



AIRCRAFT OWNERS AND PILOTS ASSOCIATION OF AUSTRALIA

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"The right to fly without unnecessary restrictions and costs"

National Aviation Policy Statement

Response to Issues Paper

AOPA is pleased to have this opportunity to submit our views on the formulation of a National Aviation Policy.

Although AOPA is on the whole more representative of General Aviation, our membership includes pilots and aircraft owners from all sectors of aviation. We therefore consider our views of the wider aviation community also relevant. Airlines recruit the majority of their Pilots and Engineers from the General Aviation community. Without a healthy General Aviation industry, Flying Training Organisations cannot provide the numbers of pilots necessary for our growing airline need, a situation approaching crisis point, at the moment.

We have endeavoured to put a balanced point of view to all the questions raised, within our expertise.

1 The Australian Aviation Industry

1.1 INTERNATIONAL SERVICES

Key Challenges

1. Do Australian international air services policies serve Australia's national interest and balance the need to have Australian based industry with robust competition from International competitors?

The current system has worked favourably for the industry. Competition is necessary for a healthy balance between the needs of the travelling public and the tourism industry. An open skies policy however, although providing initial savings for the travelling public, will result long term in services and frequency diminishing. Overseas operators will service only the more profitable routes. This can only harm the Australian Airline industry loss of employment in the airline industry has to be considered against a short-term tourism gain.

2. What should our negotiating priorities and approach be in the future?

It is important to insist that all carriers operating into Australia comply with International Civil Aviation Organisation (ICAO) standards. The difficulty is in ensuring carriers adhere to these standards, CASA does not have the personnel to carry out checks and if the country of registry does not voluntarily comply with ICAO then CASA cannot guarantee compliance. Third World countries establishing low

ALL MAIL – PO BOX 26 GEORGES HALL NSW 2198 OFFICE – HANGAR 600 PRENTICE ST BANKSTOWN AIRPORT NSW 2200

TELEPHONE +61 (02) 97919099 FACSIMILE +61 (02) 9791 9355 EMAIL mail@aopa.com.au

International Council of the Aircraft Owners and Pilots Association

Pacific Regional Office for IAOPA

cost carriers are a concern. Voluntary compliance with ICAO standards needs to be the criteria, for operating within Australian territories. We already have one international charter company operating aircraft registered in 'flag of convenience' countries within and to and from Australia.

3. How might the Australian Government continue to develop improved competition and access to services while maintaining appropriate levels of aviation safety and security?

Countries such as China and India are driving the expansion of the airline industry. Development of more efficient aircraft and increased frequency will have a significant impact. Australia needs to negotiate access to this growing market while insisting on ICAO compliance. This market segment will grow as traditional European markets decrease.

Australia continues to expand its international air services relationships

4. How will new routes, technology and business structures change the profile of Australia's aviation market?

The number of carriers will grow and increase the risk of non-compliance to ICAO standards. This poses a risk to Australia's travelling public and must be addressed. Australia needs to apply diplomatic pressure to strengthen ICAO.

5. Given Australia's evolving aviation sector, to which markets should the Australian Government seek improved access?

Access to major international centres where fast ground transport is available to enable passenger transport to the major cities. Regional centres are not viable for major International operations.

6. How might the Australian government ensure all international airlines flying into Australia maintain the highest safety standards?

CASA spot checks can establish a pattern of non-compliance, where discovered diplomatic pressure should be used on the relevant Government of the country of registry. Continued non-compliance can be dealt with by denying that operator access to Australian airspace.

7. How might the Australian Government most effectively monitor and enforce safety standards of airlines that lease aircraft rather than operating their own aircraft?

Once again ICAO compliance needs to be strengthened and non-compliance dealt with as per our comments in question 6.

8. How might access to Australian destinations outside the four major gateways of Sydney, Brisbane, Melbourne or Perth be increased?

By providing good ground transportation, minimal airport charges and adequate security.

9. What role could State Governments and communities have in attracting foreign and Australian airlines to Australia's smaller international airports?

Better ground transportation, promotion of tourism and facilitation of accommodation development.

10. Should Australia continue to pursue an “open-cargo” policy for dedicated cargo services?

Yes.

11. What cost-effective strategies could be employed to avoid delays in the transport of time-sensitive air freight?

Improved customs handling, via a priority system would be a good start. Freight Forwarders are generally on the ball and endeavour to get the freight to its destination as quickly as possible, customs delays are the greatest issue.

Access to Australian markets

12. Are the current restrictions on foreign airlines accessing the domestic market appropriate?

Very few countries allow “Cabotage”, restrictions are appropriate, expecting domestic carriers to compete with foreign international carriers who pick the best revenue routes can only result in reduced domestic services and loss of jobs in the industry.

