

27 November 2023

Director, Aviation White Paper Project Office
Aviation White Paper
Department of Infrastructure, Transport, Regional Development and Communications
GPO Box 594
CANBERRA ACT 2601

Dear Director,

Re: Aviation White Paper – Review of Green Paper - Comments by GAAN

Preliminary

The General Aviation Advisory Network (GAAN) has been established to provide advice to the Minister for Infrastructure, Transport, Regional Development and Local Government on matters affecting the general aviation (GA) sector. Members of the Network have been selected for their skills and expertise in the aviation industry and work collaboratively to respond to pressures facing the GA sector. They come from a cross section of the diverse GA sector, including business, aeromedical, remotely piloted aircraft systems, aircraft maintenance, flight training, sport, recreational and regional aviation operations.

You would be aware of the GAAN's submission in March 2023 to your office in relation to the Terms of Reference. The GAAN thanks the Department for the opportunity to comment further, this time following its review of the Aviation Green Paper.

The GAAN welcomes recognition of GA in the Green Paper. The inclusion of the subjects covered in this submission would enhance the value and relevance of the Aviation White Paper for future government aviation policy and decision making.

Observation - Sustainability

GAAN members are cognisant that the Aviation White Paper will inform policy decisions of government across a very broad industry and must therefore focus on issues of national and strategic importance to aviation. Nevertheless, in some areas, the Green Paper would benefit from a more direct, pragmatic approach to some of its goals. This is particularly so in relation to general aviation's role in greenhouse gas emission reduction. Market and technological realities must be addressed in detail if environmental sustainability benefits are to be realised. These include timeframes for aeronautical certification, feasibility of repowering existing GA aircraft, flight time limitations of electric aircraft and forecast timeframes for their extension. As well, the GAAN believes the shift towards turbine aircraft power in larger GA aircraft brings environmental benefits, as these types begin to utilise Sustainable Aviation Fuel (SAF) in future. The opportunity for the government to support extended operational trials of electric aircraft in compatible applications, for example, flight training in the vicinity of aerodromes, should be explored. The operational experience of several GAAN members in these and related subjects is extensive, and in the case of one

member, includes more than seven years' involvement in a retrofit electric engine testing program for Cessna Caravan aircraft. Please let us know if we can assist the Department in this respect.

Strategic Goals for the GA Sector

At the highest level, the GAAN's strategic goals for the sector are as follows:

Strategic Goals	Solutions
<p>Deliver increasing economic, environmental and social benefits to citizens of Australia.</p>	<ul style="list-style-type: none"> • Serve the Australian community by supplying flexible, economically efficient and competitive aviation services for a wide range of purposes, including rural and regional freight and transport, aerial application, survey and remote sensing, community safety, medical transport and evacuation, tourism, recreation, training and education, executive and specialist mobility for many primary and secondary industries.
<p>Achieve and maintain world standard levels of safety commensurate with sector risk.</p>	<ul style="list-style-type: none"> • Be regulated under a just and competitive legal framework that is clear and concise, administered transparently and efficiently, by a regulator committed to just culture, industry engagement, collaboration and administrative efficiency.
<p>Achieve and maintain sustainable economic growth within the general aviation sector.</p>	<ul style="list-style-type: none"> • Deliver benefits to the nation at costs that are competitive with other forms of transport and utilities and comparable to those of other economies, where the costs to government are balanced by the national benefit delivered by the sector to the community and other industries. • Improve the sector's carbon footprint by adopting technologies for fuel efficiency and alternative fuels, whilst safeguarding jobs and industry service outcomes.
<p>Build and develop resilience in the sector to ensure its future sustainability.</p>	<ul style="list-style-type: none"> • Attract domestic and foreign investment. • Increase the capacity of the Australian general aviation fleet and reduce fleet age averages. • Partner with governments to support Australian providers of services essential to community safety. • Increase the number of persons, beyond employment, able to benefit from a viable general aviation sector as participant and direct and indirect beneficiaries.
<p>Be innovative and support innovation by others in technology, practices and operating models that support complementary strategic goals.</p>	<ul style="list-style-type: none"> • Leverage new technology and deliver operational safety and capability enhancements to be a world leader, creating export opportunities for Australian products, people and expertise.

Strategic Goals	Solutions
<p>Work closely and collegiately with government, community and sector stakeholders to foster shared and collaborative safety regulation to support complementary strategic goals.</p>	<ul style="list-style-type: none"> • Operate collaboratively between government and industry to graduated, risk-based levels of safety that places maximum emphasis on protections for persons on the ground and non-participant consumers of aviation services, particularly passengers, who are not well-informed of the attendant risks.

