

27 February, 2009

UNSW



JASON H MIDDLETON
PROFESSOR AND HEAD
Department of Aviation

The Honourable Anthony Albanese, MP
Minister for Infrastructure, Transport,
Regional Development and Local Government

Dear Minister,

SUBMISSION TO THE NATIONAL AVIATION POLICY

Simplifying the Fee-Help System for Australian Commercial Pilot Trainees

Summary

I submit that Fee-Help access should be made available to any Australian trainee enrolled in an integrated Commercial Pilot Licence (CPL) program, or Command Instrument Rating Multi-Engine (CIRME) program (for a CPL holder), or Qualified Flight Instructor (QFI) program delivered by any CASA accredited flight-training organisation. This process will make Fee-Help available to a larger number of pilot trainees, but does not provide further limitations to any existing training organization.

1. BACKGROUND

The training of commercial pilots is expensive, and the majority of trainees are privately sponsored, ie they have to source their own funds for training. This prevents an unknown but possibly large number of potential commercial pilots from being trained and entering the industry. This is not in the national interest, and while some mechanisms exist, these are complex, inequitable and distort the market.

This submission explores the issues by analysing the present circumstances, identifying the difficulties and proposing a simple solution. The scope of this submission concerns flight training and accreditation to Commercial Pilot Licence (CPL) standard, to the Command Instrument Rating - Multi Engine rating (CIRME) for CPL holders, and to the Qualified Flight Instructor (QFI) rating.

2. PRESENT CIRCUMSTANCES: EDUCATION AND TRAINING

Responsibilities are presently divided between State and Commonwealth, and between Commonwealth Ministries concerning Aviation (DITRDLG) and Education (DEEWR).

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2a Vocational Education and Training (VET) Sector

Key aspects of the VET sector are:

- Authority to deliver, assess and accredit certificates, diplomas etc
- VET sector has state government accreditation, within a national framework
- Flight training AOC must be accredited by CASA
- Accredited VET programs can charge for flight training and students can utilise Fee-Help for this purpose

2b University Sector

Key aspects of the University sector are:

- Authority to deliver, assess and accredit degrees, graduate certificates and graduate diplomas
- University courses and programs are self-accredited (by virtue of Commonwealth Acts)
- Flight training AOC must be accredited by CASA
- Fee structures for undergraduate degrees comprise Commonwealth Supported Places (CSPs) and personal student contributions (HECS)
- Universities cannot charge for flight training as part of an undergraduate degree under CSP rules (but can for postgraduate programs)
- No new full fee undergraduate places are permitted under present Commonwealth policy

2c Commercial flight training organizations

Key aspects of the commercial flight -training sector are:

- Authority to deliver flight training if accredited by CASA
- Students cannot access Fee-Help for flight training unless courses are VET accredited

2d CASA

Key aspects of the CASA responsibilities and authorities are:

- Assess and accredit pilot licences, and accredit training organizations (which can be VET or university sector or other commercial organizations)
- Determine syllabi for PPL, CPL, ATPL, QFI, CIRME, etc
- Conduct and assess theory examinations and flight tests
- CASA has sole responsibility for pilot licensing

2e Inequity and market Distortion

The above arrangements do not provide equity and distort the market, the core issues being:

- All flight training (no matter what organization) must be CASA accredited, but Fee-Help for flight training only applies to the VET sector or postgraduate university sector
- Students attending commercial flight training organisations (accredited for flight training by CASA) are disadvantaged because they cannot access Fee-Help in general for flight training costs

- Students attending university and enrolled in undergraduate degrees (accredited for flight training by CASA) are disadvantaged because they cannot access Fee-Help for flight training costs
- The market is distorted through some universities building postgraduate programs in flight training despite actually not having CASA accreditation for flight training in order to filter funds to their favoured commercial training organisations
- The market is not equitable because the fundamental CASA accreditation to deliver flight training does not automatically guarantee students support through Fee-Help.

3. PROPOSED SOLUTION

The complexity and distortion can be addressed by a simple solution, specifically applicable to flight training for CPL, for CIRME (for CPL holders), and for QFI (for which a CPL is a pre-requisite). The solution is that Fee-Help access should be made available to any Australian trainee enrolled in an integrated CPL program or CIRME program (for a CPL holder) or QFI program delivered by any CASA accredited flight-training organization. Importantly this solution makes Fee-Help available to a larger number of pilot trainees, but does not provide further limitations to any existing training organization.

Administrative Structure

Administratively this will require coordination between Commonwealth Departments (DITRDLG and DEEWR), but will not require any new complex State/Commonwealth arrangements. The process might be simply outlined as follows:

1. CASA accredited organisations (approved for integrated CPL programs, CIRME programs and QFI programs) apply to the Fee-Help Office for registration of programs for the purposes of Fee-Help for those students enrolled in integrated CPL programs and CIRME programs.
2. The Fee-Help office (in DEEWR) will seek confirmation of training accreditation status of applying organisations from CASA, and register such organizations which meet the criteria for Fee-Help purposes.
3. Students of Integrated CPL programs, CIRME programs and QFI programs at registered organisations apply directly to Fee-Help for support.

Kind regards



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