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Electronic Submission

Committee Secretary

Senate Standing Committees on Rural and Regional Affairs and Transport

PO Box 6100

Parliament Hours

CANBERRA ACT 2600

Dear Senator McDonald

**Submission to the inquiry into**

**THE CURRENT STATE OF AUSTRALIA'S GENERAL AVIATION INDUSTRY**

Having been involved in the General Aviation industry for over 40 years, I have seen and experienced many challenges and changes that have had a massive effect on the safety, success and sustainability that has impacted heavily on the GA industry – all caused by the Civil Aviation Safety Authority (CASA) – the Legislator, Judge, Jury and Executioner to the GA industry.

**THE BEGINNINGS**

Prior to 1995 General Aviation came under the Department of Civil Aviation (DCA), Department of Transport. Everyone knew aviation rules and most pilots, engineers, airport workers abided by the rules. Accidents were minimal. Flying training schools taught airmanship, respect of aircraft, obeying rules and great flying training producing great pilots. There wasn't the having to wear ASIC passes at great costs, having to spend \$480 to do a medical at an approved Doctor who were mainly in the cities and not in the country towns where the majority of GA pilots were located. We didn't have to all of a sudden relace cabling in aircraft, with no gain in safety and at huge costs (eg. \$28,000) or have to replace all seat belts at huge costs because they didn't have a tag (which didn't provide anything towards 'safety'). These were and are unnecessary costs to aircraft owners and operators. Now we have to install ADS-B in all aircraft, bearing in mind that the person to install this equipment doesn't work in your town and it costs thousands of dollars to have someone install ABS-B on the hope this will be safety 'saviour'. No, it won't stop accidents from occurring.

On 6<sup>th</sup> July 1995 the Civil Aviation Safety Authority (CASA) was founded. This is the cause for 'safety issues' being created. Ninety percent of employees of CASA are out of the armed forces, with no real aviation experience but who think they are the Legislator, Judge, Jury and Executioner to the GA industry. Just because a pilot didn't have a WAC chart with him, CASA closed his GA business down which was providing a service to the community, providing training for pilots, providing search and rescue, a freight run, mining runs and other vital community services. This hasn't done anything to help 'safety' by shutting down this person and his business and it has cost him and us 'taxpayers' millions of dollars in the process. CASA should not have this power. The operator should be reimbursed for his loss of income, court and legal costs and damages to his reputation. This is just one example of poor CASA behaviour (unconscionable misconduct).

The GA industry is dying, and it is dying at a fast rate due to CASA and also the privatisation of airports. Soon there won't be any flying schools to train pilots for airlines or emergency services such as the RFDS and firefighting. These are vital air services to communities and provide employment for the younger generation and unless Government acts now to reduce the wasting of millions and millions of dollars supporting the current regulatory structure of CASA, then our country's vital air services will crumble.

The coronavirus is a good example of what happens to our country and its people when vital air services provided by GA are not in use. Whilst CASA is involved, the GA industry is doomed. CASA is now trying to make all GA operators RPT (airline standard) and this is going to cripple the industry and force a large number of GA operators to close down forever. Who will provide the vital community services if the costs to operate are prohibitive? CASA employees don't have the required GA experience to make informed decisions about this sector of air services. CASA does not understand how the GA industry works and their actions and lack of understanding how the impact of their new rules are causing GA to become unsafe!

CASA needs to go. If you read up on the other submissions, meetings with the Government etc, you will see how all of the GA industry is negatively affected by CASA. CASA is out to close all GA operators down as they only want airlines, but the larger airlines do not support rural and remote communities as GA does.

If CASA were to come to their senses, adopt the FAA system or even the NZ system, this would halve the costs, greatly reduce red tape and improve 'safety'. CASA (well us the taxpayers), waste billions of dollars doing their 'safety' displays flying around the country at 'tax payer' expense and does it improve safety? The answer is NO, it does nothing at all. This approach will not change the behaviour of a pilot. However by CASA adopting the FAA or NZ system, this will save costs to the GA operators and in turn this will improve safety. By GA operators not having to pay out huge unnecessary costs for CASA reasons, this will generate more jobs, more flying and it will save the dying GA industry.

### **FACTORS AFFECTING SAFETY**

When CASA changes a rule, they do not check to see how much of an impact it will have on pilots, engineers, aircraft operators and nor do they think of the cost burden for the industry. When CASA put out a change of rule to industry for 'feedback', the decisions have already been made and therefore comments and feedback will have no influence on the rule change at all. CASA do it just to make them look good and to justify their existence.

