



**SPORT AIRCRAFT ASSOCIATION
OF AUSTRALIA**

Aviation White Paper Branch

Domestic Aviation & Reform Division

Department of Infrastructure, Transport, Regional Development, Communications and the Arts

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10 March 2023

Dear Sir/Ma'am

Aviation White Paper – SAAA Initial Submission

The Sport Aircraft Association of Australia (SAAA) are a group of aviation enthusiasts, assisting each other to foster innovation in aviation, and to build, maintain and operate sport aircraft. We work closely with CASA, other Government departments, industry and most importantly, our members to continuously improve safety outcomes. Education and innovation are forefront.

The SAAA is pleased to engage early in supporting the Department of Infrastructure to develop the Aviation White Paper 2023. The SAAA is a great supporter of innovation in aviation, particularly at the grass roots level, where many inspiring ideas are conceived. Please find our initial considerations for a White Paper that will enhance emerging technology.

Relevant Terms of Reference:

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

- Government Policy should ensure new technology, including eVTOL, is better articulated to clearly identify and discriminate between crewed and passenger carrying platforms, from those that are uncrewed/drones.
 - There are significant differences in regulatory expectations and support infrastructure, such that this distinction at a policy level is vital. For example; a separate category for crewed eVTOL should be considered within policy discussions including the NEAT Paper.
- Government Policy should recognise and articulate a position that includes integration of emerging technology with legacy aircraft.
 - Emerging technologies applicable to legacy include: electrified propulsion upgrades on GA; integrated CNS solutions for GA; low cost efficiency enhancements (eg drag reduction), etc. Including legacy aircraft will reduce fossil fuel usage and provide opportunities to build new technology incrementally.
- Recognise Experimental amateur built aircraft as an incubator for emerging technology
 - Incorporating new technology on experimental amateur built aircraft is a simple, straight-forward, yet safe process – without the overhead of traditional certification mechanisms. It provides a low-cost opportunity for individuals and small enterprises to develop their technology in a quick and unobstructed manner, allowing for faster introduction of emerging technology into mainstream aviation.

The Sport Aircraft Association of Australia

- An active group of aviation enthusiasts supporting the building and flying of experimental aircraft -

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

- Exploit the experimental amateur built aircraft category to support the growing market in personal urban air-mobility.
 - The SAAA have noticed a sharp increase in interest in personal eVTOL and other aircraft involving emerging technology, including electrified propulsion. We also note several crewed eVTOL prototypes and kits potentially entering the personal aviation market. A number of members have approached the SAAA to build and operate eVTOLs and aircraft with emerging technology. SAAA see an opportunity to refine the CASRs and other instruments to support this emerging market.
- Align Government Policy on introduction, operation, maintenance and support of aviation emerging technology with the US and European models
 - Emerging technology in aviation is growing fast and will continue to outpace Government Policy. Leveraging policy of countries with similar emerging technology outcomes will provide a stable and “quick to market” approach for policy, guidance and regulation.
- Regenerate regulations and supporting legislative instruments to become more outcomes-based
 - Outcomes-based regulations foster innovation and provide broader opportunities for aviation to thrive (eg alignment to US Part 103)
- Exploit the use of SAAA sponsored Authorised Persons to expand approvals for experimental aircraft under CASR Part 21.191 to provide broader options for the introduction of emerging technology.
 - Provides quicker to market options for small enterprises and individual innovators

how to support and regenerate Australia’s general aviation sector;

- Encourage wider representation of relevant stakeholder organisations on the GAAN
- Improve and increase access to airfields and hangars in metropolitan areas for GA
 - GA operations particularly in Sydney and Melbourne are becoming more scarce and far most costly. Any threat to the GA sector by reducing options and increasing costs, limits GA operations and thereby constricts throughput of pilots, aircraft and ultimately innovation. GA and emerging technology will not however survive without each other as there are too many regulatory, infrastructure, developmental and operational overlaps. So access to affordable general aviation options, especially in metropolitan areas, is paramount for the success of emerging technology
- Create a consistent building block of rules (operational, airspace, medical, design features, etc) that more seamlessly deals with ultralights, light sport, amateur built, other experimental categories, and Type Certified GA aircraft, without imposing artificial disadvantages across different sectors that have no net safety benefit.

future industry workforce skills and training requirements;

- Identify appropriate pathways for training and licensing of pilots and maintainers of eVTOL aircraft.
 - eVTOL and other aircraft with emerging technology will challenge the accepted rules for operating and maintaining aircraft. Extant licensing will need to be reviewed as new technology will not easily fall into the current categories or Standards.

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maintaining fit-for-purpose aviation safety, air navigation and aviation security;

- Review whether the ASIC is fit for purpose.
 - It is arguable that a safety benefit has been realised from the ASIC system, especially in regional and lesser airports
 - Anecdotally it is easier (and cheaper) to gain and maintain a Government Security clearance than to seek an ASIC (every two years). The cost of maintaining an ASIC is also not comparable to the safety benefit given most self-funded ASICs only operate into a regional airport with occasional RPT.
 - It is not easy to identify which airports require ASIC.

Yours sincerely,

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