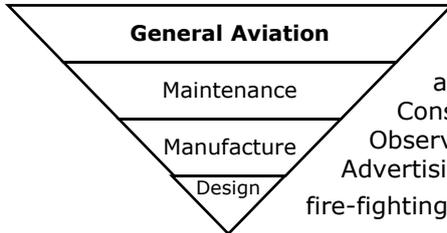
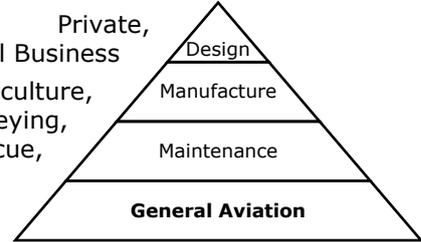


Rebuilding General Aviation, Manufacturing & Maintenance.

COVID has all but finished many small businesses



ICAO GA Includes: Private, Instructional, Non-commercial Business and Aerialwork: Agriculture, Construction, Photography, Surveying, Observation & Patrol, Search & Rescue, Advertising and 'Other' that includes fire-fighting, mustering, etc.



Post COVID has turned into how to rebuild GA back to the days pre Civil Aviation Authority when a government Department was responsible for providing a regulatory framework that delivered a cost effective, safe, a little bureaucratic, system that was not performance based.

Where is the government policy and pathways to grow civil aviation and create jobs?

Where is the government's Future GA Plan?

Government's normally produce a roadmap to the future which is about the creation of jobs. Aviation is a job creating industry in most other countries bar Australia. They seem hell bent on closing GA, manufacturing & maintenance. COVID is assisting in killing GA.

AME CBT VET System Not Compatible

On the 30th August 2021, the Aerospace IRC came to the conclusion it cannot develop competencies to underpin the CASR Part 66 MoS requirements. Whilst ever CASA sticks to its knowledge based system then providing CBT under the Education Department's requirements seems impossible. The Maritime Regulator came to an agreement with the Educators on how to adapt CBT Education Standards but CASA has not yet done this. CASA has to make changes to meet Australia's Competency Based Education System. CASR Part 66 is no longer harmonised with EASR Part 66 who are introducing a Module 18, Practical Assessment.

Adopting FAR Part 91 is Crucial for GA?

The Engineering fields of design, manufacture and maintenance needed to be as close as practical to the Convention Annexes standards so these services can participate in the global aviation market. This can only be achieved if government has agreements with foreign countries to recognise Australian aviation companies, especially small companies, AND government aviation release documents used globally.

Privatisation of Airports?

How many airports actually "promote" their airports as civil aviation hubs? Privatisation has been a disaster as far as growing civil aviation. It is really a sell-off of government assets to property developers without requiring the promotion and development of civil aviation businesses at the airport. How many privately owned, flight training, commercial small aircraft parking bays are available within the major cities geographical area?

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Background

Aviation was prosperous and growing up until government, in the late 1980s, decided to reform civil aviation economically but the real reason was to move the government financial support for civil aviation to other than the government budget. Civil aviation globally is a job creating commercial industry but not in Australia where government and bureaucrats have decided to have a regulatory framework different to the global civil aviation commercial standards.

All government wanted to do is put levels of bureaucracy (accountability) between the Minister and the Agencies. e.g. Department + Board of Agency.

The Government "Civil Aviation" regulatory reform since 1988 has done irreparable damage to a once prosperous industry. Devolvement of responsibilities from government to industry participants started in the 1950s and those government aviation pioneers would shudder at the mess we are in today. Why does Government stand back and support anti-aviation reform?

Every attempt of change to the civil general aviation, manufacturing and maintenance regulatory reform has economically damaged these sectors with no accountability from government.