CASA setup the Regional Airspace Procedures Advisory Committee (RAPAC) where selected individuals were able to provide feedback on any proposed rule changes, however again all CASA decisions have already been determined and any RAPAC input was simply ignored and a waste of our time. Our involvement was voluntary, and we attended all meetings at our own cost. CASA has advised me that they no longer require my input because I cost them money which is not true as I covered all my own costs including attendance at meetings. The truth be known it is because CASA employees didn't like to be challenged by RAPAC members who held far greater knowledge on the subject matter and effects of proposed changes to the GA industry. CASA only want to be right and

did not want more experienced and knowledgeable industry people putting forward sensible and sustainable proposals.

This is another example of CASA's unconscionable misconduct.

The privatisation of airports is another area of major 'safety' concern and of CASA's poor performance as the regulator by not ensuring aviation remains the highest priority at airports. Non-aviation development at many airports around Australia are a major cause of a reduction in safety for GA operators. Privately owned airports such as Broome, Bankstown, Jandakot and Archerfield to name a few have all experienced major changes that are non-aviation related and which have resulted in major safety concerns for GA. For example, the removal of the crosswind runway at Broome, which was turned into a massive housing development, has affected aircraft operations and led to many noise complaints from the new residents. Other privatised airports have experienced development of large shopping centres, childcare facilities etc at the expense of aviation infrastructure. All this leads to a reduction in safety, yet CASA say they cannot get involved!

There is no way in this world that the Commonwealth Government should have sold such critical community infrastructure to private owners, many of whom did not have any aviation experience. Broome airport was sold to private (non-aviation) owners in 1991 after it was initially given to the local Shire Council by the Commonwealth Government. The Shire Council did not want it and subsequently sold it to their 'mates'. The sale of Broome airport was conditional and included covenants and caveats which have been breached many times but are not policed by the Commonwealth Government.

Archerfield Airport is another good example of neglect for the aviation sector and a large increase in non-aviation related industries at the expense of aviation operators. Very few if any hangers are now owned by aircraft operators as they were when the airport was under Commonwealth control. Privatisation of Archerfield Airport has witnessed the non-renewal of the previous Commonwealth 25-year leases. The private owner of Archerfield Airport simply refuses to honour the previous lease agreements of the Commonwealth Government and as each 25-year lease of aircraft operators fell due, they were not renewed. The refuellers and fuel supply company (who are professionally trained in the field) are a good example of non-renewal of lease and therefore had to hand over their business and substantial infrastructure to the airport owner at a fraction of its actual worth. The airport owner, who had no aviation experience when the Federal Government awarded them the 99-year airport lease in a closed tender process, now run the fuel depot. A proposed master plan for Archerfield Airport included runway closure and re-alignment. This would lead to a degradation of safety for aircraft but would provide the airport owner a lucrative income from non-aviation activity on the reclaimed airport land.

CASA should be involved in any re-development of Archerfield airport that is non-aviation related to ensure compliance with lease agreements and aviation safety is maintained. But CASA does not involve themselves in this critical airport planning phase.

## **FACTORS AFFECTING PILOTS**

CASA introduced Aviation Security Identification Cards (ASIC). This card costs a lot of money to hold. Once it is approved then we shouldn't have to renew it every two years as it is an expensive process and provides no increase in safety. Privatised airports have their 'own' rules for the ASIC which adds another layer of red tape and does absolutely nothing to improve safety. These airports should be made to follow CASA rules and not create their own rules.

In relation to flight crew medicals, again pilots must do this each year for commercial pilots and every two years for private pilots. This is at great cost as there are very few approved doctors to conduct the aviation medical. A normal general practitioner should be able to conduct an aviation medical. The employees within CASA who review the outcomes of the approved aviation medical are not doctors, are not qualified and should not be allowed to make decisions regarding the medical fitness of flight crew to undertake their duties. Again the value CASA add to the process is not justified and adds enormous expense to the process.

Senator McDonald, overall I know that there are thousands of people in the aviation industry who would like to see the end of CASA. They are costing taxpayers millions of dollars and at the end of the day CASA do not provide a valued service towards aviation safety. In fact, CASA make decisions that are unsafe. CASA do nothing to assist the aviation industry and they will destroy what is left of general aviation if they continue in their current ways.

You just need to look at the latest rule change that CASA are implementing which will require GA to come under airline rules and standards – there is no way this can work. The only thing that this is going to do is completely close the GA industry. There is not an operator that will survive this.

Please, please Senator McDonald we are asking for your help and assistance to solve the GA industry from dying. Please close CASA in its current form. We do not need them. They cause more problems than they solve. They cost operators thousands and thousands of dollars for no increase in safety.

Mrs Maude Telfer