

**SUBMISSION ON CASA’S IMPACT ON AUSTRALIA’S GENERAL AVIATION INDUSTRY**

This submission relates to the implementation and application of the Civil Aviation Safety Regulations (CASR) Part 61 and the direct impact on myself as a helicopter pilot and the observations of how it has impacted my peers.

The implementation of CASR Part 61 has had a significant financial and detrimental career impact to me. To understand the extent of the impact allow me provide a summary of my aviation experience to date. I am a commercial helicopter pilot, completing my training in 2010, I hold a CPL(H) and frozen ATPL(H) with approximately 1,500 hours total time. I hold the following ratings and endorsements:

- Instructor rating (Grade 2 TE, Design Feature TE)
- Low level rating (sling endorsement)
- NVFR(H) rating

I have completed 300+ hours low level, 40+ hours sling, 200+ hours instructing and 400 hours gas turbine engine.

I completed my instructor rating post CASR Part 61 implementation, which means that for every endorsement or rating that I wish to instruct I now need to complete a syllabus of training with an appropriately endorsed instructor, followed by a flight test with a flight examiner who holds instructor examiner privileges. Under the “old” Civil Aviation Regulation (CAR) Part 5 licencing, I would be approved to instruct any rating or endorsement that I myself held, without the need for these additional training costs. What does this mean for me? Quite simply, a substantially increased and crippling financial burden.

To understand the magnitude of this new financial burden, below I have provided a summary and breakdown of the costs that I am now faced with that were not previously applicable:

I recently undertook an upgrade of my instructor rating to progress from Grade 3 instructor to Grade 2 instructor. I was required to complete a 3 hour course of training followed by a flight test. At the same time, I also completed a Design Feature (DF) training endorsement to allow me to teach Gas Turbine Engines (GTE). Fortunately, I was able to use the DF test sequence to also count as my Grade 2 upgrade test. A summary of these incurred costs are detailed below:

Item	Description	Qty	Unit	Rate	Amount
1	Grade 2 training endorsement training (R22)	3	Hours	\$550	\$1,650
2	Design Feature Training (B206)	1	Hours	\$1,200	\$1,200
3	Aircraft hire for flight test	1.6	Hours	\$1,200	\$1,920
4	Flight examiner fee	1	Item	\$1,350	\$1,350
TOTAL					\$6,120

I am now also enrolled to complete further training to allow me to conduct training for additional ratings and endorsements as follows:

Item	Description	Qty	Unit	Rate	Amount
1	Low level training endorsement (R22)	5	Hours	\$550	\$2,750
2	Sling training endorsement (R44)	3	Hours	\$800	\$2,400
3	Aircraft hire for flight test	2	Hours	\$800	\$1,600
4	Flight examiner fee	1	Item	\$1,350	\$1,350
TOTAL					\$8,100

As you can see, I am now required to invest an additional \$14,220 to be able to instruct sequences that under the former CAR 5 licencing system I would have been authorised to instruct without any additional financial strain.

When we undertake our instructor rating, a large component of course is learning how to teach, regardless of the flight sequence. Therefore, I suggest that we are appropriately trained already to teach any sequence that we ourselves hold a rating or endorsement for.

I accept that change is part of life and I encourage making the aviation industry safer. However, my question is, where is the safety case to support the implementation of these new industry and individual crippling training requirements? Where are the accident statistics that support the need for additional training to be able to instruct for each individual rating or endorsement?

What I have found is that the public is often under the false perception that as pilots we are attractively remunerated and can/should bear the additional training cost. I can assure you that it is not the case. The award rate for a helicopter pilot at present is approximately \$55,000 plus superannuation. There is no provision for any additional salary loading for holding an instructor rating as a helicopter pilot. This is an extremely low wage when you consider the investment of circa \$100,000 I have made to get to this level of training.

As a Grade 2 instructor, I am paid a full time equivalent salary of \$62,500 plus superannuation. From this before tax salary, I am now required to find an additional \$14,220 after tax to be able to instruct additional ratings and endorsements, while also paying the bills to support a family.

I have anecdotal evidence to suggest that helicopter pilots are less likely to pursue a career instructing as the cost to be able to conduct fundamental training is beyond their means. This is likely to have long term negative consequences on the future of the helicopter industry with a likely shortage of appropriately qualified instructors to train the next generation of pilots.

Please note this submission is based on my experience and observations of the helicopter industry only and I make no assertions or assumptions on the impacts to the fixed wing sector.