The Morris Inquiry in 1995 conclusions were based on:

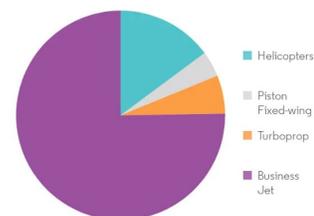
- (1) Improving Safety;
- (2) Improving the effectiveness of regulation;
- (3) Improving [CASA's] organisational performance;
- (4) Improving [CASA's] knowledge of the industry and
- (5) Improving **accountability**.

Nothing has changed in CASA. They haven't fully achieved any of the above, so you would expect more of the same conclusions by the current senate Inquiry.

Today, if you look back at the history of GA flying, maintenance, design and manufacturing there is only one conclusion that can be made: The Government reform has damaged these four sectors almost beyond recovery instead of creating a regulatory framework that should have resulted in a job creating industry that could be exporting parts and maintenance services.

"North America region currently has the highest share in the market and is expected to continue its dominance during the forecast period. The region holds the largest operating general aviation aircraft fleet in the world with the United States accounting for the majority of its share. The growth of the general aviation market in the region is driven by the existence of mature aviation infrastructure."

General Aviation Market - Revenue (%), by Aircraft Type, Global, 2020



In Australia, the diminishing civil aviation (airports) infrastructure, with government's approval, will further restrict the possibility of civil aviation growth in Australia.

Keeping infrastructure for the future is government support in advanced civil aviation countries that recognises the economic values of all commercial civil aviation.

The CAA (UK) 2021 GA Vision States: "The network of airfields is a national asset. Airfields provide crucial connectivity, both for business and emergency services, but also for leisure and sporting flying. They offer potential for highly skilled, dynamic and innovative businesses to grow and flourish – be it for manufacturing and maintenance of aircraft, aviation services, flight training, and for research and innovation. Given their significant local and regional impacts, they are vital to levelling up." "GA infrastructure that is appropriate in its extent, capability and location – and **enables GA activities to thrive.**"

What a difference between them and our Government/Department/CASA/ASA.

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Where is the Government's Future GA Plan?

The CAA(UK) has a [General Aviation Roadmap](#) with a **Vision** we hope the Australian Government would adopt and implement:

CAA(UK) "We want the UK to be seen as the best place in the world for aviation and this starts at the grassroots. It provides the entry point for careers in aviation, as pilots, engineers, scientists and other highly skilled professions; includes a number of vital businesses and services that are vital to the aviation sector; and is an enabler of innovation. **We want GA to be a flourishing, wealth generating and job producing sector of the economy.**"

Look back at past Minister's Statements of Expectations to CASA over decades and ask where are the CAA(UK) expectations to **(1) reduce the costs to aviation by implementing outcome based regulations; (2) delegate CASA functions where possible to industry; (3) create aviation business hubs at airports; (4) create direct aircraft related civil aviation jobs; (5) make Australia into a major civil aviation pilot and maintenance training hub; and (6) open foreign civil aviation markets to Australian aviation manufacturers and maintenance services.**

You can research Minister's statements, department/agencies annual reports, previous Inquiries, all stating similar points but they just do not convert into a regulatory framework that would encourage investment, jobs, domestic/international trade and growth.

This is what the regulatory framework should achieve. Why does a government produce a guide to be followed by Departments and Agencies but not apply it to civil aviation regulatory development. The government's **Regulator Performance Framework guide**, when applied to CASA's performance, has not, from an industry viewpoint, met these principles:

Government's Regulator Performance Framework .

"The Framework will **encourage regulators to minimise their impact on those they regulate** while still delivering the vital role they have been asked to perform". Signed Josh Frydenberg.

"Regulatory costs do not just come from the design of the regulations. Poorly administered regulation can impose unnecessary costs that reduce productivity. These costs inevitably flow through to business more widely and to the community even where their initial impact is on a particular business. These costs may negatively impact the viability of domestic businesses, especially those exposed to overseas competition."

How true, how true, Josh – tell it to the Department/CASA.

CASA self-assesses whether they achieve these KPIs and reports annually. Would industry agree?

