



RAAA SUBMISSION

AVIATION SAFETY REGULATION REVIEW

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Serving regional aviation, and through it, the people and businesses of regional Australia

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7 February 2014

Mr David Forsyth, AM
Panel Chairman
Aviation Safety Regulation Review
Department of Infrastructure & Regional Development
GPO Box 594
CANBERRA ACT 2601

Dear Mr Forsyth,

RAAA Submission: Aviation Safety Regulation Review

The RAAA is pleased to provide this submission to the Aviation Safety Regulation Review.

I. RAAA Background

The RAAA and its Members

The Regional Aviation Association of Australia (RAAA) is a not-for-profit organisation formed in 1980 as the Regional Airlines Association of Australia to protect, represent and promote the combined interests of its regional airline members and regional aviation throughout Australia.

The Association changed its name in July 2001 to the Regional Aviation Association of Australia (RAAA) and widened its charter to include a range of membership, including regional airlines, charter and aerial work operators, and the businesses that support them.

The RAAA has 28 Ordinary Members (AOC holders) and 72 Associate/Affiliate Members. The RAAA's AOC members directly employ over 2,500 Australians, many in regional areas. On an annual basis, the RAAA's AOC members jointly turnover more than \$1.5b, carry well in excess of 2million passengers and move over 23 million kilograms of freight.

RAAA members operate in all States and Territories and include airlines, airports, freight companies, engineering and flight training companies, finance and insurance companies and government entities. Many of RAAA's members operate successful and growing businesses providing employment and economic sustainability within regional and remote areas of Australia.

A Directory of the Association's members is attached to this submission as Annex C.

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RAAA Charter

The RAAA's Charter is to promote a safe and viable regional aviation industry. To meet this goal the RAAA:

- promotes the regional aviation industry and its benefits to Australian transport, tourism and the economy among government and regulatory policy makers;
- lobbies on behalf of the regional aviation industry and its members;
- contributes to government and regulatory authority policy processes and formulation to enable its members to have input into policies and decisions that may affect their businesses;
- encourages high standards of professional conduct by its members; and
- provides a forum for formal and informal professional development and information sharing.

The RAAA provides wide representation for the regional aviation industry by direct lobbying of Ministers and senior officials, through parliamentary submissions, personal contact and by ongoing, active participation in a number of consultative forums.

II. EXECUTIVE SUMMARY

The RAAA believes the bulk of its concerns stem from a poor culture in CASA which itself results from poor senior management and governance over several decades. If the Government of the day is not to take a more active role in the formulation of aviation policy generally and, through the relevant Department, a more active role in the management of the aviation bureaucracy, it must be prepared to create a more substantial and active Board to oversight CASA's management.

Successful operators are responsible operators who understand that safety management is integral to the management of their businesses. A safety culture cannot be imposed, it must be fostered. A regulator can police sensible accepted standards, but it cannot foster the safety culture with a rule book and a heavy handed application of penalties.

A genuine safety culture comes from the regulated and the regulator sharing essentially the same values and the same objectives. They will not always agree on the means to achieve these, but without this common basis the safety culture will be undermined. Sound safety culture and practice can really only be achieved by way of a partnership being forged between the regulator and industry.

Today in Australia the regulator, CASA, is held in such low regard there is no common ground, but more of a "them" and "us" attitude. Additionally, industry participants are wary of talking publicly about CASA due to a fear of retribution. This fear is reflected by some RAAA Members' apprehension in providing examples for our submission to this Inquiry, regardless of whether our submission is classified confidential or not.

III. INTRODUCTION

Regional aviation has suffered disproportionately compared to the rest of the industry as a result of the aviation safety regulation environment in Australia. Operators have gone out of business, livelihoods have been threatened and there has been a lack of consultation with industry. This lack of consultation has combined toxically with a faltering, directionless regulatory reform process.

The RAAA welcomes the opportunity to provide a submission to this Aviation Safety Regulation Review. The RAAA agrees with the Government that the Review is a timely opportunity to consider future aviation safety structures and regulatory development processes in Australia.

In providing this submission, the RAAA seeks to address the Terms of Reference of the review by:

- A. Investigating the structures, effectiveness and processes of key agencies involved in aviation safety as well as the suitability of Australia's aviation safety related regulations.
- B. Making recommendations on the aviation safety roles of CASA and the Australian Transport Safety Bureau (ATSB) and other agencies and outline and identify any areas for improvement in the current interaction and relationships between CASA and the ATSB, as well as other agencies and the Department of Infrastructure and Regional Development.
- C. Examining the current processes by which CASA develops, consults on and finalises changes to aviation safety regulations and other legislative instruments such as civil aviation orders, and make proposals for improving these processes.

It is hoped that this submission will assist in bringing about the necessary reform of the aviation safety regulation system in Australia, so that industry relations can once again be productive and the reform objectives that both the regulator and industry should be able to agree on can finally be met.

IV. RAAA CONCERNS

The RAAA has concerns with the administration of aviation safety regulation in Australia. Not only has there been a dramatic deterioration in relations between the regulator (CASA) and the industry over the last five years, but the regulatory reform process, which has been going on since the early 1990s, seems to have lost its way. These observations are based on RAAA members' dealings and interactions with the regulators on numerous occasions.

The feedback by RAAA members on their interactions with CASA – on issues as varied as consultation on the introduction of new Parts of the Civil Aviation Safety Regulations (CASRs) to access to safety information in the event of the reporting of accidents and incidents – greatly concerns the RAAA. There are four key areas of concern which the RAAA will focus on in this submission, and where necessary and appropriate will provide examples. The four areas are:

1. the unfortunate saga of CASA's regulatory reform process
2. CASA's increasingly adversarial approach to enforcement
3. CASA's failure to provide prompt and efficient services to the industry, and
4. CASA's undermining of the "Just Culture" approach to data collection.

In the RAAA's view these four shortcomings have created a lack of trust in CASA. However, this lack of trust is merely symptomatic of a deeper malaise in CASA and the wider aviation bureaucracy where there is confusion between the several roles of policy maker, regulator, educator and service provider currently undertaken by CASA.

The RAAA considers a review such as this is long overdue and believes that if the core issues can be addressed the regional aviation industry, so essential in a dispersed nation such as Australia, can be made to operate more safely and more efficiently in the interests of Government, industry participants and the travelling public.

1. **The regulatory reform process**

The regulatory reform process has now been running for over 20 years. In that time there have been only modest improvements in safety. There has been no harmonisation with overseas jurisdictions such as EASA or the FAA and Australia has in place aviation safety regulations that depart far from ICAO standards and recommended practices.

The previous Government's Aviation White Paper published in December 2009 was widely condemned by industry as contributing nothing to the policy debate and in fact being little more than a packaging exercise for pre-existing programs.

Consequently, members of the Australian Aviation Associations Forum (the Forum) developed their own policy position (Annex B) to amply demonstrate that there was considerably more that Government could do to improve aviation regulation in Australia.

The Forum policies were published in 2012 and offer a comprehensive approach to government policies and structures, regulatory reform, taxation, education and training, regional equity, airports, security, insurance, research and non-aviation impacts on aviation.

Future policy needs to ensure that CASA uses a risk based approach and focuses on safety outcomes rather than simply generating prescriptive rules and blindly enforcing compliance. While CASA executives appreciate and promote a risk based and safety outcome focused strategy, they have not been able to prevent their front line staff from focusing more on compliance than safety. CASA needs to acknowledge that regulatory reform should be undertaken in partnership with industry through strong formal and informal consultative relationships.

1a. The reform process should be placed within the Department

Not only is there a conflict of interest in having the aviation policeman draft the laws that it has to enforce, but as the Australian experience has shown, continuity of the reform process suffers with frequent changes in personnel and direction. The Australian experience is a strong argument for aviation policy and regulatory development to be administered by the Department.

The RAAA believes that the Aviation and Airports Division of the Department of Infrastructure and Regional Development should be expanded to take over the role of aviation regulation policy formulation. It also believes that aviation is important enough to justify a junior Minister, or a Parliamentary Secretary, as an absolute minimum.

Additionally, given the ATSB's role in investigating aviation accidents, making safety recommendations and publishing the subsequent reports, it should be given the task of aviation safety education. This would be a much better fit than CASA and free up the regulator for its primary roles. Furthermore, as explained under "Protection of Safety Information (Just Culture)" below, the ATSB must not release unfettered data to CASA.

Relieved of the confusion of roles CASA could concentrate more effectively on delivering the regulatory services it provides and take a less aggressive approach to rule enforcement.

Clearer direction needs to be given with regard to the formulation of new regulations. A letter of direction from the responsible Minister should make it clear that new regulations are to be formulated with a view to being as simple as possible, to not cause unnecessary cost or hardship to industry and to be standardised with overseas regulations. If necessary, the Civil Aviation Act (1988) should be amended to reflect this.

The rule making process must follow the guidelines promulgated by the Government's Office of Best Practice Regulation which requires that regulations should assist productivity where possible and that a Regulation Impact Statement (RIS) must be done for all regulations that have a regulatory impact on business or not-for-profit organisations. Currently CASA does not observe these guidelines.

1b. The regulations are too complicated and lack international harmonisation

The new regulations are characterised by a complex approach in both content and drafting style that seeks to obfuscate operational clarity and increase certainty for the likelihood of a successful criminal prosecution, with a complete failing of the original intent of 'safety through clarity'. This has resulted in uniquely Australian rules.

There has been Ministerial direction on several occasions to standardise Australian regulations with overseas jurisdictions and to not develop uniquely Australian requirements unless there was a definite need demonstrated by industry. However this has been ignored by CASA.

One of the problems with excessively prescriptive regulations is the time required to make legislative changes in an ever changing environment. Our concern with this time lag is that we may end up with legislation through media release to fill the gap between the legislative processes and current industry best practice. There is no need to try and micromanage every liability or outcome through regulation when there are other avenues available to CASA which provide greater flexibility.

The RAAA and individual RAAA members have over the years spent many days attending meetings, consultation sessions and training briefings only to find that particular proposed reforms are put on hold or substantially revised with little or no consultation. This is exceedingly frustrating. Adding to this frustration are the proposals that are seemingly stalled or dead becoming suddenly urgent resulting in rushed legislation and poor transition arrangements that are costly and for which it is hard to discern any safety cost benefit. An example of this is CAAP 235, which was discussed initially 10 years ago and determined to be of little aviation safety benefit according to FAA research and also produced a real safety risk in non-aviation transport, being suddenly resurrected in 2013 (see below).

RAAA Members have had to endure being provided different interpretations of the regulations by different CASA offices and also by different representatives in the same CASA office. We have been informed many times over the years that CASA is aware of this problem and is in the process of trying to rectify it. However, until a consistent interpretation is provided regardless of which CASA representative industry is talking to industry must endure a degree of uncertainty in advice provided by CASA about the regulations they not only oversee but also write.

CASR Part 42/145 is an example of industry being put under undue stress to meet timelines set by the current regulatory reform process. For Part 42 operators it was no choice but meet the time line. This for many meant allocating a large amount of finite resources to the task, and subsequently reducing the resources available to their core business, and placing both themselves and their staff under excessive pressure resulting in undue stress. When we queried CASA to why the June 2013 deadline was so important CASA responded by stating that *"as far as they are concerned they have given industry ample time to prepare for the changes"*.

For Part 145 providers this meant firstly making a decision of transiting, and be in the same situation as Part 42 Operators including costs associated to transiting to a Part 145 organisation, or ceasing to provide services to the aviation industry. In an industry presentation by CASA in March 2013 they indicated that they were aware of 180 organisations (down from 200 organisations identified by CASA in November 2011) that need to transition to Part 145 by June 2013. According to the CASA website in January 2014 there are now only 127 Part 145 organisations. Therefore we can surmise that we have lost somewhere between 53 to 73 organisations (29% to 37%) that were providing essential services for operators to maintain their aircraft. For example, we have been informed there is now only one Part 145 organisation in Melbourne available to do general aircraft airframe maintenance.

1c. The regulations have created unnecessary cost and obstacles to industry

The problem with introducing new regulations that are overly complicated and not in harmony with corresponding regulations overseas is that they have the adverse effect of creating unnecessary cost and other obstacles for industry. For example, one of our operator members has reported that the last 18 months of regulatory change have added around 40% in costs to their operations due to additional staff (designated “Key Personnel” under the new regulations) required to manage the changes. If one of these “Key Personnel” leaves the organisation prematurely the potential flow on affect is that the operator will be effectively grounded.