13. Should we be encouraging more international airlines to operate from Australia to third markets?

This is a purely commercial decision for the international airlines, the Australian Government should not be involved in their commercial decisions.

Facilitation and border control

14. How might existing Australian airport infrastructure best adapt to the challenge of processing large influx of passengers?

15. What are the implications of expanding international operations at secondary airports, including for border security?

16. Should Australia seek to limit international airline and charter operations to a defined set of international airports to ensure affordable border security?

AOPA has no comment on the preceding 3 questions

1.2 DOMESTIC SERVICES

Key challenges

17. Does the deregulated domestic airline market remain the best model for delivery of Australia’s interstate air services?

The system has worked to provide a safe and economical travel for the public, the present domestic carriers are providing broad service coverage, although escalating fuel costs may have a detrimental effect and result in reduced services.

18. Are there any constraints on the ability of Australian-owned airlines to remain competitive with foreign-owned airlines in the Australian market?

No

19. Do the existing criteria strike the right balance between allowing Australian airlines to access global investment markets and promoting an Australian-based aviation industry?

Yes, although the current turmoil in the financial markets could change the balance into the future, Australian carriers are generally well managed and competitive and provided they remain so will have access to reasonable finance.

1.3 REGIONAL AND GENERAL AVIATION

Key challenges – regional air services

20. What should be the basis of government and industry policy towards air services to regional and remote communities?

Remote and regional centres are dependant on air services for economic, social and often medical access to the major centres. Air services are as important to communities as roads, ports and rail, for which federal funding is available. These communities should not be disadvantaged through lack of government support. There should be assistance provided to local councils for aerodrome maintenance. If necessary, subsidies should be provided, to enable continuation of vital air services. The previous government's flawed approach, selling off taxpayer funded valuable aerodrome infrastructure has resulted in loss of services to many communities to allow non-aviation commercial development. Thus a short-term gain for the developer has been at the expense of aviation facilities development and the community as a whole. This needs to be corrected.

21. Are security and safety measures adopted for major capital city trunk routes appropriate for regional and remote services?

No – the financial cost of these services for the small passenger numbers are not warranted.

22. If not what alternative measures could be adopted?

The Department in question has failed to realise that security needs to be tailored to suit the centre, adopting similar systems to those used in major centres does not work. The end result is a “feels good, does nothing and costs the earth” situation and is an expensive waste of money and resources for all involved. Assess and put in place only as much security as the traffic volume and risk requires.

Key challenges – General Aviation

The recreational sector has grown in recent years, with over 4,000 recreational/sport aircraft, and over 1,000 gliders and 4,000-plus single engine, private and business aircraft and a further 4,000 aircraft used in commercial operations. General Aviation is a large section of the aviation community, and while the recreational side continues to grow, the traditional GA sector is in decline. The reasons for this can be attributed to over-regulation, the less onerous regulatory requirements that are helping the recreational sector to grow need to be applied to traditional GA. Further exacerbating the decline in GA is the lack of infrastructure, selling off aerodromes, closing aerodromes and allowing capital city secondary (GAAP) aerodromes to be sold into private ownership. The resultant pricing policies of these owners has forced closure of countless small Flying Schools and engineering facilities and driven private owners out of aircraft ownership.

We need a coherent policy on aerodromes, quarantining of any further sell-off's must be a priority. Setting aside land for aerodrome development and planning is imperative if the future pilot and engineer supply problem is to be addressed.

CASA needs to adopt a more proactive, less punitive role in its dealings with general aviation. The safety of the paying public should be its major concern, CASA seems to concentrate too much effort on policing general aviation, re- writing Airworthiness Directives issued by manufactures and the US Federal Aviation Administration (FAA) for example, rather than passing them on as written. New Zealand has adopted a modified version of the US Federal Aviation Regulations (FAR), and as a consequence general aviation in NZ has reduced costs, and their industry is buoyant, while ours, weighed down by repressive regulation, is declining. Adoption of the FAR's and in particular the USA system of engineer licensing would enable more people to take up aircraft engineering as a career, at present the average of our Licensed Aircraft Mechanical Engineers is in their mid fifties.

A viable General Aviation industry is essential for the health and expansion of aviation in Australia.

23. How has micro-economic reform impacted on general aviation businesses and what strategies need to be put in place to ensure that access to airport infrastructure does not impede industry viability and growth?

