

The ASRR Secretariat  
Aviation Safety Regulation Review Panel  
Department of Infrastructure and Regional Development  
GPO Box 593  
CANBERRA ACT 2601

Dear Sirs

Re: The Australian Government's Aviation Safety Regulation Review Submission

#### Impedance to Compliance and Safety

1. Marginal profitability for Business and inefficiency for CASA
2. Anti-competitive behavior
3. Failure of the Regulator to act.
4. Inconsistent and variant advice from the Regulator's representatives

#### Marginal profitability for Business and inefficiency for CASA

Businesses need to be profitable in order to be "safe". The regulator needs to have willing, proactive and motivated stakeholders in order to make their job more effective. The cost burden of micro monitoring compliance for the regulator will be significantly reduced when industry/business is motivated and successful. As in business, Regulation needs to provide better value for money. Compliance is often heavily human resource dependent and is expensive for business to implement and maintain. Any implementation of compliance without recognised improved outcomes will drive cost without benefit.

#### Anti-competitive behavior

Aeronautical products that are produced in Australia to a higher regulatory standard are unable to compete with "compliant" branded imports. **The Regulator has consistently turned a blind eye to aviation components entering this country that are clearly deficient in their quality control and compliance standards. Even if the certification is compliant by name (8130-3) there is a definite discrepancy between the standards required to meet the certification in Australia to the requirements of the imports' country of origin.** Placing unfair anti-competitive obstacles to local business will drive unsafe practices with negative outcomes. Allowing a company to be profitable and competitive provides the impetus and drive to perform at a higher level.

#### Failure of the Regulator to act

The acceptance of variation of standards relative to the size of an operation is understandable to some degree but there is no drive for a business to improve standards while competitors are able to continue operating at a lower level. Regardless of whether your facility produces one or one hundred units, the minimum standard should be set in stone and applied equally. The requirement for a minimum standard of safety in one unit should be no different to any other unit. Allowing people to stay within the industry that have no right to be there drives the bar lower and erodes the will of others.

#### Inconsistent and variant advice from the Regulator's representatives

Layers of regulation will never replace fostering a natural cultural drive within the aviation industry to be "safe". **Implementing multiple layers of regulation is in itself inherently unsafe.** Ensuring that the Regulators representatives are well trained and conversant with the requirements of the legislation and conversely that the legislation is more simple in its application will eliminate an environment of distain and frustration. Rather than a punitive approach; a hands on, supportive role with a real problem solving approach for those companies that are willing to work with CASA will be much more productive. Open and frank dialogue within CASA regarding experiences in the field will develop a more experienced and respected team.

Yours faithfully



Angela Barlow

