

# SAAA | Submission to the Senate Rural and Regional Affairs and Transport References Committee Inquiry into the Future of Australia's Aviation Sector, in the context of COVID-19 and Conditions Post-Pandemic.

10<sup>TH</sup> December 2020

## INTRODUCTION

This submission reflects SAAA's views around some of the matters tabled in relation to the inquiry into "*The Future of Australia's Aviation Sector, in the context of COVID-19 and Conditions Post-Pandemic*" having particular regard to:

- a) *The importance of Australia's aviation sector in supporting the economic and social wellbeing of all Australians;*
- b) *The immediate and long-term impacts of the COVID-19 pandemic response on all aspects of the Australian aviation sector;*
- c) *The immediate and long-term impacts of the COVID-19 pandemic response on all sectors that rely on aviation (e.g. tourism);*
- d) *The adequacy of government industry support and procurement and programs for the social and economic well-being of workers for all sections of the aviation industry to survive the downturn caused by the pandemic;*
- e) *The immediate and long-term employment landscape within Australia's aviation sector;*
- f) *What policy and practical measures would be required to assist the industry to recover in the medium term; and*
- g) *Any related matters.*

SAAA has already made substantial comment and suggestions to improve the performance of Australian aviation regulations that we believe offer the opportunity to substantially enable Australian aviation to flourish to the benefit generally of the Australian community and economy.

These comments and suggestions formed part of SAAA's submission dated 10<sup>th</sup> September 2020 in respect of the Senate inquiry into "*The Current State of Australia's General Aviation Industry, with particular reference to Aviation in Rural, Regional and Remote Australia*".

In specific context of the subject inquiry into "*The Future of Australia's Aviation Sector, in the context of COVID-19 and Conditions Post-Pandemic*", we make the following remarks and suggestions.

## THE IMPORTANCE OF AUSTRALIA'S AVIATION SECTOR

The importance of Australia's aviation sector in supporting the economic and social wellbeing of all Australians is not in our opinion in any doubt whatsoever. What is very much in doubt in our opinion is whether or not the Australian aviation sector, particularly the general aviation sector, can flourish to its full potential and indeed survive in a meaningful and competitive form if there are not some very material changes to the complexity and nature of our aviation regulations.

Putting the sector into context, the 2019 Bitre Report<sup>1</sup> notes a total of 3.6million hours were flown in Australia by Australian owned / operated aircraft in 2019. Of these hours:

- 1.93 million hours were attributable to commercial transport using VH registered aircraft
- 1.32 million hours attributable to VH-registered general aviation aircraft activities, and
- 0.35 million hours to other categories.

In terms of economic contribution, the Aviation industry underpins Australian business and tourism and has an estimated annual revenue of \$45.98 billion and added \$18.42 billion to the Australian economy in 2018<sup>2</sup>.

So, it is clear that aviation makes a substantial contribution to Australia's economy; and further, general aviation whose activity makes up in the order of 40% of total flying activity cannot be ignored and certainly not intentionally sidelined.

Let's not forget the fundamental role that general aviation plays in connecting remote towns and communities to our major centres – this is critical to supporting regional Australia and general aviation needs to be able to operate in an environment that is nurtured, sustainable for the operators and affordable for the customers.

However, there is a problem, and it is by no means a new problem or a problem that arose as a result of COVID.

Whilst the activities of The Australian Government working the aviation industry and providing support for freight and critical passenger movements through a range of assistance programs in the wake of COVID-19 are acknowledged, this does not in any way shape or form fix the preceding and very fundamental problem - at the heart of which, is the complex and overly burdensome nature of the Australian aviation regulations.

## THE HEALTH OF AUSTRALIA'S AVIATION SECTOR

The general aviation sector has been struggling for decades under the weight of increasingly complex and burdensome regulations that are at odds with comparative jurisdictions such as the UK, USA and Canada. CASA seems to be out of step with contemporary regulatory practice as adopted by The International Civil Aviation Organization (ICAO) through the promulgation of Annex 19, Safety Management Systems – this seems likely to in part be contributing to the decline of Australia's general aviation industry.