The monopoly given to private airport owners has resulted in charges that are not sustainable for the aircraft owner. With the major GA airports near capital cities now being operated by private companies, the financial imperative is to provide a return to their shareholders. This has resulted in these airports being operated in a manner that does not have the best interests of the aviation community at heart. Closures of cross-runways and taxiways to facilitate commercial development for example, the siting of commercial buildings that impact on Instrument Flight Rules (IFR) approach procedures are presenting a serious safety risk. Commercial decisions are made without consideration of the risks associated with a training environment. Imposing commercial rental charges that relate to nearby commercial parks, without taking into account the restricted nature of aviation business, is detrimental to the industry and driving maintenance providers out of the industry.

To enable General Aviation fleet renewal government support is essential to reduce costs at GA airports. The average age of GA aircraft are 30 plus years, lack of taxation incentives and high airport charges the major factor in preventing fleet replacement.

To enable General Aviation to meet Australia's future pilot training needs, some incentives are required, such as a moratorium on airport charges for at least the next 5 years, security of tenure and reduced rental/lease charges; these are all needed if the industry is to survive. Pilot training needs to be subsidised, government assistance in the form of a HECS style scheme needs to be considered. It is beyond the capacity of most young school leavers to undertake pilot training, when the ultimate cost is in the order of \$150,000.00 to Airline Transport Pilot Licence (ATPL) standard.

Most flight training, approximately 85 to 90%, is conducted at the secondary airports and yet these are the very airports the previous government sold off. This must cease immediately, as previously stated a moratorium on all airport sales must be put in place. Working with Local and State government, the Federal government must guarantee these valuable infrastructure facilities. The privatisation and

commercialisation of these airports has not worked, government assistance is now required to rectify this situation and provide stability for the general aviation industry.

24. Do the needs of general aviation operators warrant any changes to airport regulatory and planning arrangements?

A supervisory body needs to be established to maintain a check on airport operators to ensure compliance with the needs of general aviation and flying schools, e.g. control site placement of buildings to give adequate clearance from operational areas, sufficient parking/tarmac areas, taxiway access and runway and taxiway lighting suitable for the training role.

25. How can general aviation operators, particularly small businesses, establish viable business models that allow them to take advantage of current buoyant conditions in the aviation market?

Reducing the cost of compliance by CASA would enable the small operators to expand their operations. The up front cost of gaining licences and approvals necessary for flight testing and training inhibits many operators from expanding, these need to be waived or considerably reduced., in addition to rent, landing fees (Airservices Australia and aerodrome owner), maintenance and fuel.

Another major constraint is the need to become a registered training organisation, duplicating in a slightly different form all that is required by CASA, to a state based bureaucracy that knows nothing of aviation.

26. In particular, how do these businesses meet the increased cost of skilled labour and improve recruitment and retention of their skilled workforce?

Reducing cost of compliance is the first step; there needs to be an appropriate wage paid to ensure retention of Flight Instructors. This is difficult to achieve with the punitive cost structure under which the flight schools have to operate. Government assistance for flying schools and reduced compliance costs are needed.

27. What role should all levels of government have in protecting secondary airport infrastructure and in providing for new infrastructure?

As previously stated, monitoring of airport owners to ensure compliance and economic fairness for airport users and to ensure building development does not impinge on operational safety. All certified and registered aerodromes should be required to meet a community service obligation to provide facilities to general aviation in the same way that the highways are not restricted to large commercial vehicles.

28. How can the general aviation industry provide the necessary investment to renew the ageing aircraft fleet?

The small general aviation operator, burdened by high cost of compliance and safety issues has not always been a good business manager. Often burdened by limited financial ability, the cost of replacement parts and engine overhaul provisioning are not budgeted for, but dealt with as and when necessary. Aircraft replacement as a result is not considered. Tax incentives would seem to be the logical consideration and is normal practise in some industries and a viable incentive to replace aging aircraft.

29. Is there a role for governments?

Yes there is a role for government, both financial and advisory, along with tax incentives and even low interest loans, this would help overcome the problem.

30. Are additional measures required to ensure the continued safe operation of aging aircraft?

Aircraft age is but one of many safety considerations and needs to be considered as part of an overall strategy. Aircraft manufacturers are monitoring the effects of corrosion on these older aircraft, continued vigilance by engineering organisations to the effects of corrosion and fatigue is necessary, and cost effective procedures for rectifying corrosion and fatigue in aging aircraft, need to be developed.

It is important that CASA does not continue its trend of requiring unique Australian expensive solutions, that are more strict than manufacturer and/or overseas authorities require, to keep the ageing aircraft fleet flying safely.

1.4 ADDRESSING SKILLS NEEDS IN THE AVIATION INDUSTRY

Key challenges

31. What strategies should the industry adopt to attract, retain and plan for their future skills needs to remain competitive in a tight labour market, and how can these be improved?