AMROBA impression is there is none that could have a yes against it.

Regulator Performance Framework		Y/N
KPI 1 – Regulators Do Not Unnecessarily Impede the Efficient Operation of Regulated Entities	1. Regulators demonstrate an <u>understanding of</u> the operating environment of the industry or organisation, or the circumstances of individuals and the current and <u>emerging issues that affect the sector.</u>	N
	2. Regulators take actions <u>to minimise</u> the <u>potential for unintended negative impacts</u> of regulatory activities on regulated entities or affected supplier industries and supply chains.	N
	3. Regulators implement continuous improvement strategies <u>to reduce the costs</u> of compliance for those they regulate.	N
KPI 2 – Communication with Regulated Entities is Clear, Targeted and Effective	1. Regulators provide guidance and information that is up to date, <u>clear, accessible and concise</u> through media appropriate to the target audience.	N
	2. Regulators <u>consider the impact</u> on regulated entities and <u>engage with industry groups and representatives of the affected stakeholders</u> before changing policies, practices or service standards.	N
	3. Regulators' decisions and advice are provided <u>in a timely manner</u> , clearly articulating expectations and the underlying reasons for decisions.	N

Regulator Performance Framework		Y/N
	4. <u>Regulators' advice is consistent</u> and supports predictable outcomes.	N
KPI 3 – Actions Undertaken by Regulators are <u>Proportionate</u> to the Regulatory Risk Being Managed.	1. Regulators apply a <u>risk-based, proportionate approach to compliance obligations</u> , engagement and regulatory enforcement actions.	N
	2. Regulators' <u>preferred approach</u> to regulatory risk is regularly reassessed. Strategies, activities and enforcement actions are amended to reflect changing priorities that result from new and evolving regulatory threats, without diminishing regulatory certainty or impact.	N
	3. Regulators recognise the compliance record of regulated entities, <u>including using earned autonomy</u> where this is appropriate. All available and relevant data on compliance, including evidence of relevant external verification is considered.	N
KPI 4 – Compliance and Monitoring Approaches are <u>Streamlined and Coordinated</u>	1. Regulators' information requests are <u>tailored and only made when necessary</u> to secure regulatory objectives, and only then in a way that <u>minimises impact</u> .	N
	2. Regulators' <u>frequency of information collection is minimised</u> and coordinated with similar processes including those of other regulators so that, as far as possible, information is only requested once.	N
	3. Regulators utilise existing information to limit the reliance on requests from regulated entities and share the information among other regulators, where possible.	N
	4. Regulators base monitoring and inspection approaches on risk and, where possible, <u>take into account the circumstance and operational needs of the regulated entity</u> .	N
KPI 5 - Regulators are <u>Open and Transparent</u> in their Dealings with Regulated Entities	1. Regulators' <u>risk-based frameworks</u> are publicly available in a format which is clear, understandable and accessible.	N
	2. Regulators are <u>open and responsive</u> to requests from regulated entities regarding the operation of the regulatory framework, and approaches implemented by regulators.	N
	3. Regulators' performance measurement results are published in a timely manner to <u>ensure accountability to the public</u> .	N
KPI 6 – Regulators Actively <u>Contribute to the Continuous Improvement</u> of Regulatory Frameworks	1. Regulators establish cooperative and collaborative relationships with stakeholders to <u>promote trust and improve the efficiency and effectiveness of the regulatory framework</u> .	N
	2. Regulators engage stakeholders in the development of options to reduce compliance costs. This could include <u>industry self-regulation, changes to the overarching regulatory framework</u> , or other strategies to streamline monitoring and compliance approaches.	N
	3. Regulators regularly <u>share feedback from stakeholders</u> and performance information (including from inspections) with policy departments to improve the operation of the regulatory framework and administrative processes.	N

After more than 30 years of regulatory framework reform, the system is still not performance based, cost effective, efficient or economic, let alone be safety based.

Is the public service of the opinion that our safe aviation is an unsafe industry? It appears so.