CASR Part 90 – cockpit ballistic doors

The issue of hardened cockpit doors is an example of cost under-estimation to industry by CASA. The initial installation of these doors was achieved with the assistance of \$3.2 million of Commonwealth Government funds. In August 2013 CASA’s NPRM proposed enhancements to the legislation which would require the current doors be modified. The NPRM grossly underestimated the cost of the enhancements through using a labour cost of \$53/hour. This figure is simply not realistic. Advice from our members is that the realistic cost of labour would be at least triple the rate provided by CASA in the NPRM especially in the case where the work would need to be outsourced to an Approved Part 145 Maintenance Organisation. One of our members estimated that the capital expenditure required to have their fleet meet the new requirements of the 2013 NPRM is in the order of \$1 million. Despite the huge cost involved, CASA did not provide any scientific evidence or safety case to justify the new requirements.

CASR Part 42/145

Part 42/145 currently applies only to regular public transport (RPT) operators and highlights where the lag in bringing in complementary legislation uniformly can provide a non-level playing field for operators competing for the same business. An operator who provides RPT services as part of their operations, and also uses the same aircraft to provide charter services, now has a much higher cost base and regulatory requirement than someone providing charter services only. This will only change when Part 135 comes into existence, which is not expected by industry for several years. One of our members has informed us that currently it costs them 20% more per engine to overhaul it for a RPT aircraft than what would be charged for the same engine obtaining the same service on a charter only aircraft. This cost increase does not include additional auditing costs required for RPT operations and that it takes more man hours for administration of the same aircraft.

An RAAA Member (an RPT operator) estimates that the CASR Part 42/145 processes have added \$1.5m per annum to its overhead, for no safety or reliability gain. That figure excludes the ability of the RAAA member's pilots to clear minor bird strikes (after training). Another incident under the new rules with a RAAA Operator Member involved a four hour delay at a regional South Australian airport. The operator had to charter an aircraft to fly an engineer to the airport when there was clearly no damage.

An RAAA Operator Member was provided with a one sector ferry permit by the engine manufacturer to fly an aircraft to Adelaide to do an engine change. CASA subsequently denied the ferry permit and the operator was required to ship an engine and all other necessary materials to Perth at a cost of over \$100,000.

Our Part 145 maintenance provider Members indicate that the cancellations of Maintenance Authorities (MAs) for Regular Public Transport (RPT) aircraft, combined with inadequate transitional arrangements, has created unnecessary cost and obstacles for organisations. This excessive restrictiveness, without any safety basis, highlights lack of continuity between the old and new rules and the lack of flexibility with the new rules. For example, a Member under the old rules had an MA signing out their own work safely for over 6 months. Now that MAs are cancelled it will be 18-24 months until that individual will be able to sign out their own work again, forcing the organisation to bring in expensive sub-contractors to cover the interim period.

Members have also reported incurring further massive costs when a requirement is imposed by CASA to send two CASA Airworthiness Inspectors overseas to approve a maintenance facility that already has a FAA/EASA approval.

CASR Part 60 - Synthetic training devices

There is currently a misalignment of standards exercised between overseas synthetic training device operators and Australian synthetic training device operators. An Australian pilot can travel and complete a Type Rating course overseas in a simulator training center that has not been audited by CASA, complete a course that CASA have not assessed or approved, train in a simulator that CASA has not fidelity checked and be trained by an instructor that has not been assessed or approved to conduct endorsement training. This completed Type Rating that is unaudited is recognized by CASA. For example, CASA has accepted Type Endorsements from Malaysia which we understand is not a recognized State for CASA regulatory approvals. Additionally, we have been informed that a pilot who did his A320 Type Rate in the USA, during an employment interview explained that he had not done a visual circuit in the simulator and that all landings were auto landings. His application for an A320 endorsement was nonetheless approved by CASA.

1d. Some regulations are far too restrictive and do not have a safety case

COA 48 – Fatigue Risk Management Systems

In May 2012 CASA released an NPRM to change the requirements around the management of fatigue by operators that added considerable cost and complexity to regional operators, without a corresponding demonstrated safety benefit. Although there is a growing body of literature on fatigue in general, its practical application to aviation is largely theoretical. Whilst the RAAA supports efforts to gain a better understanding of fatigue management and has generally favoured the flexibility allowed to operators to develop an FRMS as an alternative to the prescriptions of CAO 48, we are not aware of any body of evidence linking fatigue to aviation accidents or incidents in Australia. Accordingly, there is not a sufficient basis to make regional operations more complex and costly by restricting the current safe and reasonably flexible rostering of flight crews. Moreover, the expectation of major and ongoing amendments and approvals to Operations Manuals is an unjustified cost imposition.

Based on the NPRM in May 2012 CASA have indicated that there will be only 5 operators in Australia with an FRMS under their proposed regime. This highlights the inadequacies as an “all of industry” viability is not available. Additionally, a safety case has not been provided by CASA. One of our members pointed out that the table provided in the NPRM is completely inadequate for regional operators. For example, a pilot flying at 6am in the morning is assumed to be awake at 11pm the previous evening, which is ludicrous. As noted on page 6 of the NPRM the consultative process on this involved 12 Organisations. Noticeably absent from this list are any Members of the RAAA (or the Association itself).

We understand the proposed CAO 48.2 (Flight Attendant) flight and duty times are currently being developed. This proposal should have been done in conjunction with the pilot rules changes to ensure that both rule sets are seamless. Industry must now ensure that there is no misalignment between the two regulations to ensure the proposal is operationally workable for regional operators.

CAR 235A – minimum runway width

CAR235A describes a process to develop standards of operations on narrow runways. It also introduces additional requirements that may restrict or prohibit operations to remote regional communities. Additionally, the Civil Aviation Advisory Publication (CAAP) contains contradictions in regard to crew training and does not provide an alternative means of achieving equivalent safety outcomes. One of our Members indicated that CAR 235A has put regular public transport services to at least one remote regional location in jeopardy.

Another of our members had a local inspector do all the checks at Clermont Qld for reduced runway width and submitted the Standard Form of Recommendation (SFR) to CASA where it was signed off by the applicable section. After this it went to the General Manager within CASA for final approval who refused to sign it without reason. The CASA General Manager revisited the SFR twice ultimately waiting till the maximum time period (3 months) specified in the regulations was just about expired and then approved the SFR. Due to the excessive period taken by CASA the client of our Member had decided not to proceed with the project (mining) at that time.

MOS 139 - Aviation Rescue & Fire Fighting (ARFF)

The instigation of an ARFF service at airports is currently triggered by the number of passenger movements at an airport exceeding 350,000 for the previous financial year with the removal of the service potentially after the passenger movements fall below 300,000 for a 12 month period.

The RAAA is firstly concerned that although the instigation of the AARF service is automatic once the 350,000 movement threshold has been breached the removal of the service is not so clear cut. For example, Ayers Rock (Connellan Airport) passenger movements have been below the 300,000 passenger movements for some time now however the service has not been decommissioned, and continues to be paid for by the aviation industry through Industry's Long Term Pricing Agreement (LTPA) with Airservices Australia. The continuation of this ARFF service is due to, we understand, non-aviation related reasons. The RAAA believes that if the commissioning of an ARFF service is predicated on breaching a predetermined threshold so should be the decommissioning of the service.

A further concern we have is that the instigation of an ARFF service is currently based solely on historic values without consideration of future movements at the location. This is compounded by CASA, who instruct Airservices Australia to instigate an ARFF service, recently indicating that Airservices Australia must have an ARFF service ready to be operational as soon as the threshold is breached; thereby pre-empting the need for capital outlay and ongoing expenses such as personnel.

This has resulted in airports at Ballina, Coffs Harbour, Port Hedland and Newman now requiring an ARFF service, at a cost of \$58.9 million paid for by industry through the LTPA, due to the increased number of passenger movements - predominantly due to the growth in the resource sector and the use of fly-in fly-out labour. With the current softening in the mining industry now that the boom has finished there is a risk that CASA's insistence on instituting an ARFF as soon as the threshold has been breached may result in a service being provided unnecessarily.

The RAAA is also concerned that the instigation of an ARFF service is based solely on an arbitrary threshold that does not take into consideration a risk assessment. The current arbitrary threshold for the installation of an ARFF service has been in place for numerous years and does not take into consideration advances made in aircraft safety or factors associated to the location in question. Airservices Australia has indicated to us that they have approached CASA about the threshold, however CASA are not willing to discuss the issue.

1e. The length of current regulatory reform consultation timelines

Current regulatory reform consultation timelines are far too short, and proper more effective consultative procedures with industry should be introduced. Not only has industry input been ignored in a number of instances, but proper Regulation Impact Statements have not always been undertaken, with the result that the cost/safety case for the change is not justified.

Additionally, the consultative mechanisms that CASA has put in place, in particular the Standards Consultative Committee (SCC), are clumsy and have not achieved genuine industry participation. The reform process is in the incongruous position of having consultation time frames that are far too short, but of being a process that has already taken far too long. Shortening consultation timeframes to push through reform only serves to exacerbate the problems.

Part 61 – Flight Crew Licensing

The proposed replacement of Division 5 of the CARS with Part 61 is generally supported by industry as a worthwhile development and has been in process since before the FLOT Conference in 2003. The industry have expended large amounts of staff time and financial resources attending numerous consultations and information/training sessions.

Despite the lengthy gestation, in September 2013 CASA staff were advising CASA delegates in a training session for Approved Testing Officers (ATOs) that amendments were still being made to legislation due to come into effect on 4 December 2013. The forms to be used by the ATOs in less than 3 months were not available and their usefulness was debated by the ATOs. The Manual of Standards (MOS) to support the Regulations was also not available. For industry it is critical that when CASA is contemplating dates for any proposed legislation to come into effect that the MOS, forms, and other relevant documents are available to, and have been agreed by, industry so that industry is aware of how they are expected to comply with the proposed changes and how the proposed changes potentially affect their business model.

It was simply unacceptable for CASA to try and place the blame for the delay in implementing Part 61 solely on the industry, which is highlighted by legislative changes still being announced in January 2014. For example, a finalised MOS (in its draft form over 600 pages) has still not been promulgated to industry. So industry continues to sit in limbo about how to develop programs and comply with this legislation that was supposed to come into effect in December last year.

A particular issue within Part 61 relates to ATOs indemnity. A minor, but significant effect of Part 61 is to change ATOs into Flight Examiners who would no longer be CASA delegates and enjoy the indemnity of CAAP Admin1. There is no doubt that this was deliberate policy not an oversight - but its impacts, unintended or otherwise, had not been thought through. The potential insurance cost implications are such that a majority of ATOs have indicated they will cease testing, throwing an unmanageable burden back on CASA.

Operators who have ATOs on staff will have to consider paying the insurance costs of those examiners so their operations can continue. This has the potential to increase staffing costs considerably. Currently neither operators nor insurance organisations have a mechanism for this form of insurance, know what the potential cost of obtaining this type of insurance will be, or know what level of insurance cover would be required.

CAAP 235-2(2) - Carriage and restraint of small children in aircraft

The Civil Aviation Advisory Publication (CAAP) for “Carriage and restraint of small children in aircraft” was released on the 28 October 2013 with responses due by 11 November 2013. This allowed us 10 working days to review the document (in addition to our other responsibilities), obtain member feedback, draft and clear through our Board an appropriate response and then finally submit the approved response to CASA.

The RAAA office is a small energetic team comprising 2 full time staff and one part time staff member; unlike CASA that has 850 employees at its disposal. During the time period to respond to this CAAP one of the full time staff members was on leave. Furthermore, RAAA Operator Members are in the day to day business of providing safe and reliable air services to the community. Our Associate Members are in the business of providing support services to our operator members through maintenance, training, or other ancillary services. RAAA Members core activity, and the one their livelihoods' rest on, is the services they provide - not reviewing legislative changes. Additionally, although some RAAA members do have large complex operations, overall the membership comprises small to medium sized businesses with extremely limited human resources that are key in ensuring their day to day operations run safely and smoothly.

The 10 working days allowed by CASA in this, and other, consultations is simply inadequate and highlights industry concerns that consultation by CASA is of a token nature. The RAAA recommends that at a bare minimum 25 business days are required for simple documents and 60 to 90+ days for more complex documents should be used. Consultations of less than 25 working days should only be used in the most extreme circumstances where there is an immediate and critical safety issue affecting life and should require CASA to be more proactive in contacting all of industry affected by the change and obtaining feedback.

2. Adversarial Approach to Enforcement

There has been a dramatic deterioration in relations between CASA and the industry over the last five years. Instead of taking a co-operative approach to its dealings with industry, CASA has relentlessly pursued an adversarial approach, to the detriment of the industry as a whole. CASA needs to reset its relationship with industry.

As with their approach to regulatory reform, CASA's approach to enforcement should be undertaken in partnership with industry. It is in the interests of both CASA and the industry to be on the same page regarding safety and how that is best achieved. CASA needs to realise that an adversarial approach to enforcement and a sustained and concerted attack on principles such as Just Culture (discussed further below) will only continue to antagonise industry relations.

