



Aviation Policy Paper

APRIL 2022

The Australian Aviation Associations' Forum is an alliance of the majority of Australia's largest aviation associations giving industry a united voice to government on key aviation issues and policy.



The Australian Aviation Associations' Forum (TAAAF) members represent the majority of Australia's largest aviation industry associations: from commercial passenger-carrying operations, to business charter, aerial work using fixed-wing, rotary and uncrewed aircraft (drones), and sport and recreational aviation. Aviation at all levels has been hit especially hard by the pandemic, with both international and domestic traffic down in 2020, by up to 80 per cent and 70 per cent respectively. Australian aviation was one of the hardest hit. Continuing complications in 2021—unpredictable state border closures; inconsistent state and federal rulings on aviation, health and security issues; COVID-19's wider impact on the health and availability of the workforce, and on infrastructure and logistics, contributed to Australian aviation's operational challenges.

Australia was one of the global pioneers of commercial aviation, and its aviation industry is a vital contributor to Australia's economic and social wellbeing: as a direct employer; a driver for tourism and nationwide supply-chain logistics; and as a key player in agriculture, mining, construction and emergency services. The Australian aviation industry is an economic engine, contributing billions of dollars to gross domestic product, and employing 65,000 people.

In the leadup to the Federal election, TAAAF would like to highlight policy areas requiring urgent government attention. Many of these issues have been the subject of considerable ongoing discussion, but TAAAF is calling for the incoming government to take timely action to address these concerns. This policy paper identifies some quick wins, as well as areas requiring more significant, long-term action.

The aviation policy environment and the regulator

The Civil Aviation Safety Authority (CASA) is in the throes of completing an overhaul of aviation regulations, moving from civil aviation regulations (CARs) to civil aviation safety regulations (CASRs). The new CASRs, unlike the more prescriptive CARs, are designed to be outcomes- or performance-based regulations. The philosophy underpinning the CASRs is that there is no one prescribed way to meet the requirements, and that organisations know the inherent risks in their operating environment better than the regulator. Aviation organisations can therefore adopt the most appropriate way to meet the requirements, as long as they can demonstrate their approach meets the desired safety outcomes—it is an acceptable means of compliance.

However, the effectiveness of performance-based regulation relies on the culture within industry, and perhaps more importantly, within the safety regulator; a culture requiring a greater level of maturity, accountability, transparency and flexibility. Therein lies the problem. TAAAF members' experiences of interactions with CASA do not show it to have these characteristics.



TAAAF members have found that CASA appears to be divesting itself of many activities, but not keeping up with funding of resources to handle the resulting administrative tasks. TAAAF association members, for example, report frequent and frustrating delays with administrative approvals. The loss of paperwork by CASA resulted in one organisation being unable to approve certificates of airworthiness for six weeks, because their instrument had lapsed, and another is still waiting after three months for approval for safety documents.

Communication is another major issue. Despite the setting up of a number of technical working groups and other consultative bodies, TAAAF members feel that lip service is being paid to industry consultation. The communication is one-way, with opinions/advice offered by industry often being duly ignored. There are also silos of information within CASA, as wider internal communication of the outcomes of these meetings does not seem to occur. This reinforces the divide between standards personnel and operations, with standards personnel often many years removed from current industry experience and operational realities. A significant number of operational personnel/inspectors seem to struggle with the new outcomes-based regulatory culture, still oversighting organisations through the lens of the old prescriptive mindset.

A comprehensive training program is urgently required, as well as employment of new staff with contemporary expertise. What is needed above all, is a proportionate approach to regulation and policy, where the policy solution and operational outcome is proportionate to the risk involved.

The CASA funding model also needs urgent reform, with a deteriorating situation made worse by the devastating impact of the pandemic on aviation activity/fuel use.

An independent review

TAAAF members are therefore calling for an independent review of the way CASA does business—its organisational culture. This review should be carried out by an independent firm and not, as has happened in the past, by political appointments too close to the regulator or to industry.



The review should include, but not be limited to:

- » Examination of whether regulations are fit-for-purpose
- » Service delivery – licensing, certification etc.
- » Communication, consultation, stakeholder engagement
- » Staffing – organisational structure and training
- » Accountability – KPIs
- » Funding model
- » CASA's relationships with other agencies, such as the Department and Airservices Australia



Access to airspace and airports

Airspace

The rapid maturing of technologies such as uncrewed aircraft (drones) and electric aircraft, (now, conventional fixed-wing, and in the next five to 10 years, urban air mobility vehicles) combined with aviation traffic growth generally (seen until the pandemic struck in 2020) bring challenges in managing this increasingly congested airspace safely and fairly.