Hawke Report, 2007

“Recommendation 1: The Minister and CASA commit to achieving completion of the development of the priority Regulatory Parts by submitting all drafting instructions to OLDP by the end of 2008 and full implementation of these Parts by 2011”. (A decade later and still not done)

“Recommendation 15: The Taskforce agreed that Australia should continue to benchmark and harmonise with other leading aviation countries in relation to new technologies, subject to risk and cost-benefit considerations. Consideration should also be given to the ability of operators to absorb the costs associated with these technologies and what initiatives might be available to minimise cost impacts.” (Not Harmonised and industry cannot absorb the costs)

So why is the US FAR system so cost effective and safe?

Why won't CASA adopt the FAR System?

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AME CBT VET System Not Compatible

Maintenance employers and employees had one major request in the late 1990s to have **CASA accept RTO qualifications in lieu of CASA Basic examinations**. A sensible proposal to CASA that could have been achieved if CASA had not adopted the EASA Parts 66/147 and abandoned the Convention's Annex 1, Chapter 4 globally recognised trade skill training system.

The Convention's Annex 1, Chapter 4 was also amended last year to provide for a B1.1 AME competency based system. Isn't that what Australia's VET system has?

The impasse between CASA's knowledge based system and the government's CBT system is brought about because CASA won't amend foreign legislation they adopt to integrate into Australia's legislative system that requires competency based training.

A failure of CASA to follow government guidelines to fit into the legislative framework.

Will CASA ever change its regulatory system to recognise Australia's CBT? Obviously NOT.

CASA adopted this EASA system in 2007 and still has not obtained an agreement with the Education portfolio Department on how they can fit a non-competency knowledge based system into the competency based trade training system. 14 years and NO agreement.

When CASA fails to amend foreign regulations to fit into the Australia's legislative framework and on-going problems exist, CASA has now decided to adopt another option from that EASR Part 66 and introduce the self-study pathway to overcome their failure to integrate.

Failure: This is an admission of failure by CASA "to meet the industry's request to replace Basic Examinations by accepting RTO qualification" after 22 years. In addition, they have destroyed the excellent trade training that was available from RTOs that CASA did not approve.

Conclusion: CASA meddling with Australia's trade training syllabi has not improved the traditional skills and knowledge that RTOs once produced. They have increased costs and are so stubborn and steadfast of dragging education back to a past era in education that Australians won't be trained to global standards. An over 20 year costly experiment.

Self-study opens new pathway

Basically, CASA has re-introduced Basic Examinations after their failure to amend legislation so they could have accepted a NVET qualification to obtain a licence.

Employers/employees can now use this alternative pathway to get their AMEs licenced without the need to use the NVET system. This doesn't help the apprentice system, as it works against the apprentice system in not requiring practical skills training, only evidence of work performed recorded in a SoE over a period of time. A return to the past.

CASA has also stated that current apprentices and AME transitioning from the previous system to the new self-study system can transpose their current SoEs into the new Log book.

CASA: "For licence applicants who find themselves in this situation, I suggest it would be best if they "transposed" their SOE entries into the relevant sections within new logbook and then also submit their "SOE" as supporting evidence for these particular logbook entries.

This way, CASA has the original SOE and an applicant in this situation can effectively get some credit for already completed SOE evidence towards meeting their practical experience requirements if they have elected to use the Part 66 self-study training pathway."

This will assist those currently under training. It also opens the training market for RTOs, not approved by CASA, to return to providing AQF IV avionic and mechanical trade training pathways like they did in the past.

How much money has been spent to return to the past? Basic Examinations structure on the Part 66 modules instead of on kinds or aircraft to be certified in CARs.

eLearning Books Dedicated to Part 66 Modules.

We have also become aware of EASA module based trade/licence self-study training eLearning books available and asked CASA are they suitable.

