

The Old Aeroplane Company Pty. Ltd.

Aircraft Maintenance, Engine Overhauls and Spare Parts Supplies
Specialists in Antique and Warbird Restorations

Submission to the Aviation Safety Regulation Review

The Old Aeroplane Company P/L has held a CAR 30 approval for maintenance for approximately 25 years. Some of our personnel have worked in the industry for much longer.

During the past 25 years, we have seen change upon change to the Regulations with little benefit to safety. This latest switch to EASA rules for GA is the worst yet.

In general, we support and strongly agree with the submissions of AMROBA and AOPA. This submission is limited to comments on regulatory reform. Some of our concerns include -

REGULATORY REFORM

Civil Aviation Act

- CASA's charter is limited to aviation safety. It should be expanded to encompass all aspects of aviation including fostering what was once a thriving industry. The word "Safety" should be dropped from CASA's name; the focus is too limited.

Regulations

- There should be a requirement that regulatory changes be quantified in terms of cost and safety benefit.
- There are now so many cross-references that the rules are incredibly difficult to interpret. Inadvertent breaches inevitably occur and are then vulnerable to criminal prosecution.
- The new rules are so inadequate that they are already being "patched up" by instruments and exemptions. Unless you are aware of these instruments it is too easy to get it wrong.
- It seems absurd that Australia should adopt EASA regulations when most of our GA trade is with America.
- The new rules were intended to be ICAO compliant but I believe they are not. Australia stands alone and Australian licences are not internationally recognized.

CASA

- Consultation – CASA has full time staff and lawyers drafting the Regs, but industry, which is trying to keep afloat, is given too little time to digest and comment. Deadlines are often just before Christmas or at the end of the financial year.
- Interpretation – CASA personnel seem to be as bewildered by the new Regs as the rest of industry. It is rarely possible to get definitive and unanimous advice on interpretation from CASA.
- "Policy" – CASA often justifies its interpretations as "CASA policy". Just where these policies are published is a mystery to industry.

Personnel

- LAME training is becoming all theory with little practical "hands on" experience.
- The new licences are a cause for concern because no one, including CASA, really understands the limitations. They might work in an airline environment, but not for GA. They are not recognized anywhere but Australia.

Recommendation

- We need an urgent halt to these new regulations and consideration given to adopting the FARs for GA.

Yours faithfully,

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Director
The Old Aeroplane Company P/L