the aviation sector."***

"Through the Aviation White Paper, the Government will provide national leadership and a strategy for aviation which looks to the long-term, recognizes the importance of aviation to the economic prosperity of the nation and provides a basis for planning and investment in the industry".

We look forward to the Government policy achieving this for all sectors of aviation.



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Proposed initiatives

Principle 2 – Driver of economic prosperity

“General aviation” - we support the overall policy and initiatives.

“Industry skills and productivity”

"The Government recognizes the importance of a suitably skilled and trained workforce to the future prosperity of Australia's aviation industry. The Government has:

- *launched the new Aviation Training Package which delivers for the first time Australia-wide standards and qualifications for pilots and other aviation workers;*
 - *as a result, for the first time the two regulators of Australia's aviation industry - the CASA and Defense - have agreed on standards and requirements for pilot qualifications;*
 - *This means aviation workers will be able to move more freely between civilian and defense workforces.*

To continue to ensure the Australian aviation industry's future needs can be addressed within an overarching national skills framework the Australian Government proposes to:

- *continue to provide assistance to all Australian industries to address skills issues through the education and training framework, specifically encouraging the aviation industry to:*
 - *communicate industry workforce needs to Skills Australia to ensure that the allocation of Productivity Places Program training places considers the skills needs of the aviation sector;*
 - *form partnerships with schools to better define career pathways from school into aviation occupations; and*
 - *Work in partnership with training providers to deliver quality training which maximizes access to assistance measures."*

Above proposals for Government policy are most welcome. We further suggest that some initiatives be included in Government policy to work with the aviation industry to

- *"ensure the closer alignment of national civil and military air traffic controller standards and qualifications; and*
- *reinforce with industry that it needs to be more pro-active in developing attraction and retention strategies and broader workforce planning, including:*
 - *transparent workforce planning process to articulate future recruitment needs across industry sectors, e.g. progression of pilots;*
 - *improved conditions and flexible working arrangements to encourage retention of key personnel, taking account of the aging workforce;*
 - *improved marketing of aviation careers; and*
 - *Consideration of the use of 'bonding' arrangements to offset cost barriers for individuals and industry in training highly specialized employees."*

The industry could be asked to develop forecasts of needs for pilots, engineers, ATC etc and then assess the capability of training establishments to meet those needs in the coming years. Further some initiatives to provide financial assistance or tax relief to training organisations in the private sector are most urgently required.



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Principle 3 – Infrastructure

Economic regulation appears to be concentrating on car parking at airports. The cost of aircraft parking and hangar leases etc – particularly at Capital city GA airports has become a serious problem.

General Aviation section 5 (page 134-135)

"One issue which has become important in the general aviation industry over recent decades is the cut-off point at which smaller aircraft, those below 650 kg, are subject to alternative arrangements for oversight of safety and security. Under limited operational circumstances (including day-time operations, visual flight rules, uncontrolled airspace, maximum of two occupants) these aircraft may be operated under self-administration arrangements.

Self administration arrangements currently apply to the sports aviation sector, where peak bodies in each aviation sport administer regulations set by CASA. These peak bodies issue licenses and certificates, carry out safety surveillance and provide other regulatory services.

CASA then audits the activities of the peak bodies to ensure compliance with regulatory standards. This approach means CASA only devotes a relatively small level of resources directly to sports aviation, allowing more attention to be focused on higher priority passenger-carrying operations.

Due to the differences in regulatory approach between the recreational and traditional general aviation sectors, some stakeholders define general aviation to exclude recreational aircraft activity."

We are concerned that the author of this section does not appear to understand this area of aviation and has mixed up "Recreational", "sports aviation" and "smaller aircraft". We strongly recommend that his section needs to be carefully rewritten, corresponding to current regulations, when it reaches the stage of the White Paper".

GENERAL COMMENTS ON THE GREEN PAPER

This section further develops the GAPAN position.

