



**AUSTRALIAN DIVISION INC.**

23<sup>rd</sup> February 2009

Aviation Green Paper  
Department of Infrastructure, Transport,  
Regional Development & Local Government  
GPO Box 594  
CANBERRA ACT 2601

**Submission on National Aviation Policy Green Paper**

Dear Sir,

Attached is a submission in response to the National Aviation Policy Green Paper issued by the Minister in December 2008. This submission has been prepared by the Royal Aeronautical Society Australian Division.

The Royal Aeronautical Society was founded in 1866. It has a worldwide membership of 18,000 mainly current or past engineers, pilots, academics, managers, and executives from major aviation bodies. The Society is a non political, not for profit organisation, and works to further the future of aviation and aeronautics around the world.

The Australian Division has a similar demographic to the wider Society membership. The Division is fortunate to have amongst its members, a number of former CEOs and executives of Australian aviation organizations, and also a number of former senior Defence executive officers.

Development of a National Aviation Policy is an important and timely consideration of the challenges facing Australian civil aviation. The Society's Australian Division welcomes the opportunity to comment on issues of importance to its members.

Thank you for the opportunity to submit comments.

Yours sincerely,

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# **ROYAL AERONAUTICAL SOCIETY - Australian Division**

## **National Aviation Policy Green Paper Response - February 2009**

This paper is submitted by the Royal Aeronautical Society Australian Division (RAeS). The Royal Aeronautical Society was founded in 1866. It has a worldwide membership of around 18,000 mainly current or past engineers, pilots, academics, managers, and executives from major aviation bodies. RAeS is a non political, not for profit organisation, and works to further the future of aviation and aeronautics around the world.

The National Aviation Policy Green Paper is a comprehensive and timely consideration of the challenges facing Australian civil aviation. The Society welcomes the opportunity to comment on those issues of interest to its members.

This paper does not attempt to address all the topics contained in the Green Paper, but restricts its content to those issues important to its membership, the organisation's objectives and which are encompassed within the expertise of its Australian members who made comment.

RAeS is in general supportive of the policy initiatives in the Green Paper, and applauds the Government for its commitment to developing an aviation policy. In this response to the proposed policy initiatives, RAeS has only made comment upon the initiatives on which it has suggestions regarding the nature of the policy or its implementation

The Section headings below correspond to the headings in the Green Paper section titled Summary of Government Policy Initiatives .

### **Principle 1 – Safety**

#### **Aviation Safety**

RAeS applauds the re-introduction of a CASA Board. The only caution offered is that the appointment of Board members, in the light of past history, needs to be done extremely carefully to avoid influence by vested interests.

RAeS repeats the comment in its response to the Issues Paper, that CASA could be split into two distinct functions, one a Policy function, the other the Compliance function. The Policy function should cover policy and regulatory reform. The Compliance function should cover regulatory compliance and enforcement. The Regulatory function requires a Board to provide strategic policy guidance.

RAeS endorses giving priority to ensuring the CASA regulatory reform program is completed by 2010. RAeS repeats the comments it made in response to the Issues Paper, that a policy to adopt EASA rules would enable faster change of the Regulations and greater certainty for operators. CASA as the Regulator has an important role in ensuring safety in Australia's skies, but it requires a change in mindset within CASA to end the application of questionable Australian regulations to aircraft already certified by EASA or FAA. For too long Australia has continued to create too many of its own special rules and to be too prescriptive in its regulations. This has added unnecessary costs and also reduced Australian competitiveness in the export of aviation services including training, manufacturing and overhaul (MRO) services. An important principle in formulating new regulations is that of 'outcome' based regulations rather than 'prescriptive' regulations

More recently CASA has tried to adopt regulations from other jurisdictions, which is a good step. It is starting to appear as though the European EASA regulations are becoming accepted as the new global standard, a status previously held by the US FAA Regulations. As a matter of Government Policy, the EASA regulations should as much as possible be adopted by Australia, enabling easier harmonization for aircraft operating across jurisdictions and easier purchase and sale of aircraft. That is not to say that there is no need for any special Australian rules. Australia's vast uninhabited distances with low levels of infrastructure do require some special considerations, but these are the exception.

An important aspect of harmonisation of regulations is that it not only facilitates the purchase and sale of aircraft, it also simplifies the export of aviation services including training, Maintenance and repair, and manufacturing giving rise to both employment and economic benefits.

There is a need for approval of Australian designs and products to be in accordance with an agreed schedule and in a timely manner. This requires CASA to have a strong technical base, and sufficient resources available to service industry requirements in a timely manner. In turn this requires a substantial body of industry advisory material from CASA to ensure work is done in a manner that will be approved by CASA. Alternatively, approval of manufactured aircraft in Australia could be arranged with another jurisdiction.

