



TYABB
& District Ratepayers,
Business & Environmental Group
INC: No. A044078U
PO Box 155 Tyabb 3913
Covering Watson Ward & surrounds

Logo design by Andrew Batstone

Acting President: Val Davis 0419 004 085

Secretary: Katrina Chalke 0412 292 816

tyabb_and_district_ratepayers@yahoo.com.au

27th February, 2009

National Aviation Policy Statement
Department of Infrastructure, Transport,
Regional Development and Local Government
GPO Box 594
CANBERRA ACT 2601

By Email: aviationstatement@infrastructure.gov.au

Dear Minister,

The Tyabb and District Ratepayers, Business & Environment Group supports the Australian Government's initiative in revising Australian Aviation Policy through the forthcoming Aviation White Paper.

We wish to raise two matters for consideration in the formulation of the White Paper. Firstly the management of smaller airports and airfields and secondly the adequacy of the current safety regime covering General Aviation (GA).

1) Smaller Airports & Airfields

To achieve consistency of policy and outcomes that benefit all communities we ask that the panel seriously consider the statements in the attached letter from the CASA Industry Complaints Commissioner Mr. Michael Hart of the 10th January 2008. This letter describes CASA's "Small Airports Project" which was designed to address the acknowledged problems associated with smaller airfields.

Mr. Hart described the scope and reason for the project as follows. "*CASA has been in receipt of a very large number of complaints from members of the public and industry concerning the operation of unlicensed or uncertified airstrips (Small Airstrips) around Australia*".

The letter recognises, at the highest level, that many communities throughout Australia are under siege from a range of aviation activities and that operations at small airfields require closer consideration and changes to the Civil Aviation Act to moderate the impacts of such operations.

You will note the CASA ICC advised us that:

1. Recommendations to improve the situation had been made to the CEO of CASA.
2. This was a high priority for the regulator.
3. The source of complaints was from the general public “*and industry*”
4. CASA recognised its wider responsibility to provide advice and assistance to manage the problems associated with small airports.
5. The outcome of the project was to ‘*provide a comprehensive set of guidelines to Local Government and to community about airstrips, operational safety, airstrip layout operation, flight paths noise control and similar issues. ... The outcome is therefore to provide local communities with the advice and the tools to reach agreement or controls that suit those residents and communities, a community based solution.*’

Sadly, we have heard no more of this extremely valuable initiative.

The Tyabb Ratepayers Group would welcome the incorporation of the CASA ICC’s recommendations into the White Paper.

2) General Aviation Safety Regime

A recent spate of fatal GA accidents involving both high profile aviators and light aircraft falling into or near residential areas is a cause of growing concern.

Whilst the accidents themselves are tragedies, the fact that the ATSB is not investigating most of them is worse. The ATSB excuse that these are known high risk operations or that the aircraft are homebuilt or experimental is not really acceptable and appears to be symptomatic of an erosion of the safety culture that has occurred under the deregulatory/self administration model followed in recent years.

The Melbourne Age carried the following quote from the ATSB after the recent death of well known aerobatic champion ‘Pip’ Borrmann at Shepparton on the 25th of February this year: *“The Australian Transport Safety Bureau will not be investigating the accident because the pilot was performing aerobatics at the time of the crash in an amateur-built aircraft. An ATSB spokesman said aerobatics were a “higher risk operation than flying a standard aircraft”. “We have limited resources like most organisations and we need to target the investigations that return the greatest safety benefit to the public”, he said.*

The question arises if these accidents are not investigated and the causes subsequently acted upon, how is the public to be protected from activities over which they have no control?

If the ATSB does not investigate and recommend improvements in the safety regime then who does? This is of particular concern when the aviation bodies responsible for the class of aircraft are self administered such as Warbirds (AWAL) and ultralights (RAA).

It appears that it is to be accepted that a number of accidents are inevitable and unavoidable and therefore must be accepted.

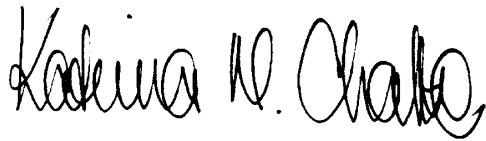
This is inconsistent policy when compared to the effort put into RPT which has near zero accidents due to regulation and surveillance.

We implore the Australian Government to resource the ATSB, or a similar body, to investigate all accidents that have the propensity to impact upon innocent bystanders.

We also ask that the ATSB be given the power to direct the regulator to take action to protect those on the ground for which the Government has responsibility and that those directions would include a move away from self administration to a model of regulation and surveillance.

In view of the acceptance by the regulator that serious issues exist at many small airfields, and the lack of any action to address these issues, we ask that the panel seriously consider the concepts outlined in the submission from the Mornington Peninsula Shire Council Tyabb Airfield Community Liaison Group as a way forward to ensure that any new policy is consistent and is applied equally across all communities, not just those around the major capital cities.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Katrina M. Chalke'. The signature is written in a cursive, flowing style.

KATRINA M. CHALKE
SECRETARY
TYABB & DISTRICT RATEPAYERS GROUP