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Civil Aviation Without a Vision

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Without Pilots There Can be No Growth

Without new pilots and owners, especially private owners, aviation will not grow.

The current regulatory system has resulted in a pilot shortage. Restricted training pathways.

e.g. Where is the FAR Part 61 independent flight instructor training pathway?

Regulatory splitting into sectors, when not necessary, is detrimental to growth. Our regulatory system is proof it does not work. Individuals & organisations, approved and unapproved, options should be available for recreational, private & aerialwork sectors.

It is a fact that the regulatory change to implement the Civil Aviation Authority (CAA) also crippled general aviation by removing 'individuals'. We were a country that had a pilot training system, based on the FAR Part 61 flying schools by using an exemption to an ANR, to a system where we no longer have these types of pilot training schools, especially in rural aviation.

- Those flight instructors produced over 60% of the pilots that came online each year.

At many of the airports that a flight instructor was available, a directly supervised maintenance organisation also existed. They too were a negative result of regulations that created CAA.

The problem is politicians & public servants won't admit their changes caused the collapse.

Today, we have a very divided industry, and it is not producing pilots as was possible pre-CAA.

Bring Back a System that will cost effectively produce pilots.

- Regulatory costs must be reduced to attract more pilots and aircraft hours per annum.
- Fixed approved locations not required for FIs training using the CASA syllabus.
- CASA approved schools used when structured flight training courses are used.

Pilot Instructors providing training to the CASA syllabus at a fixed location, under Part 61, or at student's location, based on FAR Part 61, does provide cost effective pilot training.

- The FAA Part 61 pilot training system would provide another pathway.
- CASA's oversight is monitoring the number of pilots the independent FI trains.
- Will address the shortage of pilots.

Learning at their own pace was the major method of past pilot training, especially rural, whilst approved structured courses was for those looking to be in commercial aviation.

CASA could also help by providing a "**Flight Training**" web link listing both Part 61 FIs and Part 141 flight training organisations contact details.

CASA should also look at the Canadian regulatory system for sport & recreational pilot licencing and implement a similar system to improve transition from one level to another.

VISION: **Review Regulatory System to achieve an increase in a/c average hours:** ***flown by GA aircraft per year by 50% within 5 years.***

The challenge to increase private aircraft utilisation (***US is 95 hours/annum***), by regulatory reform, would result in an increase in private aviation activity and pilot training would also require expanding the capability of individuals, e.g. independent flight instructors, LAMEs employed by aeroclubs, private owners, etc.

Benefits:

1. Removal of unnecessary regulatory imposed costs.
2. Removal of unnecessary regulations that do not add to safety.
3. Harmonise with all GA pilot training, operation and maintenance FARs.
4. Further empowerment of Individuals: FIs, LAMEs and APs.
5. Enhanced safety outcomes with higher hours flown.
6. Higher utilisation of VH aircraft – reverse the current trend.

Maybe the challenge to get more hours flown per annum by GA aircraft, the resultant regulatory system reform, based on the FAR system that does achieves these results, would end up being more beneficial for all aviation sectors and provide more pilots and maintenance engineers who are also diminishing.

General Use of Aircraft as Private Transport

Aircraft, as a form of transport, that DCA realised competed with road transport. During that DCA period, the regulatory system was fully geared to reduce costs so they could compete. Just about every airport in this country had operational GA aircraft parked and used regularly.

Today, not all aircraft in Australia are now listed on the Australian Civil Aircraft Register. Statistics for gliders, hang gliders, paragliders, weight shift microlights and gyrocopters are maintained and supplied courtesy of GA, SAFA, ASRA and RA-Aus.

*In 2020, "the annual **FAA GA Survey** stated that fixed-wing piston aircraft **flew an average of 95 hours**. But only **45%** of the fixed-wing piston hours flown by GA are for **personal/recreational** use.*

*The USA GA annual flight hours are divided: **Fixed Wing Piston: Over 13 million hours**; Fixed Wing Turboprop: just under 3M; Turbojet: over 5M; Helicopter under 3M."*

- If only Australia could attain that level of utilisation of piston powered aeroplanes!

BITRE 2023 Report. "*General aviation consists of five different sectors of flying. These are aerial work (550,385 hours, **up 0.4 per cent** compared to 2022), own use business (129,604 hours, **down 5.4 per cent**), instructional flying (381,939 hours **up 13.3 per cent**), sport and pleasure flying (246,042 hours **up 10.2 per cent**), and other flying (41,889 hours, **up 29.9 per cent**).*

*About **one in every four general aviation and commercial air transport aircraft** reported **performing no flying** during the year ended 31 December 2023. Reasons were provided for 3,702 of these aircraft with the most common reason being "Repair/maintenance/restoration" (reported by 45.4 per cent of these aircraft)."*

One in four not flying confirms the Australian regulatory system is restrictive whilst the US system, with higher aircraft utilisation, is thriving. Excluding Australia's airline sectors, the rest of the aviation sectors need the US regulatory system ASAP.

Government VISION must champion higher utilisation especially private general aviation.

The current system red tape and over regulation negatively impacts utilisation of aircraft.

Commercial operators and airlines benefit from a prosperous general aviation with active aircraft, it serves as an employment hub whenever they expand.

It is not just CASRs and CASA red tape, other regulations and red/green tape, etc. impact.

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Maintenance Training Needs Support

The implementation of CASR Parts 66/147 has had a significant negative impact on non-airline sectors resulting in a critical shortage of AMEs/LAMEs – no education pathways.