CASA: *“Thanks for bringing the ‘Emperious’ to our attention. CASA encourages individuals to source out options for EASA Part 66 textbooks available online (both e-book and hard copy versions). The ‘Emperious’ interactive e-books is a good means for how an individual may study the Part 66 knowledge under the new self-study pathway in preparation to taking the relevant module exams for the category of licence being applied for.”*

<https://youtu.be/03t18Bq3Ibo>

<https://youtu.be/q9PDCV2bsY0>

Basically, if an apprentice does trade training and they have access to an eLearning Book like “Emperious”, they will have ability to absorb the knowledge to sit the CASA examinations. The “Emperious” includes thousands of module based questions similar to what has been asked in the past. The trade training can concentrate on practical skills.

Young employees have grown up with eLearning so it seems to be natural to use it, or any other eLearning system, to obtain the “knowledge” to pass module examinations.

Other eBooks (Not eLearning) Available

[Aircraft Technical Book Company](#)

[Module 1 Mathematics](#)

[Module 2 Physics](#)

[Module 3 Electrical Fundamentals](#)

[Module 4 Electronic Fundamentals](#)

[Module 5 Digital Techniques](#)

[Module 6 Materials and Hardware](#)

[Module 7A Maintenance Practices](#)

[Module 8 Basic Aerodynamics](#)

[Module 9A Human Factors](#)

[Module 10 Aviation Legislation - EASA](#)

[Module 11A Turbine Aircraft Structure](#)

[Module 12 Helicopter Structures & Systems](#)

[Module 13 Aircraft Structures & Systems](#)

[Module 14 Propulsion](#)

[Module 15 Turbine Engines](#)

[Module 16 Piston Engines](#)

[Module 17A Propellers](#)

Possible New Scenario.

There is a massive opportunity for Australian RTOs to become on-line training providers, using the ‘Emperious’ eBook, to provide training all across Australia that would prepare an apprentice or a skilled person to obtain the practical skills and knowledge to pass the Part 66 examinations. An Australia on-line RTO would only need to develop an Australian Module 10 on-line training guide.

ICAO AME Training Guide

New ICAO Training Doc 10098, *“Manual on Aircraft Maintenance Personnel Competency-based Training and Assessment”* provides the global aviation AME training standards.

Once again, ICAO provides the solution to enabling CBT for AMEs but CASA refuses to notify compliance with the Annex changes and enacting the changes into regulatory requirements.

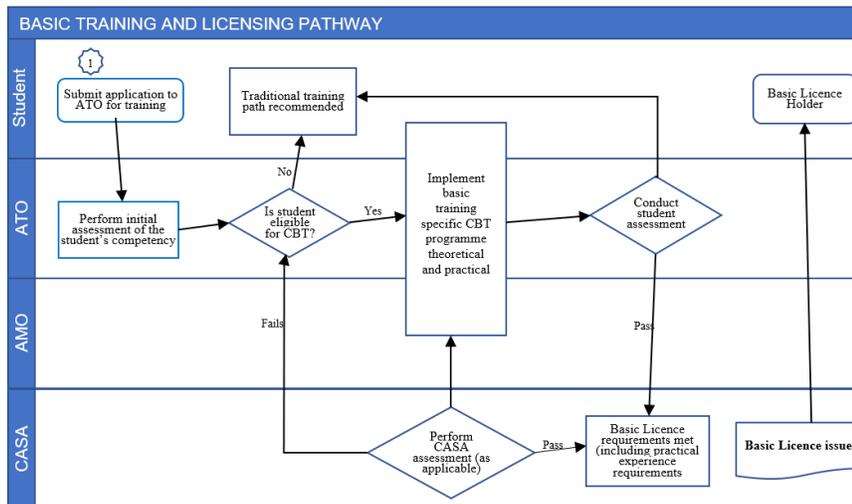
AMROBA has obtained a copy of Doc 10098 and are reviewing it. It provides many pathways to take students through a CB pathway. One way is on the following page.