To utilise the skills available, we need to open up career paths within the aviation industry. Impediments are placed in the path of those capable, but bogged down by regulation. A suitably skilled technician should be able to obtain a US-style "Airframe & Powerplant" license rather than our convoluted LAME qualification, which takes years to acquire. Adequate salaries need to be paid to all sectors, Flying Instructors need a structured career path with stable employment and government assisted training courses to ensure sound aviation knowledge.

32. What are the long-term training needs for the Australian aviation industry?

Commitment to the immediate problems of training pilots and engineers will ensure long term needs are met. Consideration needs to be given to air traffic controller recruitment and training.

33. Where will the future pressures lie?

Shortage of Instructors will be the major concern. Accessing the skills of those Instructors approaching retirement to train younger instructors will need to be given priority. Foreign owned flying schools have absorbed many Australian instructors to train their future pilots, which has left too few instructors to meet the needs of Australian airlines. We have become the training ground for our competitors.

34. How do we ensure the industry remains internationally competitive in retaining key staff and in attracting new entrants to the workforce?

As previously stated in 31

35. How should the Australian Government and industry work together to ensure the needs of the aviation industry are taken into account in its broader skills framework?

Introduction of a HECS based programs to fund training along with industry internship and apprentice programs. Remove the state based duplication and make CASA the accrediting authority for the registration of aviation training organisations.

36. Are proposals such as a national industry run flying school to train flying instructors worth investigating and, if so, how might such a school operate?

The skills shortage is beyond industry based programs, industry can contribute, but the main driver behind resolving the skills shortage, is government assistance and funding of programs. As previously stated the introduction of HECS style assistance is vital for the long term, health of the industry. Since CASA has to approve training providers, this should be broad based and not just confined to Registered Training Organisations. See Q 25 & 35.

Australia needs to recognise that recreational/private flying training and commercial/professional flying training are different; most other countries accept that distinction. The UK CAA example could be adopted, allowing for self-regulated flying training, for Private Pilot Licence, with CASA regulated training for all professional licences and ratings.

A national school to train chief flying instructors (CFI) would ensure a uniform and high standard, whether this be a government funded organisation, or a combination of industry and government, it would need to be run as a non-profit organisation. The airline industry would be the main beneficiaries and industry funding providers.

The skills shortage will get worse as Pilots and Engineers retire, airlines are introducing more aircraft into their fleets and competition from overseas airlines offering higher salaries only exacerbates the situation. The government needs to act now before the industry reaches crisis point.

2 AVIATION INFRASTRUCTURE

2.1 Airport planning and development

Key challenges

Land use planning and development approvals at major airports

37. Are the planning and development mechanisms under the Airports Act working effectively?

No.

38. How can we improve consultation with State and local authorities and with the community?

By developing a policy that recognises the need and benefit to a community of airport infrastructure, and recognises that a chain of airports with fuel is as necessary as a national highways system. The need for a similar policy has been identified in Canada:

“General Aviation Aircraft, because of their size, require relatively more frequent stops for fuel and therefore require a system of airports, strategically placed across Canada in order for this mode of transport to be safe. A look at a map of Canada indicates that the loss of CYAM would leave a significant hole in the infrastructure, in terms of a full-service airport to serve General Aviation needs. Safety and convenience would be compromised with the demise of this airport”
http://www.copanational.org/non-members/FeedbacktoFeds/FeedbacktoFedsGAPolicy_b.htm.

39. Could the regulatory regime better facilitate genuine long-term co-operation between airport operator companies and state and local governments on land use planning?

Privatisation of airports will always create a conflict of interest, aviation interests are sacrificed for financial gain by private owners. Planning airport land use needs to be controlled by one independent body, to remove the conflict generated by state and local government relationships with developers. A community service obligation must be imposed on aerodrome operators. An analogy would be the sale of the Hume Highway without guarantees that it would be available to all users at a fair price.

40. How can we better integrate investment on airports with the funding and construction of improved road and rail links to and from our airports?

Airports should be integrated within the transportation group, airports are a valuable part of our transportation infrastructure.

41. What mechanisms might be used to ensure an effective ongoing dialogue between airport operators and their local communities?

There will always be a conflict of interest between private airport owners and local communities, publicising the benefits of jobs and community based aviation such as RFDS, medivac, fire-fighting and similar activities does help.

Non-aeronautical development on airport sites

42. How can the regulatory regime better ensure non-aeronautical developments do not compromise the aeronautical requirements of airlines and airports?

By providing a supervisory body with the power to oversee airport compliance and enforce sanctions/fines for non-compliance.

43. How should the potential commercial impact for off-airport competition be taken into account in planning on-airport non-aeronautical development?