Safety Regulation

Australia's Approach to Enhancing Safety

CASA Board

GAPAN supports the establishment of a Board for the strategic management and oversight of CASA. The Board should have members from the complete range of the aviation industry including the RAAF and out side commercial Board experience.

Properly managed under an appropriate charter, this should provide considered and consistent direction to CASA, and reduce the frequency of changes to policy and procedure that may occur under leadership by a single person.



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In addition, a Board will smooth the process of change within CASA by reducing the effect and the influence, of short term political, industrial and other pressures.

Independence for the ATSB

GAPAN supports the independence for the ATSB, and believes that this can best be achieved by the establishment of a board or commission.

However the structure of the proposed Commission may lead to other forms of dependence.

Independence can be lost in several ways. Besides the risk of protecting or attacking another body, independence can be lost by the subtle action by investigators and report writers to achieve certain outcomes from the result of an investigation. This may be the perceived need to support the safety agenda of the leadership, or to the personal operational prejudices of the investigating or reporting team. The results of investigations may be used to support the introduction of new safety management techniques that have not seen full and proper development.

The best defence against this is the use of a board. Members of the board may be selected from experts in all associated fields. These members may be part time and chosen to be used as required for each investigation, but should form a permanent group. The board should review, comment and approve the results of investigations.

This body should not be subject to any form of control or influence by any organisation or person in the management of Australian aviation. The board should report to a high level of Government and should not have any role in the management, either strategic or tactical, of the ATSB. However the board should have the obligation to make recommendations to Government about the efficiency and effectiveness of the investigations carried out by the ATSB.

The establishment of the Committee, as proposed in the Paper, has the risk of using inexperienced members, whose selection for specific investigations could be influenced by others. It is also to be chaired by a person who may have an interest in the outcome of the investigation. This introduces a weakness in maintaining the independence of the ATSB.

Following up Safety Recommendations

The effective following up of safety recommendations by CASA and the industry would be improved by a high standard of ATSB safety recommendations that would come from review by a board as suggested previously in this response.



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Practical, reasonable and appropriate safety recommendations that do not follow an agenda are more likely to be applied by CASA and the industry.

Improving CASA's Interaction with Industry

Regulatory reform has been hampered by the changing priorities and the changing means of achieving reform taken by various senior CASA managers over several years. We hope that the establishment of a CASA Board provides an overall strategic approach and consistency to this question. Government policy should address this.

The several levels of consultation have arisen from past criticism that there has been insufficient consultation with industry. While a substantial level of industry consultation is needed it is important that the various consultation processes are considered by industry to be of value and industry views are respected by CASA.

There is always been a risk that the power of strong organisations with substantial resources may dominate the direction of the proposed changes. In some cases this can be driven by the reluctance to make change to established procedures and in others to remove perceived restrictions. The benefit of a change for the industry as a whole and the regulator, may be lost in this process. CASA also needs to maintain consistency with the need for safety, in accordance with world practice.

GAPAN supports the need for consultation, but believes that the processes should be relatively simple, flexible and responsive enough to allow the implementation of considered change for the benefit of all aviation organisations, including the overall responsibility for efficiently and effectively improving the safety of flight operations in Australia.

For example, it is reasonable for a consultative committee be used to recommend change and to broadly review and comment on proposed change. Regulation should then be developed by the regulator and provided to all interested parties for comment through the proposed rule making process. The regulator should review and decide on the value and appropriateness of comment provided by the industry and then complete the rule change. The regulator should regularly review the Regulations and have the co-operation of Government to ensure that required changes to rules can be implemented quickly.

It is important that CASA develops industry confidence in the consultation process. This is an area that requires strong Government policy. This policy should define the various consultation processes including the "shop front" RAPACs.



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Industry's Primary Responsibility for Safety.

GAPAN supports the assumption that the primary responsibility for safety is with industry and supports the implementation of efficient and effective safety management systems to help achieve this. In this regard "self reporting" is most valuable. However, for it to be effective there must be confidence in the industry that such reporting will not be used to the detriment of the person so reporting. Thus confidentiality in certain aspects of self reporting is vital.

