

Submission on Aircraft Noise Regulations

General comments:

1 With Historic, Ex- military and Replica aircraft, as it will be more difficult to obtain parts in the future, There is more flexibility to source and approve parts when the aircraft are certified in Limited Category. It is expected that a number of aircraft will transfer to Limited Category for this reason. Part of the process is to carry out a safety/risk assessment as to whether any changes can limit the approval to operate over populous areas .

2. Many ex-military have been flying with Normal Category Certificates of Airworthiness for many years. Just because they are transferred to Limited Category is in no way justification for requiring noise certificates. Examples include P51 Mustang, North American T6 Harvard.

Many fully normally certified aircraft which can be classified as Historic under CASR Part 132.010 have also been flying for many decades without noise issue. Types include Tiger, Gipsy, Leopard and Fox Moth aircraft, Auster, Chipmunk and Victa Airtourer.

To suggest that some of these aircraft require noise certificates because they have transferred to Limited category is totally unjustified and quite ridiculous.

Not to "grandfather" historic aircraft for noise certificate exemption would result in normally certified aircraft not requiring noise certification and identical aircraft in Limited Category requiring noise certification! **How could anyone possibly justify that?**

3. Numerous fully certified civilian aircraft generate much more noise than most Limited category aircraft. eg. Beechcraft A36 Bonanza, Cessna C206, Shrike Commander.

4. CASR Part 132.055 (1)(a) specifically allows private flying of Limited Category aircraft. The amount of private flying carried out by these aircraft is significantly less than normally certified commercially operated aircraft, which have to generate sufficient revenue to be profitable. The amount of private flying per aircraft is no more for Limited Category aircraft than it is for other privately operated normally certified aircraft. In total, there are far fewer Limited Category aircraft privately operated than normally certified privately operated aircraft.

Restricting private flying is petty, unjustifiable and ridiculous.

2.

5. There is a cost to both the Government and aircraft owners/operators in introducing such noise certification requirements, especially recurring costs of re-certification, for Limited category aircraft, for no real benefit and that is absolutely unacceptable.

Reference Para 3.1

Historic, Ex-military and Replica aircraft are defined under CASR Part 132.010. The definitions are appropriate, working well and there is no need to change them.

Reference Para 3.2 Case study.

It is stated that Yak 52, Nanchang CJ6 and Winjeel aircraft do not constitute a noise problem. It goes on to mention the T28 Trojan, which says it has a significant noise issue. There is no complaint evidence, data or justification for this claim.

Limited Category Aircraft have not generated any significant volume of noise complaints and it must be noted that the majority of aircraft noise complaints are of a general nature and are related to airports, not Limited Category aircraft. They are often generated by a very small but very vocal minority. In some cases the complainants have been shown to be vexatious.

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Holder of Appointment to issue Limited Category Certificates of Airworthiness.

Holder of CASA Instrument of Appointment to issue Airworthiness Certificates, authorize flight over populous areas and approve flight at night and under the instrument flight rules.