This system is taking a student that has some training and is reviewed to go through the CB pathway. The flexibility in the Manual should be reviewed by The Education Department to see how it can built into the current government’s competency based training system.

ICAO CBT for Basic Licence Doc 10098

“An explanation of the components that make up this workflow is outlined as follows:

1. *Submit application to ATO for training* — the individual submits an application to the ATO to undertake basic training.
2. *Perform initial assessment of the applicant’s competency* — the ATO performs an initial assessment of the applicant’s competency to determine gaps that may exist between the applicant’s knowledge and the requirements for the basic licence.
3. *Is the applicant eligible for CBTA?*
 - a) YES — move to next step in process; or
 - b) NO — traditional training pathway recommended to the prospective student.
4. *Implement basic training-specific CBTA programme: theoretical and practical* — for additional guidance, refer to Chapter 3 of this manual.
5. *Conduct student assessment:*
 - a) PASS — move to next step in process; or
 - b) FAIL — go back and repeat the elements of the basic training CBTA programme that were failed and undertake a further final CBTA assessment.
6. *Perform CAA assessment (as applicable)* — based on the training report received from the ATO, the CAA carries out an assessment of the student’s (licence applicant) training results (theoretical and practical) to determine whether the student has met the training requirements for grant of an aircraft maintenance licence:
 - a) PASS — move to next step in process; or
 - b) FAIL — go back and repeat the elements of the basic training CBTA programme that were failed and undertake a further final CBTA assessment and CAA assessment.
7. *Basic licence requirements met*— the CAA is satisfied the student has successfully completed basic theoretical and practical training, including any additional regulatory requirements for practical experience on aircraft.
8. *Basic licence issued*—the CAA issues a basic aircraft maintenance licence to the student on the basis the student has successfully completed basic training and met the regulatory requirements for grant of a basic licence.
9. *Basic licence holder* — the individual is the holder of a basic licence, the privileges of which are prescribed in legislation by the Licensing Authority and aligned with the requirements of Annex 1.”



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Adopting FAR Part 91 is Crucial for General Aviation

Adoption of the airworthiness and maintenance provisions of FAR Part 21 would reduce the costs for aircraft owners and operators and improve safety. The biggest GA fleet in the world has matured into the safest system.

Fact 1: The FAR airworthy system is split into “inspection” to meet Annex 8 (aircraft certification standards) and maintenance (includes “inspections”) to meet Annex 6 (serviceability standards).

Fact 2. The FAA does not approve most aerialwork operations but supports this by promulgating operational performance based regulations.

Airworthy Requirements. (FAR excerpts)

- “(a) The owner or operator of an aircraft is primarily responsible for maintaining that aircraft in an airworthy condition, including compliance with part 39 of this chapter”.
- “(a) No person may operate a civil aircraft unless it is in an airworthy condition.”
- “(b) The pilot in command of a civil aircraft is responsible for determining whether that aircraft is in condition for safe flight [serviceable]. The pilot in command shall discontinue the flight when unairworthy mechanical, electrical, or structural conditions occur.”
- “(a) Shall have that aircraft inspected as prescribed in subpart E of this part and shall between required inspections, except as provided in paragraph (c) of this section, have discrepancies repaired as prescribed in part 43;
- (b) Shall ensure that maintenance personnel make appropriate entries in the aircraft maintenance records indicating the aircraft has been approved for return to service;
- (c) Shall have any inoperative instrument or item of equipment, permitted to be inoperative by §91.213(d)(2) of this part, repaired, replaced, removed, or inspected at the next required inspection; and
- (d) When listed discrepancies include inoperative instruments or equipment, shall ensure that a placard has been installed as required by §43.11” and
- “(a) No person may operate any aircraft that has undergone maintenance, preventive maintenance, rebuilding, or alteration unless—
- (1) It has been approved for return to service by a person authorized under §43.7 of this chapter; and
- (2) The maintenance record entry required by §43.9 or §43.11, as applicable, of this chapter has been made.
- (b) No person may carry any person (other than crewmembers) in an aircraft that has been maintained, rebuilt, or altered in a manner that may have appreciably changed its flight characteristics or substantially affected its operation in flight until an appropriately rated pilot with at least a private pilot certificate flies the aircraft, makes an operational check of the maintenance performed or alteration made, and logs the flight in the aircraft records.
- (c) The aircraft does not have to be flown as required by paragraph (b) of this section if, prior to flight, ground tests, inspection, or both show conclusively that the maintenance, preventive maintenance, rebuilding, or alteration has not appreciably changed the flight characteristics or substantially affected the flight operation of the aircraft.”