This should not be a government concern; the primary purpose of an airport is to provide aviation services. Should the airport operator choose to undertake non-aviation commercial development he must accept the commercial risks involved.

Safeguarding" Australia's key airport infrastructure

44. How should guidance be formulated for airport operators and others about public safety zones for locations at significant risk of on-the-ground fatalities from aircraft operations?

Risk analysis planning and assessment carried out by competent consulting organisations should be able to provide guidance.

45. How can the mechanisms for guiding development around airports be improved to ensure potential issues from aircraft noise are fully addressed in planning?

By including, in any development application, the requirement to consult with the local airport authority as part of the planning process.

46. How can we better ensure that off-airport developments subject to state and local government planning regimes, such as tall buildings, do not compromise the safe and effective use of aviation infrastructure?

By requiring all development applications to be submitted to an aviation authority to ensure approach and departure profiles are not compromised and the application to be rejected if it compromises safety. Develop a standard suite of local laws available for adoption by all local authorities with a 'cost' to those that go their own way.

Future airport needs

47. How can future airport needs best be addressed, recognising the importance of airports as an element of the national economic infrastructure?

A commission needs to be set up to review the future airport requirements. The terms of reference should include planning for international airports, capital city airports suitable for General aviation, passenger and freight operations, regional airports, as well as remote area airports. This commission should also include ground transportation systems.

48. What are the current and future pressure points in relation to airport capacity?

Capital city airports such as Sydney are reaching their capacity limit noise curfews further limit their capacity.

49. Can the growing use by civil aviation of joint user or Defence owned airports be safely and effectively accommodated?

Yes, Richmond in the Sydney basin could relieve pressure on Sydney airport; Holsworthy, also in the Sydney basin, is little used by the army and could provide a valuable joint user training airport for general aviation.

50. How can the protection of the communities around airports from undue aircraft noise best be addressed as demand for services continues to grow?

The lower noise footprint of newer aircraft will help, restrictions on housing development near future airports is essential.

Pricing of airport services

51. As the aviation industry grows and changes with the advent of low cost carriers and other innovative service providers, should changes be made to the regulatory framework for the pricing of airport services and monitoring of service quality?

Yes.

52. Is there sufficient transparency in the setting of charges for services at those airports that are not subject to price or quality of service monitoring?

No – government oversight of charges and service quality should apply at all airports.

2.2 AIR TRAFFIC MANAGEMENT

Key challenges

Australian Air traffic services are not being approached from a service/user orientation. Management of air space should be based on a benefit/safety basis for

all users. General aviation is disadvantaged by the present philosophy of tailoring airspace to suit commercial interests of one specific group; the roll back of NAS, for example, was detrimental to many airspace users to suit the requirements of regional airlines. This commercial approach has done nothing for safety, on the contrary, and Australia has once again taken a unique non-ICAO approach.

53. How can Australia's air traffic management system best take advantage of new and emerging satellite navigation technologies?

ADS-B is the approach being taken in the USA. Although there appear to be significant advantages, government policy needs to recognise and ensure that any system implemented in Australia is also compatible with systems used by the USA and other major aviation countries. The implementation needs to take into account the effect on all airspace users. The cost of implementation should be borne by Airservices Australia, as they will be the beneficiaries of huge financial savings against an upgraded radar system. The time required for sourcing and installing equipment into the airspace user fleet needs to be taken into consideration and a more reasonable time frame may be necessary rather than that presently proposed.

54. What is the role of government in the take up of the new technologies?

Ensure that new technologies benefit all user groups and provide financial incentives for their introduction. Consultation with all user groups, ensure no disadvantage to any group through bureaucracy, or introduction of technology not readily available or unique to Australia.

55. Are there any regulatory impediments to maximising the use of new and emerging surveillance and navigation technology?

Yes, the usual regulatory blockage of endless enquiries with pre-conceived agendas

56. How do we enhance both air traffic management safety and capacity and efficiency?

By ensuring all members of the aviation community have access to airspace, on a fair and equitable basis for training, general and en route A to B flying. The airspace cannot be set aside for the sole use of the airline industry. The training of pilots within all airspace is an important issue for safety and efficient use of airspace.

57. How effective have Australian regulatory agencies been in pro-actively assessing the Australian air traffic management system and setting clear risk-based safety and efficiency outcomes requirements, having regard to international developments?

The airspace is not well managed in that it has not followed ICAO and is therefore not compatible with international practise. GA aircraft are regularly denied access to controlled airspace by application of separation standards that are personally determined and conflict with the separation required by the rules, particularly in D airspace. Pilot's risk being delayed and even prosecuted if they attempt to operate under the published rules as the effective manager of air traffic services is the air controllers union, not Airservices Australia management.