There have been several attempts in the past to place the primary responsibility on industry by using varying forms of system approach to safety. CASA has then satisfied itself of the effectiveness of this by auditing the system. For a while, CASA was reluctant to measure the actual application and the effectiveness, of these systems at the coalface.

The application of the latest version of Safety Management Systems risks CASA resorting to the same method of assessing the safety standards of operators.

GAPAN believes that auditing of organisations should always include the full range of the operator's safety and operational activity, including the effectiveness of the system applied by the operational staff at all levels. The staff that manage, maintain and operate aircraft are an essential part of any system.

CASA Internal Reforms

We submit that Government policy should cover the following points.

GAPAN supports the changes made to CASA in recent times and improvements made to the selection, education and training given to CASA staff. Education needs to ensure that qualified and knowledgeable people are used for the various functions of CASA.

Legislation should be supported by guidance documents, such as Acceptable Means of Compliance, or Advisory Circulars.

Consistency in CASA decisions can be greatly improved by the establishment of standard procedures within CASA. These procedures should be available to the industry.

These standard procedures, written by CASA management and used by CASA staff, should be practical, simple, living documents subject to regular review and amendment. Some work has been commenced on this, but the information is in different places, with different formats.



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It is most important that CASA staff adequately cover the full range of the industry and not have too much emphasis on a particular sector such as ex military.

Compliance is easier to achieve if the operator knows what information and form of application is required to allow CASA to easily provide an approval, or permission, or to issue a certificate. Time and cost can be saved for the operator and for CASA. This also allows CASA to make permissions, exemptions and approvals consistently across the various offices and between general aviation and air transport operations.

Once these procedures are in place, CASA would then need to develop a culture that first turned to the standard procedures to perform work.

Many issues of “poor culture” within CASA can be the result of an individual officer being required to research the rules, make decisions as to the means of achieving compliance and implementing those decisions without access to a standard procedure. CASA officers may consider themselves to be legally vulnerable and under time pressure. As a form of protection, they may be conservative. Certainly the decisions reached by individuals will continue to vary until standard procedures are in place.

The American Federal Aviation Administration is an organisation that does this well.

Air Traffic Management (ATM)

The Government proposal to retain Airservices as a statutory authority is commendable, given the focus on commercialisation of activities conducted within Airservices Australia. GAPAN supports a more directed safety focus to all sectors of aviation within Australia rather than the more recent initiatives of engaging in commercially focused initiatives outside of Australia’s primary airspace area of responsibilities.

GAPAN supports the proposals in the Paper for the continued development of air traffic management services in Australia and recognises the advances made by Airservices Australia in air traffic management and in their contribution to the developments of these systems internationally.

GAPAN suggests that the time has come to have all airspace in Australia under one authority so that it can be used with greater efficiency. All airspace should operate under the same regulations, with additional training and rules, applied to defence specific airspace if necessary.

GAPAN also supports the separation of the regulation of airspace from the provision of air traffic services.

En-route/Terminal

The extensive focus on the initiative regarding satellite based ADS-B surveillance within the green paper will serve to enhance a large section of



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Australia with improved surveillance, particularly in upper airspace. However, we believe that the earlier draft discussion paper released by DOTRS has some serious shortcomings if ADSB is proposed to replace the monopulse SSR network currently utilised in the en-route environment, particularly in the heavily trafficked J curve East Coast of Australia through to Adelaide. There are several reasons for this thinking.

The US Federal Administration Authority (FAA) Notice of Proposed Rule Making (NPRM) recognizes there are vulnerabilities in using a GPS system as the aircraft's position service. There are times when GPS may be unreliable in certain areas and during certain times due to planned testing or solar flare activity.

