

Royal Flying Doctor Service

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Royal Flying Doctor Service Submission to the Aviation Green Paper

About the RFDS

The Royal Flying Doctor Service (RFDS) is a vital part of remote and rural communities, providing critical health services to areas of great need, particularly in places where low population numbers make it unviable for permanent services to exist. This includes hospitals, emergency departments, pharmacies, General Practitioners and other primary healthcare services.

For over 90 years, the RFDS has filled this gap, bringing a comprehensive suite of health services to people living, working and travelling in rural and remote areas. Our services include include a 24 hour, seven-days-a-week (24/7) emergency aeromedical retrieval service for those who experience a medical emergency and require urgent transportation to care in a tertiary hospital. This is an addition to inter-hospital transfers by air and by road, and extensive primary healthcare services including GP, nursing, mental health and dental health clinics; allied health services as well as health promotion activities, all supported by a 24/7 telehealth service.

With 80 aircraft across the country at 23 aerobases and now including rotary wing, last year the RFDS transported 36,951 patients by air; provided 24,889 primary healthcare clinics at an average of 68 per day; and flew 27,475,543km – equivalent to 34 return trips to the moon. The RFDS was also an important part of the response to the COVID-19 pandemic, through aeromedical retrievals in rural and remote Australia for suspected or confirmed COVID cases and an extensive vaccine program and dedicated respiratory clinics in these areas.

The RFDS is contributing to this consultation as a service that provides health care throughout Australia, relying on not only critical health infrastructure but also aviation infrastructure, expertise and capacity that is vital to enabling the delivery of many RFDS services in rural and remote parts of our country. The RFDS is pleased to see in the Aviation Green Paper recognition of both the importance of aviation to ensuring the provision of goods, services and connection for rural and remote populations, and the complex factors impacting operations in these areas. It is from this perspective the RFDS makes the following comments as a follow up to that submitted to the Senate Standing Committee on Rural and Regional Affairs and Transport's recent inquiries into *Australia's General Aviation Industry* and the *Future of Aviation*.

The Royal Flying Doctor Service acknowledges and pays respect to the Traditional Owners of Country throughout Australia. We pay our respects to Elders past, present and emerging.

Federation Patron: His Excellency General the Honourable David Hurley AC DSC (Retd),
Governor-General of the Commonwealth of Australia

Royal Flying Doctor Service of Australia. ACN 004 213 067 ABN 74 438 059 643





Environmental Sustainability

Improving and ensuring the environmental sustainability of the aviation industry is a key focus of the White Paper process and of the sector generally. Like the Australian Government, and along with State and Territory Governments, the RFDS is committed to reducing the impacts of our services on the environment. We are committed to reducing our carbon footprint and increasing our sustainable use of resources.

The RFDS provides services in some of the most beautiful, and the harshest of environments throughout Australia, where the land is paramount to living, livelihoods, lifestyle and connection. We strongly support efforts by the Australian Government to reduce carbon emissions and waste; increase the use of alternative energy sources; and the promotion of environmental standards in procurement. The RFDS particularly encourages further investment, in consultation with the sector, into new technologies such as battery and hydrogen power to advance the objective of reaching net zero emissions.

However, the RFDS also notes the potential for higher costs, for example of fuel alternatives, particularly in a transition period to net zero that is likely to last many decades. This could place significant pressures on the sector, and particularly non-commercial actors, and this must be addressed in future initiatives seeking to maximise the aviation sector's contribution to net zero. The RFDS recognises the need for close collaboration between funders and supply partners in developing shared objectives of delivering social, economic and environmental factors alongside value for money and quality considerations.

Financial Sustainability

In addition to pursuing environmental sustainability, there must also be a focus on ensuring the financial sustainability of the aviation sector, particularly given the unprecedented interruption during the COVID-19 pandemic which will have an ongoing impact for many years to come. Ongoing rises in aviation fuel costs as well as goods and services are currently creating a period of significant cost pressures for many actors that must be recognised and addressed. In particular for service providers such as us, the RFDS recommends increased funding contract lengths to improve funding certainty and better recognition of significant cost fluctuations within contracts.