58. Are we effectively aligning airspace classifications and the level of services and facilities provided to reduce risk to passenger transport operations?

No, an attempt has been made to tailor airspace to suit one group in the name of safety, with no evidence to support that assumption. Controllers regularly impose

standards of separation exceeding those described in the airspace description distorting any study of airspace classification.

59. Can we better identify risk factors?

Yes through wider consultation with all user groups.

60. How do we ensure the development of Australia's air traffic control systems is compatible with global and regional systems?

By referring to methodology used in other countries with considerably greater air traffic volumes and by insisting that the controllers accept a similar cultural change to that which has been imposed on pilots.

61. How can Australia's air traffic management development be aligned with broader policy considerations such as national security and the environment?

National security and environment considerations are difficult to resile where government policy is still evolving and should not impinge on air traffic and safety procedures.

62. What steps need to be taken to ensure the retention, training and future supply of skilled air traffic controllers and associated professionals?

Salary levels need to be comparable with those paid overseas.

63. What should a national air traffic management plan cover and who should be responsible for its development and implementation?

Air traffic management should be looking to improve existing systems and designing the airspace to suit all users rather being airline-centric. To achieve this wider consultation is required with all aviation industry groups. AOPA is a member of, and supports, the ASTRA peak body and the ASTRA ATM Strategic Plan.

3 AVIATION SAFETY

3.1 Safety regulation and regulatory reform

Key challenges

64. Are there ways in which the approach to Safety Management Systems could be enhanced?

Safety Management Systems would require voluntary implementation by general aviation and recreational aviation. These entities have neither the facilities nor financial capability for implementation, therefore education and training will require programs developed for voluntary participation. The airlines and professional aviation have already programs in place. Government-promoted training and education assistance should be made available. Legislating for safety does not work; including safety management attitudes within the training environment would be a good start.

65. Should the governance arrangements for CASA be strengthened to better support the role of the safety regulator?

No, CASA has far too much power, what is needed is for CASA to take on a role similar to the FAA and be more proactive in encouraging aviation development. The police/punitive approach of cancelling Air Operator's Certificates (AOC,) forcing operators into bankruptcy while procedures are still before the courts has no place in a democratic society. CASA resources are too heavily concentrated on policing general aviation more emphasis needs to be placed on promotion of safety via seminars giving advice and assistance to operators who do not have the resources to help them comply with safety regulations. Adding a further layer of bureaucracy only increases costs while having little impact on safety.

66. How can CASA strengthen the way it relates to industry while meeting the community expectations of a firm regulator?

Consultation with industry groups such as AOPA, more staff in the field. CASA does not have the respect of industry as many of their managers and staff, are well known within the industry, which has lost confidence in them.

67. 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?

The Australian government needs to appoint a dedicated Minister for Aviation. The present Ministry encompassing infrastructure, transport, regional development and local government devalues the aviation industry, is too convoluted, with little capacity for minister overview. That the regulatory reform has become bogged down through constant change does not help. The present ministerial system is not helping the reform process. Adoption of a modified form of the FAR's as New Zealand has done would be a step in the right direction and give certainty to the aviation industry.

68. What changes could be made to improve how Australia's aviation safety agencies work together?

The appointment of a CASA Board to oversee management is essential. These agencies have to work together to produce the best flight environment for the flying public and aviation industry from both a safety and efficiency criteria.

69. What steps can the aviation industry as a whole take to ensure it maintains safety standards as it grows and diversifies?

Safety is the responsibility of management - this includes CASA. Board members and CEO's within the aviation industry should be held accountable for safety outcomes.

70. What steps should be taken to ensure Australia maintains a high standard of aviation safety in the context of global developments?

Review of global practices in comparison with those in use in Australia, implementation of those practices that will contribute to enhanced safety.

71. What issues should a 21st century aviation regulator be focussed on?

With the developing new technologies it is important to ensure regulations follow best practice and are in tune with the major aviation nations. Flying training assistance to ensure adequate pilot numbers to meet future needs, preservation of

existing general aviation infrastructure and development of new infrastructure (airports) to enable general aviation growth

72. Is self-administration a key factor in the growth of recreational aviation?

Implementation of “self administration” has been successful within the Gliding Federation of Australia, War Birds and Recreational Aviation Australia; however this has not necessarily delivered lower costs. The growth of these sectors of aviation can be attributed more to the relaxation of the strict rules and regulations imposed by CASA on other sectors of the industry. CASA has an oversight role, but needs to clean up the regulatory framework before handing over the administration of General Aviation.

73. Is there more scope for some parts of the industry to self-administer?

See 72 but not under the current convoluted and over complex legislation

74. What are the opportunities and risks for the industry, regulators and the community in greater ‘self-administration’?

