

SUBMISSION INTO CASA/GFA

For the attention of **Mr Warren Truss**

My submission relates to the enquiry into CASA with regard to unnecessary regulation to correct non-existent problems. This will prove to be expensive and has the potential to cause safety problems (counterproductive). This relates to Sporting Aviation, regulated by CASA through “Deregulation” by delegation to a sporting body. In this case, The Gliding Federation of Australia (GFA).

The GFA as I understand it was the first sport/recreational body to be deregulated and therefore self-administered. It was formed in 1949 and has been servicing gliding as a sporting/recreational activity for sixty five years. The formation and deregulation of the GFA has given many members of the community the affordable opportunity to experience the thrill of flying. There are those that have gone on to take up positions in the Air Force, Commercial Airlines and general commercial aviation as pilots.

Over many years the GFA has developed its own safety standards and developed procedures to cover gliding activities such as training, maintenance, repairs and research into fatigue and aircraft service life. In fact, the GFA in conjunction with the RMIT lead the world many years ago in Fatigue Testing of the then new materials – composite glass fibre, which is now only just being used to any large extent in new airliners today (Boeing 787 Dreamliner) composite carbon fibre construction. The point here is that the Gliding Movement in Australia, in a deregulated environment, has done a reasonable job in keeping the sport safe and accessible to many in the community.

Unfortunately accidents do occur with any element of activity that involves risk. Riding a bike, driving a car, surfing, sailing a boat, mountaineering, all incur elements of risk. To minimise risk of accidents requires sensible rules easy to understand and cost effective to implement. Human nature being what it is, people invariably avoid expensive complicated rules, viewing them as bureaucratic.

A number of years ago when other sport/recreational aviation activity was experiencing significant safety issues, the GFA model was adopted as a basis of improving safety within these organisations. This seems to have worked well, given that there are many deregulated sport aviation self-administered bodies in Australia.

Now having all this said. The question is “why does CASA wish to interfere in self-administered deregulated sport aviation (GFA), when there is not to any large extent a safety issue”?

The system has worked well for such a long time “what reason to change it”? Change can sometimes be counterproductive, as mentioned before and can increase the risk of accident. We now have a situation within the GFA Airworthiness System where young inexperienced volunteers have taken on a role that has become, I believe beyond their scope. Thus caving into CASA’s increasing demands for the GFA to change towards a shift of deregulated Recreational Sporting activity to highly regulated general aviation.

I have owned and operated my business for over thirty years maintaining and repairing gliders. The changes being forced upon us from within our own system as a result of our inexperienced people, who want to please CASA. This is resulting in division within the membership and some of its commercial repairers. Some of who, with vast experience have already left and others about to leave the industry.

These changes will impact the industry significantly, as they have modelled Approved Workshops on those that are in force for the Highly Regulated General Aviation Industry. This will not be workable and by no means sustainable, as unlike the general aviation industry where ‘EVERY aircraft has to be maintained by a registered workshop. The approved workshops in gliding have to compete with VOLUNTEERS who do work in any location (no workshop standard) and do it free of charge. So whilst it’s desirable to have a very nice workshop, it has been proven over many years that safety comes down to the integrity, training and skills of the engineer doing the work.

I am more than qualified to comment on this topic as I have a proven record in the industry for the quality work I have undertaken.

The counterproductive elements in this are:

- Disruption within the industry.
- Loss of very experienced workshops and staff.
- Lack of proper consultation on changes (causing distraction and dis-harmony within the industry to the changes) + an element of bullying.

- Double standards – requirements between volunteer maintenance and commercial workshops for compliance, which will eventually send experienced operators out of business.

The loss of experienced workers will cause a huge loss of corporate knowledge, which will impact on safety. Therefore, counterproductive.

This is the effect that occurs when the GFA system puts government powers in the hands of amateurs, where it is likely to be misused for personal gain.

The GFA has a monopoly on gliding in Australia and its structure is undemocratic, as its members are unable to vote directly to form the board. To be a member you are required to join a gliding club, a state association, and then the GFA. To fly a glider one is compelled to join all three and incur three lots of fees. If for any reason membership lapses on any of these, any qualifications that an engineer or pilot currently holds, are no longer valid.

There needs to be an alternative to this monopoly to give choice and that any qualification gained, to be certified as it is with any university or TAFE qualification. This makes it the property of the engineer or pilot. Solo pilots need to obtain an appropriate pilots license. Currently pilots are flying certified aircraft on a certificate only, not a license. Note, a certificate is not valid overseas, whereas a licence is recognised.

Change for the sake of change devised from CASA is having a ripple effect though every form of aviation and as a consequence many licensed engineers are complaining about these changes in Aviation.

Yours Sincerely

Roger C Bond

AVTEC AVIATION