ADS-B capability is currently being installed in Australia. Unquestionably ADS-B is an enabler within the framework of a global ATM operational concept. The development of the Australian Air Traffic System (ATS) has, to a significant extent, mirrored international development. However, the DOTRS sponsored proposal to replace SSR surveillance with ADS-B only is a marked departure from that regimen. In advocating adoption of ADS-B, Australia would be a world leader, totally reliant on a foreign country owned and operated space based satellite system without any national ability to control the outputs. The existing Australian Air-Routes have been structured to ensure primary and secondary radar fail safe capability by utilising a laterally separated route structure between major traffic centres. There is a need to retain those VOR's that ensure route structural separation integrity in the event of surveillance failure by Air Traffic Control.

ADS-B capability is currently being installed in continental Australia with continental coverage above FL300 and accordingly at this time there is no capacity enhancement or ability for more availability of optimum flight level utilisation than exists under the existing ADS-B UAP.

The FAA utilize a two sensor policy for existing targets and the FAA ADS-B NPRM provides for one SSR and one ADS-B position. The system redundancy therefore is maintained integral within their NAS. The FAA specified that their backup strategy must meet certain minimum requirements to meet the needs of the airspace users. The strategy must be able to support ATC surveillance to at least the same extent as current back up surveillance capabilities. In other words, at least the same level of capacity must be maintained during a loss of GPS signal as would be experienced during a comparative loss of radar services today in both the terminal and en route areas over several days. The FAA concluded that a strategy of maintaining a reduced network of SSRs best meets the FAA's back up needs given the limitations of ADS-B surveillance capabilities.

Under this FAA strategy, secondary radar services will be provided in high density terminal airspace (surrounding approximately the top 40 airports in terms of capacity), all en route airspace above 18,000 feet MSL and medium density terminal airspace above certain altitudes, as determined by proximate en route SSR coverage. Primary surveillance radar services will be retained in



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all terminal areas covered by primary radar today (approximately 200 locations), to serve as the means of mitigating single aircraft avionics failures. In the United States no new aircraft avionics would be required to support this strategy.

Any strategy to increase the utilisation of ADS-B within Australia, particularly in the Airspace adjacent to terminal areas, must give consideration to the principles of redundancy and route integrity.

Airservices Australia and Airport Funding

The funding model applied to Airservices has produced efficiencies and the TAAATS en-route system is world state of the art. However this has come at a cost to upgrade of other operational infrastructure such as the en-route radar replacement schedule and a removal from service of a number of navigation aids to reduce costs. Australia does not have any airport currently capable of ILS approaches beyond Cat 1. The new GBAS equipment at Sydney is only proposed to be certified to CAT 1 according to the Airservices website. In many locations in other parts of the world instrument approaches are conducted to Cat 3c which enables landings to be conducted in thick fog for example. While Australia has generally fine weather, when diversion or schedule disruption occurs due to adverse weather, the cost to both airlines and industry is considerable. These costs will rapidly escalate with the increased utilisation of larger aircraft such as the Airbus A380.

Part of the problem surrounding infrastructure upgrades is the fragmentation of responsibility where there is no single forward looking planning policy area determining the operating and safety planning environment. There is no overall decision making framework, for example the major airports ILS transmitters and antennae are owned and operated by Airservices but the associated required runway and approach lighting is owned and operated by the airport operator. Unlike the UK, where airports have also been privatised, Australia does not have a legislated requirement for airport operators to invest in airport operational improvements and for other than essential operational replacement. Airport operators are able to derive significantly more financial benefit by upgrading car parking or terminal retail space rather than investing in operational infrastructure improvement. While there are exceptions such as Melbourne Airport which recently commissioned stop bars, it is the only Australian Airport to be so equipped. This equipment enhances safety and is widely utilised around the world. Both Sydney and Brisbane Airports should have this equipment in accordance with CASA MOS Part 139 as well as a number of other airports because operations are permitted at numerous aerodromes where the visibility is less than Cat 1. Operational efficiency is impeded at a number of airports due to infrastructure limitations and the lack of a legislated requirement to improve operational efficiency.

The Government must ensure that the responsibilities matrix is clearer and establish policy to inform direct improvements to the aviation network and improve the standard of service across a broader range of busy regional airports.