The experience of RAAA members in recent years is that CASA has moved from assisting to penalising. In 2012 the Request for Corrective Action (RCA's) changed to Non Compliance Notices (NCN's). This was on Members' understanding that neither the substance or the status of the notice was changing with the name change. Since then, however, Members have experienced a greater use of NCNs as opposed to the previous use of RCA's, NCNs being issued on the basis of voluntary reports, and CASA refusing to acquit NCNs without an admission of fault. The last two points are particularly damaging to the industry/CASA relationship due to their aggressive nature. The reasoning we consider CASA is doing this is not to achieve safety outcomes but to create a basis for an easier prosecution through the Courts in the future.

There also appears to be a greater recourse to Show Cause Notices (SCNs), ie the Serious & Imminent Threat provisions, without reasonable notice or consultation. Some of these notices are being delivered on Friday afternoons with increasing frequency. CASA is tasked with being a model litigant but such behaviour borders on sharp practice.

CASA's Enforcement Manual states in paragraph 2.5 under the heading "Distinguishing 'Compliance-Related' Action from Enforcement Action" -

It is common ground that compliance with aviation safety requirements is normally achieved by the entirely self-motivated conduct of participants in aviation-related activities who comply with the rules because they know or believe it is the 'right thing' to do, as a matter of law and in the interests of safety alike.

Beyond such self-motivated compliance (in the reinforcement of which CASA is playing a greater and more constructive role) there are four other ways in which CASA is actively and directly involved in bringing about compliance, each of which is reflected in specified CASA functions under section 9 of the Civil Aviation Act. These are:

- *Assisting the industry to comply, generally and on an individual basis,*
- *Encouraging or exhorting compliance,*
- *Compelling compliance,*
- *Penalising and deterring non-compliance.*

This apparently co-operative policy is not being followed in practice and an adversarial approach has become increasingly the norm.

One of our operator Members wet leased an aircraft from New Zealand and had nothing but trouble from CASA. CASA refused to accept that New Zealand registered aircraft can operate safely and freely in Australia and that CASA has no oversight rights or responsibilities. CASA went to the extreme of issuing the operator an NCN on the issue.

We have been informed that in early December 2012 CASA regional offices approached flight simulator operators in relation to training data provided by aircraft manufacturers relative to the simulators in their training centre. This particular issue comes out of the Air France Flight 447 accident in the Atlantic and, although endorsed in principal by ICAO, **is not a legislative requirement** at this time under CAO 40.1.0 or MOS Part 60. In one situation the CASA regional office contacted the operator at 10am in the morning asking if CASA representatives could come talk to them. One hour later they arrived at the operators premises where they verbally informed the operator that all CASA training course approvals are being withdrawn with immediate affect due to not having the training data from aircraft manufacturers. This was done with no prior notice being given to the simulator operator, no audit by CASA on the simulator operator, and no Non Compliance Notice issued to the simulator operator by CASA. This effectively grounded the operator forcing them to cancel planned endorsement courses thus preventing revenue earnings from these courses . Several days after the meeting the simulator operator received a letter from the CASA Regional Office confirming the previous meeting with the CASA delegation about the certificate withdrawal provided verbally. After the operator went to much pain, either by convincing CASA that due to the aircraft manufacture no longer existing that they were operating under industry best practise or (in the case of 2 simulators) that they had obtained the necessary documentation, the operator did receive an apology from senior CASA management that the incident should never has arisen due to the requirement not being legislated.

3. Delivery of Services

3a. Processing Delays

The granting of approvals and the issuing of authorisations can sometimes seem to be a lottery – inconsistent responses to the similar applications, vastly differing charges and costly delays.

Licensing delays of 6 to 8 weeks are not uncommon and can be very costly for industry. Some of these delays are caused by sheer pedantry - for example, a pilot application returned because the applicant's ARN was not entered on the top of one page when it was clearly entered on all other pages and could have been entered by the processing clerk.

The medical certification seems to involve a large amount of second guessing the Designated Medical Examiners (DMEs) and demanding more expensive additional tests and re-examinations. Is there any good reason why DMEs in Australia cannot be authorised to actually issue the Medical Certificate as UK Authorised Medical Examiners are – even to the extent of issuing a UK/JAA medical here in Australia? It is the opinion of many in the industry that the medical section of CASA needs a complete overhaul.

Our Members indicate that to change an “approved Person” attached to an AOC the AOC holder must apply to CASA Regservices for a quote, at a charge rate of \$160 per hour, by completing the required form. The job when allocated by Regservices is sent to the local CASA office for completion. On completion the local CASA office issues the “instrument”. The AOC holder then has to apply again to Regservices for a quote to have the AOC Specification updated; again a charge rate of \$160 per hour is used by CASA. Why is CASA, with current technology, not able to automatically change information through all its departments and forward the amended specification automatically to the AOC holder? Additionally, many forms, such as variation for an AOC or an Instrument rating renewal, seem cumbersome and designed for initial issue. The forms require a large amount of information that CASA already holds and may also contain information that is not relevant.

One of our Members recently had a new aircraft added to their fleet that had previously been used by another operator for RPT services. After having the aircraft successfully added to their AOC it was discovered that the aircraft had not been added to their Part 145. This task takes about 2 hours however in this particular case it took over 3 weeks. This meant that the aircraft was not available for use for RPT services for this extended period resulting in a subsequent reduction in potential earning capacity for the operator.

Another recent incident experienced by one of our Members relates to an AOC variation, to add an aircraft in the Charter category only. The application was submitted in December 2013 with the estimate received in late December 2013. With the closure of CASA over the Christmas/ New Year break the Member did not pay the estimate until the beginning of January 2014. They were subsequently advised in mid-January 2014 that the anticipated completion date would be June 2014. Seven months, notwithstanding the loss of time over the Christmas/New Year break, to process the AOC variation is totally unacceptable.

In another situation, an RAAA Operator Member has a mining client who has just purchased an on-going gold mine. Included in the purchase are all buildings, plant, machinery etc and staff. Part of the infrastructure is the aerodrome which is registered with CASA and fuel storage which is covered by a Dangerous Goods (DG) approval from the Department of Mines WA. The mining company applied to the Department of Mines for a transfer of the DG license, which was issued without delay. They then applied to CASA for a transfer of the registration of the aerodrome. They were told by CASA they would need to submit a full application and it would take approximately three months to process. This is absurd considering the aerodrome is registered and the ARO's and all other staff and infrastructure remain unchanged.

Industry participants are often required to respond to CASA requests for information or action at short notice under pain of penalty or loss of rights under the civil aviation legislation. There is no similar pressure on CASA to be effective and efficient. This point is a major contradiction and should be rectified and then independently evaluated.

The CASA 2012-13 Annual Report indicates in Annex B (page 174 & 175) that they had, as at 30 June 2013, 850 employees. Of possible concern is that 441 people (52%) are classified as “Other Services”. It may be possible for CASA to look how its people are deployed to ensure that their current human resources are optimised for outcomes pertinent and effective to the Australian aviation industry.

3b. Management and structure of CASA

An overwhelming majority in the aviation industry believe CASA is essentially dysfunctional.

One of the key problems is that the Board lacks proper aviation expertise, to the extent that it is unable to properly oversight the actions and proposals of the Director of Aviation Safety. Arguably, this has led to the capital “R” regulator approach taken by CASA. At face value and compared with the size and manner of operation of the UK CAA Board, the CASA Board is too small and meets too infrequently to be able to properly oversight CASA’s management. With a small Board that does not have an in depth knowledge of the workings of the oversight organisation (such as the UK CAA Board has through its committee structure which deals directly with senior managers), the CEO can have undue influence. Senior managers can feel accountable only to the CEO and not the Board.

CASA’s programs and practices can then seem to be at the whim of the incumbent CEO. This is evidenced by the stop/start approach to regulatory reform over the last decade and half and by shifts in enforcement practice from co-operation to rigidly legalistic.

In the RAAA’s view, policy making should be clearly separated from regulation enforcement.

The Australian Aviation Associations Forum (the Forum), of which the RAAA is a member, has stated its view that the entire regulatory reform and policy development role should be removed from CASA and placed in the relevant Department. The RAAA strongly supports this view in its own Policy Document. Copies of both documents are attached to this submission (Annex A and Annex B) for reference by the Review Committee.

3c. Management within CASA

It is a cliché that bureaucracies poorly managed can become sheltered workshops for less able time servers. This unfortunately is a widely held view of CASA.

There is abundant evidence that CASA is an unhappy workplace. Criticism between regions, between regions and central office divisions and between central office divisions is regularly heard in the industry. Forum shopping for a more favourable (or some would say, more reasonable and sensible decision) has long been an issue in the industry.

There is a general belief in the industry that CASA staff are less knowledgeable and less experienced than the people they regulate and, with notable exceptions, are not competent to work in the industry.

An uninterested or defensive decision maker will often make no decision or procrastinate as being the options that produce less criticism.

An uninterested or defensive regulator will look for the soft option of auditing paper without any genuine “on the floor” or “in the field” investigation. This leaves those who genuinely try to follow the rules and who make honest mistakes feeling that the flagrant abusers are left alone because they require too much effort. The avoidance of serious detailed investigation in favour of aggressive enforcement and undermining of the “Just Culture” approach in the collection of safety data destroys any co-operative approach to safety management.

In his November 2003 Charter Letter to CASA, then Minister for Transport and Regional Services, The Hon John Anderson MP, summarises the Government’s directions for CASA as :

“I wish to see CASA demonstrate world’s best practice in the area of aviation safety regulation. In its daily dealings, CASA must exhibit those behavioural attributes of a good regulator including consistency, accountability, fairness, flexibility and efficiency.”

For the reasons outlined in this submission CASA simply has not achieved consistency, accountability, fairness, flexibility and efficiency.

3d. CASA’s funding

According to its Annual Report, CASA recorded an operating surplus of \$12.0 million in 2012-13. The operating result was \$5.0 million more than the revised estimate. CASA explained the difference as being primarily due to an increase in the aviation fuel excise that it had received. Approximately 66 per cent of CASA’s income during 2012-13 came from aviation fuel excise on fuel sold for domestic air travel.

What needs to be kept in mind, due to ICAO requirements, excise is levied only on fuel sold for domestic operations. This has the effect of exacerbating an already inequitable situation as international flights (including those operated by Australian carriers such as Qantas, Jetstar and Virgin Australia) do not pay the excise. Similarly, the major airports and Airservices Australia do not pay the excise yet they come under CASA’s jurisdiction. Clearly, a very large proportion of CASA’s resources are expended on services which do not contribute to CASA funding.

Effectively this has put the main burden of CASA funding on the regional operators and the mainline domestic operators. However as the major domestic airlines all belong to company groups that have international operations they are receiving some benefit from this arrangement. It is the regional operators that are paying far more than their fair share under this funding arrangement.

In line with the current Minister's stated intent of relieving the financial burden on the industry, funding of CASA should be provided totally out of consolidated revenue rather than the current inequitable method used with the fuel levy. However if it is deemed that industry needs to contribute to CASA funding then such funding should be based on more equitable parameters that measure activity such as passenger numbers and/or ASKs (Available Seat Kilometres). These parameters could be adapted to suit both airlines and airports.

3e. Proper oversight of CASA

Currently there is no accountability with the way CASA behaves towards industry. In theory this could be achieved through the office of the Industry Complaints Commissioner (ICC), however CASA have managed to interfere and to make this process impotent. The RAAA notes that despite the initial high hopes for the role that the Industry Complaints Commissioner could play, the inaugural Commissioner resigned under a cloud of accusations of interference from senior management, and material and significant changes to the remit of the office. The RAAA also understands that Mr Hart's successor in the role also announced her resignation in late 2013.

Experience with the ICC is that the process is very time consuming. Whilst the general principle in administrative law is that there should be internal review prior to external review, the normal expectation is that this should be done by more senior management.

In order to restore industry confidence and restore the independence of the position, the RAAA believes that the Office of the ICC needs a serious overhaul and should be moved out of CASA and into the Department, reporting directly to the Departmental Secretary or the Minister. Additionally, it should be provided with greater authority and investigative powers. Indeed, the Ombudsman's 2007/08 Annual Report notes an overlap of roles. The current system of the ICC reporting direct to the CASA CEO is seen by industry as largely ineffective and, again, discourages some industry complaints due to fear of retribution.

3f. Civil Aviation Regulation ("CAR") 206

The Administrative Appeals Tribunal decision in *Caper Pty Ltd T/a Direct Air Charter and Civil Aviation Safety Authority ("Caper")*¹ in May 2011 has created confusion over the classification of operations which have long been operated safely as charter flights but are now regarded as Regular Public Transport (RPT). In particular it is an issue for operators of scheduled charters such as air tours. The *Caper* decision is also a practical problem for a number of RAAA members, as not all of their operations can comply with RPT standards.

¹ [2011] AATA 181.

