



Moorabbin Aviation Services Pty Ltd  
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CRICOS No: 02530B ACN: 090567178 ABN: 11090567178

**19/9/24**

**Submission: Inquiry into the Education Services for Overseas Students Amendment (Quality and Integrity) Bill 2024**

Dear Senators

For decades, Australia has played a vital role in producing the pilots needed to keep global airlines operational. However, this valuable expertise and contribution to the global economy are now under threat due to the proposed student visa cap policy.

Moorabbin Aviation Services has received an indicative international student enrolment figure of 7 for 2025. Other flight training providers have been given numbers as low as one and two

These figures would severely impact our businesses at a time when we are still recovering from zero enrolments during the COVID-19 pandemic and facing additional challenges due to stricter government policies on student visas this year.

We do not know how your system derived the indicative numbers however they are grossly unfair and unsustainable for any CRICOS approved flight training business.

Furthermore the system is flawed as it does not allow us to replace students as they finish – it is also very difficult to manager when there are so many visa rejections. How many offers do we make to cover the fact that a certain percentage will be rejected?

A more reasonable approach would be a review of permitted numbers at any given time and this should be done in consultation with all providers to ascertain what is economically viable for each business and reasonable for all parties concerned.

Some key points about Moorabbin Aviation Services:

- Our company has been training pilots since 1990, with a focus primarily on international students for the past 20 years.
- Prior to the pandemic, we were training approximately 40 privately funded students as well as 150 Southern China Airlines cadet students.



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- The cessation of student inflow from China Southern Airlines due to COVID forced us to close our Mangalore campus and lay off around 35 staff members.

Despite these challenges, our Moorabbin Campus has continued to operate.

Over the past two years, we have invested heavily in international marketing, human resources, and infrastructure. These investments are based on current government approvals allowing us to train up to 70 students at any one time. Our efforts are just beginning to show results with some new training partnership agreements completed and others in progress.

Our international students are high-value contributors to the Australian economy, with each student spending approximately \$120,000 on course fees and \$50,000 on living expenses. They typically have a strong record of complying with visa conditions.

The key stakeholders in international student flight training have been holding regular discussions over the past 10 days and we agree that if implemented, this policy change would lead to the loss of Australia's flight training industry to competing countries and result in the loss of Australian jobs, revenue, and investment. Additionally, it will harm Australia's reputation as a reliable partner in aviation training—a trust that, once lost, will be difficult to rebuild.

For a long time, flight training schools have provided Australian pilots the opportunity to work as flight instructors and build the experience they need before moving into other areas of the aviation industry. This has led to a strong pool of proficient and safe pilots for Australian aviation. The destruction of the flight training industry will diminish these opportunities and make it even more difficult for the aviation industry to find the human resources it needs. This at a time when things are already challenging and Australian airlines have started to seek approval for employment of more overseas pilots.



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## **In summary**

To have our businesses undermined by a sudden policy change, without consultation, is both unfair and severely damaging to us as individual providers and to the entire Australian aviation industry and Australian economy.

As flight school operators we have all acted in good faith and in accordance with the approvals we have for training international students. Accordingly we have made significant investments in our high cost low margin industry which is tough at the best of times.

Post covid this is a particularly cruel policy at a time that our businesses are trying to re-build and once again become profitable place for learning and employment.

The indicative numbers provided to us and to other operators are unsustainable and do not justify the costs of being a CRICOS provider thus threatening our very existence.

We respectfully request an urgent review of the proposed visa cap. Either the caps should be abandoned, or industry consultation should be initiated to determine a level that is both fair and sustainable for the future of flight schools, aviation and the economy. This sentiment is also extended to the entire international training industry.

Sincerely,

Darron Hurley

CEO  
Moorabbin Aviation Services