

JACC
Jandakot Airport Chamber of
Commerce
Western Australia

Australian Aviation Safety Regulation Review Input

January 2014

Jandakot Airport Aviation Community

- JACC represents the Jandakot Airport community and conducts advocacy on their behalf.
- Jandakot Airport is the busiest General Aviation Airport in Australia and the 3rd busiest in the world after Van Nuys CA.
- Current annual movements are 220,000 down from 460,000 (7 years ago) in Class D Airspace underneath the Perth CTA. A direct result of both the GFC and regulatory reform increasing aviation and airport costs without a corresponding safety improvement.
- Stakeholders include: Royal Aero Club of WA, China Southern WA Flying College/Revesco Aviation, Singapore Airlines Flying College, Royal Flying Doctor Service, Airflite Pty Ltd, Heliwest, Air Australia, Minovation and other aviation businesses servicing over 60% of the Western Australia aviation community. We estimate our members and associates represent over 30% of all GA in Australia. One member alone produces over 200 CPL/IR/Jet pilots annually and increasing.

As the single and only Secondary airport in Western Australia Jandakot Airport serves as the GA hub.

ASR Objectives

The Aviation Safety Regulation Review objectives are fivefold:

1 The structures, effectiveness and processes of all agencies involved in aviation safety.

*Australian regulation is a product of post war proscriptive regulation and the Two Airline Policy not repealed until the 1990's. This hopelessly skewed the development of General Aviation by effectively prohibiting to them the commercial operation of Part 25 aircraft. The entire regulatory suite was built around airline operations.

*A private Cessna 172 is required to operate under similar surveillance and regulation as a B747.

*Root and Branch reform is required to put the whole process back on the rails.

*We should use tried and effective systems and not reinvent the wheel.

*By following a North American model, substantial savings can be made in the funding of CASA coupled with a significant improvement in safety.

Everybody wins.

* The relationship between CASA and the ATSB needs to be reviewed as in manner of the NTSB and the FAA.

ASR Objectives

2 The relationship and interaction of those agencies with each other, as well as with the Department of Infrastructure and Regional Development (Infrastructure).

*We refer to the recommendation contained in the Senate Enquiry into the Norfolk Island accident and fully concur with their recommendations.

*This report appears to demonstrate the level of dysfunction within agencies.

*We believe the Dept. of Infrastructure and Regional Development when reviewing and approving Airport Master Plans needs to address aviation and aviation safety issues more comprehensively.

ASR Objectives

3 The outcomes and direction of the regulatory reform process being undertaken by the Civil Aviation Safety Authority (CASA)

*We have had over 20 years of reform which in spite of good intentions has created uncertainty and confusion within the GA community.

*For example the US equivalent of Part 61 covers 100 pages, the proposed Australian “equivalent” over 800 pages.

*In the US Congress and the FAA has been instructed to review Part 23 and simplify maintenance; we appear to be on the road to further complicate maintenance.

* Does our **Not Invented Here** syndrome improve safety. NO!

*Does our NIH syndrome increase our costs and make us less competitive globally. YES!

ASR Objectives

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

*We need regulations that reflect the world's most common practice in General Aviation.

*We need to follow the practices that originate from North America where a more appropriate GA system exists or look to the new changes being implemented by the UK CAA.

*It would make sense to take a leaf out of New Zealand's book and implement a system that recognizes the size and nature of the country.

ASR Objectives

5 Other safety related matters.

*Since the 1997 privatization of Primary, Secondary and Regional airport leases, many airport leaseholders have placed more focus on commercial development at the expense of aviation.

*This is in contravention of the Airports Act 1997, which clearly states the primacy of aviation activities.

*Many airports including Jandakot have their future airside expansion limited by excessive commercial development.

*Government must review Master Plans based on a 50-75 year projection of aviation traffic growth rather than the current 4 year Master Plan review with only a 20 year traffic projection.

*In reality this means a freeze on ALL future commercial development as most Capital Cities are unable to accommodate new green field airport development.

*More severe planning restrictions around airport zones must be encouraged to improve safety.

