

[REDACTED]

Aviation Safety Regulation Review

I am a member of the Gliding Federation of Australia [REDACTED] [REDACTED]. I hold Commercial Pilot Licence [REDACTED]. This is a personal submission.

In about 1990 I retired from instructing as a Level 3 (instructor training) instructor. I hold a maintenance rating as an Annual Inspector. I have flown as a tug pilot for 56 years. I have been President of three of my six clubs. I retired last year after 60 years of gliding and from 60 years of power flying in single engine types up to Cessna 210. I am a retired Electrical Engineer, familiar with industrial safety including high voltage access procedures and safety management in power stations and on mines.

I have read Standards for safety management from the Canadian standard of about 1980 to ANZS3000 series and I believe these provide a good model for safety management. I have read Professor Reason and I accept his arguments. For these reasons I support the principle of self-regulation in accordance with specified performance requirements.

The GFA submission points out that GFA has successfully self-regulated for many years. I understand that the accident rate is comparable with that of GA, which is regulated by CASA. In other words, GFA is doing just as well as the government regulator. The Manual of Standard Procedures, the Instructor Manual and the Aerotowing Manual developed by voluntary officers are in my opinion models of their kind.

Gliding presents special problems, for example getting trainees to recognise when to break off a flight and land in a paddock, management of fluid balance on flights up to nine hours, high altitude flight (I went to 23,000 feet to gain a height qualification), aerotowing and winch launching, on which CASA has nothing to offer. These problems are dealt with by GFA.

Of course there is always a better way. CASA should be able to help with modern principles for specifying performance and importantly, with the cost of reviews and updates.

I recognise that the generality of people in industries and activities such as road transport, recreational sailing, railways and small manufacturing operations will find the principles of self-regulation based on performance specifications rather than prescriptive regulation new and strange. There is need for education and particularly for explanation of the principles. I have offered my experience to GFA. I think CASA should ask for government funding to help with this. It has long been accepted that GFA voluntary labour has saved the government money over the years.

I am not aware of the details of the sudden withdrawal of authorisations, GFA submission point 10 but any perception of urgency after nearly 70 years of satisfactory operation would certainly be misguided. I hope no such thing will happen again.

CASA's move from investigating every accident to identifying trends and devising general ameliorating action is a precedent and I endorse the GFA argument, point 6 of their submission, that changes should be justified

If as the GFA submission says in point 11, CASA officers have stepped into GFA regulation then that would raise the old problem of trying to serve two masters. That must not happen again. There are many situations in life where you have to bite your tongue and go through proper channels – for example you must direct a subcontractor only through their prime contractor. Everyone should know that.

I can not see the need for criminal sanctions and this would have to be fully justified. Existing laws should be sufficient – there are enough of them – and GFA has always had available sanctions such as withdrawal of privileges and ratings. GFA rules require the presence of an instructor on the field.

G R Neely
Dip Elec E, Dip Admin, MIEAust (ret'd) FAIM (ret'd)