Expressed in many ways and in many forums, the essence of the question has been quite simply "Why?" And further, despite Section 11 of the Civil Aviation Act 1988<sup>3</sup> - Why is it that Australia is not harmonising its aviation regulations to the rest of the world in accordance with our commitments as a signatory to the ICAO treaty? Why is Australia so different?

The consequence of the direction our regulations have taken is that aviation is a higher cost activity than it should be in Australia for a whole raft of reasons associated with regulations imposed by CASA on owners and operators. In the United States, which does not have the same approach to regulation, aircraft operating costs have been reported to be around half what they are in Australia and achieving safety outcomes that are statistically better.

Safety, particularly in general aviation, is dependent on the behaviour of individuals and their personal responsibility. The consequence of overly complex regulation is counter-productive and it might enable the successful prosecution of a very small percentage of recalcitrant individuals – however, that approach falls short when providing safe guidance to the good intentioned majority. Just consider the example of

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<sup>1</sup> Key Ind cators – B tre 2019 Report - Av at on

<sup>2</sup> Austra an Industry and Sk s Comm ttee

<sup>3</sup> Refer Append x 1 - Sect on 9 (A) and 11 (A) of the C v Av at on Act 1988

voluminous Software Licensing Agreements, which we are all required to so frequently acknowledge; similarly, our overly complex aviation regulations may obscure the best intentions. But further, overly complex regulation leads to multiple and confusing interpretations and an over-reliance on “experts” to assist understanding or clarify intent.

Calls to simplify our aviation regulations have been loud and clear from Australian aviators for decades and perhaps most vociferously in recent years at the Wagga Wagga General Aviation Summit in 2018. This summit was attended by almost 40 aviation organisations and businesses and importantly also by the Deputy Prime Minister (also Minister for Infrastructure, Transport and Regional Development), Hon. Michael McCormack MP, and the then Shadow Minister for Infrastructure, Transport and Regional Development, Hon. Anthony Albanese MP.

The calls to simplify the regulations, for example by adopting the USA aviation rules with ideally only a minimum of adjustment, remove the red-tape and all the unnecessary cost burdens to the industry so as to encourage it to flourish, and not encourage it to die were made most clearly to the Ministers. The urgency to effect change to avoid the loss of more and more aviation related business, and the effects of which reach far beyond just those involved directly in these businesses, was also made clear to the Ministers.

An important focus of the summit was to debate statements in the Civil Aviation Act in respect of the CASA's performance of functions, which at the time effectively provided for CASA to regulate to achieve “safety outcomes at any cost”. Given the wording of the Act as it stood, CASA's direction and actions were therefore perhaps unsurprising. However – the wording in the Act in this regard was considered the likely root cause of the direction in which our regulations had been heading – was it any wonder that without any regard for the economic impact of regulations designed to maximise “safety at any cost” would drive the industry into decline?

The Summit produced a number of recommendations that were carefully considered to represent real tangible steps to improve the health of Australian aviation and a specific proposal to amend the Civil Aviation Act – these recommendations were forwarded by letter to the Hon. Michael McCormack MP on 17<sup>th</sup> July 2018<sup>4</sup>. The need to amend the Act had been recognised for some time and, with bi-partisan support, some themes of the proposed amendments passed into law in November 2019<sup>5</sup>.

The long and short is that, although there has been some activity to reform the regulations, the process is incredibly slow – measured not in years, but rather decades. “Re-inventing the wheels” when well proven cost and safety effective alternatives exist elsewhere in jurisdictions such as the UK, USA and Canada? Is there some block or unconscious bias existing that seems to have largely thwarted common sense changes so long sought, in particular, by the general aviation sector over all these decades?

