

## National Aviation Policy Statement Response to Issues Paper

Thank you for the opportunity to express my views on the formulation of a National Aviation Policy. I believe I represent a good cross section of participants in the Aviation Industry and in particular pilot training. Over a period of 43 years I have accumulated some 23,500 hours extensively flying on 3 continents in a multitude of aircraft types and under various regulatory systems.

Having read most of the submissions already published I will confine myself to a couple of specific points as I am otherwise in agreement with the submissions made by both the AOPA and Guild of Air Pilots and Air Navigators, Australian Region.

### THE AUSTRALIAN AVIATION INDUSTRY

Since its inception, the industry has been the backbone of transport to remote areas, early pioneering spirit allowed the innovative Australian character to flourish and not until bureaucracy took over in the late 60s led by an influx of ex airforce pilots (excellent pilots but poor regulators) and career bureaucrats (even worse regulators) did the rot set in. The series of name changes to deflect negative attention from a gullible public put the last nail in the coffin. Today we are faced with the results of mismanagement by not only CASA but a series of Ministers of either persuasion. We have a monopoly commercial enterprise (CASA) able to regulate purely for income albeit using the “safety” banner to hide behind.

Considering that Australia has gone through a phenomenal growth phase in the last decade it is [surprising] that the General Aviation sector has suffered such a demise. The reasons for this have already been identified [as CASA] by the other contributors, but in all fairness some of it is due to a (Western) cultural change in that the former attraction as a “dangerous” past-time has all but disappeared having become mundane and not as challenging. The danger being transferred due to 9/11 as now a risky career. The closely allied IT industry has also taken over as the job of a modern pilot is now as computer operator/observer and then there are the multitude of activities on which to spend the disposable dollar!

### AVIATION INFRASTRUCTURE

Nationwide, Australia was provided with excellent “landing” facilities, many government-owned and operated with access [in later years] through a single GAIT charge. Today many of these facilities are privately-owned and each has landing and parking charges. Considering that over the years, participants in the industry paid for all these facilities through a fuel excise, to then suddenly be confronted with a “toll” for the use of the same facilities is grossly unfair !

The 99 year lease of the [secondary] airports barely considered industry submissions. The influence of the “developers”, as observed daily in all sectors, won out. The Airport Act 1996 plus the actual lease document when compared to the “commercial site leases” forced on airport tenants, make up about 10% [by volume] This illustrates the onerous conditions now imposed. To quote from the Airport Act 1996

The objects of this Act are as follows:

- (a) to promote the sound development of civil aviation in Australia;
- (b) to establish a system for the regulation of airports that has due regard to the interests of airport users and the general community;
- (c) to promote the efficient and economic development and operation of airports;
- (d) to facilitate the comparison of airport performance in a transparent manner;

Who is there to enforce the implementation? The respective Ministers have never paid any heed! CASA wouldn't know which GA operator to charge!

A solution to the Airport Leases would be the outright sale of those areas regarded as “commercial non-aviation” to the present [developer] lease holders, the subdivision of Aviation related lots and direct sale or lease to current sub-tenants and the formation of a “Runways/Taxiways entity leased to the aviation industry. The current tenant and sub-tenants would get freehold finally allowing normal financing of their premises and businesses. This would allow the developers to shed their supposedly non-profitable operations and allow employment of airport staff by a new entity operating in the interest of industry stake holders.

The Melbourne 2030 Plan, developed by “professional town planners” does not mention any new landing facilities around the area. This indicates either a lack of foresight or a concerted effort to exclude General Aviation.

## AVIATION SAFETY

This would have to be the greatest “cop out”. True Australia is by international statistics a safe aviation country, but take out its benign climate and low traffic density and its standing becomes mediocre. You cannot regulate for Safety. Safety is both a culture of good training and experience. Regulatory oversight in Australia has become a major “safety hazard” akin to watching out for that hidden “speed” camera [possibly why it is referred to as a Safety camera in some states] The vast majority of pilots respect life and act accordingly. No amount of regulation will stop the “idiot” from acting irresponsibly.

CASA and its predecessors have spent over a decade supposedly rewriting the regulations when all they had to do was adapt either the FAR's (USA) or the EASRs (Europe) but in compliance with the “law of Parkinson” they are reinventing them to suit Australia's unique conditions. The same for re-writing of all the Airworthiness directives. It demonstrates a certain level of “immaturity”.

Safety would be well served by retaining talent within the industry. By allowing experienced pilots to continue teaching after they have been found to be “medically unfit” – strangely these same people can instruct in the recreational sector without a medical in virtually the same type of aircraft. Both the FAA and EASA make appropriate allowances and work to a more acceptable (less primitive) standard.

The recreational and private sector should be allowed to train to an acceptable modular system applicable to both and allowing transition from one to the other. Strangely enough CASA will accept licence holders from other nations who may have trained entirely on recreational aircraft yet Australian pilots trained to a similar standard will not be accepted.

Australia is the only country which will not allow a properly qualified instructor to teach outside of an Approved Flying School. Again this restricts flight training in a lot of rural communities due to such an onerous requirement. We have a lot of talent ready to go if only the system would permit.

## CUSTOMER and COMMUNITY PROTECTION

Aircraft Noise: A definite problem for those living in proximity to a flight path. Considering though that as the majority of residents moved in to an area after an airport was established this becomes a self serving point. In many European countries such noise complaints are now registered on a property title to warn future purchasers – the number of complaints have dropped but off course the problem has not disappeared. Modern aircraft are quieter and it is up to pilots to comply within better aircraft performance parameters – often a rather lax point.

## CIVIL AVIATION “SAFETY” AUTHORITY

I find it of interest to note your warning:

If you believe that the information you provided in response to this invitation:

Σ is, or should be, confidential; or

Σ disclosure of this information would unreasonably affect your personal privacy; or

Σ disclosure of this information would unreasonably affect your business affairs;

to those submitting a response, as it is so in keeping with the attitude of some of those in CASA as to instigating immediate reprisal action. I speak from extensive personal experience during the period 1999 to the present.

Thank you for the opportunity to make this submission,

Yours sincerely

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