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The FAA has surveillance of virtually all its en-route airspace and some 200 terminal areas yet Australia has not materially improved the surveillance of any of the terminal airspace at its 26 controlled aerodromes within the last 20 years. All of the regional towers such as Alice Springs, Albury, Maroochydore, Mackay, Hobart Launceston, Coffs Harbour and Tamworth require the use of procedural or visual separation for control purposes and this is the dirt road of Air Traffic Control. Many of our aerodromes such as Avalon, Ayers Rock, Broome, Port Macquarie, Kalgoorlie, Harvey Bay, Bathurst, Karratha and Kununurra are handling significant RPT movements and while Ayers Rock and Broome are provided with a bare minimum Certified Air Ground Service, the others have no air traffic control service at all and GAPAN understands that in most other countries air traffic control would be mandatory for all of these locations.

Airservices recently announced upgrades to three Australian towers, namely Melbourne, Adelaide and Rockhampton and whilst tower upgrades are overdue there are other examples that we believe carry at least as great a need. The services at a number of other more regional towers such as Hobart, Launceston, Alice Springs, Coffs Harbour, Albury, Tamworth, Mackay and Maroochydore are hampered by old technology and millions of dollars could be saved by improving regional tower operational efficiency by fitting them with the latest tower operational systems with related staffing improvements.

The White paper should ensure that the future funding model facilitates infrastructure capital injection to ensure that Australia's towers are upgraded and services provided to world equivalent standards.

Office of Airspace Regulation

The separation of The Office of Airspace Regulation is strongly supported by GAPAN and it now requires this safety regulator to ensure a more appropriate standard of service. This must be independent of the commercial interests of the major airlines which have previously refused to entertain any expansion of service on the grounds that Airservices would recover the costs from them as part of the cost recovery funding model. Safety of the travelling public must be at the forefront of the considerations.

The office of airspace regulation must provide realistic safety assessment of operational needs in a coordinated plan and not accept the status quo provision of service as being satisfactory.

Sydney Airport

There will be much discussion regarding the need to upgrade the Sydney gateway and yet this is mandatory for efficiency, safety and environmental reasons. The current airport is very inefficient with a complex taxiway system that frequently requires runway crossings on arrival and departure. The airport is also operationally constrained by complex arrival and departure procedures which are environmentally extremely inefficient. For example arriving aircraft are required to reach an altitude between 8000 to 6000 feet by 20 (radial)



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nautical miles from the airport when they still have between 30-50nm to run to touchdown. Thrust with associated noise and emissions are required to reach the runway. This is very inefficient when considered in a constant descent environment.

Any new major airport for Sydney must be operationally clear of the existing major airports at Sydney, Richmond, Bankstown and Williamstown.

Aviation Security

Excessive or ineffective security is an avoidable cost and acts against the acceptance of security in high risk situations.

Gapan is concerned at the situation at Country and Regional airports where the service is low frequency piston or turbo prop services. In most cases there is expensive security fencing for part of the airport which is not serving any real purpose considering the rest of the airport in terms of security is not fenced.

The current security arrangements for every one flying into locations such as Mt. Gambier or Halls Creek to have an ASIC devalues the value of an ASIC and makes it less secure at locations which really need it.

In our opinion, aviation security should be implemented and managed by an organisation directly responsible to the Government for the performance of the role. The practice of leaving this to individual airport operators may cause a reduction of effectiveness and so allow the risk to increase.

We submit that the forthcoming Government policy should involve a complete review of Security arrangements covering the costs and cost effectiveness of current arrangements.

International Aviation

GAPAN has no further comment on the bi-lateral and ownership arrangements made for international airline operations as set out in the Green Paper.

GAPAN's interest in international air transport operations is to ensure that Australian aviation regulations provide sufficient powers to CASA to ensure that the safety standards of all airlines operating into and within Australia are maintained at the level set for Australian air transport operators.

These powers can be applied by using a foreign AOC, or through control of operations using an operations specification.

