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Mr Jason Dymowski
Assistant Secretary

Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594 Canberra, ACT 2601

Via email to aviationwhitepaper@infrastructure.gov.au

Australian Helicopter Industry Association (AHIA) Submission on Aviation White Paper Terms of Reference

Dear Jason

Thank you for the opportunity for the AHIA to participate in the Terms of Reference for the Government's Aviation White Paper.

The AHIA is a not-for-profit company that represents companies and individuals conducting business in civilian helicopter operations in Australia. Our members range from large multinational fleet operators to single aircraft owners and a host of ancillary businesses which support the industry with goods and services. Our Board comprises a national network of respected business leaders who have made significant contributions in leadership to improving regulatory oversight, effectiveness and safety in our sectors through collaboration with the Department, CASA, Airservices and ATSB. After USA, at around 2300 aircraft Australia boasts the second largest fleet of rotor winged aircraft. There are some 4500 rotor winged pilots and the industry growth has seen a consistent progression for the past 3 plus decades.

Our member operations span:

- Low-Capacity Services including charter and scenic/joyflights
- Freight and Delivery Services
- Marine Pilot Transfers
- Aerial Photography
- Airborne Law Enforcement, Surveillance, Search and Rescue
- Aeromedical Services
- Airborne Communications
- Aerial Application including Firefighting and Agricultural
- Helicopter Aerial Work including mustering, spotting, dropping, animal control, frost protection, powerline stringing and cleaning, slung loads, rappelling , winching and hoisting
- Aerial Survey
- Training
- Recreation
- Private and Business Travel

Importantly these services effectively constitute much of the Australia's sovereign emergency service capacity in response to natural disaster events including bushfire and flood relief as well as everyday critical services for urgent medical transport in addition to accidents and disasters.

AHIA is a respected member of Helicopter Association International and regularly participates in their International Partner Program.

This submission leans heavily on AHIA's participation in the GAAN , TAAAF and RAAA member collaborations and the supporting documentations are attached.

Terms of reference

Purpose

AHIA supports the formation of long-term policy direction for aviation, considering future trends, growth and innovation which ensure an efficient, safe, sustainable and competitive aviation sector in support of our economy and way of life. Understanding that policy should embrace all stakeholders interests AHIA requests appropriate consideration of the importance of our rotor wing community for the economy and way of life of all Australians as highlighted above.

Scope and themes

- aviation's role in economic development, trade and the visitor economy – general, domestic, regional and international aviation

AHIA through participation in the General Aviation Advisory Network is aware (from our last meeting 7 March 2023) that BITRE is undertaking a review of the economic value of general aviation sectors to the economy. This will be warmly welcomed by our association and industry. Our economy is heavily dependent on primary production for which livestock, grain and horticulture rely on vital rotor wing services for their production. Our economy and communities rely on the life-saving capability of the emergency services provided for medical and accident transportation and the protection of lives and assets from floods and fires. The economic impact of bushfire mitigation is a massive consideration.

- how to maximise the aviation sector's contribution to achieving net zero carbon emissions including through sustainable aviation fuel and emerging technologies.

AHIA understands the need to manage climate goals and the pursuit of alternative and renewable energy targets and it is encouraging to see very recent progress with SAF and electric propulsion. The industry is anxious to embrace the development and implementation of these advancements where practical but it is likely to be some time before these realities are widespread given the geographic remoteness of our operators amongst other factors.

AHIA will welcome broad input from Government, industry and our international allies in this process.

- changing aviation technologies and ways to position our policies, regulations and systems to encourage uptake and manufacturing of new, more efficient, transport technologies.

The advancing technologies are inevitably going to reshape our aviation industries and many of our members are keen to embrace these changes supported by AHIA. However, there remains some uncertainty about what the future looks like and the time intervals before these technologies are commercialised and operational.

- airport development planning processes and consultation mechanisms that consider the impact and changing nature of aircraft noise and related expectations on the role of noise sharing and noise mitigation.

The AHIA has historically encouraged members to operate in a community friendly manner in respect to noise and manufacturers have sought to continually improve noise reducing technologies and design characteristics. Emerging propulsion technologies will influence these expectations in time.

- how to support and regenerate Australia's general aviation sector.

Rotor wing aircraft operators are a vital component of our GA sector and as such significant users of the system as it relates to regulation, infrastructure and airways. Regional communities particularly rely on GA so policy makers need to ensure operations are efficient, competitive and fair. Much of GA is characterised by aging aircraft (and pilots) for which the associated costs and availability of components remains an ongoing threat to regenerating GA. Reform of GA-specific rulesets imposing unnecessary costs and red tape are key to a healthy GA.

- future industry workforce skills and training requirements.

Training pathways that ensure the ongoing availability of skills and competencies for the sector by dealing with student support programs, duplication between government agencies, better outcomes for trainees and reduced cost and complexity for industry are a definite priority. The focus needs to shift to attracting a young and diverse workforce with career scope that compares favourably with non-aviation industries.

- maintaining fit-for-purpose aviation safety, air navigation and aviation security systems and service delivery agencies.

AHIA supports and expects sector risk-based regulation along with cost effective and practical systems from regulators, airports, air navigation agencies and ancillary services.

- the role of airlines and airports in supporting regional economies.

Regional communities rely on competitive and reliable airlines for transport and to bring tourists and visitors that contribute significantly to regional and the national economy. Airports and associated services are important in this framework. General aviation businesses remain vital to these regional communities and future provisions need balance airline, GA and airport interests effectively and sustainably.

- other significant issues raised during the consultation process.

It is anticipated further issues will be raised during the consultation process and AHIA will avail these opportunities.

Immediate concerns (Refer GAAN, TAAAF and RAAA materials attached)

Priorities:

- Training pathways in engineering (per RAAA Shortage of Aircraft Engineers 2022 document attached)
 1. Recognition of international LAME licenses
 2. Education to support current and future LAMEs.
 3. Create a pathway for other experienced engineers.
 4. Remove challenges associated with Diploma in Aeroskills examinations.
 5. Permit issuing of an aircraft engineer license with exclusions.
 6. Government incentives to employ aviation apprentices.
 7. Align theory training delivery nationally and create a National Aviation Academy
- Review of CASA (per TAAAF Aviation Policy Paper 2022) including
 1. Examination of whether regulations are fit-for-purpose.
 2. Service delivery – licensing certification etc.
 3. Communication, consultation, stakeholder engagement
 4. Staffing – organisational structure and training
 5. Accountability – KPIs
 6. Funding model
 7. CASA's relationships with other agencies including Infrastructure and Airservices Australia

Gaps:

- Airports Act reflect better security of tenure for GA businesses.

Policy:

A critical aviation sector contributing to the national economy, job creation and the well-being of communities, strengthened by government policies and cooperative regulation underpinned by deep engagement with industry, that is fair, risk-based, responsive to cost and innovation and which promotes the value of the sector (per GAAN A New Strategy for Australian General Aviation Sector 2020)

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