Strategic Issues for the GA Sector

1. **Shortage of Skilled Personnel:** the GAAN’s highest priority for the Aviation White Paper is to address **ineffective training pathways and workforce sustainability for skilled personnel, particularly in aircraft maintenance.**

Access to suitable training pathways remains a continuing issue for general aviation, which is highly dependent on skilled personnel as pilots, maintainers, administrators and managers. Access to available student loans program, and clarity and alignment of CASA and ASQA requirements and objectives, have significant impacts on both pilot licensing and maintenance licensing regulations.

For too long, careers in aviation have been inaccessible to many women. The absence of half the population from participation in the aviation industry has left it with fewer candidates for skilled and professional employment, and exacerbated personnel shortages. Increasing workforce diversity would alleviate these issues and support the sector’s growth.

Whilst there have been encouraging developments recently (particularly CASA’s modular licensing proposal) progress is not being made as quickly as the sector needs. Among several undesirable outcomes, the industry is unable to source the skills it needs, whilst young people aspiring to an aircraft maintenance career are confronted by inconsistencies between course funding rules and CASA’s requirements. Accordingly, the Aviation White Paper should set directions to drive and support:

- Implementation of the modular Part 66 licensing scheme, and modular training and licensing programs more broadly, and for pilots, to:
 - Remove impediments to entry, such as inflexible and siloed training pathways
 - Allow early income
 - Leverage modular concepts to support cross-sector approvals
 - Create resilience in the existing workforce and enable greater workforce mobility
 - Enable access to HELP funding
- Alignment of the objectives and requirements of ASQA and CASA in the Australian Skills Qualification Framework

- Funding and recognition for CASA-authorized technical training schools, particularly to be consistent with the Australian Government’s Industry Skills Australia initiative
- Review of the prescribed competencies and requirements for general GA training and ‘specialised’ GA training, as well as those prescribed in Parts 61, 141 and 142
- Holistic review of CASR Parts 42, 66, 145 and the future 43 for opportunities to streamline LAME training and licensing and support efficient course completion
- Direct and positive encouragement of greater diversity in the aviation workforce, including via, but not limited to, programs for women in aviation, through Jobs and Skills Australia, and at schools, TAFE, universities and other educational institutions
- Policy and initiatives to attract more skilled people to the aviation workforce through:
 - Scholarships and work placement programs
 - Opportunities to attract international skilled aviation workers to Australia, noting that pilots are listed in the Department of Home Affairs desired skilled occupation list¹, but aircraft and avionics maintenance technical personnel are not.
- Incentives to promote access to and support for, aviation maintenance businesses and employment in regional areas, including offsets for business and scholarship grants.

2. **Airports Policy and Oversight:** For some time, the GAAN has been concerned about the **ineffective regulation and oversight of leased metropolitan secondary airports and inadequate state of facilities for general aviation at regional aerodromes.**

Secondary Airports: Experience has shown that the Department’s “light touch” approach to the management and governance of the leased secondary airport airports has led to refused renewals for GA airport tenants, steep increases in rent, inadequate facilities and shrinking areas of land on these airports for future aeronautical use. Strengthening the existing framework, to include more rigorous controls, is urgently needed.

The GAAN recommends that airports policy be adjusted to:

- Closely scrutinise all leased secondary airport master and major development plans to ensure that the interests of the GA sector are adequately protected
- Amend the *Airports Act 1996* to:
 - Separate the planning provisions applicable to secondary airports used by general aviation from the provisions that govern major capital city primary airports, with separate development planning approval thresholds and specific provisions to protect the GA sector
 - Establish robust and enforceable rules to ensure that all draft master and major development plans at leased airports used by general aviation remain open to public scrutiny, including the current version of such documents being visible at all times to all stakeholders, including the community generally and the GA sector

¹ This list is publicly available from the Australian Government Department of Home Affairs at: <https://immi.homeaffairs.gov.au/visas/working-in-australia/skill-occupation-list>.

- Create enforceable land use planning obligations on the operators of leased secondary airports to demonstrate conclusively that all proposed measures which:
 - Allocate land or buildings to any purpose
 - Change the allocation of land or building allocation or create, revise, or remove zones and their planned or intended purposes (however described)
 - Change or initiate aeronautical zone boundaries (however described) and/or aeronautical facilities

are fully justified and demonstrated to the satisfaction of the Minister to be in the interests of general aviation and other users of the airport and surrounding community.

