



## RECREATIONAL AVIATION AUSTRALIA

OFFICE OF THE CEO

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Mr Jason Dymowski  
Domestic Aviation White Paper group  
Department of Infrastructure, Transport, Local Government, Communications and the Arts

Via email: [dap@infrastructure.gov.au](mailto:dap@infrastructure.gov.au)

Dear Jason,

Thank you for the opportunity to make a submission on the Aviation White Paper terms of reference. RAAus welcomes the Governments' continued support of the aviation sector and we believe there are many opportunities to grow the industry, benefiting the sector and Australians more broadly.

With over 40 years of operations, Recreational Aviation Australia (RAAus) remains the largest administrator of recreational aviation in the country. We represent the interests of more than 10,000 aviators and more than 180 flight training schools around the country. Our aircraft fleet of 3,300 aircraft represents approximately 27% of the Australian piston engine fleet and it's therefore vital that RAAus plays an integral role in the development of Government aviation policy.

The recreational aviation sector not only includes participants, but it also supports a variety of business and the economic well being of many Australians. Be it aircraft manufacturers, airports, engineering and maintenance businesses, the flight training sector or local communities, we play a vital role in connecting Australians to the sector whilst supporting the broader commercial sector as the starting point for many careers.

Whilst RAAus supports the publishing of an Aviation White Paper, we implore Government to make it meaningful with tangible outcomes, plans to achieve the outcomes, and the necessary funding and support for industry to enable it to be delivered.

Please see attached for areas of focus that RAAus sees as important for Government consideration during the development of the Aviation Green Paper, and subsequently, the Aviation White Paper. We look forward to engaging productively throughout this process.

Yours sincerely,

Matt Bouttell  
Chief Executive Officer  
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**Recreational Aviation Australia**

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## Recreational Aviation Australia – Aviation White Paper Terms of Reference Feedback

The feedback on the Aviation White Paper (AWP) Terms of Reference (ToR) provided by Recreational Aviation Australia (RAAus) is outlined below:

### Purpose

There is a lack of acknowledgement of the need to establish the existing based line performance of the industry. That is, a general health check of the areas outlined within the scope and themes of the TOR's is required to ensure the correct starting point is established.

Under the previous Government, much of industry responded to the 'Future of Australia's Aviation Sector'. This provided not only a snapshot of the existing challenges as a result of COVID, but sought ideas and strategies to drive the sector into a recovery mode post-COVID. Many industry stakeholders spent significant time and resource putting forward well considered responses to this Government initiative and yet there has not been and publicly available review of this initiative. This would be extremely useful to not only determine the effectiveness of the initiatives, but to understand whether it provided a realistic baseline for the industry pre-AWP development.

**Recommendation:** RAAus recommends that prior to commencing work on an Aviation Green Paper (AGP) that the 'Future of Australia's Aviation Sector' is reviewed and a baseline on the current state of the sector is established.

### Scope and themes

This response will only address those areas to be considered by the AWP that are relevant to RAAus.

- [aviation's role in economic development, trade and the visitor economy – general, domestic, regional and international aviation;](#)

**Commentary:** RAAus sees significant opportunity to utilise recreational aviation qualifications as the entry point for international commercial flight training, as is already permitted in Singapore. To enable this, Australia should promote a more cost-effective method of training international flight students, by supporting states such as Indonesia and India to modernise their regulations to permit such recognition.

- [how to maximise the aviation sector's contribution to achieving net zero carbon emissions including through sustainable aviation fuel and emerging technologies;](#)

**Commentary:** The majority of the RAAus aircraft fleet already operates using automotive unleaded fuels rather than traditional AVGAS. Furthermore, fuel consumption is, in most cases, less than half that of a traditional general aviation aircraft. By leveraging Light Sport Aircraft, particularly in the flight training sector, General and Recreational Aviation can play a role in reducing emissions for the industry. In addition, advances in electric aircraft within the Light Sport Aircraft sector is already advancing thereby further improving our carbon footprint as a sector. This presents Government with opportunity to not only focus on new forms of aviation (eg. eVTOL, AAM, etc), but also traditional aircraft entering the marketplace using new technology.

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

**Commentary:** Significant hurdles exist for manufacturers with outdated and costly certification regulations in place in Australia. A strong focus of the AWP should be on how to relax such a draconian regulation and risk averse process to stimulate manufacturing in Australian aviation related industries.

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

**Commentary:** Key areas that need to be examined within this space include:

- The capacity of ATC at towered aerodromes to enable flight training
- Impact of uncrewed operations in low level airspace
- Recognition of recreational aviation as part of the broader General Aviation sector
- The use of CASR Part 149 certificated organisations for a larger scope of operations including some commercial operations and inclusion of larger aircraft.
- Review of 2022 Senate inquiry into General Aviation.
- Review of the Aviation Safety Regulation Review and the benefits (or otherwise) that were derived through reduction in regulation.
- Acceptance of more international standards when it comes to aircraft and component certification

- future industry workforce skills and training requirements;

**Commentary:** RAAus supports the RAAA proposal for Part 66 modular licensing framework for aircraft maintenance engineers. At present a pilot can be trained to Air Transport level in around one year however it takes more than five years to train a licensed aircraft maintenance engineer (LAME) to work on a small aircraft. This untenable situation remains an outstanding matter for CASA to address and we seek Government policy to make immediate amends to this situation. This includes less reliance on the education sector determining the educational requirements and leveraging existing competency standards contained within the aviation regulations.

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

**Commentary:** Consideration should be made around whether Airservices is the appropriate organisation to administer Unmanned Aircraft System Traffic Management (UTM) in Australia. Airservices have demonstrated their inability to deliver projects on time, including OneSky which is many years behind schedule. For Australia to remain competitive and to grow emerging technological opportunities, third parties should be considered to manage this as a priority. Furthermore, additional Government scrutiny over how Airservices administers Australian airspace should be adopted to ensure they are in fact operating in the best interest of the country and in alignment with the Airservices Act.

RAAus also seeks Government consideration of the need to appropriately fund the ATSB to undertake all investigations of aviation related accidents where an Australian has lost their life. This matter has been a vexed issue for many years and needs addressing at the earliest opportunity, rather than leaving civilian emergency services to undertake the investigation where unintended consequences have occurred as a result.

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

**Commentary:** RAAus supports the Government examining the Airports Act and lease agreements with the federally leased airports to ensure protections are in place, not only for the aviation industry, but also local communities that rely upon airports for a range of reasons including emergency services. Further protections should also be considered for non-leased airports, particularly in relation to non-aviation development in and around airport precincts. Many of these airports have aviation related businesses collocated and therefore should the local operator make changes, this often adversely affects the business. Consideration of ACCC involvement in price gouging from airport operators should also be considered.

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