

Submission to Aviation Safety Regulation Review

In light of the terms of reference of this review, I would call into question;

"the suitability of Australia's aviation safety related regulations when benchmarked against comparable overseas jurisdictions".

I also believe that CASA is out of touch with grass roots aviation in this country. We can only envy aviators in the USA, where general aviation thrives.

I feel obligated to express my disappointment at the direction CASA takes in the name of "safety", especially in the case of the current project CS13/01.

I feel I am in a good position to give you a realist's view on this topic.

Not only do I fly for an Airline, but I also fly GA Aircraft, both VFR and IFR. I also own a number of aircraft.

It would seem easy to just mandate that "certified" instruments have to be installed if you want to fly IFR. (Everyone is now safe, but are they?) Most certified IFR GA aircraft fly around with antiquated vacuum driven flight instruments, but they are certified! The nice modern EFIS systems that are certified are just TOO expensive for all but the commercial operators to install.

Whilst most pilots I know believe CASA would like to only have to deal with commercial operators, let me tell you that we in the Airlines still rely on General Aviation to find our future Airline pilots, and they are becoming hard to find in Australia.

If we are to keep General Aviation alive in this country we could learn a lot from the USA. They acknowledge the safety and reliability enhancements that modern affordable EXPERIMENTAL flight systems bring, and allow them to be used IFR so long as they pass the required periodic tolerance inspections.

I have a lot of experience with such equipment, and I can tell you that I and "the general public" are safer when using this equipment rather than flying around with "certified" antiquated systems.

To demonstrate how out of touch with grass roots aviation CASA is, the following is part of a response received from project CS13/01:

"We do not envisage removing the option for an individual to make an application to CASA for approval of specific instruments and equipment, however, the applicant would be required to demonstrate that the instruments and equipment are capable of accurately and reliably providing the necessary information to an acceptable standard."

So rather than adopting TRIED and PROVEN FAA regulations which encourage aviation, CASA would have every individual pilot of an experimental aircraft apply for approval.

I can only imagine the time, the money, the frustration, the continual hurdles, and never quite finding someone within CASA, who is willing to put their signature on such approval.

This is just one example of how Australia's aviation safety related regulations, when benchmarked against comparable overseas jurisdictions, are clearly not suitable.

Yours faithfully
Peter Hicks.