



Submission No: .....72.....

RECREATIONAL AVIATION AUSTRALIA INC

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SUBMISSION TO  
THE JOINT COMMITTEE OF PUBLIC ACCOUNTS & AUDIT  
FURTHER REVIEW OF AVIATION SECURITY IN AUSTRALIA

Recreational Aviation Australia Inc. is an Association authorised by CASA to administer the operation of sports and recreational aircraft weighing less than 544 Kg Maximum Take Off Weight (MTOW). Our organisation has been in existence and conducting this activity for 22 years. We are responsible to CASA for 5700 members and we are the one area of general aviation that is growing. Our members pay their own way and are not a continuing burden on the taxpayer.

The reason for this late submission is to correct some of the misconceptions which were put to you in evidence by Mr Bayndrian and Mr Ellis representing the Bankstown Airport Thursday, 21 July 2005.

1. There is a recurring reference throughout the discussions concerning sports/recreational aviation pages PA 23 and 24 of the Hansard minutes to "unregulated" activities to wit:
  - (a) Senator Hogg, "unregulated airports in the Sydney region."
  - (b) Mr, Ellis "move of general aviation industry into the unregulated field".
  - (c) Senator Hogg "These unregulated airports are not major risk etc" .

**All of aviation is subject to the Civil Aviation Act and the Civil Aviation Safety Regulations.** The inference in these proceedings is that the sports aviation field is an "unregulated" no-mans land is simply incorrect. Taking our organisation as an example we *administer* the Regulations on CASA's behalf.

2. (a) In Mr Ellis's statement on PA 23 he attempts to blame the growth of the sports/recreational sector for the decline of GA and the loss of business at Bankstown. The loss of the private operator's business at Bankstown and any other of the large privatised airports is due to their charging policy not sports aviation. There is little doubt that one of the reasons for the decline in aviation is that same charging policy. In the Canberra Region there are no outlying private airports for the GA private pilot to operate from, however that hasn't stopped the GA fleet that used to be tied down on Canberra airport fleeing from the privatised airport.
  - (b) Mr.Ellis goes on to blame the lack of VH registration on sports aircraft, presumably he is referring to the aeroplanes registered with us for the lack of "a picture of who the pilot is when they fly in and out". **In fact; in accordance with CASA regulations any RA-Aus pilot who flies into controlled airspace, which includes Bankstown, must hold a valid CASA issued pilot licence.**
  - (c) Mr. Ellis states that with a VH registered aircraft he can consult the Register to establish the owner. True. It is also true that we will not hand over the name and address of the owner.

- (d) **However, what he didn't say was that it is also true that we have an arrangement with Bankstown airport that if an aircraft with our registration uses their airport they can send the bill to us and we then pass it on to the owner. The same arrangement is in place for any airport operator in Australia who has landing charges.**

3. Mr Baldwin (Chair), question (PA23) " Do you think that there should be a secure but accessible database of registered ultralights?"

**One already exists. Our database is accurate and secure and it is available on a safety basis. Eg AusSAR has 24 hour a day access to our web based register. As the administrator of this section of the industry we are the first port of call. If any airport has a safety issue with one of our aeroplanes we will always assist them and safety and security will always take priority over privacy concerns.** I suggest that Mr. Ellis's concerns are more to do with posting bills and there is a procedure in place to handle that issue for him.

4. Mr. Ellis's comment re-CASA's handling of their register and that they should register ultralights! (PA24) **It is very simple when CASA does it the taxpayer funds it, when we do it the aircraft owner (user) pays.**

5. Mr. Ellis's claim that there is a security risk because of lack of identification of aircraft. **This brings into doubt the airport operators ability to cope with the aviation environment!**

(a) All aircraft whether sports/recreational aircraft administered by us or VH registered aircraft administered by CASA, must be registered and must have the markings clearly displayed on the aircraft. In the case of a GAAP airport like Bankstown, there is a tower in operation and the aircraft must identify itself via its call sign to the tower. If it is outside tower hours and MBZ procedures are active the aircraft still has to identify itself on the MBZ frequency.

(b) Reference the assertion of the security issue and the ability of the airport operator to refuse access to repeated offenders. The Bankstown Airport operators have never at any time communicated with us regarding a problem aircraft owner/operator concerning a security concern. I give you an undertaking that if this ever occurred we would give them our full co-operation. Not only that but had they contacted CASA on a such a matter I can guarantee you that CASA would have been straight onto us. I suggest that Mr. Ellis's inability to implement security protocols is because he hasn't established the proper protocols, ie. consulted with us the administrator!

(c) This aspect (as above in (b)) needs to be put into context. Sports/recreational aircraft operated by our members (registered with us) are not allowed by regulation to operate in Controlled Airspace (CTA and CTZ) unless certain conditions are met. Some of the conditions are technically based, ie specific engines and a limitation on aircraft by origins (factory built etc), but the pilot condition is the previously mentioned one of having to hold a valid CASA issued pilot licence. **In other words we are talking about a very small number of our members who operate under strict controls, it is not a case of swarms of little out of control gnats!**

(d) Regarding Mr. Ellis's claim that there is a safety issue because he does not know whether the pilot holds a licence. **This has already been addressed, it is a regulatory condition for one of our pilots to operate into a CTZ. As for Mr. Ellis's ability to establish whether the pilot is licensed, he can always ask the pilot to produce his licence. The same could be said for an aircraft with VH on the side.**

(e) Mr Ellis and his belief concerning CASA that " we know the standard of aircraft and training is monitored by CASA", whereas he doesn't know about ultralights! **Mr Ellis is displaying his lack of knowledge of the industry that he is involved in.** CASA for many years has pursued a policy of looking after the fare paying passenger first with very little oversight of private operations, historically

the same could be said of flying training although Bruce Byron is addressing that issue now. In actual fact RA-Aus monitors its flying schools on a much more regular basis than CASA and our operation is audited by CASA to see that we are doing it. As for our aircraft standards the airworthiness accident rate equates with GA.

Finally thank you for the opportunity to make this submission, if required I am available at any time to answer questions.

As to my own understanding of our industry; I commenced flying in 1961 and commenced work as an instructor in 1967. I worked in the Sydney basin as an instructor, IFR charter pilot and commuter pilot until 1978 when I joined the safety Authority (DOT). In 1988 I became an Assistant Secretary in the old Dept. which changed to a senior Manager with the Civil Aviation Authority. I retired from that position in 1994 and have been involved with the recreational aviation movement from that time. I currently hold an ATPL as well as my RA-Aus qualifications.

Paul Middleton  
Executive Director  
Recreational Aviation Australia Inc.

Canberra. 8 September 2005