JACC Aviation Safety Regulation Review Appendix 1

US Perspective

- President Obama has signed into law the Small Airplane Revitalization Act, a measure that is designed to streamline certification of new aircraft and simplify the modification of existing aircraft. The new law directs the FAA to change Part 23 by the end of 2015 to create "twice the safety at half the cost" in terms of certifying new aircraft and, just as important, adding modern avionics and other equipment to the current fleet. "Reforming the way the FAA certifies aircraft can help more pilots fly more safely while lowering their costs; and that's exactly the kind of support general aviation needs to thrive" said AOPA USA President Mark Baker.
- "Reworking the rules is still in process and there's work to do but the law to impose the deadline is a milestone". The cost of certifying new safety equipment and new airframes has prevented many owners from upgrading their existing aircraft or from being able to even consider the purchase of a new aircraft," said Rob Hackman, AOPA USA Vice President of regulatory affairs. "The changes won't happen right away, but this law emphasizes how important it is to keep reforms moving forward. We'll keep working with Congress, the FAA, and the GA industry to make sure general aviation sees the benefits of reform."

What We Can Learn From This

- A clear direction from government to improve safety and reduce costs. Create "twice the safety at half the cost"
- A rigid time frame with a deadline locked in by law to force reform implementation.

JACC Aviation Safety Regulation Review Appendix 2

UK CAA General Aviation Red Tape Challenge

In the UK Special Minister of State Minister Schapps had this to say about General Aviation, very much mirroring the sound and sensible approach taken by Warren Truss.

- General aviation is a crucial part of the UK's aviation sector. It trains the next generation of pilots and engineers, supports highly skilled jobs, provides essential services and forms a key part of our cultural heritage. The UK enjoys an enviable reputation as a place of excellence in aviation. However, in order to flourish the sector needs a proportionate and supportive regulatory environment.
- The results of the General Aviation Red Tape Challenge demonstrate that we are not meeting this aim. Regulation often appears too prescriptive, impractical and inappropriate for the general aviation sector. Every member of the general aviation community recognises the need for good airmanship and adequate safety standards but regulation should always be proportionate to the risks. Safety regulation should therefore impose the minimum necessary burden and empower individuals to make responsible decisions to secure acceptable safety outcomes.
- The package of measures we have agreed will overhaul the GA regulatory framework, moving it from a prescriptive, bureaucratic regime to a light-touch, proportionate system. Alongside the detailed programme of reform the CAA is introducing changes to its structure to create a free-standing GA unit which will be in place from April 2014, reflecting the fact that GA needs a different, lighter touch approach to safety regulation than the commercial aviation sector.
- The UK Department for Transport will scrap or improve 58% of the regulations in scope.

Sub-category	Total	Keep	Revoke	Improve
Air Navigation and Traffic Control	19	7	3	9
Aircraft	15	4	6	5
Airports	22	7	12	3
Civil Aviation Authority	2	2	0	0
International	13	8	5	0
Passenger Rights	5	2	1	2
Pilots and Cabin Crew	4	2	2	0
Security	3	3	0	0
Total	83	35	29	19

Around 44% of aviation regulations are internationally or EU-derived.

<https://www.gov.uk/government/consultations/general-aviation-red-tape-challenge>

What We Can Learn From This

- A clear direction from government recognising that the GA fleet of aircraft vastly outnumbers the airline fleet (95% GA in the UK) and in order to flourish the sector needs a proportionate and supportive regulatory environment. The comparable numbers in Australia are:

Total aircraft registered: 15,167

Airlines aircraft: 478

GA % of aircraft in Australia 97%

Source: CASA Aircraft Register

- Following an EASA approach is overly burdensome for GA.

JACC
Jandakot Airport Chamber of Commerce
Western Australia

Presentation
Australian Aviation Safety Regulation Review
Adelaide 12/12/13

Jandakot Airport Aviation Community

- JACC represents the Jandakot Airport community and conducts advocacy on their behalf.
- Jandakot Airport is the busiest General Aviation Airport in Australia and the 3rd busiest in the world after Van Nuys CA.
- Current annual movements are 220,000 down from 460,000 (7 years ago) in Class D Airspace underneath the Perth CTA. A direct result of both the GFC and regulatory reform increasing aviation and airport costs without a corresponding safety improvement.
- Stakeholders include: Royal Aero Club of WA, China Southern WA Flying College/Revesco Aviation, Singapore Airlines Flying College, Royal Flying Doctor Service, Airflite Pty Ltd, Heliwest, Air Australia, Minovation and other aviation businesses servicing over 60% of the Western Australia aviation community. We estimate our members and associates represent over 30% of all GA in Australia. One member alone produces over 200 CPL/IR/Jet pilots annually and increasing.
- As the single and only Secondary airport in Western Australia Jandakot Airport serves as the GA hub.

