AERIAL APPLICATION ASSOCIATION AUSTRALIA

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Director, Aviation White Paper Project Office
Aviation White Paper
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594
CANBERRA ACT 2601

By email: aviationgreenpaper@infrastructure.gov.au

Dear Director,

AAAA Submission – Aviation White Paper – Green Paper Feedback

Thankyou for the opportunity to further contribute to the development of the aviation white paper. The Aerial Application Association of Australia (AAAA) represents more than 300 operators, pilots and associated businesses involved with aerial application across the agricultural and aerial firefighting sectors. This submission should be read in conjunction with the numerous consultation sessions the AAAA and its members have participated in throughout the white paper consultation process. It summarises a number of key concepts that we believe would be worthy of consideration in the final drafting of the white paper.

Considerable previous analyses, reviews, policy development, and submissions have been made by and to the government on the issue of aviation policy. Overall, the green paper has provided a starting point for analysis; however, at its core, there are not sufficient meaningful and pragmatic steps in the near term to progress towards the outlined goals.

The aspirational nature of the document is to be applauded. To become a truly useful document driving change in the right direction for the Australian aviation sector and the economy at large, we strongly encourage the government to outline clear, actionable steps in the near term to ensure a meaningful foundation is established before pursuing the more aspirational goals of the document.

Transition to a Net-Zero Operating Environment: In particular, the government should outline the support it will provide to smaller businesses operating in General Aviation in Regional areas to transition to a net-zero operating environment. The economic realities of Sustainable Aviation Fuel (SAF) mean that it will simply not be financially viable for these businesses, and the impact on agricultural production will be significant. We encourage the government to invest in trials and research with small GA operators in regional areas to ensure there are no unintended consequences of the larger goals and to gain a genuine understanding of what will be required to achieve its goals.

Most of the aerial application fleet in Australia is turbine-powered, meaning that they are well-positioned to take advantage of the potential environmental benefits of SAF, and this should be acknowledged. The Green Paper as it stands alludes to the general aviation industry being an outdated legacy fleet that will have challenges in contributing to net-zero goals. These generalisations run the risk of showing a lack of understanding of the industry, and we again urge the government to invest in economic and emissions studies, including an analysis of aircraft use compared to ground-based equipment to gain a deeper understanding of the realities that exist across the sector. For instance, in the aerial application context, a modern turbine-powered aircraft can generally spread fertiliser or spray crops at much lower emissions per hectare compared to ground-based equipment. The downstream benefits of increasing yields in the agricultural context at lower emissions levels should be considered.

The Current and Evolving Value of the Aerial Work Segment: The white paper should make clear reference to the contribution of aerial work as a distinct segment of the aviation industry. The contribution of aerial work to agriculture and emergency services is significant, and a comprehensive study of aviation's input into these sectors should explore the full economic value, including downstream positive impacts and productivity improvements.

While economic studies related to general aviation have previously focused on the income and expenditure of GA businesses, a comprehensive economic study of the downstream benefits provided by the aerial work sector to other parts of the economy should be undertaken. This should include agriculture, forestry, mining, aerial firefighting, and other emergency services activities.

Researchers have recently developed econometric models to estimate the value of aerial application in the United States, with initial estimates of the value to agriculture at $37 billion USD. Although the size of the Australian industry is much smaller, a similar study of the downstream benefits provided by the aerial application and broader aerial work sector to all segments would provide valuable information for policymakers, regulators, and the broader industry to understand the total economic benefit of the aerial work sector to the Australian economy and inform the allocation of resources to the sector.

The Skills Shortage, Education, and Qualifications: There are overarching concerns surrounding the shortage of skilled aviation workers across the entire supply chain. To address this issue, it is essential to develop a comprehensive plan that supports all segments of the industry in recruiting and retaining the necessary workforce both now and in the future.

Creating incentives and providing support for workers to remain in regional areas and work in aviation operations, particularly in aerial agriculture and firefighting operations, will be of critical importance in enabling the industry to meet emerging demands in the future. The government should also consider implementing initiatives to attract skilled workers from overseas to fill seasonal capacity shortfalls that exist today.

To achieve this, the government should streamline the process of recognising foreign licenses, experience, and qualifications, and offer simplified working visa options for skilled workers. This could help alleviate some of the pressure on the industry and ensure that operators, maintenance organisations, and other aviation-related businesses have access to the workers they need to operate effectively.