Actions to date and understood to be in-hand / ongoing seem only to play at the edges and seem unlikely to deliver the quantum change that is really required to make a fundamental change to and transform the future of Australian aviation – and particularly the general aviation sector. There does not appear to be a will or the correct settings existing to effect material change. Accordingly, we are convinced that a sense and culture of expediency and a will to effect change needs to be prosecuted to truly bring about the concept of “affordable safety”, which is the necessary pre-cursor to effect the real change our industry needs.

COVID does not change a thing in this regard other than, like many other substantial domestic and world events over the decades that have been then triggers to precipitate or accelerate major reforms, bringing to the forefront the very real need to do things now to protect and improve the future viability and economic outcomes of Australia's aviation industry.

With few exceptions, the required steps have been tabled time and time again by industry. Bring some pressure to accelerate these steps, further supported with some simple short term financial relief measures,

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<sup>4</sup> Refer Append x 2 - Letter to Hon. Michael McCormack, 17th July 2018 - Recommendations emerging from the General Aviation Summit - Wagga Wagga NSW – July 2018

<sup>5</sup> Refer Appendix 1 - Section 9 (A) and 11 (A) of the Civil Aviation Act 1988

and we believe the meaningful support for recovery from the consequences of COVID will be available and, in turn, secure and enhance the long-term viability and economic outcomes of Australia's aviation industry.

SAAA believes the current direction of Australian general aviation regulatory development and how regulation is administered exacerbates:

- Proliferation of differing standards for same or similar applications or functions (pilot medicals, pilot and instructor training, aircraft maintenance etc)
- Ever increasing complexity of regulations (Australia's regulations are considered to be substantially more complex than most major jurisdictions such as for example UK, USA and Canada)
- Cost burden of administering such regulation at the expense of more effective safety risk mitigation activities
- Which collectively deliver questionable safety improvement potential or conditions that maximise the opportunity for Australian aviation to flourish in an equitable manner

We believe the pertinent questions are:

- What is driving the complexity of Australia's aviation regulations?
- What is driving the agenda for differing standards (for same or similar applications or functions) with further exacerbates complexity?
- If lesser standards are approved by CASA for same or similar applications and functions for pilots and aircraft operated by self-regulated organisations, then why are these standards not logically available to all aviation participants and activities regulated or administered by CASA or any other self-regulated body? And why would not the lowest accepted standards of the current day prevail?
- What is the safety case or indeed moral case for the complexities, confusion and exclusivity driven inequities introduced by the current agenda?
- What evidence can CASA offer that demonstrates that its approach generally benefits the Australian economy and the Australian community - in particular regional Australia?
- Why is Australia not harmonising its aviation regulations to the rest of the world in accordance with our commitments as a signatory to the ICAO treaty?
- What is the underlying factor or consistent thread over many decades that seems to have thwarted or stifled common sense approaches and recommendations to create a flourishing and competitive Australian aviation sector capable of reaching its full potential?

## **PRACTICAL POLICY AND PRACTICAL MEASURES TO ASSIST AUSTRALIA'S AVIATION SECTOR TO RECOVER IN THE IMMEDIATE AND MEDIUM TERM**

We offer the following suggestions which aim to:

- reduce operating costs to assist aircraft owners, operators and pilots across commercial and general aviation to survive and recover from the effects of COVID, but further
- kick-start a process to reset conditions that provide incentives for the aviation sector to flourish to its full potential:

Steps that can be taken "now" to provide immediate financial relief and / or ongoing financial relief:

1. Direct the Regulator, CASA, to expedite managing aviation in a manner that encourages the industry to flourish in accordance with Section 9A and Section 11