Australia has an enormous opportunity to foster an innovative and integrated aviation ecosystem through a flexible, safe and efficient integrated air traffic management framework. However, all sectors of the industry must be involved.

TAAAF is concerned that the proposed commoditisation of a national asset, airspace, is proceeding without adequate industry consultation.

Currently, there is no avenue for industry to have input into agency discussions about future use of airspace and air traffic management. When the landscape changes rapidly, TAAAF represents a range of industry membership: regional passenger-carrying aircraft, bizjets, helicopters, sport aviation, drones, which can provide informed, relevant and current advice to the agencies concerned as they formulate an integrated airspace management framework.



TAAAF members would like to see a representative and inclusive framework for industry participation in future airspace traffic management design and integration.

Aerodromes

There are anomalies for many TAAAF members in their access to aerodromes. TAAAF understands that government must balance the needs of the public, the benefits of aviation and the impacts of safety.

However, TAAAF members are concerned that many airports exhibit monopolistic behaviour, charging excessive fees and restricting access to certain aviation activities.

The helicopter industry is banned from Western Sydney, even lifesaving operations such as EMS (emergency medical services) helicopters.

Despite the likelihood of an expanding vertiport infrastructure to meet UAM requirements, Melbourne is decommissioning its last heliport.

Aviation businesses are finding it difficult to maintain tenure at airports such as Moorabbin in Melbourne and Bankstown in Sydney. For TAAAF members, such as flying training schools, this is a critical issue for their ongoing viability.

Glaring anomalies in airport charges affect TAAAF members. RA-Aus, the association representing the fastest growing sector in Australian aviation, sport aviation, reports that their members face a \$545 charge for day parking at Moorabbin Airport, compared to \$11 a day for CASA-registered VH-aircraft.



TAAAF members would like to see the Airports Act reflect better security for aviation businesses.

Skills shortages

Of the many challenges facing aviation today, the shortage of aviation professionals, especially maintenance engineers, is the one issue which has been discussed at length, with no resulting action to address the problem. Some regionally-based TAAAF members, for example, have been advertising unsuccessfully for maintenance engineers for over a year.

As the aviation industry ramps up operations following the COVID downturn, there will be an even greater shortage of aviation professionals, many of whom took redundancies during the pandemic shutdowns, and are unlikely to return.

The National Aviation Safety Plan, released in October 2021 by nine contributing agencies, (but with little or no industry input), continued this theme, saying the following: 'Training and education is key to maintaining a skilled workforce and enhancing aviation safety performance.' However, it offered no practical strategies for developing, or even 'maintaining a skilled workforce'.

The current shortage of aviation engineers, especially in regional Australia, is only going to become worse as the ageing population of engineers retires. The present training regime is too inflexible, not fit-for-purpose, and the Part 66 requirements complex and unwieldy. According to one TAAAF member, 'The system for qualifying to be an aircraft engineer needs to be improved and take a tiered approach, where engineers can more simply qualify for a licence to certify routine tasks. They can then choose whether to gain further qualifications to certify more complex tasks.'

The current system is an 'all or nothing' approach, lacking the required flexibility to qualify sufficient engineers for the industry.



- » TAAAF members would like to see a proportionate and tailored approach to engineering training, creating more flexible career pathways. This would allow for a tiered approach to qualification, giving apprentices a simpler pathway into the industry.
- » In the US, for example, there are two levels, making it more achievable to fill positions for engineers to certify for more routine tasks.
- » Engineering qualifications in Australia should be more aligned with the Federal Aviation Authority system.
- » In the short term, a possible solution is to attract skilled overseas workers. However, the system for processing visas would need to be streamlined, as processing currently takes about a year.
- » Aircraft engineers must be added to the 44 occupations on the Priority Skills Migration List to help streamline this process.

Australian design and manufacturing

Australia has a proud history of aviation innovation and manufacturing.

David Warren's black box flight recorder, which transformed aviation safety globally, is perhaps the best-known of these Australian inventions. Aircraft designed, certified and manufactured in Australia have included the GAF Nomad N22/N24, GippsAero (Mahindra Aerospace) GA200 Agricultural aircraft and GA8 Airvan (utility aircraft); Jabiru LSA aircraft and engine variants; and Insitu/Textron's AAI Aerosonde.

