

[REDACTED]

From: Sandy Reith <sandy@reith.com.au>
Sent: Saturday, 25 January 2014 5:38 PM
To: ASRR
Cc: [REDACTED]
Subject: Regulatory Review...non confidential submission.

Dear Secretary,

Please accept this email as the body of my submission. I have sent to you separately my details via your internet proforma, but there was no direct means there to write my submission by iPad. Please advise me if you can accept my submission in this manner.

I have 10,000 hours flying, commencing 1965, in general aviation (GA) as variously Chief Flying Instructor, Chief Pilot, Maintenance Controller, airport and aircraft business owner operator. I am 72 y.o. retired from commercial operations, I fly privately in my own aircraft.

My flying business, over some 35 years, included regular public transport, training, freight, Australia wide charter, scenic flights, aircraft hire, aerial photography and surveillance for Government Authorities.

1. The focus of the review is safety regulation but aviation safety cannot be separated from the general health of the industry as a whole. Unfortunately the thrust of regulation, and justification by the regulator of an excessively expensive, overbearing and ultimately counter productive regulatory and administrative regime, has resulted in a less safe, shrinking and stressed industry. This is the state of GA today. The last flying school in Canberra closed its doors around four years ago. For example as a direct result of CASA policy the lack of flying activity has resulted in the closure of numerous refueling points by the oil companies all over Australia. This is against safety by reducing the options available to cross country pilots.

2. The fact that the regulatory re-write has taken more than twenty four years, millions of dollars and still not finished, shows how inefficient is the regulator, and the 'bits and pieces' approach is confusing, expensive and uncertain. We should adopt the New Zealand rules and fully implement the Trans Tasman Mutual Recognition Treaty as it pertains to GA. Nothing short of a 'top to bottom' reform will make any difference to the safety of flight, or its regulation, in Australia.

3. The Air Operator Certificate licencing system is grossly expensive, unwieldy and totally unsuited to most GA operators, especially flying training. In the USA some 70% of pilots are trained by individual instructors outside of FAA 'approved' flying schools. Hence in Australia a lack of new pilot throughput, less flying equals more expensive maintenance, fewer experienced maintenance engineers and flight instructors. It is recognised world wide that recency in flying improves safety, so by reducing flying hours we are 'progressing' in a manner less safe.

4. No real progress in the outcomes of safety regulation for GA will happen unless there is a revitalisation of the industry. GA airport policy must be overhauled, flying businesses cannot be expected to flourish where there is no reasonable 'on airport' tenancy, let alone freehold, on which to grow, and to borrow against.

5. The criminal provisions of the current 'hodge podge' suite of regulations are totally inappropriate and should be removed.

6. The CASA medical branch, 'Avmed' is renowned for its excessive and pedantic requirements resulting again in great expense and time wasting procedures with no safety benefit. The safety benefit of aviation medicals is not proven. The reverse being the case as shown by many years of operation of the low weight category (ultralight) without any

discernible medical safety problem, any more than car driving, neither ultralight or car licences have extraordinary medical requirements.

7. The sharing of information between the ATSB and CASA would and should be a given. This would be an organic situation by the two authorities if they were not engaged in make work programs and turf wars. In particular CASA would work well with one third of its current personnel, but only if it was dedicated to the general well being of GA, in addition to its remit for safety. The prosperity of GA must be included in the charter of CASA.

Sandy Reith

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