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22 September 2021

Senator Susan McDonald
Chair, Senate Legislative Committee on
Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Chair,

Supplementary Submission to the Inquiry into the future of Australia's general aviation industry

Once again, thank you to the Committee for the opportunity to appear at the hearing on Tuesday 7th September. We provide this supplementary submission to give further detail on some of the matters raised, and to provide a response to queries raised by the Committee that were taken on notice.

As I presented, the RFDS provides a comprehensive suite of health services to people living, working and travelling in remote and rural Australia. In some instances, these are the only health services received by people in these areas. This is particularly the case in places where low population numbers make it unviable for permanent services to exist. We have been providing these services for over 90 years and this includes on behalf of the Commonwealth since the early 1930s.

Our services include a 24 hour, seven-days-a-week (24/7) emergency aeromedical retrieval service for those who experience a medical emergency, and require urgent transportation to care in a tertiary hospital. This is an addition to inter-hospital transfers by air and by road, and extensive primary healthcare services including GP, nursing, mental health and dental health clinics; allied health services as well as health promotion activities, all supported by a 24/7 telehealth service.

With 78 aircraft at 23 aerobases, along with 140 road vehicles at regional bases, the RFDS provides aeromedical retrievals and clinic services at almost 200 rural and remote sites, and in 2019/20 provided a total of over 320, 000 patient contacts. These include aeromedical retrievals for almost 40,000 patients; almost 21,000 primary healthcare clinics (equating to an average of 55 per day); and, over 17,000 episodes of dental care. To achieve all of this, last year the RFDS flew 27,250,793km – equivalent to 34 return trips to the moon.

In a strong partnership with the Australian Government, the RFDS has been an important part of the response to the COVID-19 pandemic, not least through aeromedical retrievals in rural and remote Australia, which have been in the order of 900 since the start of the pandemic in early 2020. To date we have also provided almost 40,000 COVID-19 vaccinations, along with dedicated respiratory clinics.

The Royal Flying Doctor Service acknowledges and pays respect to the Traditional Owners of Country throughout Australia. We pay our respects to Elders past, present and emerging.

Federation Patron: His Excellency General the Honourable David Hurley AC DSC (Retd),
Governor-General of the Commonwealth of Australia

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The RFDS is pleased by the focus of the Inquiry on aviation matters as they relate to rural parts of our country and makes the following brief comments relevant to the Terms of Reference.

Regulatory burdens in the aviation industry

Firstly, the RFDS supports the view that reducing the regulatory burden in the aviation sector wherever possible should be a key focus of the Australian Government and is particularly pertinent in the current climate. In doing so, appropriate, timely consultation with the sector is crucial.

Additionally, any new regulation should clearly provide a value add, with the impact on operations across the sector carefully analysed. It is noted that current processes, such as CASA Industry Working Groups, already provide effective means to consult with the sector on regulatory matters.

Responding to COVID-19 restrictions and challenges

During the initial acute period of the COVID-19 pandemic and associated restrictions, alternate arrangements were made to some regulatory processes in the aviation sector. In some cases, this amounted to streamlining, decentralising and cost savings. There is an opportunity to review, learn from and continue such arrangements going forward.

The RFDS recognises the particular and ongoing efforts of CASA in reviewing many policies and processes in light of ongoing travel restrictions. For example, a number of processes, such as those for flight examiners ordinarily require interstate or even overseas travel, either by RFDS aviation staff or CASA delegates, which obviously has not been possible. Instead, appropriate exemptions have been considered, extended or alternate models of assessment, such as through remote means, employed by CASA.

The RFDS is aware that making such adjustments in response to ongoing COVID-related restrictions has come at an already challenging time for CASA, with significant organisational change occurring over the last 24 months. As the Committee would be aware, this has seen moves towards a more “centralised” approach, and while the RFDS supports streamlining of processes and the assurance of safety in all aspects of aviation as the number one priority, observations are that local knowledge and connections, which we find to have particular value in the rural and remote context, may or have been lost during an already difficult time throughout the pandemic

Ensuring resourcing of CASA

Lastly, it is critical that all areas of CASA are, and remain, adequately funded to undertake all delegated responsibilities. We are aware of this issue being raised a number of times during this Inquiry. The RFDS is an organisation that since its inception has been reliant on safe, timely and efficient air travel to provide critical health services across Australia. Across our 90 years, we have worked closely and productively with regulators such as CASA to address many unique circumstances relevant to a provider of aeromedical services across such significant geographical distances. The role of overseeing the aviation industry, ensuring its ongoing high levels of safety while seeking to improve efficiencies for operators is a complex task for the responsible agency.

The RFDS is also acutely aware that necessary precautions and restrictions to ensure the management of COVID-19 is ongoing and will be for some time, while there is also a need to plan for a recovery. Government and regulatory bodies, primarily CASA, must be appropriately resourced for these tasks, in order to ensure agility and responsiveness that provides support to the relevant sectors, and this includes in aviation.

The Committee also raised a number of issues at our hearing which were taken on notice, and to which we can now provide the following advice, based on input gathered from our state-based Section and Operations:

The following aircraft are currently in operation within the RFDS:

RFDS aircraft details:	
Queensland Section (Qld)	4x King Air B350 16x King Air B200 (6x King Air B360 on order)
South Eastern Section (NSW, Tas, Vic)	13x King Air Beechcraft B200 6x King Air Beechcraft B300
Central Operations (SA & NT)	17x Pilatus PC12 2x Pilatus PC24 Jets
Western Operations (WA)	17x Pilatus PC12 3x Pilatus PC24 Jets (2 x EC145 aeromedical helicopters - due to commence service late 2021)

The following state-based restrictions are currently in place relevant to our aeromedical operations.

State-based restrictions	
Queensland Section	Nil restrictions other than aerodrome infrastructure required for the type operated, requirements of Part 135 and Queensland Health Aviation Standard.
South Eastern Section	Nil
Central Operations	Currently the PC24 is not allowed to operate in to an airfield that has no published instrument approach at night due to a requirement for aircraft above 5700kg max take-off weight. A dispensation has not been possible to date but this requirement may be removed under new regulations
Western Operations (WA)	Nil

We can confirm that there are currently no CASA exemptions in place for the RFDS that cannot be received by other operators.

Our Section and Operations consistently work closely with CASA, and in particular are focused on working through the implications of new regulations.

In regards to meeting CASA safety requirements in our operating context, representatives from our Sections/Operations are working through the application and implications of new restrictions. For example, our Queensland Section is currently working through the performance factoring requirements of Part 135 relevant to the types of aircraft operated, requiring liaison with the regulator and manufacturer in regards to necessary performance upgrades to ensure the same level of service capability as currently offered is available. Additionally, they are working proactively with CASA in regards to possible changes to certification for future aircraft design, specifically in the area of cabin ventilation systems.

In Queensland the RFDS has organisation members currently on Part 119, 135 and 145 Working Groups as well as on Part 61, 141 and 142 Post Implementation Review committees. In Western Australia, the RFDS participates in CASA Working Groups on an invitational basis where the focus is relevant to our service. For example, RFDS Western Operations recently contributed to a CASA Working Group on the use of night vision goggles in helicopters as we work towards integrating the first aeromedical helicopters into our fleet.



Thank you once again for the opportunity to contribute to this important Inquiry. Please let us know if anything more can be provided, and we look forward to seeing the Committee's recommendations.

Yours faithfully.

Frank Quinlan
Federation Executive Director