According to a report released in mid-2019*, the Australian aircraft manufacturing and repair services industry contributed \$2.9 billion to the Australian economy in 2016-17, contributing valuable export dollars and maintaining the nation's manufacturing capability in design, certification and manufacturing. The experience during the pandemic, with supply chain logistics threats and rising prices because of reliance on overseas products, highlights the imperative that Australia must retain and build its own aviation design, certification and manufacturing capabilities into the future.

Over the past forty years we have witnessed an attrition of Australian aviation manufacturing companies, enterprises that have been forced to move off-shore, or have been taken over by overseas companies, due, in the main, to the lack of a level playing field with overseas competitors.

Australia ranks in the top 10 among OECD countries for its quality of research. There are immense opportunities in the current technology landscape for Australia to leverage its well-deserved reputation: whether in design/certification and manufacturing of smaller aircraft,

development of electric/hydrogen powerplants and variants, autonomous flight, or in other niche aviation segments including AI and augmented reality.

However, such Australian aviation manufacturing enterprises face numerous challenges, three of which were highlighted in the 2019 report*:

Access to a skilled labour force. A decline in the number of new trainees and an ageing workforce is limiting the number of skilled workers available to the industry.

The regulatory environment and lack of mutual recognition of certifications, which have a negative impact on the industry's global outreach.

Limited government support. Greater government support is needed to attract higher volumes of work off-shore and enhance visibility for businesses in the global export market, similar to the support observed in the US, New Zealand and Europe.



TAAAF members would therefore like to see:

- » **Greater government support for Australian aviation design and manufacturing, both financial, and in the promotion of Australian aviation design and manufacturing, domestically and overseas.**
- » **An easing of the regulatory burden, by streamlining approvals for a level playing field, and negotiating mutual recognition of certification.**

*KPMG report, commissioned by the Department of Industry:

Australia's Aerospace Industry Capability Research and Economic Modelling of the Aircraft Manufacturing and Repair Services Industry in Australia. 12 June 2019

TAAAF members



AAAA

Represents aerial application operators and pilots across agricultural and firefighting domains. Over 100 operator members, who control 90 per cent of Australia's aerial application aircraft.

CEO: Nat Nagy
aaaa.org.au



ASAC

15,000 active members, and over 200,000 participants in sport aviation activities such as ballooning, gliding, parachuting, hang gliding and paragliding.

President: Grahame Hill
asac.asn.au



Antique Aeroplanes

600 members. For the restoration, maintenance, operation and promotion of aircraft from the 1930s to the 1960s.

President: Matt Henderson
antique-aeroplane.com.au



AAUS

3000 members, largest advocacy group in Australia for uncrewed systems: air, land and sea.

CEO: Greg Tyrell
aaus.org.au



ABAA

Represents Australian- or NZ-based companies operating turbine-powered aircraft.

CEO: Jessica Graham
www.abaa.com.au



ACUO

Representing the commercial sector of uncrewed aviation in Australia

President: Tom Pils
acu.org.au



AHIA

Broad membership base representing Australian helicopter operators. Australia has almost 4,500 licensed helicopter pilots and a fleet of over 2200 rotary aircraft.

CEO: Paul Tyrrell
austhia.com



Australian Warbirds Association

The administering body for all limited category (ex-military and historic) aircraft operations in Australia.

CEO: Brian Candler
australianwarbirds.com.au



RAAus

10,000 members. RAAus trains and certifies pilots, flying instructors and maintainers, registers a fleet of over 3,200 aircraft, oversees the operations of 174 flight training schools nationwide and supports almost 50 aero clubs.

CEO: Matthew Boutell
raa.asn.au



RAAA

Over 100 members representing all aspects of regional aviation: directly employing over 11,000 Australians, turning over more than \$2 billion annually, carrying over 2 million passengers and 23 million kgs of freight.

CEO: Steve Campbell
raaa.com.au



Royal Federation of Aero Clubs

Representing aero clubs, flying schools and flying training in Australia since 1914

President: Alan Bligh OAM
rfaca.com.au



Women in Aviation – Australian Chapter

A national platform representing all facets of the aviation industry, and to engaging the next generation of aerospace leaders.

President: Jessica Hayler
waiaustralia.org



The Australian Aviation Associations' Forum



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