

DARLINGTON
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June 26, 2008

The Secretary
Department of Infrastructure, Transport, Regional Development and
Local Government
Canberra ACT

Issues paper: Towards a National Aviation Policy Statement

This is a personal submission from a private pilot (ARN 125559) with nearly 40 years' flying experience. I have limited my response to areas in which I have a particular interest.

Security: The security measures undertaken at capital city airports were a reaction by the previous Federal government to events in the United States. No security breaches on domestic services were, to my knowledge, identified in Australia. Neither, in contradiction of the Issues Paper assertion, is there any evidence of specific terrorist threats to aviation. However, the cost and inconvenience to thousands of air travellers at no gain to safety is a cause for concern. The only advantage from the security clampdown appears to have been a financial one – to fencing contractors and private security companies. The regulations are draconian, and can easily be flouted, as exemplified by the intrusion of intoxicated louts on to a commercial aircraft (Perth) and the media (Sydney). Savings can and should be made by abolishing the security procedures on all domestic flights. No alternative measures should be adopted.

New category for General Aviation: The growth of the recreational sector has created unprecedented pressures in General Aviation. The recognition of RAA (Recreational Aviation Australia)-qualified pilots trained in a cheaper flying environment has created a fall-off in GA ab initio training. The central issue here is the comparative cost of maintaining aircraft in the ultralight and GA spheres. While GA is saddled with similar regulatory complexities to those which apply to commercial aircraft, recreational aircraft are relatively freer of regulation, which is reflected in lower operating costs. Consideration should be given either to creating a new category of aircraft licensing/operation, or to the extension of an existing category (perhaps RAA or Experimental), to cover mainstream GA aircraft and enable them to compete with their ultralight cousins in a self-administration environment. In this way a seamless progress from ab initio to more advanced training could be made in an economically competitive atmosphere, thus increasing the number of pilots trained and reducing the costs pressures on GA training organisations.

Airport infrastructure: Governments can help to protect secondary airport infrastructure without direct subsidy by using their planning authority to limit non-aviation development on existing airports, and/or by directing that as a condition of their lease, airport operators must channel a proportion of income generated by non-aviation activity to the provision of aviation services. The creation of new infrastructure has been tackled successfully by the Western Australian government through its Regional Airports Development Scheme. This is basically a dollar-for-dollar partnership between the State government and local authorities or organisations to provide prescribed additional facilities and upgrade existing facilities.

Updating the GA fleet: I learned recently of an innovative plan to provide non-government finance for new aircraft. A Pilbara mining company wanting to provide a fly-in, fly-out service for a small number of employees was unhappy with the age of aircraft used by a local small charter operator. It offered to provide finance for new aircraft on terms which satisfied its own requirements and resulted in the eventual ownership of the aircraft by the operator. The financial arrangements were such that the operator gained guaranteed utilisation and a fair dividend during the term of the agreement.

HECS for pilot training: Finance is the greatest barrier to young people seeking professional qualifications in aviation. The extension of HECS to cover these people would provide a reliable, ongoing supply of pilots.

Use of military airfields: Defence-owned airports occupy ground- and airspace which would better serve the Australian population as civil airports. There is no operational requirement for the military to base itself around capital cities; any foreseeable threat to Australia's security is likely to come from the north. The relocation of the RAAF from Pearce, Edinburgh, Richmond and Amberley to existing bases in the north of Australia would provide an instant and established network of civil bases to cater for increasing traffic loads. Additionally, the economies of communities at or near these expanded bases in the north would benefit.

IFR charges: Consideration should, on safety grounds, be given to zero-rate charges for GA aircraft flying under the IFR. Charges levied on commercial aircraft can be spread by imposing a nominal increase in fares; the owners of private aircraft must pay the full amount themselves. This should be seen as a disincentive to using the ATC service, with possible negative ramifications.

If you would like to contact me, I am available on xxx or [email](#) supplied.

Yours faithfully,

Tony Rees