

Recreational Aviation Australia

Opening Statement

Senate Rural and Regional Affairs and Transport Legislation Committee Public Hearing

19 November 2018

My name is Tony King. I am the acting Chairman of Recreational Aviation Australia Limited, which I shall refer to in this Address as "Recreational Aviation Australia". I have been a Member for seventeen years and a member of its Board for five years. My colleague with me today is Mr Spencer Ferrier, a Member for some eleven years and an adviser to Recreational Aviation Australia.

Recreational Aviation Australia's current Chairman, Mr Michael Monck and our CEO Mr Michael Linke offer their apologies as both are overseas.

Pursuant to the authority of the Civil Aviation Act 1988, the Civil Aviation Safety Authority (which I will refer to as '**the CASA**') has granted varying operating and administration authorities to nine (9) self-administering sport and recreational flying organisations. These are referred to as '**SAOs**'. The terms and conditions of each of the authorities is in response to each Organisation's specific aviation activities.

Recreational Aviation Australia is one such organization. It has the largest number of members, pilots and aircraft. Its duties are to register aircraft in accordance with its rules, issue and re-issue pilot certificates and maintenance certificates; to set and maintain standards of flight operations and maintenance. All are subject to the oversight of the CASA.

Recreational Aviation Australia administers almost 10,000 pilots, registers some 3,300 aircraft and oversees some 165 flight training schools across the whole of Australia - many of which operate in rural and remote Australia.

Recreational Aviation Australia has operated for 35 years, with the last ten years seeing significant growth as a result of the Light Sport Aircraft standard, which was introduced in 2006. Since 2016 we have increased our membership numbers by 11% and our aircraft fleet size has grown by 3%. We attribute

that growth to the improved management practices brought about by Recreational Aviation Australia's present overall management system. We continue to see solid growth in our sector and are excited by the future.

Recreational Aviation Australia's members have flown about 320,000 hours in the last year and the number of hours is rising steadily. Flying takes place from thousands of airports in all states and territories. Flying is in visual flight conditions (**VFR**), clear of cloud & during daylight conditions. The maximum people on board, including the Pilot is two.

Our Organisation has demonstrated an impressive safety record which we see is also steadily improving. At present we have recorded around one fatal accident every 100,000 flying hours in the past year. This is a record that we attribute to the delegated freedoms granted by the CASA and our Organisation's response to that delegation, which includes careful, practical management of air safety as well as practical management of aircraft registrations, pilot certification and standards as well as maintenance, manufacturing and construction.

Whilst we don't always agree with the regulator's requirements of us, we have satisfactorily engaged in robust, respectful dialogue that has provided general agreement with the management and oversight processes we undertake.

Turning to the specific issues at hand with regard to recent medical reform, we make the following comments:

1. **Medical reform:** Medical certification reform, as a general concept is sound. In the case of RAAus we are satisfied with the present Medical system which is working well. There is no safety case for a change concerning Recreational Aviation Australia.

RAAus closely watches its mixture of training, certification of pilots, certification of aircraft, management of technical and operations. It has a program that is produced and oversighted by the CASA. This oversight is in the nature of continual reform. Having regard to the safe outcomes demonstrated by RAAus' participants, the Medical oversight is satisfactory and it works.

2. **RAAus Medical Standards:** A pilot operating under the RAAus licence protocols must satisfy more than to hold a current drivers licence. The requirements are set out in Section 2.16. of the Organisation's Operations Manual.

The pilot is required to be satisfied prior to each flight.

3. **Avoidance of uncertainty:** This industry is sensitive to any change to the medical system and must take into account the personal and financial impact upon affected parties.
4. **Magnitude of investment to be considered:** Many stakeholders in the Recreational Aviation Australia sector have made and continue to make significant investments under the present rules (flight schools, community groups such as aero clubs, maintainers, aircraft owners, pilots, and the like). Erosion of that investment by introduction of changes not underpinned by a sound safety case should not occur.

A recent economic study into the sport aviation sector suggests an industry-wide capital investment exceed one billion dollars. Any change by way of additional administrative costs must take this investment into account.

5. **Issue of licences/or certificates by Government:** If Government were to begin to issue operating licences to self-declared eligible participants on a no-cost-per-issue basis, then Government (by such Agency as it creates) is entering into competition with itself.

In particular each sector has its overall licencing component in balance, including Medical requirements.

The concept of the parallel path for licencing and certification is acknowledged, but that path must be compatible with the costs and benefits to Government of the creation and maintenance of the nine Organisations which it has itself encouraged and provided a foundation.

6. **The present RAAus system is working and working well: Under the present system, Recreational Aviation has stabilised, is safe and actively patronised.**

The current system works well; it is the subject of ongoing review without difficulty or objection; it has been endorsed by government with the making of CASR Part 149. It is proven with the existence of 9 SAOs. CASR Part 149 will also allow, and encourage, new entrants into this market.

7. **Self Administration Organisations (SAO) are economical for Government:** The administrative burden to Government is now adequately undertaken by private not-for-profit organisations which in the case of Recreational Aviation Australia has removed from Government in excess of **\$2,500,000** per annum of outlays of a procedural or management nature, which, with respect, is not the function of Government.

Recreational Aviation Australia membership is not mandatory for an aircraft owner or pilot, it is a choice being made by many aviators because its systems work.

8. **Flexibility of oversight is provided to the CASA:** the existing regulatory framework of the nine SAOs enables an economical, flexible approach to regulation by CASA. There is no requirement to adopt a one-size-fits-all approach to specialist needs which invites constant change and cumbersome law-making.

9. **Risk-based approach to administration is a proven benefit.** Industry has spoken on numerous occasions that a risk based approach is required to best administer aviation in a safe manner. This is echoed in the 2008 Senate report (Administration of the CASA and related matters 18 September 2008) which notes that there is a preference by the Australian General Aviation Administration (**AGAA**) and the Australian Sports Aviation Confederation (**ASAC**) to delegate regulation of non-passenger carrying activities to the accountable self-administered part of the sector. RAAus demonstrates that it is a capable manager of risk.

10. **CASA itself accepts the present system and does not require alteration:** CASA is ushering- in the introduction of Civil Aviation Safety Regulations Part 149 in 2019. This reflects the will of the industry and has been made a priority in the past 12-18 months.

In Conclusion:

The self-administration model works.

The self-administration model allows for innovation.

The self-administration model is safe.