The GAAN notes that aspects of its views are consistent, in at least one documented case², with those of affected community leaders, and expects there are more.

Regional Airports: A bold and innovative approach to revitalize regional airports, based on a sustainable model, is needed to protect, maintain and grow business and employment opportunities.

The best way to sustain these assets and provide consistent, controlled standards for facilities is through direct, recurrent Australian Government funding.

Extensive existing services including power, water, drainage and roads, coupled with under-utilised land that sometimes surrounds regional airports, may provide the ingredients for business development opportunities..

Recurrent funding requirements could be alleviated by businesses prepared to commit capital and enter subsidised long-term leases.

It would be important to ensure that future commercial investments for surplus airport land were made in a way that would remain fully compatible with the ongoing use of the site as an airport, since allocation of airport land to non-aviation businesses could diminish the airport's viability.

Annual lease payments could be linked to performance indicators that require businesses to sustainably grow, employ and train staff and support regional communities. Emphasis on youth employment for apprentices and traineeships should be targeted. Annual auditing of performance indicators would provide the basis to reset or adjust lease payments.

NASF: All airports should receive **consistent and effective protection through the National Airports Safeguarding Framework (NASF)**, regardless of the state or local government area in which they are located. The Aviation White Paper should acknowledge the importance of NASF, not only in relation to aircraft noise, but also to planning controls by government at every level. It should be government policy to

² Refer also to: City of Kingston, *Submission to the Green Paper Aviation*, November 2023, retrieved from: <https://www.kingston.vic.gov.au/files/sharedassets/public/v/1/hptrim/council-administration-governance-general/public-agenda-of-20-november-ordinary-council-meeting.pdf>

strengthen NASF with measures that include pro-active inspections, assessments and interventions to prevent harm from incompatible property development near airports.

Aviation Security Identification Card (ASIC): The GAAN also considers that **the impact of the ASIC scheme on general aviation should be reviewed**. It ought not be difficult to separate the requirements for secure identification of a GA pilot from one employed in an airline, just as the Maritime Security Identification Card has two-, or four-year terms, depending on the sensitivity of the applicant's employment. Extension of the term of the current card to four years for GA pilots could include appropriate mitigations to maintain the security of airline operations, whilst reducing the cost and burden of the current arrangements.

3. **Economic study of the sector's contribution to the Australian economy:** The GAAN considers that a **detailed economic study of the sector** will support and inform better decision-making by government in many aspects of the sector's interaction with the community and government. Specifically, the Aviation White Paper should support continuation of BITRE's work, with appropriate external support, if necessary, to:
- Identify and quantify those areas of the economy that are heavily dependent on GA, for which estimate of jobs and industry value should be key outputs
 - Identify and quantify additional benefits arising from general aviation, including a breakdown to identify and quantify its positive value, particularly to regional communities and its links to education, healthcare and other business activity
 - Identify different labour market roles in GA and produce a breakdown of employment demographics, for example, by city, regional and rural, states and territories; and the type of people and qualification levels in those jobs; for example, university graduates, technical college qualification holders, school leavers and related analysis
 - Develop scenarios and sensitivity analysis modelling to understand outcomes
 - Develop and deliver modelling and assessment tools for use by Commonwealth, state and local governments. This information would directly assist planners and policy makers assess the impacts of policy on aviation, and promote awareness of GA's vital services, and the broader benefits it brings to the Australian people.

It is essential that the economic study measure the whole Australian GA sector, not just within the narrow definition prescribed in ICAO Annex 6. An equivalent study conducted in the United States³ defined general aviation as “...*the manufacture and operation of any type of aircraft that has been issued an airworthiness certificate by the FAA, other than aircraft used for scheduled commercial air service or operated by the military. For this study, the general aviation industry is defined to include aircraft and component manufacturing, flight operations, maintenance, and other activities.*” A 2015 study conducted in the United Kingdom⁴ adopted largely the same definition, noting that

³ Price Waterhouse Coopers, LLP (prepared for multiple client organisations): *Contribution of General Aviation to the US Economy in 2018*, February 19, 2020. Retrieved from https://gama.aero/wp-content/uploads/General_Aviation_s_Contribution_to_the_US_Economy_FINAL_20200219.pdf

⁴ York Aviation LLP (prepared for the UK Department of Transport): *The Economic Value of General Aviation in the UK*, Final Report, February 2015. Retrieved from https://gama.aero/wp-content/uploads/Economic_Impact_of_General_Aviation_in_the_UK-1.pdf

it included business aviation. These broad definitions also consistent with appointments to the membership of the GAAN, which are made by the Minister.