2. Immediate waiving of all regulatory charges (medicals, licencing, ASICs etc) to be reinstated only subsequent to and with consideration of a review of the fairness and equitability of such charges
3. Instant write-off of all aviation new and upgraded asset capital expenditures (aircraft, airports, infrastructure) until 30 Jun 2022, reducing to 50% by 30 Jun 2023 and thereafter in accordance with then prevailing depreciation rules
4. Immediate and permanent relaxation and re-alignment of medical certification regulations<sup>6</sup> to:
  - accord with the principles of US FAA regulations
  - remove the existing double standards that have created the commercial inequities within the recreational aviation sector
  - effected in the immediate term by way of Instruments and ultimately by way of adjustments to the Aviation Regulations

Steps that can be initiated "now" to provide financial relief of an enduring nature:

1. Commission an audit of the conduct and activities of all major general aviation airport operators and lessees – including Bankstown (Sydney), Moorabbin (Melbourne), Archerfield (Brisbane), Parafield (Adelaide) and Jandakot (Perth) with the objective to determine the fairness and equitability of the airport operators' imposed cost structures and their compliance with their leases over airport lands
2. Commission an audit of the CASA senior management to explore whether the right culture or approach settings exist to enable a flourishing and competitive Australian aviation sector that is capable of reaching its full potential?
3. Re-design the aircraft maintenance, and pilot / instructor licencing and training regulations<sup>6</sup> to:
  - accord with the principles of the US FAA regulations (some aspects already in hand) and,
  - in a manner that removes the current double standards or different rules that create the commercial inequities amongst general aviation (Australian aviators should be entitled to operate to a common set of rules)

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**The Sport Aircraft Association of Australia Inc has been involved in the construction and safe flying of Experimental Aviation for more than 50 years.**

**The SAAA is committed to the safe operation of our Australian skies for all aviators.**

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<sup>6</sup> SAAA Submission in respect of the Senate inquiry into "The Current State of Australia's General Aviation Industry, with particular reference to Aviation in Rural, Regional and Remote Australia"; 10th September 2020

## **Appendix 1**

### **Section 9A and 11A of the Civil Aviation Act 1988**

#### **9A Performance of functions**

- (1) In exercising its powers and performing its functions, CASA must regard the safety of air navigation as the most important consideration.
- (2) Subject to subsection (1), CASA must exercise its powers and perform its functions in a manner that ensures that, as far as is practicable, the environment is protected from:
  - (a) the effects of the operation and use of aircraft; and
  - (b) the effects associated with the operation and use of aircraft.
- (3) Subject to subsection (1), in developing and promulgating aviation safety standards under paragraph 9(1)(c), CASA must:
  - (a) consider the economic and cost impact on individuals, businesses and the community of the standards; and
  - (b) take into account the differing risks associated with different industry sectors.

#### **11A Functions to be performed in accordance with international agreements**

CASA shall perform its functions in a manner consistent with the obligations of Australia under the Chicago Convention and any other agreement between Australia and any other country or countries relating to the safety of air navigation.

## Appendix 2

Letter to Hon. Michael McCormack, 17<sup>th</sup> July 2018  
Recommendations emerging from the General Aviation Summit - Wagga Wagga  
NSW – July 2018





17<sup>th</sup> July 2018

**Mr Michael McCormack MP**  
**Deputy Prime Minister**  
**Minister for Infrastructure and Transport**  
**Leader of The Nationals**  
PO Box 6022, House of Representatives  
Parliament House  
CANBERRA ACT 2600, Australia

## **GENERAL AVIATION SUMMIT 2018**

Deputy Prime Minister,

On behalf of the 100 delegates of the 34 general aviation associations who attended the General Aviation Summit on 9 – 10 July, I express our sincere appreciation for your attendance, address and for your willingness to listen and have regard to the views and concerns of the general aviation industry. The delegates were very pleased to hear of your willingness to adopt a bi-partisan approach to the consideration of necessary changes to the Civil Aviation Act widening its applicability to have regard to matters in addition to solely safety.

The Summit was a major success. Many have said it was a most significant gathering of aviation associations who have worked together in harmony to provide an agreed approach to regulatory reform. Industry consensus such as this must provide Government with a clear approach for the future.

I have great pleasure in providing the Summit's Findings and Recommendations as set out in the attached document.

