

GENERAL AVIATION ADVISORY NETWORK

11 November 2020

Director
Project Strategy Unit
Strategic and Economic Policy Projects
GPO Box 594
CANBERRA ACT 2601

By e-mail to: aviationconsultation@infrastructure.gov.au

Dear Director

I write to you in my capacity as Chair of the *General Aviation Advisory Network* (GAAN), which has been established to provide advice to the Minister for Infrastructure and Transport on matters affecting the general aviation (GA) sector. Members of the Network have been selected based on their skills and expertise in the aviation industry, and work collaboratively to respond to pressures facing the GA sector. They come from a cross section of the diverse GA sector, covering rotorcraft and fixed wing services, including flight training, aerial application, sport, recreational, regional, business, aeromedical, remotely piloted aircraft systems and aircraft maintenance and manufacturing.

Members welcome the publication of the *Future of Australia's Aviation Sector - Issues Paper* and commend the Department for seeking industry views in the context of this critical planning initiative.

At the GAAN meeting of 26 August 2020, the Deputy Prime Minister encouraged members of the GAAN to read and consider the issues paper and respond with their views.

Part A: COVID 19 Response

The GAAN provided a detailed *Policy Note* to the Minister on 25 May 2020, where it set out its recommendations to aid the recovery of the general aviation sector. The members of the GAAN were very pleased with the rapid response of the Department and the Civil Aviation Safety Authority (CASA) and extended their appreciation to representatives of both agencies at their recent meetings.

The Network believes it is important for both CASA and the Department to continue relevant concessions and relief measures through the months ahead, as society more widely returns to a regular business environment.

Specifically, recovery efforts should:

- Provide relief for continuing high fixed costs during the recovery period of lower demand;
- Support personnel training and skills development to ensure capability when more normal market conditions return;

- Assign regulatory services and resources to areas of highest community and public benefit, streamlining regulatory processes and maintaining a minimum basic standard of safety across non-airline operations;
- Develop community and local engagement through complementary programs at local level, such as airport infrastructure;
- Encourage capital investment in the sector through continuing taxation incentives;
- Support opportunities for industry expansion by encouraging safe innovation, appropriately resourced; simplifying red tape and regulatory requirements; and
- Address GA's wider needs and concerns as below.

Many general aviation aircraft are able to accommodate COVID-safe flight seating and operations. Noting flight crew guidelines applicable to other aviation industry sectors, the GAAN does not consider that sector-specific legislation for social distancing or other health requirements need to be legislated for any GA aircraft operations; whilst guidelines for ground-based activities should follow other comparable industry requirements.

Opportunities also exist for the general aviation sector to benefit society, through its available capacity for freight to regional areas, medical deliveries and humanitarian purposes. The multiplier effects of such expenditure would not only support the sector, but bring flow-on benefits to service recipients and their communities.

Part B: Future of Aviation: The Government's Five-Year Plan

Since December 2019, members of the GAAN have focused their deliberations towards a more strategic approach for the future of the GA sector in Australia.

Consistent with its more recent practice, GAAN members have recently completed a *Policy Note* document outlining a strategic approach to a simplified Classification of Operations, which is linked to the development and implementation of Sector Risk Profiles for different types of general aviation operations. A simplified Classification of Operations would deliver greater regulatory efficiency, clarify priorities and enhance safety outcomes, whilst lowering the costs of compliance and barriers to entry.

In addition, GAAN members are currently preparing two further *Policy Note* documents. One will deal with airspace classification and management, while the other will provide a condensed strategy for the sector's ongoing viability. It is currently anticipated that both documents will be completed towards, or soon after, the end of calendar year 2020.

The GAAN's plan for general aviation has the following ten strategic initiatives:

1. **Economic review of the sector** to identify its value to the economy, look behind frontline participants to the users of, and demand for, general aviation services and to stimulate investment in fleet renewal and sector expansion;

2. **GA's relationship with CASA and others**, to address cultural, systemic and practice-based issues;
3. **Review of the *Civil Aviation Act 1988*** to make the law fit-for-purpose, remove irrelevancies, promote international harmonisation, serve as a head of power for ongoing reform, improve CASA's governance and reduce the potential for impediments to innovation and economic harm;
4. **Airspace for GA operations**, to address equitable airspace access and support for new technologies; and **airports and infrastructure facilities and policy** to support general aviation flight and ground-based activities for all aspects of the sector;
5. Adoption of a **simplified Classification of Operations**;
6. Application of **Sector Risk Profiles** (in conjunction with a simplified Classification of Operations and consistent with the above);
7. **Cooperative regulation principles**, to leverage industry expertise for shared safety outcomes;
8. **Reform of GA-specific parts of the regulatory set**, to repair recently-introduced obligations on industry that have increased costs and complexity in several parts of the GA sector;
9. **Improved management of CASA**, directed to continuous improvement, quality assurance, complaints handling, engagement and decision making; and
10. **Training pathways** to assure the ongoing availability of skills and competencies for the sector, by dealing with student support programs, duplication between government agencies, for better outcomes for trainees and reduced cost and complexity for industry.

As the GAAN continues to develop these policy recommendations, it will observe its operating protocols and so report directly to the Minister.

Nevertheless, we urge the Strategic and Economic Policy unit of the Department to remain across our work and use it, to advantage, to inform GA sector elements within its own plans.

The Network would welcome the opportunity to elaborate its views and support your office in the development of the Government's 5-Year Plan. In the first instance, members may be contacted through the GAAN Secretariat by e-mail

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Andrew Andersen
Chair