

10 March 2023

Mr Jason Dymowski
Assistant Secretary
Aviation White Paper Branch
Department of Infrastructure, Transport, Regional Development and Communications
GPO Box 594
CANBERRA ACT 2601

Dear Mr Dymowski,

Re: Terms of Reference, Aviation White Paper

The General Aviation Advisory Network (GAAN) thanks the Department for the opportunity to comment in relation to the Terms of Reference of the Aviation White Paper.

As you are aware, the GAAN has been established to provide advice to the Minister on matters affecting the general aviation (GA) sector. Members of the Network have been selected for their skills and expertise in the aviation industry, and work collaboratively to respond to pressures facing the GA sector. They come from a cross section of the diverse GA sector, including business, aeromedical, remotely piloted aircraft systems, aircraft maintenance, flight training, sport, recreational and regional aviation operations.

The challenges faced by the general aviation sector have been detailed in the GAAN's paper *A New Strategy for the Australian General Aviation Sector*¹.

At this time, we wish to comment about our priorities relevant to the Terms of Reference.

1. The GAAN has agreed that its highest priority lies with **ineffective training pathways for aircraft maintenance personnel**. In particular, GAAN members are very concerned about the continued failure of agencies to achieve alignment between the course requirements of ASQA and the required qualifications for licensing by CASA. Among several undesirable outcomes, this means that young people aspiring for a career in aircraft maintenance are only able to secure course funding for studies that do not satisfy CASA's requirements, whilst no funding for students is available to obtain the diploma that CASA recognises. Additionally, the non-alignment of CASA's requirements with FAA means that even highly experienced maintenance personnel who complete FAA-recognised, type-specific courses in order to support their employer's operations, are denied CASA recognition. Quite often, the required training to safely maintain aircraft engines and other components is only available in the United States. The GAAN regards both situations as policy failure and recommends that the highest priority be given to streamlining pathways for aviation maintenance personnel to gain initial and continuing training and education. Doing so would support a better educated,

¹The paper may be retrieved at <https://www.infrastructure.gov.au/sites/default/files/documents/GAAN-New-Strategy-for-the-General-Aviation-Sector.docx>

more highly skilled workforce. It would create opportunities for advancement, encourage new entrants to the aviation maintenance workforce, and support productivity, growth and employment outcomes.

2. The other area of highest priority to the GAAN is the **reduced capacity for aviation industry growth and deteriorating facilities for general aviation at leased metropolitan secondary airports** and **inadequate facilities for general aviation at regional aerodromes**. The secondary leased airports have suffered significant loss of available land to non-aeronautical since privatisation. We submit that the Aviation White Paper should project policy that ensures that the operation of these airports is subject to the independent scrutiny of the ACCC, which should investigate the pricing, market conditions, conduct and terms of business of metropolitan secondary airport head-lessees and particularly in relation to their dealings with aviation sub-tenants. Because these companies operate an effective monopoly in each city, there should be independent regulatory oversight of rents, lease conditions and operational charges paid by aviation businesses at the airports. The GAAN also recommends a wide-ranging, independent review of the Airports Act and the master planning approval process applicable to these metropolitan secondary airports, particularly in the treatment of land and infrastructure costings affecting non-aviation developments.

In addition, in the majority of cases, local governments charged with the stewardship of **Australia's regional airports** do not have the financial capacity to cover the recurrent costs of maintaining the airports, let alone contribute capital that would support the growth of aviation industries at the airports. This has led to the Australian Government having to step in with various grants and programs in an inefficient and ad-hoc manner. A forward-looking, innovative approach is needed to revitalise the nation's regional airports, to ensure that a sustainable model is deployed across the country to protect and grow regional communities, serve their critical social needs, and create employment opportunities.

3. Following these, and in no particular order of importance, the GAAN recommends that the Aviation White Paper give priority to the following matters of high importance:

- **Regulatory service performance and posture of the Civil Aviation Safety Authority in relation to general aviation**, acknowledging both recent improvements and a current positive trajectory under its current leadership. Because the aviation industry is necessarily heavily regulated, any deficiency in its operating effectiveness or efficiency will cause industry constraints, with seriously negative impacts on jobs, growth and safety. CASA's staff resourcing, skills and service standards must continue to be prioritised for improvement, with requirements for demonstrated outcomes and substantial improvement in its engagement with the general aviation sector.
- **National airspace designation, management and its configuration for the needs of general aviation** should receive serious attention in the Aviation White Paper. Technological advances, including the emergence of Advanced Air Mobility, demand review and ongoing attention to ensure that the interests of operational safety, efficiency, national security and equity of access to airspace resources for all Australians are maintained.

- Monitoring of the **economic health of the general aviation sector and its contribution to the national economy through ongoing economic statistical studies** and review.
- **Review of the *Civil Aviation Act*** to ensure it remains fit for purpose as the legislative backbone of industry regulation.
- **Review and support of better regulations and practices for the design, certification, manufacture and export of Australian aeronautical products.** The global nature of the aviation industry demands that Australian-designed and made products are fully harmonised with those of intended markets. As the dominant markets for GA products, acceptance by the United States FAA and European EASA of Australian regulatory approvals with nil, or minimal differences, is an essential concept. The Aviation White Paper is the ideal vehicle to drive better engagement with industry and a renewed focus on regulatory support for these activities.
- **Targeted programs to support the development and early adoption of aviation technologies**, so that Australia's skilled and in many areas, world-expert workforce and organisations, can participate globally in the opportunities offered by new technology and its translation to a new agenda for sustainable economic growth and desirable employment outcomes.

Members of the GAAN are encouraged by recognition in the Terms of Reference of the importance of general aviation to the nation. We seek policies that support a safe, strong, and sustainable sector that can create opportunities for employment and bring prosperity and other benefit to the whole nation. The industry's key characteristics, particularly its ability to span state and international borders and drive and adopt new technology, highlights the value that the Aviation White Paper will bring to the economy.

Members of the GAAN are available to assist the work of the Aviation White Paper team if desired.

Should you wish to discuss this submission, or any aspect of the work ahead, please feel free to contact me by email through the GAAN Secretariat (GAAN.Secretariat@infrastructure.gov.au), or phone me directly on [REDACTED]

Yours sincerely,



Andrew Andersen

Chair