The following are provisions of Part 91 that removes unnecessary airworthiness requirements.

Note: The FAA system differs to CASA interpretation of "approved" and "accepted" data. Basically, FAA "approved" relates to design data and "accepted" relates to maintenance data. Annual inspection includes design data. (e.g. 'mandatory' airworthiness limitations, not 'recommended' airworthiness limitations)

CASA must repeal CAR 2A, Approved Maintenance Data, for FAR Part 43 to work.

1. Every aircraft must have an annual inspection (i.e. "conforms to all applicable FAA aircraft specifications, type certificate data sheets, airworthiness directives, and other approved data") iaw Part 43, including Appendix D, except listed below. (annual includes 100hrly)
 - a. Flight instruction & Carrying any Persons for Hire – add 100 hourly inspections.
 - i. *"The 100-hour limitation may be exceeded by not more than 10 hours while en route to reach a place where the inspection can be done.*
 - ii. *The excess time used to reach a place where the inspection can be done must be included in computing the next 100 hours of time in service."*
 - b. Not applicable to SFP, Experimental or LSA aircraft.
 - c. Not applicable to P125/135 operators (System of Inspection).
 1. A continuous airworthiness inspection program
 2. An already approved inspection program
 3. A manufacturer's inspection program
 4. A CASA approved inspection program
 - d. Not applicable to Progressive Inspection Programs.
 1. Manufacturer's or CASA approved.
 2. Nominate person controlling.
 - e. Not applicable to large aircraft. (above 5700Kgs)
 - f. Not applicable turbine powered rotorcraft. (irrespective to size)

Note: it is the inspection program that the FAA concentrates on. Safety is to direct where to look.

Outcome of 1.

- No more regulatory requirement for log book statements or to be sent to CASA.
 - No more issue of CASA maintenance release valid for a period – replaced by certification in log book that annual and applicable ADs have been completed.
 - Anyone can produce a flight trip record such as the [NBAA](#) flight log sheets that can be freely downloaded.
 - *Recommended* Airworthiness Limitations not applicable to private or flight training aircraft unless FAA has mandated the AWL by an AD. Annual inspections are “detailed” inspections that should look at the areas covered by SIDs inspections and, if defects found, be repaired iaw the SIDs maintenance data.
 - All of the above reduces considerable unnecessary costs but not safety standards.
2. Operating with inoperative instruments and equipment.
- a. The FAR provides many conditions depending on the type of operation (e.g. day VFR or other, MEL available or not, private operations).
 - b. Enables, in the right condition, to remove instruments if not essential, blank and/or placard and send for repair.
 - c. Must be entered, signed in maintenance records.

Outcome of 2

Returns an Australian practice for private operations that worked safely in the days of CAOs.

Conclusion: Industry will continue to be negatively affected whilst we have a government, department, agency that work very hard to stop harmonisation with the biggest general aviation market in the world, the USA FAR system.

Annual Inspection Certifies Airworthiness Standards in Compliance.

When will CASA promulgate all the aircraft Certificate of Type Approvals issued by CASA and its predecessors, so annual inspections can be carried out correctly. Needed if Part 43 is adopted.

