



Royal Aero Club
of Western Australia (inc)



Towards a National Aviation Policy Statement

A submission by:

The Royal Aero Club of Western Australia (inc)

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1. Introduction

The Royal Aero Club of Western Australia (Racwa) is a not for profit organisation, delivering flying training, instructor training, aircraft hire, charter services and aircraft engineering services to its members and the general public. Racwa has undergone many changes in its business focus since its inception in 1929. Today, the mission of Racwa is to “promote flying training to the highest standards; provide quality aviation activities and facilities for its members; and fosters the involvement of the broader community”. Racwa provides these services under certification from the Civil Aviation Safety Authority.



Racwa is one of the largest flying training organisations in Australia with regard to hours flown per year. We have over 40 aircraft on the flight line and offer one of the largest and best selections of aircraft anywhere. Our team of both Ground and Flight Instructors are highly motivated and experienced. The Club has a modern multi-million dollar training facility, including an upstairs lounge, café and licensed bar.

In order to promote aviation in WA, Racwa organises regular flying competitions and flying outings. We also encourage training in Aerobatics, Formation Flying, Night Ratings and Tail Wheel Endorsements. Our students can also benefit from our Advanced Training section that has its own Flight Simulator and a choice of twin-engine training aircraft.

On the 21st May 2008, Racwa acquired the Western Australian Aviation College (WAAC). The acquisition of the WAAC enables Racwa to teach aviation theory, establishing it as the industry leader in pilot training within Australia and internationally.

Racwa is the only flight training organisation to hold approval to conduct European (JAR) Flight training in Australia.

Based at Jandakot Airport in WA, Racwa has been training pilots for almost 80 years and now employs over 100 staff. It is a not-for-profit organisation operating for its members.

Whilst Racwa is a member of the Royal Federation of Aero Clubs of Australia (RFACA), Racwa holds its own views in a number of areas related to General Aviation in Australia – views that are not necessarily consistent with those of the RFACA.

It is Racwa’s view that the RFACA in the main represents smaller Aero Clubs across Australia (Racwa’s annual flying hours represent some 60% of the total hours flown by all RFACA members) and hence offers views that support smaller operations but are not necessarily consistent with the broader requirements of General Aviation across Australia.

As one of the largest pilot training organisations in Australia, Racwa is compelled to put forward a submission in its own right.

Racwa therefore provides this submission making comment on the various elements of the document “Towards a National Aviation Policy Statement”. It does so by commenting only on those areas in which we believe we have influence and expertise.

2. Comment on Section 1.3 – Regional and General Aviation

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

In order to ensure that there is a consistency of standards and policy application across the General Aviation community, the same vigour that is applied to metropolitan communities should also be applied to regional and remote locations. For too long now, there has been a variation in standard in key areas of safety and security in these communities – to the ultimate detriment of the industry.

It is only by the consistent application of standards that the General Aviation industry will keep pace with the requirements of the industry both nationally and globally.

Are security and safety measures adopted for major capital city trunk routes appropriate for regional and remote services? If not, what alternative measures could be adopted?

Yes. As mentioned above, consistency is essential. Hence, security and safety measures adopted for major capital city trunk routes should also be applied to regional and remote services.

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

Not unlike the previous response indicating a need for consistency of policy and therefore standards, so to there is a need for a more consistent standard of infrastructure in regional and remote locations. Indeed, in many cases, considerable investment is required if safety standards are to be consistently applied across the entire aviation network.

There is an immediate need to dramatically increase the level of funds available in the Regional Airports Development Scheme (RADS). Additionally, the 50/50 split of investment needs to be reviewed with a greater skew of the funding towards the government and away from the industry. It is only by this vehicle that immediate improvements will occur.

It is crucial that 100% funding is available for sustainable infrastructure development. Regional Airports are as essential a part of the nation's infrastructure as the roads that connect them making government support essential.

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

This element is partially covered in 1.4 Addressing Skills Needs. Put simply, the General Aviation industry needs to adopt a more commercial approach to the operation of the businesses it controls. However, given the vital nature of General Aviation as a feeder into the broader Aviation community, government support is essential to ensure the ongoing development of the industry.

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

As indicated previously, government has a key role to play here. It is only by configuring the RADS system to meet the needs of Regional airport infrastructure that improvements will occur. Without this level of support, Regional airports will continue to deteriorate in infrastructure standards and the safety of their operation.