Australia is in a unique position for our industry to benefit substantially from the huge demand for pilot and engineer training not only for our aviation industry but also for our neighbours in Asia and the world. The Australian economy and community benefits from a healthy general aviation sector and we must not let these opportunities pass because of impractical and overly burdensome regulation.

The Summit delegates were very clear. No one wishes to see our world class safety record and performance diminish. What is needed is practical, outcome-based regulation designed to foster and develop our industry while maintaining our high level of safety as demanded by the community.

The consensus on immediate changes to the Civil Aviation Act will provide direction for the regulator to move forward. A full review of the Act and subsequent regulations over the coming few years will build on this reform.

On behalf of the delegates, I urge you to accept the Findings and Recommendations and work with your Parliamentary colleagues, including the Opposition, minor parties and Independents to enact the consensus changes and allow the industry to move forward and achieve the best possible outcome for Australia.

With kind regards,

**GEOFF BREUST**  
**General Aviation Summit 2018 - Chairman**  
PO BOX 26, Georges Hall NSW 2198, Australia





# RESOLUTIONS

## GENERAL AVIATION SUMMIT 2018

The General Aviation Summit has agreed to pass two resolutions which (1) set out the principal findings of the summit with regard to the regulation of general aviation in Australia and (2) commits the industry to providing appropriate information and to make recommendations for action on reform as follows.

### **The General Aviation Summit concluded:**

1. the General Aviation sector wants to maintain or improve Australia's aviation safety outcomes;
2. the General Aviation sector is of vital importance to Australia especially regional and rural Australia not only in economic terms but in social and community service provision terms;
3. the General Aviation sector, including the commercial elements of the sector, is overburdened with the complexity and cost flowing from the current Civil Aviation Act, Regulations and other aviation legislation;
4. the current regulatory regime is based on a prescriptive approach to rules and compliance. World best practice is based on Outcome Based regulation which Australia should implement immediately in accordance with DAS Directive 01/2015 and the Minister's CASA Statement of Expectations;
5. the cost and complexity burdens placed on the General Aviation sector are exacerbated by the actions of Airservices and airport operators, both privatised and local government owned, by further cost impositions, operational restrictions and inappropriate infrastructure development;
6. the Australian economy has the opportunity to benefit from pilot and engineering training, aircraft and component maintenance and construction services flowing from the world-wide expansion of air travel and aviation activity – especially in Asia. To achieve this, we must be able to respond effectively and be liberated from over regulation; and
7. the attitude must be to adopt best regulatory practices in parallel with embracing safety and economic benefits of new technologies in Australian aircraft and operations. This will allow Australia to achieve its potential as an aviation leader, aviation service provider and exporter.

### **In looking to the future, the Summit further resolved to:**

1. provide a statement of value of the General Aviation sector in Australia;
2. provide a statement of opportunity for the General Aviation sector in Australia;
3. recommend the Civil Aviation Act and other Acts associated with aviation including aviation infrastructure, be reviewed and amended to ensure implementation of Outcome-Based regulation and industry facilitation during the first term of the next government;
4. in the meantime, to recommend a small number of amendments to the Civil Aviation Act to immediately refocus to an holistic and less prescriptive approach to regulation for bi-partisan passage through the parliament before the next election (see ANNEX 1);

5. recommend the establishment or redefinition of an Office of Aviation Industry in the Department of Infrastructure and Transport to engage and assist industry to further foster and develop aviation both domestically and internationally; and
6. recommend that there are a number of advances in aviation safety and amenity that can be made within the current regulations and responsibilities. The summit seeks to have an established programme to identify, prioritise and implement a programme of these changes with defined timeframes and covering CASA, ASA and Aerodrome Operators (see ANNEX 2)



## ANNEX 1: CHANGES TO THE CIVIL AVIATION ACT – STATEMENT OF INTENT

Whereas the current regulatory stance adopted by CASA is out of step with contemporary regulatory practice, as adopted by The International Civil Aviation Organization through the promulgation of Annex 19, Safety Management Systems, and is contributing to the rapid decline of Australia's general aviation industry, and whereas the world is facing a growing shortage of skilled aviation personnel and Australia has the opportunity to contribute to the training of these personnel in a way that can improve safety, the Aviation Summit finds that elements of the current Civil Aviation Act are not fit for purpose.

