

Aircraft Operations
Aviation Environment Branch
Department of Infrastructure, Transport, Cities and Regional Development
GPO Box 594
CANBERRA ACT 2601

19th Nov 2019

Dear Sir/Madam,

In response to your Issue Paper dated September 2109 dealing with a review of the Air Navigation (Aircraft Noise) Regulations 2018 – Specialised Aircraft, please accept the following submission as representing the views of the Sport Aircraft Association of Australia (SAAA).

Our organisation is the primary organisation supporting the interests of the owners and builders of VH registered Experimental Amateur Built (EAB) aircraft in Australia. SAAA Authorised Persons (AP) holding a CASA Instruments of Appointment issue Special Certificates of Airworthiness (Experimental Certificates) for our member's new EAB aircraft under the provisions of CASR 21.191(g). CASR 21.191(g) EAB aircraft are permitted to be flown for private and recreational purposes only. Current practice is that EAB aircraft are routinely issued by your department with an authorisation to engage in air navigation without a noise certificate

I offer the following appraisal of the noise impact of CASR 21.191(g) EAB aircraft in respect to the "Terms of Reference" raised in your Issue Paper:

- (a) the characteristics, nature of these aircraft operations, as appropriate, and their impact on noise exposure, including:
- (i) size, weight and design Are typically light two or four seat aircraft
 - (ii) type of use (e.g. recreational, commercial, special category e.g. emergency services); Only permitted to be used for private and recreational purposes
 - (iii) operational height and location e.g. industrial/residential/rural/remote areas; Similar to other GA aircraft
- (iv) total number or movements per day and per hour, duration and time of flights (day/night); Typically a low number of flight hours/year (e.g. less than 50 hours/year)
- (v) technological developments; and
- (vi) noise characteristics including sound level, tonal qualities and number of noise events. Similar to other noise certificated GA aircraft
- (b) the relevance to noise regulation of the aviation safety regulatory requirements and exemptions provided under the Civil Aviation Safety Regulations 1998, administered by the Civil Aviation Safety Authority (CASA); Permitted by CASA to operate without noise certification
- (c) the community acceptability of noise impacts of these types of aircraft especially in built up and residential areas; Very low noise impact due to very low hours flown.

From the above it is clear that it is considered the extent to which CASR 21.191(g) EAB aircraft exceed the noise standards is insignificant. The fact that they are routinely issued authorisations to engage in air navigation without a noise certificate attests to this fact.

In order reduce administrative burden and cost on our organisation and members associated with the regulatory process of seeking routinely issued permissions to operate without a noise certificate", I hereby urge amendment of the Air Navigation (Aircraft Noise) Regulations 2018 to exclude aircraft operating with an Experimental Certificate issued under CASR 21.191(g) from the provision of the Act.

Kind regards,

Geoff Danes CASA.IOA.0155
National Technical Manager & National Councillor

Sport Aircraft Association of Australia (SAAA)

Plan Wise – Build Well – Fly Safe



**SPORT AIRCRAFT ASSOCIATION
OF AUSTRALIA**