How can the general aviation industry provide the necessary investment to renew the ageing aircraft fleet? Is there a role for governments?

The age of the fleet in the General Aviation community is a matter of growing concern.

With ever increasing cost of operation with a reduced ability to recover these increased costs from the end user, there is an every decreasing level of investment in new fleet.

The increasing age of General Aviation fleet brings with it an increasing concern in terms of safety. Additionally, without an investment in new fleet, General Aviation reduces its ability to feed the broader Aviation community – a community that is operating in an increasing complex operating environment.

Therefore, incentives to support the investment in new fleet by the General Aviation community are essential for maintenance of safety standards and the sustainability of technical skills in the industry.

Tax relief is only a partial solution as profit levels are low creating minimal additional benefit. It is only through tangible subsidisation of the investment costs that the industry will invest in the new fleets it so desperately requires.

Are additional measures required to ensure the continued safe operation of ageing aircraft?

Whilst measures could be considered here, the emphasis must be on providing incentives for General Aviation to invest in new fleet. Indeed, any system that supports General Aviation retaining ageing aircraft is counter-productive.

3. Comment on Section 1.4 – Addressing Skills Needs

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?

This is a complex issue, one that faces most industries of the modern business era. However, there are a few aspects of the General Aviation industry that apply unique pressures to it:

- In order for the flight training industry to attract and retain flying instructors, the role needs to be seen as a career path. One of the prime reasons it is currently not seen in that light is the remuneration levels. Whilst some in the industry are now paying higher rates to flying instructors, even these higher rates do nothing to attract pilots to the role as a career goal;
- Even at the above rates, industry struggles to get a return on the employment costs invested. Whilst commercial logic suggests passing these costs on to the end user, the cost of flying continues to grow putting it further out of reach for those choosing this industry as their career path;
- There is a high cost for individuals wishing to achieve the various qualifications. In order to achieve even the first level of GR3, a flying instructor has invested considerable money and, in doing so, achieves a level of remuneration that cannot adequately repay the debt;
- There is a solution to this issue – albeit that it pushes the boundaries of current conceptual thinking. Put simply, if the industry is to attract pilots and flight instructors, the costs of doing so must be able to be funded by some form of HECS/Fee Help style system – for all levels achieved. To clarify, if an individual could fund all costs in achieving levels up to a Flight Instructor Grade One, the industry would attract individuals across all of society and not be skewed towards the wealthy end of the socio economic spectrum. This dramatic expansion in the pool would have an immediate and ongoing positive effect on the industry.

What are the long-term training needs for the Australian aviation industry? Where will the future pressures lie? How do we ensure the industry remains internationally competitive in retaining key staff and in attracting new entrants to the workforce?

In addition to the above, the industry is in serious need of doing more than just improving flying skills. Whilst the flying skills within the General Aviation industry in Australia continue to achieve the high standards required, the industry makes no investment in professional development.

If the General Aviation industry is to continue to develop and meet the standards of an increasingly complex business environment, it must invest in the professional development of those that work within it.

However, as distinct from the previous issue which demands investment by individuals, this issue demands investment by the organisations that work within the industry – investment that the industry would struggle to afford at the moment.

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?

Whilst the previous responses relating to investment in training both for individuals and for organisations indicate a need by industry to undertake these investments, the current operating costs of flying schools will make any contribution towards costs difficult.

The Australian Government has a role to play in providing funds to support an investment in training:

- HECS/Fee Help for individuals as per the recommendations on the previous page;
- Subsidisation of costs by organisations prepared to invest in professional development of their personnel.

The effects of the above will be sustainable improvement in the size of the pool of individuals entering the industry (through a HECS/Fee Help type scheme) and a sustainable improvement in the professional skill set of the industry (through subsidisation of professional development costs).

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?

