

I put to you that the operation and effectiveness of the Civil Aviation Safety Authority as far as applying the Act as it stands, is woeful. I draw your attention to the Act. Section 8 part 9 CASAs functions in particular paragraph (c) developing and promulgating appropriate, clear and concise aviation safety standards.

### **Clear and Concise**

This is written in the Act and to me, as a pilot, business owner, employer of pilots and maintenance organisations, is one of the most important lines in the Civil Aviation Act.

Recently I looked at Papua New Guinea's Aviation Rules and regulations. I could understand them. A good example is their flight and duty regulations. The flight and Duty regulations for a helicopter pilot in Papua New Guinea is about 2 pages long. and very easily understood. Ours has 16 different sections and 7 appendixes and I'm still not 100% sure I understand it. I don't say this lightly as I am the Chief pilot of my organisation.

I have been flying since 2003 and in that time all I have seen from CASA is more complex rules that are not Clear and in no way Concise. I believe the problem lies with the Culture in CASA as in that time we have seen many CASA Directors come and go without any change in the direction of the type of rulemaking. You cannot regulate every last detail of a flight or a pilots life as it would seem they are trying to do.

back to the act. A few paragraphs down, in (g) in CASA's Functions it says 'to promote the development and improvement of the system.

Nothing could be further from the truth. Before the new rules I knew what I had to do to be able to fly a different type of helicopter. Now it is totally unclear the level of training required and by who. What's more, if I ask two separate CASA FOI's I'll get two different answers. This is true about any part of the rules. differing interpretation by FOI's make compliance difficult and proves the system isn't working as surely Clear and concise rules couldn't be misinterpreted.

Further down the page it states that CASA should 2(b) promoting full and effective consultation and communication with all interested parties on aviation safety issues.

Though CASA does conduct surveys and have working groups the results and information coming out of these are by and large ignored and disregarded. Also the questions and answers are pointed and don't allow us to give a fair account on what we really think about the topic in question.

We are living in the result of years of over regulation by people with no real world commercial aviation experience and even worse they seem to have no care factor for those they serve. More than that they seem to be operating to deny us fair and proper process.

CASA have sent out requests for comments on large parts of legislation right at the start of the mustering season and given operators not enough time in their busiest part of the year to respond properly and fairly. They have disregarded advice and done exactly as they pleased with no form of regard to the cost imposed on industry. even though 'At No Cost to industry' was once their tag line. As an example. I attained my Agricultural rating in 2006. At that time I could do a renewal every two years in any helicopter I was licenced for or wanted to become licenced for. This would cost me between \$500.00 and \$1000.00. I could do this with any grade 1 instructor. Now I have to do a Robinson type renewal and a Mustering training renewal every 2 years then an Ag or Firefighting rating renewal every year. This is a direct cost to me of around \$7000.00 every year. If I had another pilot with the same ratings as myself then you can add that price again. **Every year.** That's If I can get an instructor in Australia who has the appropriate licences to conduct this training to come to the Northern Territory. This is clearly not an **Improvement of the system**. The Fixed wing agricultural

operators can and have for the past 15 years or so been able to get Chief pilots from other organisations to do each other's annual checks yet CASA refuse to let the Helicopter Chief pilots do the same? I watched the senate inquiry with Phil Hurst with interest, particularly where you hoped to get a resolution from CASA for the Helicopter Ag Chief pilots to conduct each other's annual checks. this was some 9 months ago, with still no result.

The new rules put EMS work into a different category to aerial work. I live across from the Katherine Hospital and see many different helicopters come and go. I know some of the passengers have been dehydrated, broken legs, gored by buffalo. The list would go on as you can imagine. While Careflight do the majority of medical retrieval work at least in our part of the NT a lot of people are brought to hospital by other machines. These new rules fail the general public by taking this option away. Australians are resilient and no doubt if we see someone in need we will help them, not every patient needs the full complement of careflights capabilities and smaller choppers are spread right across the NT everyday doing mustering and many other Aerial work tasks. why take away this capability to legally save a life or reduce pain.

I was trained properly, to fly safely as a junior pilot. I was lucky enough to fly with many senior pilots who collectively had over 120,000 hours. This mentoring I received has saved me many times over my career. With CASA's current rules I would not have had this opportunity. It is now very difficult for me to legally train my junior pilots to fly safely. The ability of senior pilots to mentor junior pilots has been tied up in too much CASA red tape. The long term effect this will have on aviation safety in Australia should not be underestimated. I don't believe I have been saved once in my career by CASA's new legislation!

I am a pilot not a lawyer and I believe The CAA, CASR, CAO, MOS and other layers of rules being forced upon us are not written for pilots. They are written for lawyers. We cannot comply with the rules if we cannot understand them. Many of the new rules that are about to be thrust upon us are completely unworkable. CASA have been told this by many of us in the industry and Technical working groups but as is their culture they push on and ignore us regardless of the effect it will have.

Maintenance. As I understand, CASA is going away from the current CAR 30 Maintenance organisation to a CAR 145 organisation which is aimed at the big end of town. and a separate system where a Maintenance engineer can work without a CAR 30 certificate and seemingly to a lower standard than what is currently required today. putting the requirements for compliance back on the aircraft owner. This system will be detrimental to safety and detrimental to operators like myself who because my aircraft do Charter as well as Aerial work will have to be maintained to the higher standards. I will be competing with operators who don't conduct charter operations and can therefore maintain their aircraft to a lower standard. Thus creating an uneven playing field. reducing my ability to be competitive on price. I have spoken with my engineer Ian Fairweather from Seabreeze aviation about the up and coming regulations and his concerns are that with reduced CAR organisations there will be less opportunity to be able to take on apprentices and a lack of Licenced engineers is already apparent right across the industry. He felt ignored when he raised concerns with CASA and also said that there was not enough industry consultation, and that by and large the new regulations are not seen as an improvement, not wanted and also the engineers as a group were ignored. **Sounds familiar?** He also said that airworthiness inspectors have been redirected from face to face contact and where once he had someone he could ring and get an answer from now he has to call a 13 number and wait for a response which may never come. CASA failing industry.

At the moment I operate under an AOC. As I see it in the near future I will need a certificate for operations under part 119 for the charter I currently do and also for aerial ambulance functions, another one under part 133 for rotorcraft air transport, another one under part 137 when the

eventually put helicopter agricultural operations in there, Another one for part 138 for other aerial work, I ask you how this is an improvement? So far four different operating certificates. Will I need four different Chief pilots? I haven't had a clear answer yet. **Clear and Concise.**