Representing JACC today

- JACC President: Michael Braybrook, Company Director, Founder Malaysian Flying Academy, PPL Multi/CIR, Cessna 172 aircraft owner.
- Jan Ende: LAME all groups and types, ATPL, Cessna 185 (restored) aircraft owner and has operated commercially in all GA piston and turbine types up to Hawker 900, Falcon 900
- David Currey: B.Com, MBA, Principal WA Aviation College-RTO, General Manager Royal Aero Club of WA, one of the largest in Australia, large maintenance facility, 36 instructors and a diverse fleet of 34 single and twin aircraft, including a Tiger Moth.
- Gary Gaunt: Aviation Business Advisor, ATPL, Accountable Person for four (4) AOC's, last as CEO Revesco Aviation, worldwide unrestricted, for GIV, CL60, C550 and EMB500 and as Australia's first IS-BAO Stage 2 registrant.
- Glenn Hood: Aircraft & Hangar complex owner, Jandakot
- All have over 45 years of experience in Australian GA at all levels.

The JACC Agenda For Today's Briefing.

- This short presentation is intended merely to introduce the JACC and outline the matters we wish to canvas.
- The Senate Enquiry into the Norfolk Island ditching.
We endorse unequivocally and in total this report and the 27 recommendations.
- This presentation will cover the five key objectives of the Aviation Safety Review.
- We have given you hard copies of this presentation and a detailed submission in writing to the Review Panel will follow.

ASR Objectives

The AASR objectives are fivefold:

1 The structures, effectiveness and processes of all agencies involved in aviation safety.

*Australian regulation is a product of post war proscriptive regulation and the Two Airline Policy not repealed until the 1990's. This hopelessly skewed the development of General Aviation by effectively prohibiting to them the commercial operation of Part 25 aircraft. The entire regulatory suite was built around airline operations.

*A private Cessna 172 is required to operate under similar surveillance and regulation as a B747.

*Root and Branch reform is required to put the whole process back on the rails.

*We should use tried and effective systems and not reinvent the wheel.

*By following a North American model, substantial savings can be made in the funding of CASA coupled with a significant improvement in safety.

Everybody wins.

* The relationship between CASA and the ATSB needs to be reviewed as in manner of the NTSB and the FAA.

ASR Objectives

2 The relationship and interaction of those agencies with each other, as well as with the Department of Infrastructure and Regional Development (Infrastructure).

*We refer to the recommendation contained in the Senate Enquiry into the Norfolk Island accident and fully concur with their recommendations.

*This report appears to demonstrate the level of dysfunction within agencies.

*We believe the Dept. of Infrastructure and Regional Development when reviewing and approving Airport Master Plans needs to address aviation and aviation safety issues more comprehensively.

ASR Objectives

3 The outcomes and direction of the regulatory reform process being undertaken by the Civil Aviation Safety Authority (CASA)

*We have had over 20 years of reform which in spite of good intentions has created uncertainty and confusion within the GA community.

*For example the US equivalent of Part 61 covers 100 pages, the proposed Australian “equivalent” over 800 pages.

*In the US Congress and the FAA has been instructed to review Part 23 and simplify maintenance; we appear to be on the road to further complicate maintenance.

* Does our **Not Invented Here** syndrome improve safety. NO!

*Does our NIH syndrome increase our costs and make us less competitive globally. YES!

ASR Objectives

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

*We need regulations that reflect the world's most common practice in General Aviation.

*We need to follow the practices that originate from North America where a more appropriate GA system exists.

*It would make sense to take a leaf out of New Zealand's book and implement a system that recognizes the size and nature of the country.

ASR Objectives

5 Other safety related matters.

*Since the 1997 privatization of Primary, Secondary and Regional airport leases, many airport leaseholders have placed more focus on commercial development at the expense of aviation.

*This is in contravention of the Airports Act 1997, which clearly states the primacy of aviation activities.

*Many airports including Jandakot have their future airside expansion limited by excessive commercial development.

*Government must review Master Plans based on a 50-75 year projection of aviation traffic growth rather than the current 4 year Master Plan review with only a 20 year traffic projection.

*In reality this means a freeze on ALL future commercial development as most Capital Cities are unable to accommodate new green field airport development.

*More severe planning restrictions around airport zones must be encouraged to improve safety