Classification as an RPT operation would require a number of RAAA members to invest in infrastructure such as runway length and additional security requirements in order to meet the regulatory standards for an RPT operation. In most cases this represents funds that RAAA members do not have and simply cannot afford. Nevertheless, at least one operator has informed the RAAA that it would be applying for an RPT AOC in response to the decision in *Caper*, and that the decision would likely see some consolidation and a number of departures from the charter business – both in terms the number of operators and certain routes.

In view of the serious consequences arising from the *Caper* decision, CASA needs to immediately work with industry on a solution. The introduction of the new Part 135 of the Civil Aviation Safety Regulations (“CASR Part 135”) may go some way to resolving the issues that arise from the *Caper* decision. CASR Part 135 will set the minimum acceptable standards applicable to small aeroplanes that are conducting Australian air transport operations, and will affect air operators involved in current charter and RPT operations (passenger and cargo) in aeroplanes².

However, the implementation of CASR Part 135 is already behind schedule. CASA has previously made representations to RAAA members that Part 135 would be finalised by the end of 2013. This has not occurred, and whether this will affect the proposed commencement date for Part 135 of 5 March 2015 is unclear.

In any event, there is a regulatory vacuum that will exist from the date of the *Caper* decision to whenever CASR Part 135 becomes law. To combat this, CASA proposed a solution where CASA may, in appropriate cases, consider exempting an RPT operator from complying with some otherwise applicable requirements, and approving deviations from certain other requirements where that option is available.

In light of *Caper*, CASA indicated that it would consider applications for authorisation to conduct RPT operations with the exemptions detailed above where the aircraft involved have a seating capacity of not more than 9 seats and a maximum take-off weight of not more than 8,618 kg.

The RAAA understands that the Industry Complaints Commissioner had been pursuing test cases regarding CAR 206, to confirm whether or not CASA’s Regulatory Policy was effective in resolving the issues raised by *Caper*, at least in the interim. However, as noted above the Commissioner has recently resigned from her position, with the test cases only part way through the legal process.

In the interim some operators have ceased regular charters for fear of being prosecuted by CASA with a resultant adverse impact on their business and the local tourist industry.

² “Small aeroplane” under Part 135 means an aeroplane with a maximum take-off weight not exceeding 8,618 kg and fitted with a passenger seat configuration of not more than 9.

4. Protection of Safety Information (Just Culture)

Australia was once at the forefront of robust safety information protection regimes. However, we are now in an environment where CASA has made it clear that it regards any information it obtains, regardless of the circumstances by which that information is provided, as a potential basis for administrative action.

Safety information should only be used for safety purposes. Safety purposes do not include regulatory action against an individual or organisation.

The protection of safety information is arguably a subset of the RAAA's concerns in relation to enforcement aggression, but it is of sufficient importance and concern to be treated as an issue in its own right. There have been a number of recent examples of both actual and proposed conduct by CASA (and to a lesser extent by the ATSB) that the RAAA considers will jeopardise the free flow of safety information. Some of these examples are outlined below.

The working paper presented by Australia (CASA) at the 37th Session of the ICAO Assembly, *Some Caveats on 'Just Culture'*, highlights CASA's arrogance, misalignment of views to the Australian aviation industry on Just Culture, and wilfulness in pursuing legal recourse rather than safety outcomes where they say under 4.2 of the paper "... *the discourse on Just Culture that so often essays to distance itself from the courts and the law, is unhelpful*". It is the RAAA's opinion that any paper presented to the ICAO Assembly should be first presented to the Australian aviation industry for consultation. This is to ensure it represents, as far as possible, a holistic view based on safety outcomes as opposed to a predetermined legal recourse wanting to be imposed by the Australian Regulator.

4a. The safety buffer between ATSB and CASA and the CASA push for unfettered access

The current push by CASA towards unfettered access to safety reports held by ATSB and to operator SMS databases evidences reluctance on CASA's part to do genuine enforcement investigation and can only undermine the quality and usefulness of safety reporting.

These attempts by CASA to gain access to safety information held by the ATSB for the purpose of further enquiries have become an increasing occurrence. The recent moves by CASA to seek full access to incident reports from the ATSB through proposed changes to the TSI Act and amendments to the draft CASR 119 illustrate the inherent conflict in having the safety enforcer also in charge of the regulations.

Current practice allows for the sharing of some information between the ATSB and CASA where it is necessary to maintain safety standards. There is no need to extend this, particularly when it is at the risk of compromising Safety Management Systems. CASA's view that any action taken as a result of receiving these reports is not punitive or disciplinary is not shared by the industry. Such a move compromises Just Culture and would inevitably erode the healthy reporting culture that is so essential to a successful Safety Management System.

Similarly, CASA's recent tendency to demand full access to Safety Management System databases has the potential to severely damage the safety reporting culture. If this was to be mandated then it would be perceived by employees that Just Culture no longer exists.

Several RAAA members have reported situations where CASA inspectors have asked to see identified information in their Safety Management Systems. One operator responded by refusing them access to the data altogether whilst another allowed the inspector restricted access to reports which had been previously de-identified. Notwithstanding sanctions for failure to report safety related incidents or possible safety risks, individuals will not report if they feel they are exposing themselves to punitive action. The concept of just culture is essential to ensure that safety information is collected solely for the improvement of aviation safety and not for punitive action against reporters. To achieve that end the safety reporting system must be confidential, voluntary and non-punitive. Administrative action to suspend or cancel a licence or an approval cannot be described as non-punitive, simply because it was not done through criminal proceedings.

The independence of the ATSB must be maintained, and the fostering and promotion of safety should be removed from CASA and placed under ATSB jurisdiction. In addition, the policy on access to ATSB safety reports by CASA, including access to industry SMS databases, should be determined by the Department and not by CASA.

The RAAA believes that a common sense approach should be taken here. The suspension or cancellation of an authorisation or licence is clearly a punitive action. It is highly likely that an individual, faced with an action such as this, or with the threat of his or her employer being shut down, will think twice about reporting a safety incident. In such cases, there is a risk that errors and unsafe actions will remain hidden and organisations and regulators will lose opportunities for improvement and prevention.

In the CASA 2012-13 Annual Report (page 33) under Portfolio Outcomes they state for the number of incidents per hours flown, by industry sector that, *"However, there was an increase in reported occurrences in the regular public transport sector during 2012. This may be a result of an improved reporting culture in this sector. The introduction of the REPCON scheme for voluntary and confidential reporting of safety concerns under the Transport Safety Investigation Regulations 2003 may have also contributed to an increase in the number of incidents reported to the Australian Transport Safety Bureau."* We can therefore surmise that even CASA sees the benefit of the current Just Culture regime that they are now attempting to dismantle.



V. CONCLUSION

The RAAA is grateful for the opportunity to provide our views to the Review Committee for the Aviation Safety Regulation Review. We hope the above information provides an insight into the current regulatory environment our Members' experience.

If the Review Committee, or any of its Members, would like further information about the items contained in this submission, or clarification on any of the points we make, the RAAA would be more than happy to assist.

Regards,



Paul Tyrrell
Chief Executive Officer

Annex A
Regional Aviation Association of Australia
Submission to the Aviation Safety Regulation Review
January 2014

A stylized map of Australia is the background for the top half of the page. The map is dark blue and overlaid with a network of white lines and dots representing flight routes and airports. The lines connect various points across the continent, showing a dense network of connections, particularly in the eastern and southern regions.

REGIONAL AVIATION
ASSOCIATION OF AUSTRALIA

***CALL FOR ACTION ON
REGIONAL AVIATION POLICY***

19 March 2013

Serving Regional Aviation,
and through it,
the people and businesses of regional Australia

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INTRODUCTION

The Regional Aviation Association of Australia (RAAA) is a not-for-profit organisation formed in 1980 as the Regional Airlines Association of Australia to protect, represent and promote the combined interests of its regional airline members and regional aviation throughout Australia.

The Association changed its name in July 2001 to the Regional Aviation Association of Australia (RAAA) and widened its charter to include a range of membership, including regional airlines, charter and aerial work operators, and the businesses that support them.

The RAAA has 30 Ordinary Members (AOC holders) and 70 Associate/Affiliate Members. The RAAA's AOC members directly employ over 2,500 Australians, many in regional areas. On an annual basis, the RAAA's AOC members jointly turnover more than \$1b, carry well in excess of 2 million passengers and move over 23 million kilograms of freight.

RAAA members operate in all states and territories and include airlines, airports, engineering and flight training companies, finance and insurance companies, educational institutions and government entities. For rural and regional communities its members provide an essential link to metropolitan centres for important services such as medical, hospital, legal, education, tourism, government, sport and financial services.

In recent years there has been a dramatic decline in regional airline services. Most recently we have seen the impact of the Global Financial Crisis and spiraling costs. Of particular concern is the fact that significant cost increases are due to Australian Government policy and regulation. The current financial year will see many millions of dollars added directly to RAAA members' bottom line due to three Government policy initiatives alone.

On the Governments own figures from the BITRE, essential regional air services have been in serious decline for over two decades and negative policy initiatives such as these only serve to increase the downward trend. Government needs to develop policy that can slow or reverse this trend and guarantee regional Australia, outside of the major tourist and mining centres, the essential air services needed for its continued economic and social well being and future prosperity.

This paper lists out the critical issues that will determine the viability of air services for most regional cities with recommendations on policies to be adopted by the Government. The RAAA calls on the Minister for Infrastructure and Transport and the Shadow Minister to state their positions with regard to these issues so that regional communities affected can make informed decisions during the upcoming elections as well as hold the government accountable for promises made during the election campaign.

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GOVERNMENT POLICY AND STRUCTURE

Recent Government policy and regulation formulation has been characterised by a lack of meaningful consultation with the regional aviation industry. Legislative changes have been made with no industry input and enacted without notice.

Examples of this are the carbon tax levied on fuel for regional operators, the withdrawal of the Enroute Rebate Scheme, the increased CASA fuel levy for domestic operators and the proposed new rules for Fatigue Risk Management Systems. Of concern are broken promises when policy positions are promulgated such as the failure to produce any replacement for the Enroute Rebate Scheme as promised in the Aviation White Paper.

Policy has been developed for political and bureaucratic reasons, in isolation from industry knowledge and expertise. Government policy has shown no real understanding of its impact on the regional aviation industry and the regional communities served by it. This situation can be improved with an increased focus on regional aviation and more meaningful consultation. Realistic policies are needed that foster and promote improved regional aviation services.

Due to its geography, regional aviation has played an integral part in Australia's development. This was recognised from the early days with the formation of the Department of Civil Aviation in 1935, which played a vital role in regional aviation until being absorbed into the Department of Transport in 1973. The Department of Aviation was reformed in the 1980s under the Hawke Government but since 1996 there has been no Department or Minister of Aviation.

Australia would be better served by having a clear aviation policy with a direct Ministerial and Departmental focus on aviation as a separate sector rather than being lost in a generic Department dealing with transport and infrastructure.

Where active industry participation in policy development has been sought (as with ASTRA and NASAG) good results have been achieved and such bodies should be maintained within the Department.

POLICY

- Commit to establishing a Minister of Aviation and a Department of Aviation or at least a Parliamentary Secretary for Aviation.
- Improve engagement with industry by establishing a Ministerial Aviation Council with leading industry associations such as the RAAA.
- Re-align responsibilities for Government agencies as follows:
- Department: fostering and promoting aviation, developing regulations, regulatory reform, aviation security, airport policy and airspace management.
- ATSB: fostering and promoting aviation safety and administering the TSI Act.
- CASA: ensuring safety standards are maintained.
- Airservices: as per its current charter.

SAFETY AND SECURITY

REGULATORY REFORM

CASA has lost sight of the original aim of improving safety by simplifying and clarifying the regulations and in the process making them more practical. The reform process has now been running for nearly 20 years with only modest improvements in safety and no harmonisation with overseas jurisdictions such as EASA or the FAA.

The consultative mechanisms that CASA has put in place, in particular the Standards Consultative Committee (SCC), are clumsy and have not achieved genuine industry participation.

Comparisons of regulatory reform with other countries highlight the failure of CASA to manage the regulatory reform process, to strategically manage workload within both CASA and the industry, or to consider the capacity of industry to adapt to significant change to the extent that the regulatory reform program has itself become a potential threat to aviation safety.

There is a conflict of interest in having the aviation policeman draft the laws that it has to enforce. Policy and regulatory development should be administered by the Department.

Future policy needs to ensure that CASA continues with its risk based approach and focuses on safety outcomes rather than simply blindly enforcing compliance. While CASA executives appreciate and promote a risk based and safety outcome focused strategy, they have not been able to prevent their front line staff from focusing more on compliance than safety.

POLICY

- The regulatory reform process should be removed from CASA and placed within a new aviation department or, failing that, a new division within the Department.
- Regulatory reform should be undertaken in partnership with industry through strong formal and informal consultative relationships with industry.
- Regulatory reform should be based on achieving harmonisation with the regulatory regimes used by key trading partners and neighbours. There should be no uniquely Australian rules unless industry can demonstrate a need.
- Review the US Regulatory Flexibility Act and the US Paperwork Reduction Act with a view to applying similar principles to Australian legislation.
- Move the Office of the Industry Complaints Commissioner out of CASA and into the Department and provide it with greater authority and investigative powers.

