



# Aerotec Queensland Pty Ltd

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31<sup>st</sup> January 2014

## AVIATION SAFETY REGULATION REVIEW SUBMISSION

Aerotec Pty Ltd and now, Aerotec Queensland Pty Ltd, has been in maintenance since 1981. Our Chief Engineer, Wayne Milburn, has been with us for over 20 years.

In the past 20 years we have seen change and confusion with the regulations which have been detrimental to the industry with very little benefits. Some of the concerns are as follows:

- Cost to Maintenance businesses and owners of aircraft
- The rules have been impossible to keep up with and difficult to interpret. It is inevitable that breaches would occur unintentionally.
- We do not want Australia to adopt the EASA regulations, our General Aviation trade is mostly with the United States.
- The method which CASA allows consultation does not give adequate time to digest.
- Often CASA personnel appear to be confused as to different interpretations of the Regulations.
- Training for licensed engineers should be looked at in the light of more practical experience in the workplace.

We at Aerotec Queensland Pty Ltd, including myself and Engineer Wayne Milburn ARN [REDACTED] are totally in support of AMROBA's Submission.

We strongly recommend, for the sake of the Aviation Industry in Australia, that the current re-writes are stopped.

Yours sincerely,

[REDACTED]

Lynette Zuccoli  
Managing Director  
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## **Submission to the Aviation Safety Regulation Review**

Aerotec Queensland Pty Ltd has held a CAR 30 Approval for maintenance for approximately 32 years and, for the last 10 years, holds an AOC Approval for Charter and Flying Training.

I strongly support AMROBA's position and their concerns on the future viability and continued survival of Regional Aviation and General Aviation in this country. The proposed new rules, based on EASA legislation, have little or no practicality in the Australian aviation environment. The Minister must realize that the current legislative system, governing Aviation, is so out-of-sync that it is becoming extremely difficult for small businesses to cope in the current climate of constant regulatory reform and uncertainty.

CASA's charter should be changed to foster and promote a healthy aviation industry. In the last 20 years we have seen a steady decline in many country Aero Clubs and Flight Training Schools. I believe this is partly due to the fact of over complicated regulations and unnecessary bureaucracy. It is at the stage where Chief Flying Instructors and Chief Pilots basically have to be "bush lawyers" to interpret the regulations to ensure they don't have any inadvertent breaches. At a recent professional development course for Approved Testing Officers, which I attended, it was blatantly obvious that the new regulations even had CASA's own staff confused. It is quite common to not be able to get a definitive explanation or interpretation of the new Regulations. I hope the Government realizes that we are at an important cross-road for Australian aviation. The regulatory reform process has been drifting on for years at great expense and has become, in my opinion, well and truly lost and out of step with what the industry needs.

Yours sincerely,

Matt Handley  
Chief Pilot/Chief Flying Instructor