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We are comfortable stating this having read the BITRE GA Survey. To enable a viable safe general aviation industry to grow and provide jobs throughout Australia, the past regulatory changes additional costs that imposed across aviation sectors need to be totally reviewed. Participants know that, but governments imposed costs far exceed such costs in other countries.

Laurie Brereton was the last Federal Minister that was pushing for economic reform. Prior to the formation of the CAA, the Department was more conscious of making decisions that affected the viability of this sector. Aviation businesses all operate to a very small profit margin.

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General aviation benefits the economic viability of the local community around an aerodrome. The local community benefits from the local aerodrome. The aviation industry cannot support aerodromes alone.

2. AME Licencing Has a Pathway to Reform.

The Education Department's Aerospace Industry Reference Committee has mapped a way to at last implement a training system that will provide the "qualification" to match each AME licence.

The only issue is for CASA to promulgate the EASR Part 147 course duration/mix in the CASR Part 147. It is a catch 22 situation. CASA has no idea of understanding the politics between government departments and agencies. EASA promulgated course duration/mix for one reason: so each EU State would fund the training.

Until CASA promulgates, the States won't receive the Federal education funding and will remain the same inadequate funding as in the past. You would expect CASA would like to show other NAAs that our course hours/mix is harmonised with theirs.

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3. Are Aircraft Registration Databases Dependable?

If you read the GA Survey report, it makes you question the viability of aircraft and other aviation registers used statistically in Australia. CASA's aircraft and LAME registers are unreliable.

How many aircraft that are on other sport organisations registers actually fly each year?

We already know the AME licencing register is unreliable as many of the LAMEs on the register are no longer working in this industry. The result of a perpetual licence with no validation period.

Aircraft registers are exactly the same. The GA Survey identified that 30% of the aircraft on CASA's Aircraft Register flew zero hours.

Ever since the "major" notification form was repealed in the 1900s, the validity of the aircraft on the register is questionable.

Both databases can be corrected by CASA re-introducing validation provisions into the appropriate regulations. In this modern electronic world it can be quite simply done. CASA needs to know that the certificate of airworthiness remains valid. If the CofA is not valid then CASA should suspend the certificate until it is notified by a maintenance release being issued.

For aircraft, the person signing the maintenance release would electronically enter aircraft registration, TTIS and AMO/LAME number into a CASA dedicated portal.

For the LAME, adopt the EASR 5 year validation provision. Re-introduce the LAME notification form from the past that included LAME declaration of employment history.

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This industry does not need a new government policy with every Minister, it needs a new Civil Aviation Act that will drive the changes that are required so general aviation sectors are sustainable. The Act has to be amended to require “*minimum regulations and standards*”.

FAA Act: “Section 44701, General Requirements. *This section empowers the FAA to promote flight safety for civil aircraft in air commerce. The Administrator has the duty to require minimum standards for governing practices, methods, and procedures to provide for national security and safety in air commerce.”*

CAAct: Section “98 Regulations etc.

(1) The Governor-General may make regulations, not inconsistent with this Act:

(2) The regulations may apply in relation to state aircraft.

(3) Without limiting the generality of subsections (1) and (2), those subsections include the power to make regulations for or in relation to the following:

(aa) the design and manufacture of aircraft;

(a) the registration, marking and airworthiness of aircraft;

(b) the manner of applying for AOCs, including the information that may be required, and the conditions to be satisfied, for the issue of AOCs;

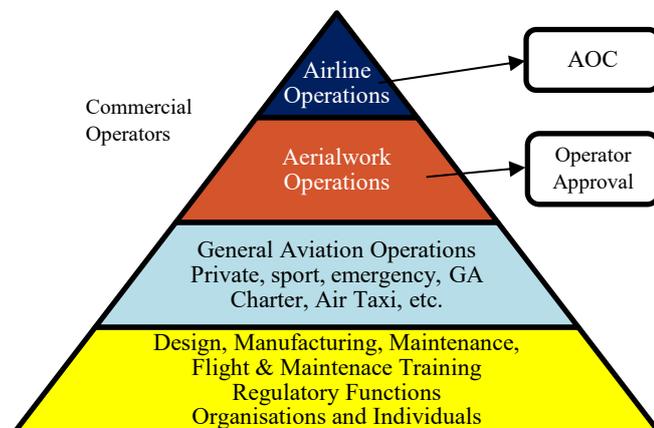
(ba) the manner of applying for permissions under Part III, including the information that may be required, and the conditions to be satisfied, for the granting of permissions; etc. etc. etc.”

Unlike the USA Act, the word “**minimum**” does not exist in the Australian Act therefore not limiting the need for regulations. Until government changes the Act, economic regulatory reform won’t eventuate. Another Catch 22 issue.