SAFETY REPORTING

The recent moves by CASA to fully access reports to the ATSB through proposed changes to the TSI Act and amendments to the draft CASR 119 illustrate the inherent conflict in having the safety enforcer in charge of the regulations.

CASA's view that any action taken as a result of receiving these reports is not punitive or disciplinary is not shared by the industry. Such a move compromises Just Culture and would inevitably erode the healthy reporting culture that is so essential to a successful Safety Management System.

Current practice allows some sharing of information between the ATSB and CASA where it is necessary for maintaining safety standards. There is no need to extend this, particularly when it is at the risk of compromising Safety Management Systems.

Similarly, CASA's recent tendency to demand full access to Safety Management System databases has the potential to severely damage the safety reporting culture. If this was to be mandated then it would be perceived by employees that Just Culture no longer exists.

POLICY

- The independence of the ATSB must be maintained.
- The fostering and promotion of safety should be removed from CASA and placed under the jurisdiction of the ATSB.
- Policy on access to ATSB safety reports by CASA should be determined by the Department and not by CASA. This includes access by CASA to industry SMS databases.

SECURITY

Increased security measures add additional expense to the industry and in the case of regional services can threaten the viability of thinner routes as airport passenger and baggage security screening costs are passed from airport operators (on behalf of the security contractors) back to regional airlines as an additional operating cost burden. The annual operating cost of security screening at a typical category 3 regional airport is in the order of \$750,000 - \$1,000,000 which far exceeds the PBT made by the air operator in all but the very large regional centres.

Providing sophisticated passenger and baggage screening at the smaller regional airports may be problematical due to difficulties with maintenance and staffing as well as both the significant upfront capital costs and ongoing operating costs that are associated with introducing sterile areas into regional airports.

As nationally imposed threat assessment and security measures are for the protection of the entire community, consideration should be given on thinner routes for the cost of security measures to be fully funded from consolidated revenue.

If threat levels and assessments decrease, there does not appear to be any planning or system for reducing security requirements.

Aviation security must have as its basis realistic risk and threat assessment. Security measures must be employed commensurate with the associated risk to each individual locality. While broad guidelines for screening may be based on aircraft MTOW, the requirement for screening should be location and risk specific rather than aircraft specific. For example if there was only one medium jet aircraft movement per week at a particular location it may be decided after risk assessment that screening was not required.

The same logic should be applied to large aircraft charter flights. Where there is a large aircraft regular charter service, little different to an RPT service, then screening makes sense. However, in the case of an ad hoc one off charter to a port without screening facilities, it would obviously not be practical. Again, the requirement should be risk based.

POLICY

- Allow for a location and operation specific risk based approach to screening requirements in regional ports rather than a strict adherence to a weight based cutoff for full screening.
- Link the threat assessment level with security requirements so that if the threat level drops, so does the security response.
- If a threat level requires additional screening or other measures on thinner regional routes that cannot support such measures, the government will provide ongoing financial support (both CAPEX and recurring) to the airport owner.

CASA FUNDING

The FY11 federal budget introduced a significant rise in funding for CASA by way of an increase in the fuel levy. In the forward estimates the amount of the fuel levy allocated to CASA increased from \$80M in FY10 to \$124M in FY14. Proportionally this raised the amount of CASA funding out of the fuel levy from 61% to 74% over the period with the balance coming out of ordinary appropriations.

This had the effect of exacerbating an already inequitable situation as international flights (including those operated by Australian carriers such as Qantas, Jetstar and Virgin Australia) do not pay the fuel levy. Similarly, the major airports and Airservices Australia do not pay the fuel levy yet they come under CASA's jurisdiction. Clearly, a very large proportion of CASA's resources are expended on services which do not contribute to CASA funding.

Effectively this has put the main burden of CASA funding on the regional operators and the mainline domestic operators. However as the main domestic airlines all belong to company groups that have international operations they are receiving some benefit from this arrangement. It is the regional operators that are paying far more than their fair share under this funding arrangement.

This was the subject of a Senate Inquiry in 2010 with some concern expressed by Coalition Senators in the final report as to the process employed to enact this increase.

POLICY

- Funding of CASA should be provided totally out of consolidated revenue rather than the current inequitable method used with the fuel levy. However if it is deemed that industry needs to contribute to CASA funding then such funding should be based on more equitable parameters that measure activity such as passenger numbers and/or ASKs (Available Seat Kilometers). These parameters could be adapted to suit both airlines and airports.

LONG TERM VIABILITY OF REGIONAL AIR SERVICES

ENROUTE REBATE SCHEME

This was cancelled on 1 July 2012.

In 2009 the Aviation White Paper noted that the smaller regional air services were in serious decline and recognised the need to retain the Enroute Rebate Scheme in one form or another. It gave a commitment to introduce an equivalent subsidy system to support services to the more remote destinations, commencing 1 July 2010. The Government broke its promise and this scheme never materialised. However the need for some form of assistance still remains.

With the cessation of the Enroute Rebate Scheme there is no Commonwealth Government assistance for essential regional airline services. The Western Australian Government provides some subsidies for air services in the Kimberley region while the Queensland Government has a more comprehensive scheme for its outback regional centres. The other states do not provide any assistance.

With the onset of airline deregulation in the United States, it was recognised that many smaller communities would lose their air services and the Essential Air Services (EAS) scheme was put in place to subsidise around 150 of these communities. Australia also deregulated its domestic airline industry but without any consideration of the impact on regional communities.

BITRE statistics show that over the period 1984 to 2008 the number of regional airports served by scheduled airlines fell from 278 to 138, with the steepest decline on low density routes. The number of airlines serving regional airports fell from 53 to 27 in the same period.

In the FY11 budget the Government allocated \$12.5 billion for essential road and rail infrastructure while withdrawing \$6 million for the Enroute Rebate Scheme. Essential air services play just as critical a role in the social and economic well being of regional centres as surface transport and yet are denied the smallest amount of assistance.

POLICY

- Re-establish the Enroute Rebate Scheme.
- Establish a strategic national system to support financially the provision of essential air services to those communities where a commercial aviation service is not viable or requires development to be viable in the longer term.

CARBON TAX

When introducing the carbon tax the Government gave consideration to some modes of transport by exempting private vehicles and delaying the imposition of the tax for the trucking industry by at least two years.

No such consideration was given to air transport which saw its fuel bill massively increased on 1 July 2012. We estimate that this will add an extra \$195M of costs for the aviation industry as a whole in the 2012/13 financial year. For RAAA members, who represent 25% of the total aviation industry, this has meant an estimated extra tax of over \$49M p.a. which it has to either absorb or pass on to its passengers. This is in addition to the estimated \$5M per annum extra tax RAAA members have had to pay from the 1 July 2010 for the increased funding to CASA (See CASA Funding above).

The imposition of this tax is designed to force energy users to reduce their carbon emissions. For regional airlines operating aircraft with less than 50 seats this is meaningless as they cannot reduce their fuel burn and carbon emissions due to the lack of any new technology available in the market to replace existing equipment. The only way they can burn less fuel and hence create fewer emissions is to reduce their flying. In practical terms this means closing some routes and/or reducing frequency, meaning that regional Australians lose out as essential regional air services are either removed or diminished. In the end this new tax means that smaller regional airlines will not produce any less carbon emissions, unlike the larger airlines that over many years have been able to reduce their fuel burn through improved technology.

Ironically the transport sector which has the most potential to reduce carbon emissions, through new technology, and which is a direct competitor on many regional routes was exempted from the tax. This is the private motor vehicle which is often a regional airline's main competitor. More fuel efficient motor vehicles are available that will reduce carbon emissions from this sector and yet it is exempt from the new tax.

The carbon tax that the government is imposing on regional air services does not make any sense and is purely revenue gathering from an industry that is in serious decline and can ill afford it.

POLICY

- Abolish the carbon tax on regional air services.

AIRPORTS

CAPITAL CITY AIRPORTS

Access to capital city airports is vital to regional air services and needs to be permanently secured.

Although there is current legislation with respect to Sydney Airport which guarantees slots for regional services, it does not provide protection for other essential facilities such as lounges, hangars, network operations and pilot briefing rooms.

Sydney Airport has a vested interest in driving out regional aircraft and can and has tried to do so by applying exorbitant price increases on unregulated charges. Charges at Sydney Airport which are currently regulated by the ACCC are subject to Declaration 92 and Direction 31 under Part VII of the Trade Practices Act which are not permanent. These regulatory controls expire on 30 June 2013 and a more permanent arrangement is needed to provide certainty for regional air services into Sydney.

The trend to drive out smaller operators is not confined to Sydney with airports such as Brisbane and Canberra using high prices to discourage smaller regional operators. Additionally as traffic increases and slot schemes are put in place in other airports, regional operators will be in danger of losing access as can be seen with the proposed Runway Demand Management Scheme at Brisbane Airport which discriminates against aircraft with less than 50 seats. Similar legislation to that at Sydney, protecting regional Australians access to their capital city, will be needed at these airports in the future.

The Federal Governments “light touch” approach to regulation at airports like Sydney has clearly not worked. This can be seen by the extraordinary profits made by Sydney Airport (EBITA in excess of 80% for the last 5 years notwithstanding the GFC). It is clearly monopolistic behaviour as highlighted by the ACCC. The only practical answer is a return to price regulation.

The curfew and movement cap at Sydney is sorely outdated, highly inefficient and needs to be re-examined in the light of modern aircraft noise levels.

POLICY

- Direct the ACCC to oversee and regulate pricing at capital city airports under Part IIIA of the Competition and Consumer Act 2010.
- Ensure that regional air services have guaranteed access to all capital city airports, including the necessary space required to maintain their operations.
- Guarantee regional air services access to Kingsford Smith Airport in the event that a second Sydney airport is constructed.

- Review the movement cap at Sydney Airport, with the purpose of lifting the cap to 85 movements per hour, which it operated to prior to the 1996 federal election when it was dropped for political purposes. Consideration should be given to removing propeller aircraft from the cap as these aircraft are not the subject of noise complaints.
- Review the curfew at Sydney Airport. The curfew should be reformed to allow aircraft that meet the appropriate noise criteria to operate within the curfew period. .

REGIONAL AIRPORTS

Excessive price increases are not an issue confined to the major capital city airports but are also an issue at some major regional airports.

Regional airlines experience many unnecessary increases in per unit charges (passenger head taxes and landing fees). Such increases should not be the focus of regional airport owners. Consideration should be given to significant passenger and flight activity growth. What is important is total airport revenue, yet local government processes are often fixated on annual CPI (or greater) increases that are simply not justified and often result in less revenue for the airport. Local government often seems unable to move away from their traditional approach of pushing up fees in line with the CPI or some other figure imposed upon them. They seem incapable of grasping the concept of revenue growth from increased passenger numbers.

Many larger regional airports do not run adequate accounts for the airport, with airport revenue being channeled into general Council revenue to fund other Council activities. These Councils talk about having to get a ROI on an asset that was gifted to them by the Commonwealth under the ALOP (Aerodrome Local Ownership Programme) and was never intended to be used as a cash cow. The Commonwealth handed these airports over so that they could remain an essential piece of local community infrastructure but this seems to have evolved into a grab for revenue by some Councils. Airports, unlike any other piece of community infrastructure, are seen as ways of making money by many regional Councils.

In addition, some regional airport head tax increases are implemented to fund grand airport development plans that are unlikely to ever eventuate due to a “build it and they will come” mentality. Another situation that routinely occurs is that a domestic carrier may decide to enter a regional port with large aircraft which triggers significant airport infrastructure works and as a result all airport users are faced with significant increases in airport charges despite the fact that not all users will derive a benefit. In these cases the smaller regional operator is forced to subsidise the cost of a competitor introducing a larger aircraft.

Another example of charges by the major regional airports which can be anti-competitive in nature are security charges which are 100% recovered from the airlines.

The problem arises at the larger regional airports when one of the network domestic operators introduces an aircraft of over 20 tonnes MTOW (typically a 74 seat Q400 or 68 seat ATR72) that triggers the security screening requirement. Invariably the airport operator then insists on charging all airlines for screening even though the smaller aircraft do not legally require it and under current OTS Air Transport Safety Regulations can operate simultaneously with the larger aircraft without being screened. As the cost of screening is high this anti-competitive behaviour has rendered some air services unprofitable and led some small regional airlines to exit routes when they would normally not have done so.

POLICY

- Larger regional airports should come under a form of price regulation administered by the ACCC or review by an Ombudsman so that there is a course of appeal for regional airline operators subject to unfair price increases.
- Enact regulation to prevent airport operators from charging for passenger and baggage screening services for aircraft that do not legally require such services and for which the operator has elected not to have.

