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Submission to the Independent Aviation Safety Regulation Review

My name is Laurence Hoffman. I have been an active glider pilot, gliding instructor and member of the Gliding Federation of Australia for over thirty years. I have also held a Private Pilots Licence for much of that period.

I am a glider owner and the Chief Flying Instructor of Sydney Motor Glider Flight Group, affiliated with the Gliding Federation of Australia and was a past Chief Flying Instructor of the Royal Australian Navy Gliding Association.

I submit the following points for the panel's consideration in achieving its desired outcomes:

1. CASA's relationship with the various sectors of Australian aviation.

- outline and identify any areas for improvement in the current interaction and relationships between CASA and the ATSB, as well as other agencies and Infrastructure

The various forms of sport aviation along with general aviation are the grass roots of the entire industry. They are the introductory avenues to aviation for the vast majority of pilots. *The core attitudes, skills and understandings, in particular those related in any way to safe flying ie 'airmanship', are established at this point and most often retained career and life long.*

As a glider pilot I speak on behalf of gliding. The outstanding performances of Chelsey Sullenburger of Flight 1549 fame and earlier, Robert Pearson of the 'Gimli Glider' (Air Canada Flight 143) fame are just two of many examples of commercial pilot performance under duress being greatly enhanced by previous gliding exposure. Additionally, there are countless examples of similar safe outcomes in the history of general and military aviation for the very same reason.

Gliding and Sport aviation in Australia should be more greatly acknowledged, adequately financed and politically supported relevant to its key contribution to aviation safety by CASA and all levels of Government.

CASA is to be congratulated for its program of regular national safety seminars and associated programs. Unfortunately the goodwill generated at these is too often undermined by CASA's work in the field with the widespread notion of pervading officiousness and unreasonable behaviour from many of its staff underpinned by a lack of operational knowledge.

Despite extended periods of positive and cooperative support from CASA for the gliding sector in the past, this has not been the case for some years. In fact CASA officers and personnel have unfortunately earned a reputation across all aviation

sectors for ineptitude, officiousness and shallow knowledge of operational requirements.

In an attempt to be all things to all parts of the aviation industry, *CASA's human and physical resources are extended too thinly and consequently far less than effectively.* Even experienced CASA officers and staff, along with the rest of the aviation community, find the overwhelming weight and complexity of regulatory requirements impossible to monitor, to remain up to date with, to manage and to apply.

As a consequence, there is a pervading minimal operational knowledge of all forms of sport aviation in particular. Inaccurate, misleading, conflicting and outright wrong directives and expectations from CASA personnel often result. A review of the myriad online forums and hard copy publications of the entire industry in recent years very rarely reflects anything other than *disdain and mistrust for CASA intervention of any form.* Unfortunately it is almost impossible to find a positive comment on this area.

The Part 149 proposals are a step in the right direction for sport aviation, especially gliding, and I fully support GFA's submission with regards to these with the proviso that gliding experts drive any reform, not uninformed others.

2. Cost of Aviation Safety in Australia

- review the implementation of the current aviation safety regulatory reform programme and assess the effectiveness of the planning and implementation of regulatory changes, including cost impacts on industry
- examine and make recommendations on options for improving future aviation safety regulatory reform having regard to international experience and stakeholder views, and the Government's objective of reducing the cost of regulation to business

The current and projected costs of administering aviation regulatory obligations are a major drain on the National purse. Cost efficiencies and administrative overhaul is urgently needed as it is arguable that the Australian taxpayer is getting a relatively poor return on the funds directed to this area.

We currently suffer from excessively complex and unwieldy aviation documentation and regulation across all sectors of aviation. At the coal face, this is most obvious firstly for operators in their attempts to satisfy the myriad regulatory requirements, and secondly, for the regulators, where even the most experienced officers must grapple with an overwhelming weight and complexity of documentation.

The outcome is too often an unmanageable concoction of uncertainty, inconsistency, selective interpretation and wrong decisions mixed with combative personalities and rising animosity. The negative impact of all of this on aviation safety is obvious.

There is a more efficient and more cost effective way – the primary focus of limited resources on Regular Public Transport where they rightly belong and a concurrent supportive partnership with the General Aviation and the Self Administering Sport Aviation Organizations which lays the bulk of safety responsibility.

3. Cost reduction and greater levels of safety through partnership

- provide advice to Government on options for improving oversight and enforcement of aviation regulations, including rights of review
- examine the current processes by which CASA develops, consults on and finalises changes to aviation safety regulations and other legislative instruments (such as civil aviation orders) and make any proposals for improving these processes such that new regulations are best practice in safe operations for each relevant sector of the aviation industry

The Gliding Federation of Australia was inaugurated as early as the last 1940s and delegated the full authority to administer all gliding matters by the then civil aviation body.

As the longest running Self Administering Sport Aviation Organisation, its has a record proven over decades of effective and economical management of this aspect of aviation in this country. Its also has a proven record for achieving this outcome relatively cheaply thanks to the significant voluntary labour contribution of its membership.

For much of its history GFA has enjoyed a positive and cooperative partnership with the regulators. *This partnership for aviation safety must be revitalized through a major cultural change within the regulator...* an imperative if we are to move forward, even if Part 149 is rightly adopted.

There is a wealth of skill, operational and technical knowledge essential to maintaining high safety standards held by a large number of long term gliding personnel like myself. Such a resource should be embraced and utilised to the fullest rather than frequently ignored or repudiated. *Lets the experts do their job.*

Self regulation by Self Administering Sport Aviation Organisations with a proven track record, in accordance with agreed standard operating procedures and policies should be encouraged and supported. This, and intervention by the regulator only if there is a failure to conform to such agreements, is the way forward to an affordable and more effective level of aviation safety.

Regards
Laurence Hoffman
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