Specifically, Section 9A, Performance of Functions, imposes upon CASA a limitation that impedes the development of performance-based regulation and the safety benefits that would otherwise be achieved. §9A (1) requires that, in exercising its powers and performing its functions, CASA must regard the safety of air navigation as the most important consideration and there is an urgent need to address this anomaly.

1. The Aviation Summit supports a review of the Civil Aviation Act, to include as a minimum, a repeal of Section 9A (1) and a replacement with the following language:

### **9A Performance of functions**

- (1) In exercising its powers and performing its functions, CASA must seek to achieve a world standard of **safety in air navigation as well as:**

**(a) maintaining an efficient and sustainable Australian aviation industry, including a viable general aviation and training sector;**

**(b) creating the conditions for more people to benefit from civil aviation.**

2. The Summit delegates support the need to amend, as soon as possible, the Object of the Civil Aviation Act and other aviation related Acts, without reducing the primacy of safety, to include an amended Object to support a sustainable and viable aviation industry;

The current main objective of the Act is to establish a regulatory framework for maintaining, enhancing and promoting the safety of civil aviation with particular emphasis on preventing aviation accidents and incidents;

Moving forward, the objects must include;

- i. a strong, efficient and sustainable aviation industry;
  - ii. enabling more people and communities to benefit from aviation; and
  - iii. emphasis on substantially reducing the administrative and financial burden of regulatory compliance.
3. The inclusion of the government's Red Tape Policy to be permanently inserted into Section 98.



## **ANNEX 2: PRIORITY LIST OF ACTIONABLE ITEMS (3 Pages)**

### **MINISTER & GOVERNMENT**

1. **Update the Civil Aviation Act as prescribed by the Summit in Annex 1**
2. **Change the name of CASA to the Civil Aviation Administration (CAA) to reflect its enhanced responsibilities;**
3. **Establish clear transparency of the CASA Board and require that all meeting agendas and minutes be published publicly via the CASA website;**
4. **Government to assure that CASA conforms with, and reports publicly on its compliance with DAS Directive 01/2015 (existing) and the Minister's Statement of Expectations (existing);**
5. **In recognition that the GA sector has an extensive slate of both Macro and Micro reform concerns, the government establish a joint general aviation industry task force that;**
  - a. **identifies industry reform priorities;**
  - b. **builds an agreed agenda of action items that assigns clear timelines and accountability for reform completion;**

### **AVIATION MEDICAL**

6. In alignment with its indemnity for Flight Examiners, CASA to confirm inclusion/extension of Indemnity to DAMEs acting pursuant to CASA delegations for the issue of medical certificates;
7. Extend the newly announced Class 2 Basic Medical provisions to include IFR (Command and PIFR) and NVFR for private operations (which are arguably as being of no greater stress level than VFR operations), and on a minimal risk to public basis to include solo Aerobatics;
8. Introduce US FAA regulations for supplemental oxygen use as per FAA 91.211;

### **FLIGHT TRAINING**

9. Require that CASA publish on an ongoing basis via its website a business directory of all current general aviation flight training organisations, which includes;
  - a. Company Name and Full Address Information – Including airport location details
  - b. Contact Telephone, Email address and website information
  - c. Summary of approved services
10. In recognition of the pending closure of many smaller and local training operations, based on their apprehension of Part 141/142, delay final implementation of part 141/142 until either the regulations can be made workable for such operators, or necessary education and familiarisation is completed;
11. Notwithstanding the Part 141/142 provisions for Approval of Individual Instructors, adopt the much simpler US Federal Aviation Regulations in relation to instructor certification and operations which are, where applicable, treated as provision of educational services, not of piloting services;