ICAO sets the international standard for air transport operations and they audit each State to establish the level of compliance. However GAPAN supports the obligation on the Australia Government to ensure that the terms of the foreign AOC, or operations specification, are being complied with. It is only by this means that the Nation can protect itself against the development of an "AOC of Convenience" approach to air transport operations that could be used by AOC



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holders from other States to carry passengers to and from Australia. This can best be achieved by regular inspection of international aircraft operating through Australian airports.

In the current economic climate consideration needs to be given to policies that will secure Australian jobs and protect investments against unfair international competition.

Domestic and Regional Aviation

GAPAN believes that a large risk to safety in the de-regulated domestic area of operations can be the result of financial pressure caused by the poor financial health of an operator. This risk is due to the temptation to reduce the resources applied to the safety needs of an operator in times of financial stress.

This concern is the main reason why Civil Aviation Regulations require the financial strength of an applicant for an Air Operator's Certificate to be considered during the application assessment. It is also a trigger for concern by CASA if an operator falls into a position of financial uncertainty.

For this reason, GAPAN supports the use of the Remote Air Service Subsidy Scheme, the En-route Charges Scheme and the Remote Aerodrome Safety Program to allow a degree of financial stability for operators providing a necessary service to areas that otherwise would place severe financial challenges on some regional services.

General Aviation and Training

GAPAN supports the initiatives listed in the Green Paper, particularly those that relate to the ownership and operation of secondary airports to ensure that a general aviation operator has certainty of tenure and at a reasonable cost, to ensure the ability to continue to provide a safe, necessary service.

GAPAN supports the recognition contained in the Green Paper that the structure of general aviation worldwide has changed, particularly with recreational flying and the training associated with that.

Recreational flying in smaller aircraft has been developed by gradually increasing the weights and carrying capacity of these aircraft and by removing some restrictions to their operation, as operational experience has been gained.

The management of parts of the general aviation sector has been divested to non-government organisations, although responsibility remains with the Australian Government to ensure that these areas are properly administered under Government policies. Careful examination of the numerically high number of accidents in recreational aviation would be needed to provide confirmation.

GAPAN has always supported the fact that the majority of pilots have been trained and gained their early experience in the General Aviation sector. The establishment of sound practices, with suitable knowledge and standards in this



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phase of their career, leads to a positive safety culture for the operating life of the pilot.

To stress how important GA training is we offer the following comments and advice for your consideration.

“commercial pilots and aviation workers.”

“The Green Paper outlines the Government’s proposals to deliver against these objectives”.

With statements such as these, all taken from the Executive Summary, it would be reasonable to expect that the Green Paper was going to deliver General Aviation (GA) from the malaise into which it has slipped during the past decade or two. Regrettably that is not the case as yet again GA is handed plaudits with no supporting reality.

“The general aviation industry also plays an important support role for the wider industry through the training of commercial pilots and engineers.”

Focussing on pilot training it is not unreasonable, to take the view that GA is more than just *important* to the wider industry it is essential. Stripped of the pilot training conducted by GA the industry will grind to a halt. The reality of this was clearly apparent during the recent global shortage of pilots as airlines, charter companies and a range of related operators within Australia sought to source qualified pilots from anywhere – including, in some instances, taking instructors from those Flight Training Organisations (FTOs) responsible for the training of the airlines own cadets. A significant aspect of that period was the number of operators seeking flight instructors from outside the country as the airlines lured an increasing number of the local instructors away from the training sector – it was not just the airlines that were making use of the 437 Visa. Anecdotal evidence indicates that during that time a number of Flying Training Operators ceased to function and numerous larger operators experienced training delays that were unprecedented all due to a lack of instructional staff. Larger operators undertook measures not previously experienced on a wide scale including:

- The provision of scholarships to encourage aspirants to undertake instructor training with the lure of an airline placement after a set period of instructional duties (of the sponsoring airlines’ cadet pilots);
- Airlines returning ‘line pilots’ to instructional duties with selected FTOs (again directed to training the airlines cadet pilots);
- Rigorous recruitment campaigns particularly in New Zealand and South Africa (with some rumoured to have gone as far a field as Eastern Europe);
- Regional airlines recruiting pilots with bare commercial licences, instrument rating not required although desirable; and
- Regional airlines taking pilots over 60 years of age.

