

General aviation (GA) participants who know what GA was like pre 1988 understand, with the right regulatory approach, that the airspace would have a lot more aircraft, especially private aircraft, clocking up flying hours which creates employment. The loss of jobs started with the making of the Civil Aviation Regulations (CAR) in 1988 that added regulatory administrative costs resulting in many leaving the VH industry. But who cared?

GA today relies mainly on commercial GA to support it and some of commercial GA is seasonal. The decline from 1988 to 1995 should have raised alarm bells within government as jobs disappeared. But who cared?

The CARs created under the Civil Aviation Act implemented requirements that were unsustainable for many in GA and the theme has continued since 1988. But who cares?

Many pilots left the VH sector for the non-VH recreational aviation sectors and that also affected the sustainability of the GA supporting industry. At the same time, airport operators, the only real profitable sector in general aviation, set about pricing private aviation out of business in populous aerodromes near capital cities. Many supporting aviation businesses had built and invested in their premises on airports but were shocked to receive no re-imbursment from airport operators who took possession of their premises and leased it back to them, some at exorbitant costs. But who cared?

The Regional Aviation Airline Association lists, on their website ([RAAA History](#)), the number of AOCs over the years which shows the demise of the AOCs from a high in 1993 to less than half today. But who cares?

When the CAA was created many senior managers left. This loss of management corporate history changed the legal drive to create a 'new' aviation approach, supposedly as a result of a Parliamentary Inquiry in the late 1980s, by inexperienced regulators who created more regulations with no regard to the sustainability of the aviation sectors. But who cared?

Every Australian government through this period promulgated regulatory development guidelines telling departments & agencies to revert to creating regulations as the last resort, but CAA/CASA prioritises the creation of regulations. But who cares?

Australia, like most advanced aviation countries, has developed a very complex set of rules and regulations for aviation safety. They are the product of a long running (and continuing) process of incremental adjustments stifling the industry. But who cares?

Each major regulatory change has affected the sustainability of various sectors of aviation. 1988 changes affected private owners more than any other sectors, thus forcing many owners out of the VH aviation sector into either the less regulated recreational sector or out of aviation altogether. But who cared?

- Certainly not the government or the CAA/Civil Aviation Safety Authority (CASA) who have continued to create regulations ever since the CAA was formed.
- CASA (proudly) admits that aviation is now regulated to be only second to the number of taxation regulations/requirements.

Obviously CASA thinks every participant in aviation cannot be trusted to be safe and are criminals waiting to be caught. But who cares?

Private GA was a 'cottage' industry that complied with 'standards' mainly promulgated in ANOs and then CAOs. Regulators, pre CAA, knew that administrative costs had to be kept to a minimum so private aviation survived. Post 1988, regulations more applicable to airline operations have been applied to GA and has crippled the 'cottage' sector. But who cared?

More recently the move to overlay the airworthiness engineering processes with the EASA system, made more restrictive, has already seen a reduction in jobs. But who cares?

The decline in growth in GA, compared to increase in registered aircraft, especially in the private sector, is unique to Australia because GA private is growing in New Zealand who took a different regulatory approach than Australia in the early 1990s. GA decline has virtually stagnated over the last 10 years and a lot of people now think that is the norm for GA though more aircraft were registered during that period. But who cares?

GA is still very active in the USA where minimal regulatory impositions are applied. Since the creation of the Civil Aviation Act and Regulations, the steady growth in aviation changed and the decline started. The number of personnel and organisations involved in engineering and maintenance is dependent on the number of operators and private pilots actively participating, especially in GA. Those sectors are diminishing. The Charter, Aerialwork and Flying schools also declined. We are in crisis. BUT WHO CARES?

In 1994, the Morris Report listed the number of participants in aerial work, Charter and Flying Schools were significantly higher than the numbers in last year's CASA Annual Report. The 1994 list provided to the Morris Report per State & Total compared to 2015 numbers.