4. **Regulator:** on behalf of the GA sector, GAAN members look to **CASA to continue and extend its program of improvement, particularly in its relationship with the aviation industry, and to redouble its efforts for administrative and service efficiency.**

Recent implementation of CASA's regulatory operational suite has not been without challenges, and both the sector and CASA have had to adjust to new regulations. GA operators have been required to update large volumes of documentation, apply for new approvals and adapt to changed processes; whilst CASA has reorganised its functions for better efficiency and taken positive steps to work with the sector going forward.

This is not to say that the new regulations are perfect, or to imply the sector's unbridled enthusiasm for them. However, communications with CASA senior management have been vastly improved and the regulator's stance has become considerably more positive than the environment that prevailed just three years ago.

In specific terms, the Aviation White Paper should set a direction for the industry regulator to:

- Continue CASA's successful GA Workplan initiative, seeking to reduce red tape wherever possible and minimise delays in decisions and approvals that have an impact on GA operations, investment and expansion decisions
- Utilise industry expertise to continue to develop cooperative approaches, where CASA cooperatively:
 - Identifies and works closely with industry safety partners (e.g., peak bodies) in different aspects of the sector
 - Identifies and gathers sound data for improved safety
 - Identifies key risks and safety issues in each relevant sector
 - Identifies risk controls and safety initiatives
 - Develops safety performance indicators to monitor ongoing safety trends
- Continue programs for service improvement and quality management across all aspects of CASA's interactions with general aviation
- Ensure CASA is adequately resourced, both in management and technical expertise, to continue its programs of improvement, to support new and emerging technologies, and to ensure GA's access to timely regulatory services, delivered to high standards of performance
- Work with industry to identify and complete repairs and reforms required to key elements of GA regulations, including Part 61 provisions for specialised requirements and flight examiners; Part 135 and non-scheduled Part 121 business aviation approvals, exemptions and limits; Parts 137 and 138; and administrative requirements required by Parts 141 and 142 that are not justified by safety considerations.

5. **Airspace:** The GAAN believes that the Aviation White Paper should specifically call out the need for a **complete review of the Australian strategic airspace model, with consideration for existing and emerging airspace user needs.**

A national body (an enduring Airspace Industry Advisory Board) should be established to advise government, in the national interest, in relation to airspace management, consistent with the Minister's airspace policy statement. Doing so would:

- Maintain a national vision and plan in line with updates to the Minister's Policy Statements, changing stakeholder needs, and emergence of new opportunities for innovation
- Ensure valid and properly representative strategic airspace user input in relation to airspace change proposals.

There is currently no single user group to provide advice on airspace changes. The present arrangement only engages airspace users locally. For example, there is no effective national user consultation in relation to instrument approaches, which are a critical resource that has been affected by significant regulatory change in recent years.

Current airspace change discussions are limited to specific changes and not assessed against a national strategic plan for the evolution of airspace and air traffic management accounting for the changing needs of all airspace users.

A national airspace plan, consistent with this objective, the ICAO Global Air Traffic Management Operational Concept and Australia's State Safety Program, should be prepared by the new advisory body with appropriate industry engagement.

Australia lacks a National Air Navigation Program or Plan that would complement our State Safety Program.

Currently, airspace decisions are not made in accordance with any strategic vision, transparency of user needs, or input. The CASA Office of Airspace Regulation (OAR) regulates, and Airservices Australia implements. Often, these are not done in a coordinated way; industry is only consulted on specific changes, and too often, by the time it is, the proposal is a foregone conclusion.

The current arrangements present a significant risk, which will only worsen and compound as the number of new airspace users with diverse operational needs increases, including drones, RPAS and advanced air mobility.

Significant changes can be seen on the international horizon, with development in other countries of future strategic airspace operational concepts, encompassing all elements of airspace classifications, rules, air traffic management and more, to ensure safety, capacity, equity of access and operational efficiency, considering continued air traffic growth and complexity.

Whilst past attempts, driven by the aviation industry, have been beneficial in some matters, the future Airspace Industry Advisory Board must be given the authority required for the task, including direct interaction with the Aviation Policy Group and Aviation Implementation Group.

Airspace reform would provide a stimulus to the GA sector, bringing job creation, fleet renewal, improved maintenance facilities and a more supportive environment for flight training.