REGIONAL AIRPORT INFRASTRUCTURE

Many regional centres rely on air services as an essential means of transport and a vital link to the major cities for services, especially medical, that cannot be provided in country areas. Additionally smaller regional airports play a vital role in emergency service provision, (such as air ambulance, police, search and rescue, fire fighting and Defence), business and social needs.

While the Government does provide support for remote communities through the Remote Aerodrome Safety Programme (RASP) there is no support for the essential service routes of the wider rural community. With few exceptions regional air service infrastructure, as opposed to the remote social services covered by RASP, is not supported at all by Federal or State Government.

While the larger airports in regional centres do have the capacity to maintain and develop their own infrastructure, many smaller airports are in long term decay through neglect and may eventually be closed. The larger regional airports that can sustain themselves should be treated differently from the smaller airports in terms of policy, access to Commonwealth funding support and statistical analysis.

Smaller and unsustainable airports are in dire need of assistance to ensure they remain a useable part of the national infrastructure system. They require Commonwealth funding support through a new regional, rural and remote airport scheme that will support the ongoing maintenance and development of this critical national infrastructure. They are no different to the highway or railway line servicing the same town which receives infrastructure funding from all three tiers of government.

POLICY

- Commit to recognising airports as critical national infrastructure and develop appropriate funding mechanisms to support their ongoing development and maintenance.
- Enforce Aerodrome Local Ownership Programme (ALOP) deeds to ensure airports previously handed over to local government remain as airports unless otherwise approved by the Commonwealth.

INDUSTRY SKILLS SHORTAGE

Both Boeing and Airbus have officially forecast a major demand for aviation professionals over the next 20 years as Low Cost Carriers continue to expand, particularly in Asia. Worldwide, on average some 20,000 pilots and 30,000 maintenance engineers will need to be trained every year for the next 20 years. 400,000 pilots and 600,000 engineers in the next twenty years need to be trained.

One of the greatest risks that regional airlines face is a shortage of pilots, as happened in 2007/2008, when regional airlines lost huge numbers of their pilots to the major domestic airlines. In some cases the loss was over 100% in one year. This resulted in route closures, frequency reductions, delays and inconvenience to passengers.

Australia will need to ensure that it can keep pace with domestic demand and also allow for the fact that many aviation professionals, particularly pilots, take up lucrative job offers overseas thereby increasing the demand in Australia.

Professional pilot training is very expensive, costing over \$100,000 to reach the Commercial Pilot Licence level. The Australian Government makes the VET FEE HELP programme available for pilot training linked to tertiary institutions. However the smaller flying schools and aero clubs which have in the past supplied many pilots to the industry are largely not eligible for this scheme.

The VET FEE HELP programme requires the incorporation of a Certificate IV aviation course into the flying training syllabus through a TAFE or tertiary education institution. Undergraduate degrees and diplomas used for pilot training with the assistance of HECS HELP and FEE HELP will provide a means for a longer term solution to the sourcing of pilots but will not allow for a quick response once pilot recruitment begins to increase rapidly as happened just prior to the global financial crisis.

A more expeditious way to train pilots quickly would be to identify eligible courses for training professional pilots through approved training organisations or RTOs which concentrate on essential pilot qualifications as per the CASA syllabus. This training can be accomplished in less than 12 months and graduates can then quickly progress to an entry level job in the industry.

POLICY

- Extend access to VET FEE HELP to RTOs which can deliver a Commercial Pilot Licence with Instrument Ratings as per the CASA syllabus without the need for lengthy tertiary courses.

A stylized map of Australia is the central focus, rendered in a dark blue silhouette. Overlaid on the map is a network of white lines and dots representing flight routes and airports. The lines connect various points across the continent, with a particularly dense network in the southern and eastern regions. The background of the top half of the page is a light blue gradient.

REGIONAL AVIATION ASSOCIATION OF AUSTRALIA



THE AUSTRALIAN AVIATION ASSOCIATIONS' FORUM AVIATION POLICY



THE AUSTRALIAN AVIATION ASSOCIATIONS' FORUM

AVIATION POLICY

The Australian Aviation Associations' Forum is an alliance of Australia's major peak aviation associations to ensure the industry presents a united voice to government on key aviation issues and policy, characterised by expertise and the widest possible representation of people and organisations involved in aviation.

The following associations support the policies contained in this document:

Aerial Agricultural Association of Australia	ph. 02 6241 2100
Australian Association of Flight Instructors	ph. 02 4998 1301
Australian Business Aviation Association	ph. 02 9953 0363
Aviation Maintenance Repair and Overhaul Business Association	ph. 02 9759 2715
Regional Aviation Association of Australia	ph. 02 6162 0305
Royal Federation of Aero Clubs of Australia	ph. 02 6253 9724





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INTRODUCTION

Who is the Forum?

The Australian Aviation Associations' Forum is an alliance of the majority of Australia's major aviation associations to ensure the industry presents a united voice to government on key aviation issues and policy, characterised by expertise and the widest possible representation of people and organisations involved in aviation.

The Forum is simply a regular meeting of peak aviation Associations that enables these representative bodies to discuss matter of mutual importance to their members, the aviation industry and the community.

The Forum participants represent the significant majority of aviation operators, aircraft owners, service providers, supporters and participants.

The Forum has been operating successfully since 2008.

Why Publish Policies?

The aviation industry has long been accused by government and government agencies as being fragmented and difficult to deal with.

By uniting on policy issues, participants in the Forum are able to lend the considerable representative weight of their combined memberships to issues of common concern and remove the government's traditional excuse for inaction.

These policies have been developed by Associations with enormous aviation and public policy experience who represent members who daily deliver aviation services, safely and securely.

Many policy issues identified here are unique to aviation and require considerable background and technical knowledge to understand.

A significant number of the policies are designed to address the inequitable policy treatment of aviation by successive governments.

For example, the difficulty of accessing HECS and VET fee help for candidates attending traditional CASA approved aviation training organisations such as flying schools and aero clubs has directly exacerbated the pilot skills shortage the industry is currently suffering.

Only by formulating and presenting coherent policies, based on sound principles of government, management and the needs of the aviation industry, can political representatives be called to focus on the difficulties created and the social and economic opportunities lost by the current state of Australian aviation policy.

Australia should be a world leader in aviation

Australia should be leading the world in key aspects of aviation such as flight training, maintenance, air traffic management, security and regulatory controls, avionics and manufacturing of small to medium aircraft and components.

Australians can recapture their previous 'airmindedness' and aviation vision through realistic policies that free the industry from red tape and foster and promote improved aviation services.

Australia is capable of sustaining a vibrant aviation industry that is characterised by a high level of safety, strong employment, a significant contribution to the national economy, and a logistical capability that enables and supports communities, businesses and families.

We believe our political representatives can capitalise on our natural advantages and the skills of our people by working with the industry to establish an environment that supports safety, encourages competition and delivers significant benefits to the Australian community.

To revitalise the aviation industry's contribution to the common wealth of Australia, a range of initiatives are essential to completely reposition aviation as a policy priority area rather than the backwater into which it has been allowed to drift.

The potential of aviation to contribute across a wide range of policy areas – from maintenance and manufacturing and jobs to the environment and regional development – is very real and only requires encouraging policy settings that put aviation on a similar standing as other industry sectors.

GOVERNMENT POLICY AND STRUCTURES

Problem:

There has been a loss of focus on aviation policy due to compromises made by political parties in terms of Ministerial arrangements, portfolio and Departmental structures.

While aviation is an essential part of national infrastructure, this has not been reflected in the structure of the Department of Infrastructure and Transport or in departmental structures over recent decades.

There is a distinct lack of any government instrumentality with a clear charter to promote aviation and yet it is the preferred mode of transport for business, tourism and industry.

Australia would be better served by having a clear aviation policy and direct Ministerial and Departmental focus on aviation as a separate sector, rather than being lost in a generic Department dealing with transport and infrastructure.

Over the last 20 years there has been a significant growth in the wider population accessing aviation services, but Australia has not had a commensurate policy and structural focus on aviation to add value to this significant and fundamental change in the nature of aviation.

Policy Actions:

1. Develop specific stand-alone aviation policies.
2. Commit to establishing a position of Minister for Aviation and a Department of Aviation or at least an improved ministerial focus on aviation through a Parliamentary Secretary and a clearly delineated department or at least division.
3. Government should engage better with industry by establishing a Ministerial Council with leading industry associations.
4. The CASA Board does not appear to contribute to aviation policy or provide direction to CASA. The role of the CASA Board should be reviewed to include industry representation with authority to direct CASA.
5. New structural responsibilities for Government agencies should include:
 - a. CASA – responsibility for ensuring the Australian aviation industry functions at an acceptable level of competency and safety.

- b. ATSB – responsibility for fostering and promoting aviation safety (moved from CASA) and administering the TSI Act.
 - c. Department of Aviation or Aviation division within the Department – responsibility for fostering and promoting aviation, developing regulations, consulting with industry and managing regulatory reform, managing aviation security, managing airport policy, airspace management, and ARFF policy, and continuing the positive work of NASAG (Safeguarding Airports) guidelines and policy processes.
 - d. Airservices – as per current responsibilities, other than removing ARFF services and making provision and management of ARFF the responsibility of airport owners, in compliance with standards established on a risk basis by the Department.
6. CASA should be directed by Government to work more cooperatively with peak industry associations to develop recognised Codes of Practice that will support aviation safety while reducing compliance costs, in line with ICAO recommended practice.
7. Maintain ASTRA as the primary consultation forum on technology issues for aviation navigation technology with direct reporting to the Minister.

FOSTER AND PROMOTE AVIATION

Problem:

There is no government agency at the Federal level with carriage of the responsibility for fostering and promoting aviation. There is a patent need for government to play a role in promoting what is an essential part of the economy, manufacturing, jobs, national development and infrastructure.

The Civil Aviation Act 1988 does not include any direction or head of power to foster and promote aviation in Australia. This has had a serious and ongoing negative impact on the way CASA operates and the way it interprets its role and the legislation it manages for the Commonwealth without consideration of the impacts of its decisions on the industry.

Other countries have shown the potential to build strong aviation industries and jobs by adopting a 'foster and promote' approach to aviation regulation and manufacturing. Brazil, Canada, France and USA have all strong support measures in place for their indigenous aircraft and component manufacturing industries.

Australia, despite a strong start and proven superior products, has been left behind.

Policy Actions:

1. Amend the Civil Aviation Act 1988 to include a new power and responsibility for CASA and other aviation agencies to foster and promote the aviation industry in Australia.
2. The proposed Minister for Aviation or Parliamentary Secretary should then provide a new letter of direction to the CEO of CASA and any other relevant agencies clarifying the means by which CASA is to give effect to this new responsibility.
3. Government direct its aviation agencies – including CASA, ATSB, OTS and Airservices – to incorporate into their corporate planning and procedures the requirement to consider how their policies and regulations will foster and promote aviation.
4. Government aviation agencies should cooperate more strongly with organisations such as IATA and the tourism industry to develop policies that support aviation.

REGULATORY REFORM

Problem:

The reform of Australia's aviation regulatory system is out of step with key trading partners, international best practice and the relevant international treaties.

CASA has lost sight of the original aim of simplifying and clarifying regulations. The reform process has been running for over 20 years with little demonstrable improvement in harmonisation or simplification.

The inability of the new regulations to establish international harmonisation between Australia and major aviation countries is a missed opportunity that underlines the inability of CASA to maintain a steady focus on clear objectives.

The new regulations are characterised by a complex approach in both content and drafting style that seeks to obfuscate operational clarity and certainty for the likelihood of a successful criminal prosecution, with a complete failing of the original intent of 'safety through clarity'.

The consultative mechanisms CASA has put in place and especially the Standards Consultative Committee (SCC) and the newer safety forums are founded on a flawed culture of instructing industry on CASA decisions rather than genuine consultation.

Comparisons of regulatory reform with other countries highlight the failure of CASA management to contain the regulatory reform process, to strategically manage workload on both CASA and industry, or to consider the capacity of industry to adapt to significant change.

There are currently more than 50 individual regulatory change projects that CASA has established in addition to the already significant workload of the regulatory reform program.

CASA has demonstrated very poor control of the workload involved in developing the regulations, to the point that the regulatory reform program has itself become a potential threat to aviation safety.

It is not appropriate for the aviation regulation enforcer (CASA) to draft the law. Policy and regulatory development should be vested in the Department.