	NSW	VIC	QLD	SA	WA	TAS	ACT	NT	TOTAL 1994	TOTAL 2015
Aerial work	268	155	232	67	126	17	11	49	925	NA*
Charter	243	150	237	69	100	15	13	49	876	593
Flying Schools	93	63	57	22	22	7	6	7	277	188
TOTAL	604	368	526	158	248	39	30	105	2078	781 + AW

* Asked CASA for aerial work figures but no reply – guess 150-200 by some participants?

1. Twenty six years of regulatory and administrative changes that have not been based on "sustainability" – this is what raises the ire of participants.
2. Regulatory reform based on "safety" without including "sustainability" has one outcome for GA – reduction in participants.

Note: The Searle Report in 2008 identified the same issues raised in the ASRR.

The Second Report of the Air Safety Regulation Review Task Force also identified similar issues in 1990.

WHO CARES: Every industry association that has members in GA sectors are aware that GA can grow IF the FAA system is adapted correctly to Australian GA. The FARs would need to be very compatible with NZ to align with other NAAs in the Pacific region. The NZ system is based on the FARs for the non-airline sectors without the FBO system.

e.g. it would mean adopting FAR Parts 61, 91, 43 as "standards" for the non-airline sectors.

Implementing an Australian variety of the USA Fixed Based Operators (FBO) using a whole of government legislative approach is feasible. The US FBO system is controlled by their Department of Transport through their airport funding model that does not exist here.

Refer FAA AC 150/5190-7, Minimum Standards for Commercial Aeronautical Activities.

Adopting a FBO system where some organisations would not need CASA approval as long as they employ appropriate CASA licenced personnel can be done.

Instead of the 'airports' setting minimum standards for businesses they permit to operate on their airport, industry sector representative associations could assist with creating minimum standards acceptable to CASA to be applied nationally.

USA FBO specialized aviation service operations include aircraft flying clubs, flight training, aircraft airframe and powerplant repair/maintenance, aircraft charter, air taxi or air ambulance, aircraft sales, avionics, instrument or propeller services, or other specialized commercial flight support businesses.

Based on the US FBO system, independent CASA licence holders could work in an FBO not approved by CASA such as:

1. How many FBO flying training organisation would exist if CASA did not approve them?
 - a. Must be an Australian registered business – WHS etc. apply to businesses.
 - b. Can employ an independent flight instructor (same as FAR 61)
 - c. The same FBOs may employ a LAME to maintain their aircraft.
2. How many FBO * maintenance organisations would exist if CASA did not approve them?
 - a. Must be an Australian registered business – WHS etc. apply to businesses.
 - b. Must employ a LAME or LAMEs to maintain aircraft.
 - c. Aircraft operating for passenger carrying AOCs excluded.
3. How many FBO aero clubs would there be if CASA did not approve them?
 - a. Can employ independent flight instructor for training.
 - b. Can employ a LAME for maintenance.
4. How many FBO** aerial work operators would exist if CASA did not approve them?
 - a. Must be an Australian registered business – WHS etc. apply to businesses.
 - b. Aircraft must be certificated for the purpose.
 - c. Pilots must be rated to fly such aircraft.
 - d. May employ LAME to maintain their aircraft.
5. When could an independent flight instructor or LAME work outside an FBO or CASA approved operator/organisation?
 - a. Privately provide flight instruction.
 - b. Work directly for a private owner who provides the data, equipment, tooling, etc.
 - c. Work directly for a business aircraft owner who provides the data, equipment, tooling, etc.
 - d. All work on non-retractable aircraft?
 - i. Excluded from major repairs and modifications.

To overcome possibility of safety concerns, the move to the FBO system should rely on FBOs being members of a particular industry sector association, who would be able to provide advice to meet the industry sector minimum standards as suggested in the FAA AC above. Instead of airports setting the standards, the Associations would develop these in conjunction with CASA. One industry sector standard.

All FBOs would need to be Australian registered businesses to meet WHS (safety) requirements. Compliance with a new CASR Part 43 encapsulating FAR 43 & FAR 91, Subpart E and FAR 61, independent flight instructor provisions would need to be adopted.

To achieve such a major change, industry needs to be involved to ensure the impacts on industry would be sustainable and encourage participants' growth.

WHO CARES?

* CASA approval may be retained for some levels

** CASA approval may be retained for some aerialwork?