

to  
Deputy Prime Minister's independent aviation safety regulation review panel  
submission  
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### **The view upward from sport aviation toward aviation regulation in the broad**

This submission provides to the review panel a perspective about the overarching aviation safety framework as seen from one particular sport aviation segment. It is hoped that this viewpoint is helpful in reminding the review about the diverse and unique individual elements which gather together under the broad banner of 'aviation'.

Where the goal is safe operation, by individual segments within that diversity and through collaboration between segments. Achieving this goal relies on mutual understanding and blending of processes and needs suited to segments. Rather than being based on an assumption that all segments can be dealt with through a single uniform method.

The history of sport aviation is precisely of this character. Each sport form has evolved processes attuned to its own format. With overarching regulation providing exemptions from commercial aviation methods where these are inapplicable. And providing for alternate processes within the regulation arrangements subject to meeting safe outcomes. (The long standing CAO 95.4 for gliding operation enshrined that diversity and focused on safe outcomes, even though these be by a number of parallel processes within the overall sport.) These traditional relationships between regulatory and sporting agencies; the resulting structures and processes have over numerous decades proven to generate satisfactory outcomes.

In recent years, the focus to align processes both between different aviation segments as well as to align with overseas regulatory structures, has along the way also introduced new mindsets. The result has focused on embedding single methods for aviation overall, for individual segments, and using the method of single agencies oversight – at exactly the time when sport aviation segments have generated diversifying constituents.

Gliding today encompasses a significant peak performance section, a motorised (sustainer, self launch and touring) section, as well as its traditional pure sailplanes (now operating in 'vintage' and 'classic' segments). The Gliding Federation of Australia has come in this recent time to emphasise the peak performance and motorised segments. Along the way, service provision to other segments has devolved to 'classic aircraft type' enthusiasts – in gliding this is Vintage Gliders Australia. This is evidenced by the cessation in recent decades by the Gliding Federation of Australia of field training to volunteers in servicing/repair of traditional constructed sailplanes. Where the more complex peak performance sailplanes and motor gliders tend now more toward commercial servicing.

Thus within just this one segment of aviation, there is divergence in practice in distinct parts of the sport. Vintage Gliders Australia has therefore, like any classic aircraft type club, instituted its own ‘passing on expertise’ events as well as along the way also becoming the source of knowledge about servicing and maintaining ageing airframes – particularly plywood structures – and generating best practice and methods beyond regulatory and manufacturer schedules and disseminating this across owners and operators.

In the aviation regulation restructure process in recent years however, these linkages are lost. CASA interacting with only the recognised sport organizations thereby aligns processes to prominent interest arenas (such as in gliding peak performance flying and commercial servicing).

Whereas the previous long standing CAO regulatory structure ensured that diverse interest groups all had grasp of the overarching safety obligations, along with flexibility to implement through methods suiting their segment.

The current conundrum therefore is that –

- on the one hand, processes are seen to have moved toward being more onerous, burdensome
- on the other, these processes are less directly applicable and relevant to parts of the constituents
- leading overall to the impression that there are those aviation segments that are wanted and catered for, and others which might as well wither away.

Sport aviation is an entirely discretionary activity. Its participants choose to fly for no other reason than enjoyment, recreation, fun. There are no commercial drivers, no travel obligations – none of the forces that impact on commercial aviation safety.

The traditional strength of sport aviation has been that it is ‘bottom up driven’ – those with the interest also participate in its processes, knowledge acquisition and dispersal, and safety focus.

The move toward processes which align with commercial aviation practice can in the sport aviation context bring with them the sense of burden and lack of relevance which kills off the sport aviators’ engagement with safety and processes.

This impression can come through both regulator and recognised sport organization.

Without engagement and shared ownership of the sport and its processes, sport aviators are likely to experience poorer safety outcomes.

This submission suggests to the review that in comparison with traditional arrangements, the recent regulatory focus brings with it strictures on the flexibility of sport aviation to operate to best fit its constituent parts. The coming outcomes thereby are increased burden and reduced safety.