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AMROBA Parafield Airport Meeting 30/10/13

A meeting of local and some interstate businesses met at Parafield with Senator David Fawcett attending the am session of the meeting. The Senator informed the meeting of the government's position and recommended all attendees read the [LNP Aviation policy paper](#).

In his opening speech, the Senator stated his government supports a safe and sustainable aviation industry, especially general aviation. The word "*sustainable*" is what is missing from current regulatory changes – costs are increasing as was clearly identified by attendees.

CASA does not currently have a Charter or Ministerial Direction to develop legislation so that we can have a safe and "sustainable" aviation industry – LNP policy should mean a new Ministerial Direction to CASA.

It did raise an interesting point – CASA once had a mission statement for a "*Safe and Viable Industry*" – that has been replaced by the "*Safe Skies for All*". Obviously, this current objective is being achieved by increasing the administrative costs to a level that more and more aircraft owners and service providers have stopped participating – outcome: a diminishing GA with no change to safety.

The Senator spent considerable time asking attendees for examples of issues with the introduction of new regulations and what benefits the regulatory changes were bringing to the industry. Due to increased costs to managing a business, little benefits, if any, have been realised from the regulatory change. The regulatory changes so far have not changed the way maintenance or flight training is carried out – it only increases business administrative costs.

The word "**sustainable**" focused attendees' inputs during discussions with the Senator.

During the discussions many subjects were addressed – the following is an overview.

1. Issues relating to obtaining & maintaining CASR Part 145 approval:

- a. Very costly exercise that has added ongoing administrative costs, not associated with core activities, which will affect businesses profit margin, especially component maintenance, when they pass on increased costs.
 - i. Some are concerned if they pass on the costs the work will go off shore.
 - ii. Implementation costs ranged between \$150-200K – has to be recovered.
 - iii. Ongoing costs is an additional person in a medium sized organisation – this adds a minimum \$60-70K to a business's overheads.
 - iv. Higher business operating costs increases risk to business sustainability.
 - v. The change has affected local businesses competitiveness both domestically and globally. Off shore costs are lower, including lower regulatory imposts.
 1. Now cheaper for operators to send parts off shore for maintenance.
 2. CASR Part 145 is unique when compared to other Pacific Rim countries' Part 145 regulatory imposts. e.g PNG parts 43/145 circulated.
- b. Regulatory imposed 'Expositions' standards have changed the company manual to meet individual CASA inspectors' interpretation on how to comply with the regulatory requirements and not "how" the company would control the work to comply with the same regulatory requirement.
 - i. Exposition "phraseology" demanded by CASA individuals vary across the country. What is acceptable to one CASA individual during the approval process is not by another in another similar sized business.

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- ii. Businesses virtually have to write what the CASA individual wants rather than what the business needs to ensure staff meet regulatory requirements.
 - iii. Business owners don't feel they can "own" their 'exposition' as it is what CASA demands – not what business owners see as meeting their requirements.
 - iv. Very tedious task to obtain approvals or to vary approvals.
2. Lack of standardisation by CASA.
- i. Lack of clarity in CASA Standards – variable interpretations of requirements.
 - ii. Several cases where Exposition words that were accepted by one CASA Office were rejected in another office and, on some occasions, within an office.
 - iii. General impression is that standardisation seems to be worse today.
 - iv. CASA promulgated standards lack clarity.
 - v. It was observed by businesses that approvals could take 18 months or more except for a period just before the commencement date of the regulation when CASA approvals were rushed through the approval process.
 - 1. Post that date, businesses are struggling to make headway – there is no consistency.
 - 2. Current applications are going through pedantic approaches by CASA.
 - vi. Generally agreed that CASA is not "trade-conscious" when dealing with its industry.
 - 1. Industry is use to planning to meet targets – no such approach from CASA – 'just the opposite' was the general feeling.
3. Manufacturing Issues.
- a. Need to clarify CASA/Industry responsibility so processes can be done in a timely manner. Industry deal within EASA & FAA as well as CASA, and CASA is increasing and changing administrative processes – not following FAA.
 - b. CASA delegates/authorises industry specialists to 'APPROVE' data and then spends inordinate processing time to issue a document based on delegate/authorised person approval.
 - c. Lack of business skills has delayed projects that have delayed aircraft operators meeting commercial timeframes.
4. Aircraft Maintenance Engineer Skills
- a. Unlike Eastern States, the local Parafield TAFE College has maintained a close working relationship with industry and have been providing AMEs with trade skills meeting AQF IV levels as well as providing AME licensing qualifications (Part 66/CAR31).
 - i. Industry supports the continuation of providing skilled AMEs the industry can employ.
 - ii. It was identified that Eastern States RTOs are providing a licencing outcome whereas the local TAFE is still providing a trade skill outcome to support licence requirements.
 - 1. Industry supports the trade skill outcomes.
 - 2. Licences without trade skills are a concern to MRO employers.
 - iii. Parafield TAFE will provide a full time 18 months mechatronics course as of next year – positively received.
 - iv. Industry prefers trade skill outcome and would support CASA providing examinations for licensing purposes.
 - v. Parafield TAFE is funded differently to other States – national approach needed.
5. Flight Operation Issues
- a. The introduction of CASR Parts 61, 141 & 142 is seen as a repeat of the problems that CAA confronted with the maintenance rules.