The opportunities to lower costs and encourage growth through “self administration” cannot be realised unless funding is provided to the extent of the saving to the regulator in not performing the administrative tasks concerned. Risk assessment would require evaluating overseas experience and statistical data from the Australian groups presently “self administering”. CASA still has an oversight role, which would mitigate risk to a certain degree. The type of operation envisaged for “self administration” poses very small risk to the wider community.

4 CUSTOMER AND COMMUNITY PROTECTION

Addressing the impacts of aviation

4.1 Aviation emissions and climate change

Key challenges

75. What practical steps can the aviation industry take right now to reduce greenhouse gas emissions?

- *Improved traffic flow via a more efficient ATC.*
- *Pilot training to minimise delays from start up to take off along with flight operations that emphasise the most efficient use of fuel.*
- *Introduction of more fuel efficient aircraft in the airline industry and development of diesel technology for light aircraft.*

76. Are carbon offset schemes enough?

No.

77. What measures should the aviation industry be taking in the short-medium term to reduce emissions, such as clean engine technology and clean aviation fuels?

See answer to 75.

78. Given the international nature of aviation, what opportunities are there to minimise greenhouse emissions and trade emission permits through emission trading schemes?

Minimal.

4.2 Aircraft Noise

Key challenges

79. Could the ANEF system be improved or be supplemented by other planning tools to better explain the impact of aircraft noise?
80. Should State and local governments play a greater role in aircraft noise management?
81. What should be the responsibilities of airports?
82. Should emphasis be given to airport/community partnership approaches, for example, based on locally negotiated agreements rather than generic legislative approaches?
83. Can techniques for sharing information on aircraft noise impact be further developed to improve the supply of information to potential property purchasers and other affected parties?
84. Which airports in Australia need to remain curfew free and under what conditions?
85. Can operations at airports be better managed to ensure the community is protected while at the same time providing for night time access?
86. How effective are the current noise enquiry and noise complaint services?
87. Are there more effective ways to deal with people's complaints and requests for information?
88. Can the services be better provided?

AOPA has no comment on the preceding 10 questions

4.3 Consumer Protection

Key challenges

89. Are existing consumer protections and airline procedures adequate in dealing with these challenges?
90. Is it possible to improve passengers' travel experiences without adding unnecessary costs to airlines that would inevitably need to be passed on to all passengers?
91. How can airlines ensure passengers are appropriately informed about restrictions?
92. Furthermore, are existing airline terms and conditions reasonable?

AOPA has no comment on the preceding 4 questions

4.4 Disability Standards

Key challenges

93. Are the current Transport Standards adequate to ensure the removal of discrimination from air travel?
94. Are there recommendations arising from the recent Transport Standards Review that might be implemented to improve services for people with a disability?
95. Are current complaint and compliance mechanisms effective?

AOPA has no comment on the preceding 3 questions

4.5 Compensation Arrangements In The Event Of An Accident

Key challenges

96. Are Australia's domestic arrangements for passenger and baggage/cargo liability appropriate in the context of international developments, including the Montreal Convention?
97. Is there a better system or model for compensating people?
98. Are the minimum insurance standards appropriate?
99. Should the system be extended to require insurance for third party surface damage?
100. Does the aviation industry face any difficulties in accessing appropriate levels of insurance to cover their potential liabilities?
101. Is the voluntary Family Assistance Code an appropriate measure to ensure airlines meet their responsibilities in the event of an aviation accident and to what extent are airlines complying with the Code?

AOPA has no comment on the preceding 6 questions

5 AVIATION SECURITY

Key challenges

102. Could Australia improve its approach to protecting air travellers from threats while facilitating quick and efficient travel?

No, delays are inevitable, current security measures are in line with other major aviation states.

103. How can we improve the system to improve both security outcomes and passenger facilitation through airports?

More screening facilities, better trained personnel able to better assess the risk factor; there seems little point in subjecting an 80 year old lady to a full body pat down because she has had a hip replacement. Security screening at small GA airports, fencing and other costly infrastructure where there is no measurable risk is an expensive waste of resources. Holders of ASIC cards should be expedited as they are already security cleared

International developments

104. Is enough information available for passengers to make well informed choices before they travel in order to comply with security requirements?

Yes, generally the public is well informed on security requirements.

105. Can more be done at our international airports to assist passengers to comply with security requirements?

Information at the point of ticket sale would help this information needs to be available in various languages, as does information prominently displayed at the terminal in the various languages of the travelling public.

106. Should more be done at airports where passengers leave for Australia to make clear our own security requirements?

Yes, as well as security, quarantine information needs to be given far greater emphasis.