Policy Actions:

1. The regulatory reform process should be removed from CASA and placed with a new aviation department, or at least a new division within the Department.
2. Regulatory reform should be characterised by strong formal and informal consultative relationships with industry.
3. Instead of reinventing the wheel in an international industry, regulatory reform should be based on a sound understanding of international best practice and the regulatory regimes used by key trading partners and neighbours, where relevant.
4. General principles in regulatory reform should include:
 - a. No uniquely Australian rules unless industry can demonstrate a need.
 - b. Reduction of 'red tape' and the simplification of processes within the regulator for the benefit of industry should be a priority
 - c. Review the US Regulatory Flexibility Act and the US Paperwork Reduction Act with a view to applying similar principles to Australian legislation.
5. Continuous improvement principles should be applied to aviation regulation in Australia, including the relevance of regulations to the current status of operational technology. Consideration should be given to automatically applying a sunset clause to regulations where appropriate.

AVIATION TAXATION

Problem:

Australia has an uncompetitive and inequitable taxation system in place for aviation.

The current system provides no incentive to CASA to be more efficient. The system provides no incentive for updating of the fleet due to ATO rulings on useful working life of aircraft, which works in direct opposition to goals of encouraging newer aircraft for improved safety and better environmental performance – including both lower noise and lower emissions. The system takes no account of the highly variable, seasonal and often time-critical nature of aviation. The carbon tax penalises the industry for no environmental improvements. The lack of access to training support has created a skills shortage.

Policy Actions:

1. Abolish the carbon tax or provide mechanisms to recognise the inability of the aviation industry to adjust quickly due to aviation's regulatory and engine certification requirements.
2. Provide for 60% depreciation of aircraft assets in the first year to have an internationally competitive investment environment as available to aviation sectors overseas.
3. Provide for a 150% write-off for aviation research and development to encourage skilled jobs in Australian aviation, innovation and an indigenous aviation design and manufacturing industry.
4. Provide for aviation company income averaging across a rolling five year span.
5. Establish within the ATO a high level working group to identify and remove tax impediments to the aviation industry and to develop more equitable approaches to taxation, as is currently the case with other sectors.
6. Allow all commercial pilot candidates (and sector specific rating candidates) to participate in HECS.
7. Exempt agricultural, medical and emergency services operations from fuel tax.
8. Establish a joint industry / Departmental / CASA Efficiency Taskforce to improve efficiency within CASA and thereby reduce the need for additional cost recovery, including a focus on developing better systems of delivery of services.
9. Establish an industry taskforce to consider the long term funding of aviation regulation in Australia, including a more equitable application and levying of the fuel tax, charging international airlines for services provided, and identifying potential contributions to covering the cost of aviation regulation by other government agencies also charging the industry (such as Airservices etc). A key focus of such a taskforce should be to identify those operations currently undertaken by CASA and other aviation regulators that deliver a community rather than industry benefit and fund those activities from consolidated revenue rather than industry cost recovery.

EDUCATION AND TRAINING

Problem:

The inequitable treatment of aviation careers by successive governments has created an aviation skills shortage that threatens to cripple the industry's capacity to service the community.

The previous willingness of pilots, LAMEs (engineers) and support staff to self-fund their education and qualifications has encouraged a laziness in national aviation skills policy that is now compromised by the unwillingness of new generations to incur massive personal debt to commence a career in aviation.

As costs have continued to spiral unchecked by efficient regulation and new generations not seeing aviation as attractive a career as previously, the need for sensible government education support that is available to other sectors is becoming critical.

The cost of a commercial pilot licence with a command instrument rating is in the order of \$100,000.

In addition, industry projections for pilot and LAME training demand internationally is significant. Australia is in a prime geographic location with excellent weather and few capacity restrictions to take advantage of this predicted boom in aviation training. The quality of Australian aviation training is recognised around the world and Australia has excellent providers and infrastructure for training.

As a result of no aviation training policy in place to support the development of Australian jobs in meeting this demand, Australia is poised to fail in capitalising on this opportunity.

Policy Actions:

1. Extend access to HECS and VET FEE HELP to commercial entrants to the industry to manage significant training costs, including traditional aviation training through CASA approved flying schools and for vocational ratings required for sector specific aviation jobs such as aerial application ratings.
2. Establish a review into training and licensing of all aviation licences and ratings to ensure they continue to provide appropriately skilled graduates for the aviation industry.
3. Commit to review impediments and any support measures required to assist and encourage aviation training in Australia as an increased export opportunity, including a review of regulatory costs imposed on trainers.
4. As a part of government's new commitment to foster and promote aviation, ensure that aviation is included in all government and skills councils' careers publications and career advice.
5. Fund at least one aviation high school in each State and Territory based on the successful Queensland model.

REGIONAL EQUITY AND ACCESS

Problem:

The role of aviation in community building and sustenance in rural, regional and remote areas is critical.

Aviation helps deliver a range of critical services ranging from medical access to freight to education as well as enabling social inclusion and regional and rural equity of access to services and family.

Over the last 25 years more than half the Regular Public Transport routes and more than half the operators have been lost due to cost pressures, changing demographics and government policy indifference.

This trend is continuing and represents a significant decay in regional equity and access in terms of services to communities outside major cities and regional centres.

Australia has previously had a range of schemes to support the provision of aviation services to regional, rural and remote communities. Despite commitment to the contrary in the Aviation White Paper, a replacement for the previous En Route Subsidy Scheme has not eventuated.

There is no national system to ensure aviation services to regional, rural and remote areas are maintained as a critical part of both national infrastructure and equity and access for those Australians who live outside the major cities and regional centres.

Policy Actions:

1. Establish a strategic national system to support financially the provision of regular aviation services to those communities where a commercial aviation service is not viable or requires development to be viable in the longer term.
2. Fulfil the commitment in the Aviation White Paper for the establishment of an En Route Subsidy Scheme.

GENERAL AVIATION

Problem:

Governments at all levels are not providing the environment or infrastructure for general aviation (GA) to grow because they have not objectively determined the benefits of general aviation to the Australian community and economy.

While governments are willing to assist in funding a range of other infrastructure identified as critical to the 'national interest', general aviation is left to fend for itself.

The contribution made to the Australian economy by GA was underestimated in the Government's White Paper, where it claimed the sector only employed some 3,000 people. In fact, GA employs many times that number.

GA makes a significant contribution to employment, the economy and the community by:

- Creating sustainable jobs in piloting, aircraft repair and maintenance, manufacturing and ground support services such as refuelling and other aircraft support functions.
- Facilitating business transport – especially point to point and especially in regional Australia.
- Providing tourism transport and 'experiences' that generate significant flow-ons for local communities.
- Providing critical health care access and services – both emergency services and general transport capabilities.
- Delivering business services such as banking, media, post, courier and freight.
- Providing specialist aviation services such as aerial firefighting, oil spill control, locust control, crop protection and fertilising, mining survey, powerline construction, survey and maintenance, forestry services and a range of other activities.
- Linking rural and regional businesses and communities to larger metropolitan centres, thereby providing an important piece of infrastructure to support the movement of populations away from capital cities.
- Training a significant proportion of Australia's pilots, including those employed by major airlines.
- Enabling remote communities to access a range of services taken for granted in more populous regions.

Unnecessary and heavy-handed regulations must be replaced by regulations that are similar to a country like the USA where GA is vibrant and making a larger contribution to the economy and employment.

Similarly, the attitude of the regulator – CASA and others – must be significantly changed so as to clarify that GA should be regulated in such a way as to promote development through simpler and more cost-effective regulation.

The cumulative impact of ongoing increasing costs from a range of sources including regulatory compliance, red-tape, insurance, maintenance, fuel and tax is such that private use of VH registered aircraft continues to decline.

A key challenge for the future is to identify sustainable fuel sources that are more readily available, cheaper and which provide the same level of safety.

Policy Actions:

1. Joint industry / government review and implementation of the previous GA Action Agenda which was published but never implemented.
2. Each State/Territory should establish a complimentary aviation policy that recognises and protects the value of aviation in their jurisdiction. In particular, States/Territories should focus on policies that identify and support the social, welfare, health and economic benefits of aviation in regional, rural and remote areas.
3. Remove the mandatory requirement for GA Air Operators Certificate (AOC) holders to have a Drug and Alcohol Management Plan, but maintain CASA random testing.
4. Exempt all GA operators from the requirement to have a Transport Security Plan.
5. ASIC card validity for GA personnel should be extended to five years.
6. CASA should better delineate between airline type operations and GA in the classification of operations which in turn should drive a simplified approach to regulation of GA.
7. Increase government support of aviation safety initiatives from peak GA associations, including training, safety awareness and safety promotion activities.

AVIATION MAINTENANCE

Problem:

The safety, reliability and resilience of the aviation industry is underpinned by skilled maintenance providers.

The Australian aviation maintenance industry is confronted with an ageing population, a skills shortage and a crisis in regulatory framework.

The new CASA regime for maintenance licencing has totally missed its objective of being harmonised with the European countries and being an improvement on the previous framework. The Australian aviation maintenance qualifications are now unique and not recognised by our major trading partners, nor does CASA automatically recognise European or US or other qualifications. Other countries have been successful in developing a qualification that is recognised by both Europe and the US.

Maintenance organisations have been confronted with a new and complex regulatory regime that will not sustain either the industry or the services it provides to aircraft operators.

The 'unintended consequences' of this new regime include a lack of harmonisation internationally and with neighbouring countries, Australian industry being placed at a disadvantage to competitors, unworkable distinctions between organisations in Australia and significantly increased costs of compliance.

The new system of licencing and training of personnel and regulation of the maintenance and repair businesses is unique in the world.

It represents a significant delinking of Australian standards and regulation from international (including Pacific) best practice and produces no identifiable benefits such as improved safety, reduced costs or greater simplicity.

Only a thorough independent review – closely considering the advice of local industry - will enable the development of a better system.

Policy Actions:

1. Establish an independent inquiry that must include industry representatives and which must make an interim report within 90 days. The inquiry must have broad terms of reference to inquire into maintenance training, licencing, funding and current maintenance repair organisation regulation, including consideration of mutual recognition with overseas jurisdictions, simplification of regulations and reducing costs to industry.

AVIATION MANUFACTURING

Problem:

The key challenge for Australian aviation manufacturing is how to become a sustainable global player. Currently in a global context, Australia is not on a level playing field.

Aviation manufacturing in Australia has been characterised by great innovative products hamstrung by government indifference and bureaucratic impediments. The lack of a robust aviation manufacturing policy has left individuals and companies to self-develop global markets and prevented significant investment in the Australian aviation manufacturing industry. Consequently, the sector has suffered an inarguable decrease in capacity and capability..

A policy for the sustainability and viability of Australian aviation manufacturing will need to address priorities including skills shortages, bringing innovation in design to fruition and how to progress cost-effective quality manufacture within a heavily regulated regime.

Current research and development programs and criteria are not aviation friendly and mitigate against existing government support flowing to aviation companies.

The significantly increased costs caused by CASA red-tape put Australian companies at a clear disadvantage both domestically and in international markets.

The potential for our aviation expertise and jobs to move offshore is real under current policy settings.

Policy Actions:

1. Establish a review of aviation manufacturing impediments
2. Provide for a 150% write-off for aviation research and development to encourage skilled jobs in Australian aviation and an indigenous aviation design and manufacturing industry.
3. Amend the Civil Aviation Act and related legislation to include the principle of fostering and promoting aviation.
4. Focus on developing Bilateral Aviation Safety Agreements and the harmonisation and cross-recognition of regulations with a range of other countries so as to facilitate Australia aviation products and parts exports.
5. Aviation should automatically be included in negotiations for any free trade agreement, including for the unhindered export of Australian aviation parts and components.
6. Responsibility for negotiating international aviation agreements should be given to the new Aviation Department / Division

AIRPORTS

Problem:

Airport policy has been based on a number of failed assumptions – that airports can compete with each other, that airports can be trusted to act in the interests of aviation and not as monopolies, and that regional, rural and remote airports can be maintained without support from the Commonwealth.

There is a policy disconnect between airport policy and wider aviation policy, where decisions on airport development are being made without reference to aviation impacts. Similarly, airports are not being integrated into aviation policy where strategic decisions could lead to win-win scenarios.

A strong policy framework is desperately needed to ensure that airports are regulated and operated so as to continue to provide essential services to the aviation industry and the wider Australian community.

The lack of oversight of major airports charging regimes is indicative of a policy failure that can only be remedied by direct oversight of charging to ensure it remains equitable for aviation users.

Some airport owners have deliberately exploited the lack of policy oversight to remove the aviation industry from airports so as to cash in on the real estate value of the airports through non-aviation compatible industries – as witnessed by safety impacts at airports such as Canberra and Bankstown where buildings have compromised operations.

Similarly, the decline of secondary airports and general aviation facilities on primary airports has been underwritten by poor government policy regarding inappropriate developments that are compromising the ability of these important airports to service the aviation industry. The subsequent loss of aviation support and service businesses and jobs has led to a widespread malaise that is continuing to cripple development of the general aviation industry.

The recent National Airports Safeguarding Advisory Group (NASAG) guidelines are a welcome improvement but a binding compliance mechanism needs to be implemented so that State/Territory planning agencies are required to protect airports and their environments for aviation purposes.

