

## ***Address to the Aviation Safety Regulation Review Panel from Peter Bini Advanced Flight Training***

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Firstly it is with great thanks and appreciation to the Minister for conducting such a review, and to the review panel for bringing the review to Moorabbin Airport and allowing the industry voice to be heard.

Referring to the CASA website, CASA have publicly listed 15,150 registered aircraft. Of this amount, less than 25% are aircraft that weigh less than 5700 kgs and manufactured since the year 2000.

62% of the listed aircraft were manufactured in the 1980's or earlier.

This is evidence that the industry is not one of wealth.

### **CASA**

CASA appear to either be poorly managed or substantially lacking resources. It is apparent that CASA are struggling to discharge their duties in an effective manner.

Evidence of this was the failed introduction of the Part 61 amendments due in December 2014 which had key financial impacts on individuals and businesses alike.

Businesses spent much time diverting their focus away from key activities, and in some cases sacrificed revenue raising activities only to have CASA postpone the changes.

It has become increasingly apparent that the members of the aviation industry are losing confidence with the Civil Aviation Safety Authority. The way CASA handled the ditching off Norfolk Island, Senator Nick Xenophon's repeated open criticisms, and the postponement of Australian Aviation's largest know change in legislation - Part 61 have done nothing for CASA's reputation. The media release from CASA regarding the postponement of Part 61 was scandalous.

The management of CASA raises some question. CASA had their office at Moorabbin, but relocated to the Melbourne CBD. They then started charging for CASA staff to visit Moorabbin at a rate that included travel in both directions. This comes at a significant cost to operators and students.

The changes from GAAP to Class D were not thought through, with the announcement that all runways are to be considered active, EVEN during night operations when these runways or taxiways have no lighting and cannot be seen. Moorabbin is the most complex airport in Australia due to the runway layout, and the Class D changes have increased the difficulty for pilots. This statement has been proven by the level of runway incursions at Moorabbin.

Although not completely evidentiary, it would appear that the organisation of CASA has been reduced considerably over recent years. This has impacted the general aviation industry. CASA appears dislocated from industry.

Cost recovery cannot be relied upon to rectify this, as cost recovery is bleeding the industry to break point.

Cost recovery is of little concern to an airline, but to a small flying school or single flying student, the cost imposed by government agencies on top of other external costs such as private landing charges, are difficult for operators and students to absorb.

## CASA AVMED

It is with great regularity that we hear students complaining about the CASA AVMED office. Students advising of AVMED failing to reply to calls or emails, losing documentation and presenting a bullish attitude, and refusing to acknowledge reports from medical specialists. The law of unintended consequence will see these incompetency's cause pilots to withhold medical information purely because of AVMED's dysfunction, poor management, and stubbornness. This could result in major implications. Out of all the CASA departments, AVMED must be transparent and open so pilots feel comfortable to communicate with them.

It is acknowledged that AVMED have recently made changes to communication access, however AVMED needs to have more medical staff to process medicals in an efficient manner.

## CASA EXAMINATIONS

CASA examinations are also in need of review. The ATPL flight planning is a key example, where the examination has been made so difficult, the pass rates are not being made public due to the very low pass rate. After consulting people who work in airline flight planning, there are few similarities between the ATPL flight planning and industry flight planning.

## CASA SUMMARY

The FAA has demonstrated their openness to fostering General Aviation. In Australia we believe it is absolutely necessary for CASA to demonstrate the same support for the Australian general Aviation community, in order to keep the GA community alive.

When dealing directly with local CASA staff, it has been nothing but a pleasure. The individual CASA staff members have been exemplary. They have been incredibly willing and helpful. It is our belief that CASA staff members have mammoth challenges due to the organisation being crippled as a result of insufficient funding, poor management and lack of resources.

## AIRPORT LEASING

The leasing of commonwealth airports to private organisations has resulted in substantially low profit margins for airport operators. Being located at a secondary metropolitan airport has resulted in substantial increases in rentals and airport fees. These costs prevent organisations being able to replace ageing fleets, and we can observe a decline in movements. Airservices Australia data shows a reduction in fixed wing light aircraft movements at Moorabbin of over 21% in 2010 and 13% in 2012. The statistics for the same aircraft types at all Australian towered airports shows a continuous 4 year decline.

It is a common point of discussion that the Commonwealth should consider recovering the key aviation areas of secondary metropolitan airports allowing current airport lease holders to manage the airport fringe retail areas.

## ASIC CARDS

The Aviation Security Identification Card is one such program that must be considered for review. Moorabbin Airport often has students who come from overseas who will obtain an ASIC, complete their training that could be as little as 6 weeks, and then leave the country with an ASIC. The need for an ASIC at Moorabbin Airport given the minimal airline movements at the airport raises the question of the need for such a scheme.

The CASA website claims that an ASIC is only required in certain areas of Moorabbin Airport, however Moorabbin Airport advises that ASIC's are required for the whole airport.

## AIRSERVICES AUSTRALIA

A key concern to aviation organisations is the focus of Airservices Australia towards the airline industry. Many technical advances in General Aviation in the United States are yet to be introduced by Airservices Australia to the benefit of the Australian General aviation Industry. For example, technology that allows a vertical descent path to be applied to instrument approaches that use satellite technology. These satellite approaches exist in airports such as Moorabbin but without vertical guidance, and currently we are required to mentally imagine a descent path. With the reduction of ground based nav aids in Australia in 2016/17, these satellite approaches will become the main type of approach. Applying vertical guidance should be considered a key safety benefit. The airlines have access to this technology with 2 pilots on board, however the General Aviation aircraft with only 1 pilot on board, has to contend with guessing where the descent path is.

Airservices Australia have a National Operations Centre. This Centre disseminates a wealth of information thus enhancing safety. However it only services the Airline Industry. It is not made available for General Aviation. Such a resource should be available to the whole industry.

The amount of times General Aviation aircraft, particularly VFR, are rejected from entering controlled airspace is evidence of GA being the lowest priority to the Airservices Air Traffic Controllers. Our clients who have had the opportunity of flying in countries such as the UK, USA, and Canada, have all commented just how helpful controllers are in those countries compared to their experiences by Australian Controllers.

### IN CONCLUSION

In conclusion, the fracture between the industry and the government agencies of CASA and Airservices Australia is a growing one.

More needs to be done by Government to resource CASA, and encourage the CASA executive to work with industry, not external to industry. The fracture will result in an adversarial attitude between industry and regulator. For safety reasons this can never be allowed to happen. CASA needs more funding, however the General Aviation industry will risk suffering the same fate as the car industry if it is further burdened with expenses.

The same is to be said for the clear lack of intention by Airservices Australia to foster General Aviation.

Our government needs to encourage government organisations such as Airservices Australia to foster General Aviation and provide much safer technologies and resources, and to consider aviation training when they decide to remove ground based nav aids.

The Aviation Training Industry needs government help. Help to reduce operational overheads so we can move away from ageing aircraft. Help with encouraging overseas students to train here, and help to prevent government bureaucracy and greedy airport lease holders from choking small aviation businesses.

Finally, recently at a meeting with the representatives of the Victorian education department, it was advised that parents are moving away from allowing their children to choose aviation as a career, due to the poor perception of aviation. This is mostly due to negative publicity with Qantas.

The question must be asked, what are we doing to ensure Australia will be providing the Pilots of the future?