107. What can be done by government and industry to achieve greater international harmonisation of aviation security measures?

More consultation with security organisations from other major aviation states will ensure uniform approach to security measures.

Threat

108. Should aviation security remain the key focus for government and industry?

No.

109. Should more attention be paid elsewhere?

110. Is enough being done to enhance security in the aviation sector?

111. Are we thinking broadly enough about the likely threats we may face and how they may be countered?

Security issues have been very expensive for the aviation industry, we have achieved a level of security, but further expenditure will do little to improve our present level of security.

Efficiency and costs

112. Could government spending on security be spent more efficiently?

Yes, money has been wasted on security measures at minor airports that do not achieve any real level of security and that do not have any recognisable threat. The need for a student pilot to hold an ASIC card has put a four to six week delay into the training schedule and is far beyond what is required in the USA at that level.

113. Could more focussed security measures provide a higher level of security?

Possibly, but this would have to be very specifically targeted. To our knowledge no 'terrorist' or person with malicious intent has been fined under the aviation security regulations but many otherwise law-abiding persons have been fined for failing to wear a pass. From our perspective the concern to appease the Federal policeman or Departmental inspector has alienated the aviation community and rendered it less willing to co-operate. To use Lyndon Johnson's analogy the current rules and policies have forced GA outside the tent costing the government a valuable surveillance asset.

114. Could the requirements imposed on industry be changed to achieve similar security results at less cost, or greater security at the same cost?

The costs are distributed on a user pays principle, in some cases the duplication of some security requirements eg. AVID and ASIC cards, has served no purpose other than to increase costs. Why is a Maritime Security Identification Card valid for five years whereas the aviation equivalent must be renewed every two years, with associated costs.?

115. Is the current charging regime for provision of security screening services equitable between major metropolitan airports and regional airports?

116. Should alternative arrangements be put in place?

AOPA has no comment on the preceding 2 questions

Growth and industry development

117. Whether current passenger security screening requirements based around jet aircraft should be extended to non-jet aircraft of similar capacity, speed and weight?

Yes, the risk factor is the same.

118. Is the security infrastructure at airports adequate?

Yes, all major airports have robust screening.

119. The current focus of the aviation security system is regular passenger transport services. Should it be extended to include aircraft providing, for example charter services?

No, there is no evidence of risk from this area.

120. Should the cost of aviation security at particular airports be more evident to passengers?

Yes

121. Could industry manage its costs more effectively?

No, security issues are dictated by external factors.

Technology

122. Should we introduce new technologies for passenger screening that can improve processes even if they are more invasive or costly?

Only if the technology does not violate the personal privacy or dignity of the individual.

123. Biometrics is an effective way to manage access arrangements at airports and an improvement on current practice. Is there value in introducing biometrics into Australia's airports for people working there?

Yes, where they can be shown to be cost effective and more efficient.

124. Should we expect the same security technology standards from all airports regardless of location, the traffic levels at the airport, and the costs?

No

Passenger experience

125. How can we improve/optimize passenger screening arrangements within Australia?

126. Should special arrangements be put in place to enable frequent travellers who understand security requirements, often business travellers, to move through passenger screening more quickly?

127. What type of special arrangements, if any, would be appropriate?

128. Do we adequately address the requirements of people with special needs?

129. Are we consistent enough in the delivery of services to passengers?

AOPA has no comment on the preceding 5 questions

Legal requirements

130. Is the current regime too heavy handed?

Yes we have many documented cases of pilots flying into an aerodrome then after proceeding 'groundside' being denied access to their aircraft by 'security guards'. This would not be tolerated in other areas.

131. Could it provide a similar level of protection while reducing demands on passengers, industry and workers?

Yes

132. Are the legislation and regulations in need of simplification?

Yes

Air cargo security

133. Has enough been done to enhance air cargo security?

134. Are there alternative approaches to air cargo security that should be examined?

135. Is the Australian approach to air cargo security consistent with the highest international standards?

AOPA has no comment on the preceding 3 questions

Identity and background checking

136. What can be done to improve the robustness and timeliness of background checks, particularly for applicants from overseas?

Better communication between security agencies overseas.

137. Should the ASIC eligibility criteria be further strengthened?

No, the present system is adequate efficiency however needs to be improved. Requirements for student pilots should be relaxed as per USA.

138. What should be the relationship between 'background checking' of staff, and access control arrangements?

139. Should background checking be extended to include managers/directors of companies with employees who hold an Aviation Security Identity Card?

Yes

Submitted with the authority of the Board of Directors, Aircraft Owners and Pilots Association of Australia.



Tim Blatch
Chief Executive Officer
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