A sustainable aviation industry is dependent on a large foundation of participants required to support the commercial aviation sectors. A well-established internationally compliant design, manufacturing, maintenance and especially flight & maintenance training providers must exist to support a large general aviation community and commercial operators.

General aviation participants were looked at as an employment pool that

provided flight crew and maintenance personnel needed by the upper two levels of commercial aviation. The size and growth in aviation is dependent on the yellow and blue level supporting the upper levels. The blue level needs to be much larger than the commercial levels above to provide the personnel required by the commercial levels. Today, it is out of balance.



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Until CASA promulgates, the States won't receive the Federal education funding and will remain the same inadequate funding as in the past. You would expect CASA would like to show other NAAs that our course hours/mix is harmonised with theirs. We have asked them once again to promulgate these requirements.

The good side of the equation is we have an IRC totally on side. The competencies missing to enable the LAME B 1.2 diploma to be issued have now been included.

Their next project is to align the competencies with the licence stream modules promulgated by CASA. The IRC has agreed to this task which will put the appropriate competency units into the right module. Some of the RTOs are already packaging their training program compliant with the modules promulgated in the Part 66 MoS.

Our only concern is the timeframe – it is always too long. We believe it can be achieved this year if a Technical Advisory Committee includes those RTOs that are already providing a training package based on the CASA promulgated Modules. Once this is done, CASA can remove all the competency units from the MoS.

It is interesting that comments made by CASA staff sounds very much like 'they' have determined the outcome of CASR Part 66 review before a working group has been formed.

The B1.1 and B1.2 concepts was introduced well before the design standards of Part 23 was changed to 19 seats, 8618Kg. The B1.2 LAME of the future should address Part 23.

In addition, the wording of the EASA A, B1 & B2 licence privileges only adopts one privilege of the ICAO Annex 1 Chapter 4 privileges. General aviation relies heavily on the other ICAO privilege, to certify the aircraft as airworthy post maintenance.

EASA Privileges of B1 and B2 aircraft maintenance licences:

4. Currently in Regulation (EC) No 2042/2003, Annex III (Part-66), the privileges associated to each aircraft maintenance licence category are described as follows:

A category A aircraft maintenance licence permits the holder to issue certificates of release to service following minor scheduled line maintenance and simple defect rectification within the limits of tasks specifically endorsed on the authorisation. The certification privileges shall be restricted to work that the licence holder has personally performed in a Part-145 organisation.

A category B1 aircraft maintenance licence shall permit the holder to issue certificates of release to service following maintenance, including aircraft structure, powerplant and mechanical and electrical systems. Replacement of avionic line replaceable units, requiring simple tests to prove their serviceability, shall also be included in the privileges. Category B1 shall automatically include the appropriate A subcategory.

A category B2 aircraft maintenance licence shall permit the holder to issue certificates of release to service following maintenance on avionic and electrical systems.

FAR 43.13. (b) Each person maintaining or altering, or performing preventive maintenance, shall do that work in such a manner and use materials of such a quality, that the condition of the aircraft, airframe, aircraft engine, propeller, or appliance worked on **will be at least equal to its original or properly altered condition** (with regard to aerodynamic function, structural strength, resistance to vibration and deterioration, and other qualities affecting airworthiness).

(In other words, continues to meet its original or approved modification.)

This is the problem with EASA regulations, they are written for the airline sector and lack provisions for general aviation. The blind push to the EASR system has damaged general aviation. It is why we must align the non-airline sectors with the FAR standards.

Adoption of EASR Part 66 without FAR Part 43 adopts a lower standard.

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15,425 aircraft on register, the percentage of not flying (blue) and inoperable aircraft (oranges) have been trending upwards since the early 1990s when the first large regulatory changes were implemented with the creation of the CAA and then major maintenance changes in 1990. If you add the two together there is about 35% of the fleet not flying, i.e. about 5,400 that are not flying/operating.

These figures are based on those that are reported and could be worse if all owners reported.

This can be fixed by CASA including a Certificate of Airworthiness validation requirement. This could be done whenever the LAME signs the annual maintenance release or when the CAMO does the airworthiness review.

CASA could introduce an electronic input from the LAME or CAMO confirming the CofA has been validated. We would then have a true register of operating aircraft.

The LAME licence needs to adopt the EASA 5 validation requirement so the register would know how many active LAMEs are left in the industry. Many have left, but CASA's register does not register because of the perpetual licence.

Two other charts from the survey clearly identifies the downturn. One is the RaAus climb and then decline then holding there own

The bottom chart shows the downturn in hours of single piston engine aircraft that has negatively affected many of our members.

There is a real need to make the government database provide true figures of aircraft and LAMEs that are actively involved in aviation. These false figures from these databases is why CASA believes nothing has changed. CASA and other government statistical reporting has been based on false figures for years.

The CASA aircraft register true figures may be under 10,000 active aircraft?

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