In many respects these measures could be seen as being positives and indicative of a reasonable and growing future for GA – but that is not the case as



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much of the benefit has not and will not flow to the local industry as the main focus for these measures other than those for regional airlines were directed towards the provision of training for international cadet pilots. Whilst this is a valuable source of foreign exchange and an important export initiative there is minimal flow on to locally directed training. Indeed there is a strong case for the view that a focus on training for foreign airlines has a detrimental effect as it attracts locally trained instructors away from domestic training.

If GA is to provide flight training sufficient to meet even the basic long term needs of the industry in Australia and sustain the current levels of foreign training, there are two factors which must be addressed:

1. The financial burden of flight training; and
2. The recurrent shortfall in flight instructor numbers.

As noted in the Green Paper, continued reliance on the willingness of individuals and their parents, to meet the high cost of training is neither strategic nor is it sustainable in a tightening economic climate. Failure to address the financial burden will inevitably lead to a shrinking and aging, work force with the associated reduction in the delivery of air services, in particular, to rural and remote communities which are already facing significant loss of amenity. To use the current economic situation as an excuse to avoid addressing long term work force issues would be both poor politics and equally poor strategic planning.

Although an improvement in the responsiveness of CASA and improved planning arrangements at airports will benefit GA, neither of these measures presented as Government priorities in the Green Paper will have a major or lasting impact on the viability of GA. Equally, Government handouts, whilst welcomed and undoubtedly heartening, will not act to develop any real long term benefit for the industry.

There are however, measures which would have both an immediate and a long term impact on GA. A measured, and more readily available, extension of the extant FEE-Help system would have double benefit as it would provide direct financial support to pilot trainees thus increasing trainee numbers and consequently providing a much needed financial stimulus to the training sector. The FEE-Help available to the training sector currently through the VET system is not satisfactory as there are few if any flying training operators who have been successfully in obtaining access. Clearly such a funding scheme requires entry control and ongoing monitoring if it is to avoid the issues faced by New Zealand when they introduced a similar scheme. Monitoring (through surveillance and audit) can be provided by the existent VET system in conjunction with CASA. However, entry control should be provided by the industry. A functional means of entry control could be achieved through the use of 'selection procedures' akin to those employed by the airlines, or the implementation of 'selection/screening' scheme similar to that provided in the UK by GAPAN of Air Pilots and Air Navigators. An extension of this type of approach involving the airlines could also provide a measure of career progression and be utilized to encourage newly qualified pilots to become flight instructors for designated periods of time with participating FTOs. The appeal of such an approach is that there are benefits for all parties:



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- The Government, as their financial support is 'protected' by way of the entry control;
 - A secondary benefit should also flow from a greater level of stability in the training sector;
- The industry, through a better level of stability and the opportunity for the application of greater levels of standardization utilizing the already existing CASA Flight Training and Testing scheme;
- The provision of a steady supply of flight instructors will ensure that the industry remains viable;
- Trainee pilots benefit through the provision of financial support for their training; and
- The industry would not be relying on Government handouts as continued success is still dependent on the delivery of quality training at a reasonable cost.

Perhaps the most significant aspect of such an approach is that all the elements and the necessary participants are readily available as is the industry expertise required to develop and manage the process.

Finally, there are some areas of the 'Industry Skills and Productivity' chapter which give rise to some concern.

In the area of Defence and civil qualifications there would seem to be little need for more than is already in place as this excerpt from the CASA website shows: *"The Civil Aviation Regulations (CAR) provide for Australian Defence Force (ADF) flight crew to be exempt from certain specific requirements for a licence such as exams and flight tests if they hold or have held a pilot qualification which is deemed to be at least equivalent to the licence sought."* Similar provisions are in place for maintenance engineers and air traffic controllers.

