

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

Dear Sir/Madam,

I would like to thank the Australian Government for a comprehensive Aviation Green Paper and the opportunity to provide feedback. To quantify my experience to provide relevant and informed comment, I was a commercial pilot for major airlines in Europe and the Middle East for several years. I have been an aviation consultant which included an advisory capacity to aviation regulators and training organisations. I now work in the aviation department at Griffith University, and my roles include oversight of our pilot training program, and R&D on emerging technologies including remotely piloted aircraft systems (RPAS). Subsequently, although I collaborate with major airlines on the introduction of new technology (specifically immersive technologies), a significant proportion of my time is liaison with General Aviation (GA) pilot training providers.

I would like to address some of the questions the Paper raises and highlight a potential void in policy direction. Griffith University is committed to sustainability and is aligned with the United Nation's Sustainable Development Goals (SDGs) by fostering partnerships to create synergies, best practices and amplifying our impact in achieving the SDGs for a more sustainable and inclusive future. Commendably, the Aviation Green Paper addresses maximising aviation's contribution to net zero in several areas through efficiency gains, propulsion technology advancements, use of high-quality offsets and the development and uptake of sustainable aviation fuels (SAF). Although the Paper concedes there is uncertainty about viability and timeframes, the thrust of narrative, support, and measures are aimed at airlines and airports. Although these sectors will inevitably see the greatest impact on net zero in the long term, short-term gains can be made from GA, which in some areas will serve as building blocks for the larger sectors. However, there is very little emphasis or support for net zero practices in GA. Implementation of some aspects of net zero technology and practices such as electric aircraft will be driven from the lower tiers upwards. While I praise the establishment of the Australian Jet Zero Council and am aware of their Terms of Reference, the lack of GA representation on the Council membership suggests that the focus is on airlines, airports, defence, and large aircraft manufacturers.

By way of a case study, I am in the process of creating a tender to onboard additional GA pilot training providers to enable our post-graduate students to complete pilot training. There is a worldwide exponential growth of demand for pilots, and this is reflected in the number of students with pilot aspirations. During my market sounding, I was unable to identify a single GA training provider in Australia that had definitive plans to implement net zero technology for pilot training. This makes my contribution to implement not only Griffith University's sustainability policy but also that of the Australian Government's commitments challenging. Only one GA training provider who has an international presence is trialling the use of an electric GA aeroplane, but that is in Europe, and the training provider has no plans to trial or implement the electric GA aeroplane in Australia. The GA training providers cite the primary reasons for not considering net zero technology as lack of awareness/understanding, excessive cost, and lack of support.

While I have specifically focused on GA pilot training, as the Aviation Green Paper states, GA as a whole is an evolving sector with emerging growth opportunities. I believe GA can be used to set the foundation for the wider aviation community in certain aspects of net zero policy such as electric aircraft and the necessary infrastructure. To address some specific questions that the Aviation Green Paper raises:

- Policy and regulatory settings should support research, development, and investment of emerging low and zero emission technologies and related infrastructure in GA.
- Specific measures that more emphasis and support the introduction of net zero technology and practices such as electric aircraft should be given to GA.
- Government should work with the GA community to support the implementation of net zero policies. Although I believe there are already plans to include GA in the Net Zero Roadmap and Action Plan, there does not appear to be any representation of GA in this plan.
- The Australian Government can ensure the GA sector plays a role in meeting Australia's emissions reduction targets through incentives and buy-in.
- The Australian Jet Zero Council should include GA and piston aircraft, or a new, separate 'Australian Piston Zero Council' should be created. The Australian Piston Zero Council would be paramount in implementing the Government policies across GA, promote, mobilise and galvanise international industry efforts to decarbonise domestic GA, and establish GA research laboratories to meet emission reduction targets while growing jobs and innovation.

Finally, I must express that these are my personal views, and do not necessarily represent those of my employer.

Yours sincerely,

Jamie Cross

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