### **METEOROLOGY**

12. Undertake an immediate post implementation review of 'reduced Terminal Area Forecast services' with a view to re-establishing services in critical locations;
13. Undertake an immediate post implementation review (in conjunction with the General Aviation industry) of the 'introduction of Graphical Area Forecasts and Grid Point Wind and Temperature Forecasts';

## **AIRPORTS**

14. The Federal Government formally acknowledge that all Australian airports including regional and secondary are 'Public National Infrastructure Assets' that are essential to the success of the aviation industry and are being operated as a 'Monopoly' that requires strict federal government management to ensure fair and equitable access by the general aviation sector;
15. The Federal Government, where they are the underlying airport owner, be responsible for ensuring;
  - a. that aviation infrastructure be maintained in full, preventing runway closures and/or shortening, along with preserving taxiways, aprons and other essential aviation infrastructure;
  - b. GA aircraft users and operators have access to facilities for parking, loading and passenger amenity, at rates/charges that are consistent with the community usage of the facility;
  - c. aviation related airport lessees are to be provided with long-term lease conditions in excess of 25 years and be provided with guaranteed lease-renewals, so as to encourage continued investment in their aviation businesses and to satisfy bank lending conditions;
  - d. all fees, charges and leases to be subject to review as required;
16. Make it a condition of all Commonwealth and State Government funding provided to any privatised or local government managed airport that an Airport Advisory Committee (AAC) made up of airport users and stakeholders be established and for the AAC to sign off on any airport funding requests before funding can be provided;

## **AIRCRAFT REGISTRATIONS**

17. Require that CASA perform an audit of its aircraft registrations and for it to publish on an ongoing basis via its website up to date information, with respect to the;
  - a. Total number of aircraft registrations
  - b. Total number of airworthy registrations (aircraft with a valid/current maintenance release)
  - c. Total number of non-airworthy registrations

## **MAINTENANCE, ENGINEERING & LAME**

18. Require that CASA publish on an ongoing quarterly basis via its website a directory of all current general aviation maintenance organisations, which includes;
  - a. Company Name and Full Address Information – Including airport location details
  - b. Contact Telephone, Email address and website information
  - c. Summary of Certificate of Approval information
19. Establish the necessary framework to facilitate the sustainable and reasonable operations of small Independent LAMEs without excessive administrative and procedural burdens more appropriate to larger scale and commercial operations;
20. Simplify and increase the efficiency of gaining aircraft engineering/maintenance qualifications for GA Aircraft;
  - a. Simplification and clarification of Maintenance Training Requirements;
  - b. Encouragement of apprenticeships;
  - c. Recognition of prior learning (without high charges);
  - d. Reintroduction of Distance Learning LAME training (possibly drawing on existing mothballed materials);
21. Undertake a post implementation review of the Cessna SIDs and impact on industry, with a view to establishing improved forward arrangements for the continuing maintenance of Cessna aircraft.

## **AVIATION SECURITY**

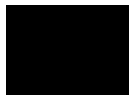
22. The Minister communicate with the Hon Peter Dutton MP, Minister for Home Affairs, requesting an immediate review the ASIC Card procedures and requirements for general aviation, with a view to;
  - a. the termination of the programme - failing this;
  - b. extending ASIC issue to a minimum 5 years in alignment with the Marine SIC card (MSIC); and
  - c. reducing the cost impost on industry;

## **AIRSPACE**

23. Fully implement the national airspace system to reduce complexity and allow more equitable use of airspace;
24. Standardise metro class 2 airport procedures for entry, exit and clearance along with Transponder code pick-up;

In addition to the items above, it is anticipated that a General Aviation Task Force, recommended in item 6, will result in further micro reform items.