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- b. Starts in a few weeks with lack of CASA promulgated documentation.
 - c. Does not change how you train a person to fly.
 - d. Changes administrative processes.
 - e. Will add additional costs to training schools.
6. Safety Management – introduction of new aircraft treated different to introduction of new regulation.
- a. An interesting analogy was discussed how CASA demands industry to have all documentation completed, training completed and proving flights, where necessary, before an operator can add a new aircraft type to their AOC but regulatory change commencement date continues to happen prior to documentation and training being completed.
 - b. Industry was critical of CASA’s safety management approach with regulatory change. Regulatory change is introducing risks for industry to manage.
 - c. Regulatory change being made to meet a timeframe irrespective if documentation, training and confidence/competence has been attained.
7. CASA relationship with industry:
- a. Basically, industry sees it as a “them and us” situation instead of working openly together with industry in the interest of safety like they did a decade or so back.
 - i. Industry does not bring safety matters to the attention of CASA because CASA has an enforcement first mentality instead of safety first.
 - ii. This subconsciously creates a ‘cover up’ attitude which is not helping safety.
 - b. Little respect basically because of attitude of individuals. One rotten apple in a location is losing confidence in the regulator.
 - c. Many individuals in local offices are seen as mature and sensible but hamstrung by internal uncertainties with internal policies.
 - d. CASA has no risk management approach to aviation – many feel that CASA staff are totally risk adverse. Safety is about managing risks.

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ICAO states in their Safety Management Manual:

3.2.1 A misperception has been pervasive in aviation regarding where safety fits, in terms of priority, within the spectrum of objectives that aviation organizations pursue, regardless of the nature of the services that aviation organizations might deliver. This misperception has evolved into a universally accepted stereotype: in aviation, safety is the first priority. While socially, ethically and morally impeccable because of its inherent recognition of the supreme value of human life, the stereotype and the perspective that it conveys do not hold ground when considered from the perspective that the management of safety is an organizational process.

3.2.3 There is no aviation organization that has been created to deliver only safety. Even organizations that act as guardians of aviation safety are subject to efficiency constraints, internal or external, as dictated by their stakeholders. This includes the International Civil Aviation Organization, national and supra national civil aviation authorities, international trade organizations and safety advocate international organizations.

3.2.5 The perspective advanced by this manual is that safety is not the first priority of aviation organizations. Rather, the management of safety is just another organizational process that allows aviation organizations to achieve their business objectives through the delivery of their services. Safety management is therefore just another core

It is a pity that CASA staff or management are not sensitive enough to realise what those that wrote the ICAO Safety Management Manual are saying and applied it during regulatory change.

Safety is but one aspect when staff are carrying out aviation functions – it does not take priority over managing the business so that it can be profitable – sustainability depends on profits.

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Safety All Around.

3rd November, 2013

Appendix 1

The following is excerpts from a few governments re aviation purpose”

NZ: *The objectives of the Minister under this Act are—*

- *(a) to undertake the Minister's functions in a way that contributes to the aim of achieving an integrated, safe, responsive, and **sustainable transport system**; and*
- *(b) to ensure that New Zealand's obligations under international civil aviation agreements are implemented.*

What a difference when compared to the Australia’s Civil Aviation Act:

3A Main object of this Act

*The main object of this Act is to establish a regulatory framework for **maintaining, enhancing and promoting the safety of civil aviation**, with **particular emphasis on preventing aviation accidents and incidents**.*

NO FLY – NO ACCIDENTS OR INCIDENTS

NOTHING ABOUT HAVING A “SUSTAINABLE” INDUSTRY