The Aviation Training Package announced with much fanfare in early 2008 introduced nothing that was new as CASA licensing requirements have been aligned with the national training/qualification framework for a number of years. In addition there has, to date, been little if any evidence of any flow through to aviation of the dollars or 'placements' presented under the umbrella of the so-called Productivity Places Program – which does not appear to provide for additional places for aspirant maintenance engineers. The provision of funding to a single 'Aviation High School' in Brisbane will have a minimal effect across the other states. At the secondary education level there is already a viable option in place in Western Australia – Aviation Studies have been available at a number of Secondary Schools since the 1970's.

Consideration should also be given to supporting and enhancing the tertiary level delivery of Aviation Studies – again this has been ongoing since the late 1980's. Indeed, there is a reasonable argument to be made for requiring 'professional pilots' to hold tertiary qualification.



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Industry Skills and Productivity

GAPAN supports the principle that education and training in all aviation related skills should be supported by Government at least to the same extent as other professions and industries.

GAPAN also supports the proposition that civilian and military training should include the complete range of “soft” skills, such as Crew Resource Management, Human Factors and Threat and Error Management, so that they become part of the culture for all pilots, operations and maintenance staff who may eventually find their way into commercial maintenance, training and flight operations.

GAPAN also supports the contention that the managements of Government services such as CASA and Airservices Australia should be accountable for longer term planning for the training and provision of staff and facilities to meet the ongoing and future needs of aviation within Australia. Government should be committed to support this planning.

GAPAN continues to propose the establishment of a national training program for flight instructors as set out in our response to the issues paper.

Consumer Protection

GAPAN has no comment to make in this area.

Aviation Infrastructure

GAPAN's interest in infrastructure is mainly to ensure the safety of flight and maintenance operations.

The imposition of curfews, flight path for terrain avoidance and noise abatement procedures for arrival and departure are additional challenges to the safe operation of aircraft. While normally these requirements are easily complied with, care should be taken to ensure that procedures are not so demanding that they impact on the ability of pilots to maintain safe operations in conditions affected by aircraft unserviceability, weather, or other circumstances beyond the control of the pilots.

These matters are presently, and will be in the future, affected by building development at and around airports.

To this end, GAPAN supports the initiative to control development at and around airports, while recognising the difficulties co-ordinating this aim with state and local governments.

Aviation Emissions and Climate Change

While not directly safety related, The Paper does not appear to recognise that the design of airport departure and arrival procedures and the practical application of those procedures, can have a significant effect on aviation emissions.



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This also applies to ground times before and after flight, as well as ground and in flight holding times.

Modern aircraft technology, now available on the majority of large air transport aircraft operated within Australian airspace, should continue to be used and further developed to maximise the efficient use of aircraft. This requires ATC to update its procedures to match.

It is worth noting that aviation is a low polluter, some 2% of total pollution.

Noise Impacts

GAPAN supports the need for communities to be as free of aircraft noise as is reasonably possible and that this should be controlled in the future primarily by development controls around airports.

GAPAN is concerned that the implementation of any policy to punish pilots and operators under noise monitoring schemes can have an adverse effect on safety. This subtle pressure may cause a pilot to make decisions affected by noise considerations rather than the safety actions required by changed operational circumstances.

Generally, all pilots and operators will comply with noise alleviation procedures, but must be permitted the flexibility to vary those procedures in abnormal situations.

Certain noise alleviation practices, such as “drift out”, minimum speed climb and the late approach stabilisation can increase the risk of placing the aircraft in an unsafe situation under some circumstances and should not be used as a means of achieving noise compliance.

Conclusion

The Guild of Air Pilots and Air Navigators (Australian Region) has made this submission in the hope that it provides the Australian Government with support for the policy as proposed in the National Aviation Policy Green Paper and with some suggestions as to how GAPAN feels that this Policy may be improved.

We remain committed to provide any advice and information to further the development of safety and training within the Australian aviation sector.

GAPAN will remain available to provide this assistance as requested.

Captain B.A.Brooksbank,
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