

In response to the Australian Government's Aviation Safety Regulation Review

I refer to the "*Terms of Reference – Objectives*" of the Review as set out below.

The principal objectives of the review are to investigate:

- the structures, effectiveness and processes of all agencies involved in aviation safety;
- the relationship and interaction of those agencies with each other, as well as with the Department of Infrastructure and Regional Development (Infrastructure);
- the outcomes and direction of the regulatory reform process being undertaken by the Civil Aviation Safety Authority (CASA);

- the suitability of Australia's aviation safety related regulations when benchmarked against comparable overseas jurisdictions;
- any other safety related matters.

My submission focuses solely on the matter of ASIC cards for recreational pilots. It is my belief that the system is useless as a deterrent against terrorism and adds an unnecessary expense for honest pilots. It is more anti-tourism where I live than anti-terrorism. I suspect it is the same at every regional aerodrome outside the capital cities in Australia. I would like to see an outcome where agencies take another look at ASIC cards with a view to at least extending their life to 10 years and taking more responsibility for ongoing background checking.

I understand that the purposes of ASIC cards are to identify individuals; perform background checks; classify various classes of persons such as pilots, staff, ground handlers etc.

What annoys me and every other pilot I know is the cost of an ASIC card and its short-lived duration of two years.

On the matter of identity. Once identified, I am unlikely to ever need re-identifying. My passport is a primary identifying document and lasts 10 years and accepted world wide. So is my driver licence. My working with children card lasts five years.

On the matter of background checks. When I spoke to a man at the ASIC issuing department, he said the ASIC card is virtually useless the day after the background checks are made, because quite incredibly, the referral authorities only respond to that one enquiry at the time of application. I would expect that once an ASIC applicant is registered with a referral authority such as commonwealth and state police, that a watch would be maintained on that person for an extended period say until the ASIC card was revoked. So in the event an ASIC card holder is convicted of a bombing or membership of a terrorist organisation or some other heinous crime, CASA would automatically be contacted. But no, it is a free for all until the applicant re-applies after two years. Without constant monitoring for offences, the ASIC security checks are severely wanting and pretty well useless.

The ASIC penalises honest pilots. I have a Private Pilot Licence, a Recreational Aviation Australia Pilot licence with instructor rating, a gliding certificate, a passport, a driver licence, a working with children card. Yet I have to review the ASIC card every two years.

The ASIC card holds no protection at regional airports. I live in Mildura where the aerodrome has a high fence around the passenger terminal and a post and wire fence to the rest of the property. There are crash gates at the end of the runways! There is no real security. People with ill intent would have no trouble wreaking havoc at Mildura aerodrome. The only emphasis is on the Blue Lined part of the apron where the passenger planes pull up. Why on earth is the whole aerodrome so called "security controlled"? Why not restrict access to the Blue Lined area and let honest, properly licensed pilots use the rest of the aerodrome?

Pilots without ASIC cards are prohibited from landing at Mildura Aerodrome. What a sorry state of affairs. Mildura relies on tourism, but pilots without ASIC cards are not allowed to arrive, visit and refuel, so they stay away. On the other hand, the ERSA is not clear about this and honest pilots unknowingly landing to refuel or just use the toilets at the GA lounge at the aeroclub could be fined or sent to prison or both. It is just overkill and absolutely inappropriate to use the lack of an ASIC against honest pilots in these country aerodromes.

Here are my recommendations:

1. The ASIC card be issued once for a period of ten years, then reviewed.
2. That the regulating authorities keep their own security monitoring once the ASIC card has been applied for in the first instance of issue.
5. That the declared "*airside*" and "*security designated areas*" on regional Commonwealth aerodromes be restricted to the apron where Regular Passenger Transport aircraft movements occur only.
6. Allow non ASIC holding pilots to visit Mildura and like aerodromes and lawfully be on the runways, taxiways, visit the petrol bowser and park in the GA parking areas.

Sincerely yours.