Racwa is totally opposed to this concept on the basis of a number of grounds:

- It imposes a high cost impost on the flight training industry. Even if subsidisation of costs either partially or totally was proposed, these costs need to be recovered from within the confines of the industry. In an environment where the costs continued to increase at concerning rates, the industry simply cannot afford the costs associated with centralisation;
- The concept suggests that consistency of flying instructor skills is an issue throughout the industry. It ignores the considerable investment by the industry in Competency Based Training (CBT), a concept designed to produce a consistent skills set without imposing the significant costs of a centralised flying school.
- Rather than centralising, investment could be made in providing a consistent CBT syllabus. Indeed, Racwa would gladly participate in providing input and expertise in this field. The outcomes from this would be a consistent tool set and education process ensuring more consistent standards across the industry;
- The concept ignores CASA's recent investment in ensuring consistent testing standards. This would appear to be an ideal model to work in conjunction with a nationally consistent syllabus. Nationally consistent training methods and material combined with nationally consistent testing standards must surely produce a more nationally consistent skill set amongst the pilots achieving the various qualifications.

As additional background, Racwa has been running an instructor training school for a number of years now and continues to produce a consistently high quality of instructors as a consequence. Indeed, Racwa produces somewhere around 25-30 new instructors each year through this programme.

4. Comment on Section 3.1 – Safety Regulation

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

General Aviation must become self aware in this area. Rather than merely complying with regulations in this most crucial of fields, General Aviation needs to adopt an attitude of complete ownership of sustainable Safety Management Systems.

Government support in the form of specific systems (rather than broad guidelines) would assist those operators who do not have the technical skills to adopt their own systems. Making suitable tools available to the industry will enable General Aviation to concentrate on proactive safety management rather than merely acting with compliance.

Hence, rather than a suite of templates, a complete flexible Safety Management Toolkit needs to be developed and made available to the industry. This must include training packages aimed at developing ownership of proactive safety management.

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

Yes, but only if this produces a proactive mindset. Governance is not the issue, nor is compliance. CASA needs to assist in developing understanding and the development of a proactive mindset by General Aviation not merely demanding compliance without investing in the training and development of the industry.

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

This is a significant challenge for CASA. Racwa supports the need for CASA to be a firm regulator. However, CASA needs to adopt a far more proactive approach to industry communication.

Whilst accepting that CASA has a significant role to play in ensuring adherence to safety standards, new initiatives from CASA will be far more successfully implemented by industry if there is buy-in on the concept from industry itself. Indeed, as mentioned above, ownership will be far more successful teacher than a demand for compliance.

This can only be achieved by industry consultation well in advance as distinct from the all too often compressed compliance deadlines implemented in the past.

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 response here is not dissimilar to the response above. Regular industry workshops on issues, initiatives and regulations being considered would be both welcomed and supported.

Whilst new concepts will not always be endorsed, if they are approached with the necessary background logic, industry understanding and ownership will be developed as distinct from industry resistance.

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

Racwa is not in a position to comment on this issue other than to say that there needs to be a high level of communication, interaction and cooperation between the ATSB and CASA.

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

Again, regular consultation between the regulator and the industry is called for here. As mentioned previously, regular industry workshops on issues, initiatives and regulations being considered would be both welcomed and supported.

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

Given the global nature of this issue, Racwa is not in a position to comment on this issue.

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

Australia has an outstanding global reputation for its aviation safety standards and practices.

It is essential that Australia not only monitors would best practice it needs to evolve beyond those levels.

Therefore, it is essential that Australia adopts a position of leadership on air safety not merely an adopter of world's best practice elsewhere.

Is self-administration a key factor in the growth of recreational aviation? Is there more scope for some parts of the industry to self-administer? What are the opportunities and risks for the industry, regulators and the community in greater 'self-administration'?

Self administration will not deliver a proactive attitude towards Safety Management.

The issue at hand here is not compliance, it is ownership – the need for industry to adopt a proactive attitude towards Safety Management Systems.

Refer above response to:

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

5. Comment on Section 5 – Aviation Security

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

Racwa supports the need for continued focus in this area.

Whilst the timeliness is in need of improvement, the need for a robust checking system remains paramount.

Should the ASIC eligibility criteria be further strengthened?

Yes. Indeed, if further strengthened, ASIC eligibility can become a preeminent form of identification.

However, it is essential that a focus on timeliness is maintained.

What should be the relationship between ‘background checking’ of staff and access control arrangements?

Access control arrangements need to be strengthened and enhanced – especially outside the key major city airports.

A consistent approach to security is essential across the industry.

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

Yes. If ASIC is to become a preeminent form of identification, it needs to be applied to all employees in the industry.

Indeed, this very approach would assist in ensuring a much stronger emphasis on access control arrangements with the ASIC become an essential element of all regulations in this area.

6. Contact Point within Racwa

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