The 1970s ICAO airframe, engines, electrical, instrument and radio (mechanical/avionic) training courses provided by State VET systems were overturned in the 1990s post the Airlines Demarcation Dispute that created the "Structures" trade in the airline sector. This was done by splitting the government Mechanical (Airframe/Engine) training funding into Mechanical Systems and Structures. Basically, 1800 funded training hours split 1280/520 hours.

During the **early 1990s**, CASA cancelled DCA Pub 35 that promulgated the ICAO 5-trade mechanical/avionics training standards: theoretical, practical and experience.

The Australian National Training Authority (ANTA) was provided with the ICAO AME training documents that supported the 5 trades. These were later applied to the 3-trade airline union agreement to the detriment of the non-airline sectors, general aviation and helicopters.

ANTA/State Recognised Training Organisations provided ICAO compliant basic training courses

CASA reintroduced Part 66 **two (2) trade-based** training standards **in 2007** with the partial adoption of EASRs Part 66/147. Noticeable missing standards relate to training course details and durations that are compatible standards used by ASQA for course approvals.

Basically, CASR regulations has put employers, outside airlines, and unions into conflict.

This 2 trade CASA regulatory approach (*avionic/mechanical*), compared to the current 3 trade (*avionics/mechanical/structures*) national training system, has left the non-airline employers with a skilling problem. Where to get the training?

Note: EASA overcame this problem within the EU States by promulgating course standards for the 2-trade based licencing system.

These EASR course standards have not been adopted thus no Australian Skills Qualification Authority (ASQA) approved courses, except for the airline B1 & B2 licence pathways.

Outside the airline 3 trade system, the 2 trade (avionics and mechanical) system still applies but the VET training system has not changed since the demarcation decision.

Mutual Recognition CASA/ASQA

The ASQA system has regulatory standards to comply with regards approving tertiary courses that support trades and licences standards set by licencing authorities.

EASA applied ICAO AME training course durations standards modified to support their 4 mechanical/1 avionic licences, so training packages provided for EASA licences, met the EASA standard. They even went further to provide questions standards – very detailed.

To ensure Australia AME training complies with adopted EASA training standards, based on ICAO standards, CASA must take action to adopt these missing EASA course standards so ASQA can endorse a 2-trade based training system for the non-airline sectors.

CASA CREATED, ONLY CASA CAN FIX.

To make regulations, the government provides guidance and the need for a Regulatory Impact Statement. Obviously, this major problem was ignored and not included in the RIS.
Once it was identified in the mid-2000s, one would have thought CASA would have urgently taken corrective action to adopt EASA Part 66/147 missing course regulatory details.
Only CASA CEO in recent times agreed to adopt EASA course standards was Carmody. Why?
VET course AQF qualification should be recorded in CASRs or MoS.

Potential Solutions

Pilot Shortages

Pilot training is split between non-CASA pilot licencing and CASA pilot licencing systems instead of CASA pilot licences with multiple pathways to attain such licences.

Step one would be to adopt the FAA Part 61 CFI system

– CASA specifies standards, but no CASA approval is needed.

Step two would be to look at the excellent pilot model that is used for Canadian sport/recreational licence pathways as well as their standard pilot licences. Canada has demonstrated how effective pilot licencing can be with some pilots trained by sport aviation associations and the commercial use of some Sport & Recreational vehicles.

TCA Pilot Licencing pathways:

Student Pilot Permit;	*14 yrs*	*Glider Pilot Licence;*	*16yrs*	*CPL Aeroplane*
Gyroplane Pilot Permit;	*17yrs*	*Balloon Licence;*	*16yrs*	*CPL Helicopter;*
Ultra-Light Permit;	*16 yrs*	*PPL Aeroplane;*	*17yrs*	*ATP Aeroplane;*
Recreational Aeroplane Permit,		*PPL Helicopter;*	*17yrs*	*ATP Helicopter.*

- A Recreational RAP age is also 16yrs.

The Canadian Authority sets all pilot standards, **see links**, and Authority Licences are issued.

CASA would need to delegate Australian Sport & Rec Associations to issue CASA Sport and Recreational licences.

The Canadian system could, properly implemented, reduce entry and ongoing costs.

Aircraft Registers

One aircraft register segregated with individual sport and recreational associations sectors managed and controlled by delegated associations. E.g. Gliders, RAAus, etc. Each association sets the details they list whilst CASA VH data complies with global standards.

AME/LAME Shortages

Correcting a long-time problem in Australia with specific training that affects general aviation and helicopter sectors can only be done by CASA if government supports aligning trade training by attracting Year 10 secondary students to move into tertiary trade training. To achieve this, CASA needs to set the standards for training, knowledge, practical and experienced based on ICAO Annex 1, Chapter 4.

CASA, who adopted the EASR Parts 66 licence system, must adopt the 2 trade course standards so appropriate standards can be applied by ASQA when approving NVET courses.

Until CASA and ASQA have harmonious standards, detailed pathways for the three pathways, airline, helicopter and general aviation aeroplanes, shortages will continue.

We are a mature aviation country that lacks formal AME training pathways.

Economic Benefits

Airports offer communities a variety of business services, including transportation, medical, emergency services, surveying, flight instruction, aircraft maintenance, recreation, humanitarian missions, agricultural services, and more.

Community leaders should embrace every opportunity to create economic advantages to bolster organic growth and business development. This economic advantage can be found at the local airport assisting local businesses and residents use of airport services.

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