Compliance is clearly a function which requires surveillance and audit activity, with appropriate penalties for breaches of Regulations. Increased application of a graduated points system would be an improvement with graded levels of financial fines similar to those enforced in the USA, or for that matter, used in State driving offences. For many years CASA had an all or nothing system of penalties which was sometimes unfairly applied. RAeS agrees with the development of a balanced and effective range of responses to breaches of safety compliance.

The importance of self reporting cannot be overstated. Aviation safety relies to a significant degree upon the honesty and integrity of the people working in the operational areas to report errors in order to build databases of information about low level hazards so that these can be examined and mitigated to avoid more serious incidents and accidents. The current self reporting regulations have not always been consistently applied and contain some ambiguity regarding when a breach is found relative to when it is reported to CASA. Every effort should be made to encourage self reporting and to apply a 'just' culture approach to breaches and reporting.

In addition, RAeS would encourage better legal protection for flight data analysis programmes. Data may be required to be released by a court order; however pilots can deactivate these devices even though they confer great safety benefits. There is therefore a need to ensure a careful balance between the need for public release of this data and the safety benefits accruing through confidentiality.

## **Air Traffic Management**

It is now apparent that the introduction of ADS-B as a surveillance tool will be more gradual than had been proposed by Government agencies prior to the Issues Paper. Australia will not be on the 'bleeding edge' of the technology but will mandate ADS-B for high altitude operations before its widespread use in lower level airspace. There may be selected opportunities for deployment of ADS-B in remote areas which have increasing traffic levels requiring radar like surveillance, but which would involve prohibitive cost if radar were to be deployed eg mining areas in WA. A trial in such an area could be utilised to deploy ADS-B and special requirements or restricted airspace used to ensure ADS-B is used on all aircraft wanting to use that section of airspace.

RAeS believes consideration should also be given to mandating use of approved GPS equipment in order to phase out older NDB, DME and VOR equipment. Most sensible pilots

already use GPS for navigation and the financial cost of GPS equipment continues to come down. This needs to be decided soon in order to avoid major expenditure to replace some of the older nav aids.

The extension of ATM services to more regional areas is a worthy aim, especially if ADS-B is in use. However this should only be done after a full safety and risk management assessment has been made, and a cost benefit study of the most efficacious method of ATM service completed. Recent evidence suggest that the CASA OAR leans toward mandating a higher level of airspace classification than might be warranted, ostensibly on the basis that the cost of C airspace is not a lot higher than E airspace. This tends to move a sector from nothing to a high level of control in one step. There are a number of intermediate steps available including the use of a Unicom service, a CAGRO, and E airspace before moving to C airspace.

As noted in the RAeS response to the Issues Paper, over the last 20 years, many airspace management initiatives have caused extensive debate between different industry sectors, and progress slowed by disagreements within the industry. Government needs to ensure use of the Common Risk Framework is made by Airservices, CASA, RAAF and the Department plus a consistent method of evaluating airspace using agreed triggers. This is essential for transparent and fair decision making on airspace classifications. A methodical assessment of airspace risk in the light of traffic growth, passenger movements, VFR activity, and other parameters should be objectively made. Such assessments need to be regularly revisited to ensure the risk is re-evaluated when change occurs. The important core of this exercise is the methodical assessment of risk.

There are also a large number of areas designated as Restricted Airspace, often associated with Defence airfields and activity. Government has a role to play in ensuring that these restricted areas are not overly exclusive, and that as much as possible, the airspace is available for both RPT and GA aircraft to use when Defence is not active. There are some successful models in Europe for flexible use of Military Airspace which could be examined for their suitability in Australia.

RAeS was pleased to see the Green Paper mention the development of a common ATM platform. Both Airservices and Defence are starting to evaluate the next generation of ATM platform. It would be a tragedy if they purchased different systems. The providers should be able to have modules that can be isolated for Defence use where extra security is required. Both organisations have great pride in their independence and technical prowess, but unfortunately that leads to desire on both sides to control the process and the platform. Neither bureaucracy is likely to yield control of a new platform to the other and neither should they. It will require great management ability from the highest level of Government to facilitate cooperation between the two organisations. The most likely control mechanisms will be the allocation of funds to both organisation in such a way that one platform is their only option. Alternatively a Ministerial Direction would be required to both organisations.

The opportunity exists to include New Zealand in the exercise for a new ATM platform, but that is a Government to Government issue which might add too great a layer of complexity.

RAeS endorses the policy to clarify the situation at RAAF Base airfields used by civilian aircraft, and particularly those used by RPT operators.

