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Standing Committee
Senate Rural and Regional Affairs and Transport

8 Jan 2021

RE: Submission to the Senate Rural and Regional Affairs and Transport Standing Committee Inquiry into the Current State of Australia's General Aviation Industry

SAFA is a small family business flying training operation operating out of a single small hanger located at Swan Hill aerodrome. Our school operates under registration and oversight by Recreational Aviation Australia. We link our students to our general aviation (CASA) partners for progression from the Recreational Pilot Certificate to the Recreational Pilot Licence and beyond to Commercial Pilot Licence for students who may wish to undertake a professional career in aviation.

The author also currently serves as the Executive Officer of the Moorabbin Airport Chamber of Commerce and I have recently retired from service, after many years, as a Director of Recreational Aviation Australia Ltd. I have undertaken RAAF pilot training and am a Reserve officer.

The current Senate inquiry has a particular reference to aviation in rural, regional and remote Australia. Our family business operates in rural Victoria.

I agree with the main thrust of the submission to the committee that CASA operates unfairly and without procedural fairness. I further agree that CASA regulations as they are currently framed and enforced are extremely damaging to the entire aviation industry in Australia. Other submissions have clearly and correctly articulated the various reasons behind this view and I will not repeat those in my submission.

Instead, I will provide a couple of examples of the damaging arrangements currently existing in relation to airport facilities. I am being brief in the hope that these examples will serve to create alarm in the minds of Senators as to the repeated and ongoing damage to the entire aviation capability and sustainability in this country.

Swan Hill council recently sent out 'variations to leases' to all of us who have a hangar leased at the Swan Hill airport. This lease amendment imposes a requirement that all lease holders must increase the minimum liability insurance to \$20 Mil dollars, regardless of business risk assessment. No consultation was undertaken and no reason was provided other than a vague reference to collaboration with Council's insurance provider. This has resulted in an increase to my insurance premium from about \$896 for \$10Mil cover to \$1538, an increase of \$642, entirely based on the sudden and unnecessary increase imposed by Council.

I joined the many voices of protest to this change imposed by Council. However, Council have not bothered to respond in any way to our complaints. Council have not provided any basis for this change and are bullying and threatening leaseholders with compulsory acquisition of our hangars if we do not comply. One of the leaseholders is a LAME small business that has operated from the airport for over fifty years. He is on the verge of closing his aviation engineering services business because this 'attack' represents the last straw of increasing and ongoing

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impositions against sustainable business operations. This LAME business is the only provider of aviation engineering services in the Swan Hill region and in neighbouring regions.

My second example is that the Moorabbin Airport Corporation has recently taken another step toward significantly destroying all but a very small and concentrated aviation capability at Moorabbin Airport. Submissions elsewhere have fully detailed the egregious bullying and unlawful activity imposed upon general aviation operators, including LAME services, at Moorabbin Airport over the past decade. The recent forced closure of about 30% of the aviation footprint at Moorabbin to allow for the building of additional retail and industrial subdivision will result in the death of Moorabbin Airport in a few years due to increasing uncertainty, lack of infrastructure and obvious messages that aviation operations are not welcome at the airport.

I encourage all Senators to decide what aviation should look like in Australia and to transparently describe that vision. This expression should focus on changes which will allow industry participants to make informed decisions based on certainty and under a rule-of-law environment.

Yours faithfully,

Alan Middleton (B.Com, LLM, FCPA) Chief Flying Instructor