6. **New Technologies, Aeronautical Product Design and Manufacturing:** the GAAN believes that the Aviation White Paper should support programs to **reposition the Australian aviation industry’s aeronautical engineering, design and manufacturing capabilities**. Australia has an opportunity to become a significant manufacturer of specialised aviation products for and associated with emerging technologies, but a national aviation manufacturing policy to encourage the development of this area of the industry has not emerged. In particular, Australia has a poor track record in maintaining its aircraft certification and manufacturing capabilities. In the past, general aviation aircraft and component manufacturing has faced excessive cost and time delays caused by regulatory inflexibility.

The GAAN notes with satisfaction that CASA is currently working with the FAA for the certification of an Australian designed large Remotely Piloted Aircraft Systems (RPAS) and Advanced Air Mobility (AAM). This is one of several recent encouraging signs of the possibility of a renaissance in aeronautical design and aviation manufacturing opportunities.

Policy settings in the following areas deserve detailed review and revision:

- The regulatory burden faced by industry in the export, and overseas recognition, of Australian designed, manufactured and certified aeronautical products
- More balanced bilateral arrangements to ensure efficient and timely entry of Australian certified aircraft and aviation products in international markets
- Resources available to government agencies to meet new industry demands and establish the policy, regulatory and infrastructure constructs needed for safe sector growth, particularly to include the rapidly growing markets for RPAS, AAM and electrically-powered aircraft
- Prioritisation of national research and development programs for innovations that have the potential to:
 - Deliver safety, efficiency, economic or sustainability benefits across multiple aviation sectors
 - Create new, or enhance existing, commercial, civil or defence applications for GA
 - Create new manufacturing and export opportunities for Australian based industry.

Additionally, the consensus standards to be adopted by the FAA MOSAIC program⁵ offer new opportunities for Australian innovation and should be carefully examined by the regulator in close cooperation with industry.

Geoscience Australia is currently implementing, SouthPAN⁶, a Space Based Augmentation System (SBAS) for Australia and New Zealand. This whole-of-society project will bring national benefits to many industries, and especially to agriculture, construction, resources, tourism and utilities; and for the aviation, maritime, rail and road transport industries. The support of Australian Government aviation agencies for the SouthPAN project, particularly Airservices Australia and CASA, should be a high,

⁵ A copy of the proposed rule is available at: <https://www.federalregister.gov/documents/2023/07/24/2023-14425/modernization-of-special-airworthiness-certification>

⁶ Information about SouthPAN is provided at: <https://www.ga.gov.au/scientific-topics/positioning-navigation/positioning-australia/about-the-program/southpan>

national priority. SouthPAN will bring the safety benefit of vertical guidance during instrument approach operations to many aircraft operators, particularly those in GA that provide essential aeromedical, freight, business and charter services in regional Australia.

The General Aviation Sector is a Critical National Asset

GA businesses are at the coal face when it comes to bringing new entrants to the industry and are often the starting point for long and productive careers in aviation.

It should not be forgotten that general aviation's flying training services are critical to the availability of pilots for the airline sector.

At the highest level, the Aviation White Paper presents an opportunity for the government to:

- Promote policies and settings that support a strong, sustainable and effective GA sector for all Australians
- Work together on a program to uplift the industry's image and make it an employer of choice for young people.

The GAAN seeks policies that support a safe, strong and sustainable sector that can create opportunities for employment and bring prosperity and other benefits to the whole nation.

The general aviation sector's strength lies in its flexibility, enabling it to be responsive to community needs and to scale to match demand. General aviation services can grow and be adjusted to serve the nation across a broad spectrum of activity, spanning emergency medical response to sport and recreation.

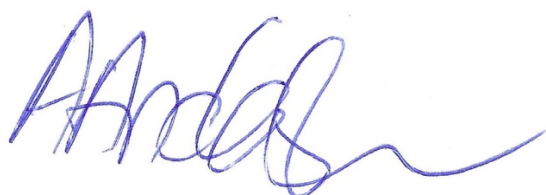
Unconstrained by requirements for fixed schedules, general aviation operators get sick people to hospital, extinguish bushfires, deliver freight, and educate technical personnel for the entire industry, every day.

All of Australia will gain from an Aviation White Paper that serves as the foundation for policy decisions that enable the GA sector to continue to deliver, and build upon its services to the community, with increasing safety, efficiency and environmental and economic sustainability.

GAAN members commend the Department for the effort it has made to capture input from the GA sector, and appreciate the opportunity to provide this submission.

Please contact us by email (GAAN.Secretariat@infrastructure.gov.au), if we can be of assistance.

Yours sincerely,



Andrew Andersen

Chair