Workforce

There are currently significant challenges for many operators in attracting pilots. Substantially higher wages in the commercial sector, especially overseas, are available and it is particularly difficult for non-commercial providers to compete against this market. There is also a well-recognised skills shortage for engineers. In the context of these workforce challenges, there are particular difficulties ensuring a rural and remote workforce. These challenges are not dissimilar to those faced by the rural and remote health sector, and the RFDS recommends governments employ or align with similar initiatives to address shortages. These include specific subsidies and initiatives to recruit pilots, engineers and others to rural and remote locations and recognition of service in these areas including targeted incentives and programs to access ongoing education and professional development.

There are also particular challenges in attracting a workforce to rural and remote areas which includes accessing housing. It is vital that governments and other funders specifically address this limitation, for example, through the acquisition and provision of accommodation or assistance with rental costs.



Regulatory burdens in the aviation industry

The RFDS supports any efforts to reduce regulatory burden across the aviation sector wherever possible as a key focus of the Australian Government noting this is particularly pertinent in the current climate. In doing so, appropriate, timely consultation with the sector is crucial.

Additionally, any new regulation should clearly provide a value add, with the impact on operations across the sector carefully analysed. It is noted that current processes, such as CASA Industry Working Groups, do already provide effective means to consult with the sector on regulatory matters.

During the initial acute period of the COVID-19 pandemic and associated restrictions, alternate arrangements were made to some regulatory processes in the aviation sector. In some cases, this amounted to streamlining, decentralising and cost savings. There is an opportunity to review, learn from and continue such arrangements going forward. There were however some adjustments in response to ongoing COVID-related restrictions that saw moves towards a more “centralised” approach, and while the RFDS supports streamlining of processes and the assurance of safety in all aspects of aviation as the number one priority, observations are that local knowledge and connections, which we find to have particular value in the rural and remote context, may or have been lost.

Ensuring resourcing of CASA

As the RFDS and others positioned in the recent Sente Inquiries, it is critical that all areas of CASA are, and remain, adequately funded to undertake all delegated responsibilities. The RFDS is an organisation that since its inception has been reliant on safe, timely and efficient air travel to provide critical health services across Australia. Across our 95 years, we have worked closely and productively with regulators such as CASA to address many unique circumstances relevant to a provider of aeromedical services across such significant geographical distances. The role of overseeing the aviation industry, ensuring its ongoing high levels of safety while seeking to improve efficiencies for operators is a complex task for the responsible agency.

The RFDS would also like to note the following specific matters related to ensuring fit-for-purpose agencies and regulations:

- We encourage further work on the viability of instrument approaches. There have been some notable efforts made to enable this at some regional locations, however without and adequate workforce approvals are not able to be maintained. Appropriate and relevant processes regarding who can inspect are necessary, particularly in rural and remote locations. Part 139 also requires linkage with enabling instrument approach.
- Part 135 has seen the emergence of medical transport specialists and requires significant additional cabin training for clinical staff. This has placed a substantial additional burden on providers such as the RFDS and an often already stretched clinical workforce, that has not been recognised in any funding arrangements.

Aerodromes, airports and runways

The RFDS notes the general suitability of current processes to access Commonwealth government funding, particularly for runway upgrades. However, we also encourage that initiatives and polices for upgrades as well as the future planning of airports adequately recognise the requirements (e.g. runway length) for new aircrafts.

Emerging and access to aviation technologies

Accessing emerging aviation technologies can be particularly difficult for non-commercial providers, and in rural and remote areas. The RFDS faces particular difficulties accessing simulators for flight training. For example, there are no PC-24 simulators in Australia, and without the financial ability for not-for-profit organisations to purchase



such simulators, there are significant costs to enable staff to access necessary training overseas. Greater opportunities for government support or initiatives for industry partnerships are encouraged to alleviate these pressures.

Thank you once again for the opportunity to contribute to this important process. Please let us know if anything more can be provided, and we look forward to being further involved as the White Paper is developed.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'F. Quinlan'.

Frank Quinlan
Federation Executive Director

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