## ANNEX 3: SUMMIT PARTICIPANTS

### SUMMIT CHAIRMAN

Mr Geoff Breust, former Managing Director of Regional Express

### INVITED SPECIAL GUESTS

- 1) The Mayor, City of Wagga Wagga, Councillor Greg Conkey OAM
- 2) Deputy Prime Minister, The Hon Michael McCormack MP
- 3) The Hon Anthony Albanese MP, Shadow Minister
- 4) Member for Mount Isa, The Hon Robert Katter MP
- 5) Senator for Western Australia, Senator Slade Brockman
- 6) Senator for Queensland, Senator Fraser Anning
- 7) Senator South Australia, Senator Rex Patrick, Represented by Jonathan Sharman
- 8) Senator South Australia, David Fawcett, Represented by Mr Micah Wright-Taylor
- 9) Senate RRAT Committee Secretary, Dr Jane Thomson
- 10) Department of Infrastructure, Mr Jim Wolfe
- 11) Department of Infrastructure, Ms Melissa Cashman
- 12) Aviation Advisor to the Deputy Prime Minister, Mr Stephen Campbell
- 13) Civil Aviation Safety Authority, Group Manager, Mr Rob Walker
- 14) Airservices Australia, Mr Stephen Angus
- 15) Australian Transport Safety Bureau, TBA
- 16) iAOPA Secretary General, Mr Craig Spence
- 17) University of New South Wales, Prof Ian Hampson
- 18) Falcon Air Safety Officer, Mr Ken Lewis

### ATTENDING INDUSTRY ASSOCIATIONS

- 19) Aircraft Owners and Pilots Association of Australia (AOPA Australia)
- 20) Aircraft Electronics Association – South Pacific Region (AEA)
- 21) Aircraft Maintenance Repair Overhaul Business Association (AMROBA)
- 22) Airtourer Association (AA)
- 23) Antique Aeroplane Association of Australia (AAAA)
- 24) Australian Aircraft Manufacturers Association (AAMA)
- 25) Australian Beechcraft Society (ABA)
- 26) Australian Business Aviation Association (ABAA)
- 27) Australian Licensed Aircraft Engineers Association (ALAEA)
- 28) Australian Mooney Pilots Association (AMPA)
- 29) Australian Parachute Federation (APF)
- 30) Australian Piper Society Inc (APS)
- 31) Cessna 182 Association of Australia (C182AA)
- 32) Cessna 200 Association of Australia (C200AA)
- 33) Cirrus Owner Pilots Association of Australia (COPA)
- 34) Colour Vision Deficient Pilots Association (CVDPA)
- 35) Experimental Light Aircraft Association of Australia (ELAAA)
- 36) Gliding Federation of Australia (GFA)
- 37) Hang Gliding Federation of Australia (HGFA)
- 38) International Comanche Society – Australia (ICSA)
- 39) Lancair Owner Builder Organisation (LOBO)
- 40) Recreational Aviation Australia Limited (RAAUS)
- 41) Regional Airports User Action Group (RAUAG)
- 42) Sport Aircraft Association of Australia (SAAA)
- 43) Seaplane Pilots Association of Australia (SPAA)
- 44) Australian Aero Clubs Alliance (AACA)
- 45) Your Central Coast Airport Association (YCCA)
- 46) AVPLAN-EFB
- 47) *Rotorcraft Asia Pacific– Observer Only\*\**
- 48) *Angel Flight Australia (AFA) – Observer Only\*\**
- 49) *Royal Federation of Aero Clubs (RFAC) – Observer Only\*\**
- 50) *Australian Women Pilots Association (AWPA) – Observer Only\*\**
- 51) *Australian Warbirds Association Limited (AWAL) – Observer Only\*\**
- 52) *Regional Aviation Association of Australia (RAAA) – Observer Only\**
- 53) *GARMIN Australia – Observer Only\*\**
- 54) *Hawker Pacific – Observer Only\*\**
- 55) *Thomas Global Systems – Observer Only\*\**