## **Aviation Security**

RAeS repeats its suggestions in its response to the Issues Paper regarding Regional Airport Security. The imposition of security measures adopted for capital cities at regional airports has added a significant financial burden to already marginal regional routes. There are numerous reports of regional airports having fences and security gates installed 100 metres either side of

the terminal building, but beyond that anybody can walk around and access airside of the airfield. This has added cost to regional communities, for little real benefit.

If a hub system was introduced for major regional centres such as Dubbo, Tamworth, Wagga and Albury to act as hubs for flights to the capital cities, then the security need only be applied at the regional hubs. The remaining regional airports, which would feed into the regional hubs could operate as they would normally without the imposition of the additional security.

## **Principle 2 - Driver of Economic Prosperity**

**International Aviation**      No further comment

### **Domestic and Regional Aviation**

RAeS repeats its suggestion made in response to the Issues Paper that increased use could be made of a Route Licensing system. State Governments have used, and still do to a limited extent, use a Route Licensing system to ensure continuity of services to remote regional communities. In Queensland for example, services to Longreach and Thursday Island operate well and ensure continuity of service. The main regional hubs can often be operated economically without a licensing scheme, but the smaller and more remote towns are rarely sustainable in difficult economic times.

The airline industry has a history of cut throat competition, which at its best, provides service frequency and cheaper fares for consumers, but at its worst can result in cessation of services or bankruptcy of airlines. There are several recent examples such as Narrabri in NSW and MacAir in Queensland. A Route Licensing scheme, while having its drawbacks, can ensure continuity of service and a sustainable economic result for a regional operator.

Government has a role to play in ensuring such a scheme operates and continues to provide air services for the smaller regional communities.

### **General Aviation**

There remains an issue of sustainability of the recreational level of General Aviation (GA) in Australia which operates under the 'VH' or CASA jurisdiction. The booming Recreational Aircraft sector appears to be replacing it at the recreational pilot activity level. Government has an important role in ensuring the sustainability of this sector, the availability of appropriate infrastructure for it, an appropriate regulatory regime to oversee it and a means to assist transition from the existing 'VH' sector.

The remaining non recreational GA sector covering low level charter, small freight, medical and rescue services etc might still require assistance.

### **Industry skills and productivity**

There remain some significant issues about pilot training in the non recreational pilot area. There is a need to establish funding assistance for trainee pilots similar to that which exists for maintenance apprentices (under the "institutional" training model), because of the high cost of training for pilots.

A national "Central Flying School" should be investigated, using similar methods as is in the ADF – maybe even combining the two – and operated on commercial lines by either an industry

consortium (between airlines and simulator companies), a Government department (with responsibility for aviation transport), a consortium of flying training schools, or a flying training school as a response to a tender process.

The problem of the role of flying instructor being seen as just a stepping stone to a job as an airline pilot needs to be addressed. The role of an instructor is so important that it must be sustainable as a career in its own right, and be able to attract the right people who have the necessary skills, patience and teaching capability.

**Consumer protection** No comment.

## **Principle 3 - Infrastructure**

### **Aviation Infrastructure**

RAeS supports the Government's policy to support a second Sydney Airport. The current airport at Mascot is very beneficial to the travelling public in terms of convenience and closeness to the city, and should obviously be retained. However its footprint is small for the size of its operation compared to similar sized airports around the world, it has no ability to expand its boundaries, has significant noise and environmental concerns from surrounding communities and has limited ability to increase its capacity other than by continuing to increase the size of the aircraft per operating slot.

At some point in time, there will be an economic impact in Sydney and NSW, and perhaps Australia, unless capacity is able to grow. Requirement for a second Sydney airport will become critical unless the essential infrastructure planning is commenced.

## **Principle 4 - Environment**

### **Aviation Emissions and Climate Change**

There remains an issue of the industry's ability to reduce carbon emissions by utilising more efficient routes, continuous descent approaches and straight in approaches. Greater co-ordination and using 'gate to gate' flight planning could enable shorter sector times and less aircraft manoeuvring in the approach phase of flight. More efficient use of runways with more flexible LTOP targets would also assist reduction in emissions.

RAeS applauds Government's continuation of initiatives through APEC, ICAO and similar bodies to achieve regional reductions in emissions by implementation of improved and Regionally co-ordinated Air Traffic Management systems. RAeS notes and welcomes Governments intention to work towards a better understanding of aviation emissions and their impact, including through the development of tools for comprehensive carbon monitoring and footprinting. As noted in RAeS response to the issues paper, the Society believes that there is a need for a central body to provide a co-ordinated and neutral review of the often conflicting imperatives relating to this matter. RAeS with resource support from its UK offices, in particular through its work on the "Greener by Design" initiative, remains available to Government should it be decided to proceed with such a body.