More broadly, the relationship between the ASQA frameworks, student funding, and CASA's international obligations in delivering ICAO-compliant licence outcomes and competence needs to be comprehensively reviewed, and steps taken to harmonise these areas. Further to this, the Industry Skills initiatives of the government should be further reviewed to ensure all elements of the industry have appropriate representation on the Jobs and Skills Councils to ensure that the work conducted is truly representative of what is required at the frontline of the industry and in particular, regional areas.

Maintenance and supporting elements within general aviation are of critical importance to the ongoing sustainability of the industry, as well as the downstream sectors and communities supported by general aviation. The white paper should outline steps to ensure that the future maintenance environment for general aviation, particularly in regional areas, is simplified, and businesses are financially incentivised to remain or expand into regional areas. This could include support such as grants and offsets for these small businesses.

With regards to regulatory reform, it is critical to ensure that any new maintenance regulations do not escalate costs or introduce complexity that is not required, and that they are harmonised wherever possible with key partners globally.

Government Policy and Regulatory Environment: Ensuring that regulatory bodies and safety agencies, such as CASA and the ATSB, are continuously evolving to meet the needs of the aviation industry is crucial. It is important to limit regulatory intervention to cases where it is necessary to maintain industry standards and safety for the travelling public. This should include having regulatory settings in place that consider the risk profiles of sectors that have a limited safety impact on the travelling public. A modern, contemporary regulator with the necessary capabilities and skills should be the goal, and concrete actions to achieve this should be outlined in a clear and actionable manner.

Given the rapid pace of technological advancements and disruptive elements within the industry, it is of utmost importance to have a regulatory environment that can adapt at all levels of the organisation to appropriately manage the level of oversight required without placing undue burden on the industry. Failure to do so may result in investment in the industry being stifled, which could have dire consequences. The white paper should, therefore, emphasise the importance of having a regulator that can support innovation while appropriately managing the unintended consequences that may arise when introducing innovations into the system.

From a general aviation and particularly aerial work sector policy perspective, the work of the General Aviation Advisory Network (GAAN) is particularly informative, including their white paper submission. AAAA strongly supports the role of the GAAN and its policy recommendations and it should remain a central advisory pathway for the government.

Further, the ASAP and associated TWGs should remain a key component to ensure that current and contemporary knowledge is included within the discussion in the design and reform of various regulatory documents and settings. This should be combined with ensuring that CASA has contemporary expertise in the elements of the industry being regulated, and when this experience does not exist then expertise must be sourced from within the industry to provide the input required to design effective solutions that focus on real outcomes that do not increase the regulatory burden on the sector without commensurate gains in productivity and safety.

Regulatory interventions must have a pragmatic lens applied that clearly considers the impact on all segments of the industry, while also clearly being able to demonstrate real benefits, not benefits defined in a theoretical construct.

Relating to CASA, the white paper should ensure it specifically addresses the following:

- Utilise industry expertise in the design and ongoing oversight of various sectors. In particular, CASA should increase cooperative programs and approaches with industry peak bodies such as the AAAA. These organisations hold both a significant body of knowledge about real-world current risks and operating realities, as well as having an interest in increasing the safety and sustainability of the sectors they represent.
- Continue CASA's GA Workplan initiative, seeking to reduce administrative overheads wherever possible and minimise delays in decisions and approvals that have an impact on GA operations, investment, and business decisions.
- Ensure CASA is resourced appropriately – including contemporary technical, regulatory, and management expertise to support practical regulatory decisions and advice to general aviation that is relevant, timely, and of a high standard.
- Ensure a focus is continued on service improvement to ensure timely processing of requests so as not to increase the financial burden already on small businesses operating in the sector.

In conclusion, the AAAA again reiterates the importance of a holistic approach to aviation policy, balancing environmental sustainability goals with safety, economic growth, regulatory flexibility and workforce capacity. AAAA is committed to fostering a thriving aviation industry in Australia, one that embraces innovation, safeguards safety standards, and ensures the ongoing health of the various other segments of the economy that the aerial application sector supports.

We look forward to continued collaboration and positive outcomes for the future of Australian aviation.

Yours Sincerely,

Nat Nagy

CEO