Regional and rural airports form a key element of national infrastructure that has long been neglected.

Some larger airports in regional centres do have the capacity for growth and self-sustaining charging and renewal, while many smaller airports are continuing a long term decay through neglect. The larger and often tourism or mining focussed regional airports that can sustain themselves should be treated differently from smaller airports in terms of policy, access to Commonwealth funding support and statistical analysis.

Smaller and non-self-sustaining airports are in dire need of assistance to ensure they remain a useable part of the national infrastructure system. This significant impairment of national infrastructure must be reversed by Commonwealth intervention and funding support through a new regional, rural and remote airport scheme that will support the ongoing maintenance and development of this critical national infrastructure.

Remote airports are supported through the current remote area scheme and this is a welcome policy that delivers across a range of national infrastructure, social, economic and community objectives.

Policy Actions:

1. Development of an integrated airport and aviation policy that seeks to maximise the compatibility of developments with aviation outcomes.
2. Commit to recognising airports as critical national infrastructure and develop appropriate funding mechanisms to support the ongoing development and maintenance of airports.
3. Direct the ACCC to oversee and regulate pricing at major and secondary airports and direct it to maintain a focus on airport pricing, especially as it affects aviation users.
4. Ensure that access for regional airlines and business jets at primary airports continues to be available on a fair and reasonable basis at fair and reasonable prices.
5. Protect airports for aviation use as a primary goal of planning policy and prevent the further destruction of aviation airport infrastructure due to inappropriate, non-aviation related development using the NASAG guidelines as a starting point.
6. If an airport or aerodrome is proposed for closure, the closure not proceed until an alternative and equivalent airport has been constructed and commissioned.
7. Commit to maintaining, protecting and continuing to develop for aviation purposes a general aviation airport in each Australian capital city.
8. Enforce Aerodrome Local Ownership Program (ALOP) deeds to ensure airports previously handed over to local government remain as airports.
9. Provide for increased education of local government airport owners through a best practice program that identifies airports that encourage GA and the initiatives they use to remain viable .
10. Maintain the airport remote area scheme or combine it into the proposed airport scheme above.

SECURITY

Problem:

Additional costs arising from security measures continue to affect the industry.

In the case of regional routes, the additional costs imposed are such as to threaten the viability of some routes as terminal screening costs are passed from airport operators back to regional airline passengers.

In addition, the viability of providing sophisticated screening at regional airports may be compromised by difficulties with maintenance, staffing and skills levels as well as the significant capital and operating costs involved with sterile areas in regional airports.

As any nationally imposed threat assessment and security measures are for the protection of the entire community, the costs of any measures should be fully funded from consolidated revenue.

If threat levels and assessments decrease, there does not appear to be any planning or system for reducing security requirements.

The Office of Transport Security (OTS) has grown very large and the threat assessment and response system – including the mandated need for screening – does not have the essential flexibility to de-escalate in accordance with reduced risk and threat assessments.

Aviation security must have as its basis realistic risk and threat assessment.

Policy Actions:

1. As any nationally imposed threat assessment and security measures are for the protection of the entire community, the costs of any measures should be fully funded from consolidated revenue.
2. Review OTS and aviation security policies and procedures in consultation with industry with a view to reducing the size of OTS, reducing the cost of compliance especially in regional areas, and increasing the operational flexibility available, especially for security screening in regional areas.
3. Link the threat assessment level with security requirements so that if the threat level drops, so does the security response.
4. If the threat level requires additional screening or other measures on 'thinner' regional routes, the government should provide ongoing financial support to the airport owner for the provision of the required services.

INSURANCE AND LIABILITY

Problem:

In its efforts to comply with the intent of international treaty obligations, a previous government enacted the Damage from Aircraft Act. In so doing, an additional and unreasonable liability was created for all aircraft operators whereby they were made liable for any damage from an aircraft, irrespective of contributory negligence or other factors that might otherwise mitigate that liability.

In addition, the legislation specifically excludes the 'roping-in' of any other party that may also have played a role in the cause of any damage.

Consequently, the Damage from Aircraft Act does not work in a fair or equitable way and has been proven to raise a liability, especially for general aviation users, that was not envisaged in the original second reading speech or explanatory memorandum of the legislation.

In addition, the current government has proposed the creation of a compulsory third party insurance scheme for all aircraft owners. It is not clear what remedy such a scheme would provide in addition to the current civil remedies, or what market failing it may seek to rectify.

Policy Actions:

1. Review the current proposal for a compulsory third party insurance scheme so as to establish the need for such a program through significantly more consultation with industry and aircraft owners.
2. Amend the *Damage From Aircraft Act* so as to:
 - a) Introduce the defence of contributory negligence.
 - b) Allow others, in addition to the aircraft operator, to be 'roped-in' and liable to pay any damages assessed in accordance with allocations of liability attributed by courts.
 - c) Amend the eligibility or coverage of the Act to specifically exclude any person who suffers damage or injury as a consequence of being brought to the scene of an accident by the nature of their employment, training or skills – such as firefighters, rescue and emergency services and powerline workers – who are already covered under mandatory Workers Compensation Insurance.
 - d) Exempt general aviation operations from the applicability of the Act as per the original intent of the legislation second reading speech and explanatory memorandum.
 - e) Remove duplication in State based legislation covering the same issues.

AVIATION RESEARCH

Problem:

There is currently no coherent, consolidated high-level research body charged with the responsibility of delivering relevant analysis of aviation issues and trends that would serve policy makers and industry.

Consequently, there is no well researched, independent, reliable and high-level policy advice available to industry or government that can be used for policy development purposes or to identify emerging opportunities or threats to the Australian aviation industry.

In addition, a range of statistical measures collected by BITRE are collated in such a way as to give a skewed view of particular industry sectors – for example regional airlines and regional airports.

Policy Actions:

1. Create a government funded Aviation Research Institute to inform itself, government and industry of relevant industry issues and trends. This would reflect international best practice seen in other advanced aviation countries such as the US, UK and Canada. The government should partner with existing higher education and research institutions where possible. The Institute should include both a contracting arm to provide research to industry and an extension program to ensure research is communicated to industry.
2. Review, in consultation with industry, the data collection and allocation processes of BITRE to ensure they reflect an accurate measurement of the industry in areas such as regional aviation and airports where many airports and routes are counted as regional despite being driven by tourism or mining.
3. Commission the BITRE to undertake a detailed study on the economic and social contribution of aviation to Australia.
4. Direct the BITRE to work more closely with international organisations such as IATA to improve the availability of economic analysis of the aviation industry in Australia and to benchmark Australian performance against other relevant countries.
5. Refer any research from the study above to the proposed Aviation Ministerial Council to develop suitable policy responses to issues identified.

TECHNOLOGY and ENVIRONMENT

Problem:

There is enormous potential for environmental improvements through improved access to and use of technology to support air traffic services. More accurate guidance and reporting means more direct routes, less time in the air, less fuel burnt and a reduced environmental footprint.

There are a range of processes currently in place to assess the use of GPS and other systems as they might assist aviation safety and there is the potential for a significant environmental and efficiency pay-off for sound government investment.

Key considerations should include the cost/benefit of any proposed system on industry, the possibility of other sectors such as geoscience, agriculture, land and sea transport contributing to the cost of such a system, and the ability of the aviation industry to absorb and manage significant change and cost.

In addition, consideration must be given to the need to maintain traditional aviation navigation aids for training purposes such as NDB and VOR.

Close consultation with industry is essential to ensure the long term plan for this significant cost impost is manageable.

Policy Actions:

1. Maintain ASTRA as the primary consultation forum on technology issues for aviation navigation technology with direct reporting to the Minister.
2. Coordinate the range of current reviews (including the Geoscience Australia project, CASA and Airservices proposals) of a national navigation and positioning system to ensure consideration of all potential users and contributors including geosciences, aviation, agriculture and land and sea transport.
3. Ensure that any decision on the future technology requirements for aviation includes a comprehensive risk based cost-benefit analysis to ensure the industry can absorb any costs over the short to medium term.
4. Adopt a continuous review of the regulatory regime to remove restrictions to new technology and innovation safely.

NON-AVIATION IMPACTS ON AVIATION

Problem:

There are a range of non-aviation issues that continue to impact aviation safety and as a result of gaps in legislative and regulatory coverage, they are permitted to continue to impact on aviation safety with no risk assessment or mitigation.

Impacts may include wind towers, wind monitoring towers, radio masts, smokestacks, coal seam gas plumes, powerlines, buildings near runways or proposed buildings that could potentially impact on approaches or departures from airports.

It must be noted that many of these developments are occurring away from airports, but still have significant impact on aviation safety – for example, for legal low level aviation operations that are likely to conflict with unmarked, un-notified wind monitoring towers.

Policy Actions:

1. All airport master plans – regardless of them being approved by the Commonwealth Minister or a local authority – must give detailed consideration to the likely impact of any buildings on the safe operation of aircraft. Where the proposed building imposes an aviation risk, primacy must be given to aviation safety with the building application being refused.
2. Industry strongly supports the current work of NASAG in developing, in cooperation with the planning and related agencies of the States/Territories, a range of guidelines to inform and, where appropriate, restrict future developments that may impact on aviation safety.
3. Industry strongly supports the strengthening of the NASAG guidelines into legally binding national regulatory requirements.
4. In the future, aviation industry peak bodies should be included as an integral member of NASAG processes.
5. Establish a national database of tall structures, regardless of their height but based on an aviation risk assessment, which is accessible by all pilots and to which reporting of all tall structures is made mandatory. Such a database should be made available to all legitimate low-level aviators through a website.
6. Establish a national mandatory requirement for the marking and notification of aviation hazards that will include wind towers, wind monitoring towers, powerlines, radio masts and other aviation hazards. In particular, all powerline companies should be required to make mapping information of their network available to bona fide low level aviation operators and should be required to mark powerlines that pose a hazard to bona fide low level operators such as agricultural application and firefighting companies.



RAAA DIRECTORY

Annex C

Regional Aviation Association of Australia
Submission to the Aviation Safety Regulation Review
January 2014

January 2014



Serving Regional
Aviation,
and through it,
the people
and businesses of
regional Australia

**Support the
supporters
of aviation
in regional
and remote
Australia**

The RAAA Directory lists initial contact details for all Ordinary, Associate and Affiliate members of the Association.

This handy reference will allow you at a glance to locate our Members and the services they provide.

Only by working together will we:

- ✈ reduce excessive regulatory charges,
- ✈ reduce onerous regulation,
- ✈ promote our industry to Federal, State and Local Governments,
- ✈ promote and educate the community in the essential role we play,
- ✈ increase air services to regional and remote Australia, and
- ✈ obtain better government financial assistance for apprentices and trainee commercial pilots.

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Annex C, Regional Aviation Association of Australia Submission to the Aviation Safety Regulation Review



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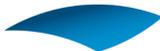
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REGIONAL AVIATION

TRAINING ORGANISATION

(Also see Aircraft Operators - Flight Training)



REGIONAL AVIATION

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The RAAA is the only organisation representing all sectors associated with regional aviation in Australia. This includes airlines, charter operators, aeromedical operations, airfreight operators, flying schools, airports, maintenance organisations, training organisations, engine and airframe manufacturers, insurers, financiers - just to name a few.

Being a member of an industry association such as the RAAA is an indication to others that you take your industry, and by extension your profession, seriously. It says you:

- ✈ care about the future of your industry
- ✈ value continuing professional development
- ✈ are actively involved in issues affecting the industry.

For many RAAA members the key to belonging to us is the networking opportunities with your peers. Not only does it provide the opportunity to meet individuals who share a common interest; it can also spark the beginning of a new friendship. After all, one can never have too many contacts in the aviation industry.

Some of the other benefits include:

- ✈ lobbying on national and individual aviation issues
- ✈ ability to participate in RAAA technical meetings
- ✈ participation in email trail on issues affecting the industry
- ✈ ability to attend RAAA Annual Convention at reduced rates
- ✈ ability to attend RAAA Social functions
- ✈ web content on the RAAA website
- ✈ inclusion in the RAAA Directory
- ✈ ability to submit information into RAAA Newsletter

Why Not Join Us!

Further information is available on our website at www.raaa.com.au



RAAA upcoming meetings and events:

05 March 2014 - Melbourne VIC

- ✈ Technical Working Group
 - ✈ Member Function
- to be held at the Ansett Aviation Training School

04 June 2014 - Darwin NT

- ✈ Technical Working Group
- ✈ Member Function

28 August 2014 - Canberra ACT

- ✈ Technical Working Group
- ✈ Member Function

RAAA Annual Convention

Date & venue to be confirmed

03 December 2014 - Sydney, NSW

- ✈ Annual General Meeting
- ✈ Technical Working Group
- ✈ Annual Christmas Function

Please mark these in your diary
we look forward to your attendance