The promulgation of the saved Australian issued aircraft Certificate of Type Approvals (CTAs), pre introduction of the Type Acceptance Certificate. Many Australian CTAs have conditions attached that need to be available to the LAME performing an annual inspection. Any CASA, or its predecessors, issued CTA with condition(s) attached must be available to the LAME certifying the annual inspection. The condition(s) were attached by CASA & its predecessors.

This is another aspect of aviation where history has been lost within CASA. Without understanding the history of CASA and its predecessors means costs are added unnecessary to industry.

CASR 202.050 Certificates of type approval (Saving Provisions)

- (1) *A certificate of type approval for an aircraft, or an aircraft engine or a propeller, that was, immediately before 1 October 1998, in force under regulation 22 of CAR as then in force **continues in force** on and after that date as if it were a type certificate issued under regulation 21.013A or 21.029.*
- (2) *A certificate of type approval for an aircraft that was, immediately before 1 October 1998, in force under regulation 22A of CAR as then in force **continues in force** on and after that date as if it were a type acceptance certificate issued under regulation 21.029A.*
- (3) *A certificate of type approval **continued in force** under this regulation remains subject to any condition to which it was subject immediately before 1 October 1998.*

Knowing our regulatory system is a priority and being trained by the FAA Training Academy must happen.

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Privatisation of Airports?

It is hard to find support for long term civil aviation growth at previously owned and operated federal government airports. All the words are written with open development concepts.

e.g. Australian Government response to the Productivity Commission Inquiry into the Economic Regulation of Airports

- **Announced 11 December 2019 by the Deputy Prime Minister and Minister for Infrastructure, Transport and Regional Development, the Hon Michael McCormack MP, and the Treasurer, the Hon Josh Frydenberg MP.**

RECOMMENDATION 9.2 FUTURE PRODUCTIVITY COMMISSION REVIEWS

The Australian Government should continue the practice of five yearly Productivity Commission inquiries into the regulation of airports, to determine the effectiveness of the regulatory regime in achieving the following objectives:

- *promoting the economically efficient operation of, and timely investment in, airports and related industries*
- *minimising unnecessary compliance costs*
- *facilitating commercially negotiated outcomes in airport operations.*

The Australian Government **supports** this recommendation in principle.

The Australian Government agrees periodic reviews of the economic regulation of airport services are a key element of the light-handed regulatory framework currently afforded to the industry and supports this ongoing practice. The Government will consider the terms of reference for any future inquiry – including whether requests for information from airports would be of specific use to the inquiry – nearer to the time.

Recommendation 10 *The Australian, State and Territory Governments should:*

- *ensure that an independent analysis of proposed government funding of regional airport infrastructure is completed, and made available for public comment, before funding is committed. The analysis should include a public consultation process and assess:*
 - *the economic and financial viability of proposed infrastructure investment*
 - *whether the project is consistent with the long-term strategy of the region and the airport's master plan.*
 - *the social and economic benefits and the recipients of those benefits;*
 - *users' (airlines and communities) willingness to pay for the infrastructure;*
 - *whether the airport operator has in place sound asset management practices;*
- *assess proposed government-funded investments in airport infrastructure using the relevant functional economic region as the basis for decisions, not individual local councils.*
- *monitor and independently evaluate any project that receives funding to assess whether the project outcomes have been achieved. The evaluation report should be published.*

The Australian, State and Territory Governments should publish the justification for funding an infrastructure project that was not supported by independent analysis.

Reply:

"The Australian Government **notes** this recommendation.

The Commonwealth Grants Rules and Guidelines (CGRG) **promote the proper use and management of public resources** through collaboration with government and non-government stakeholders to achieve government policy outcomes.

The general grants principles outlined in the CGRG include the need to consider the interests of grantees and beneficiaries, collaboration and partnerships, value for money, appropriate governance and accountability, transparency and other grants administrative processes, when providing and administering Australian Government grants.

The existing Australian Government regional grants programs play an import role in investment decisions across all types of assets and projects. When agreeing to a grant, the Australian Government gives consideration to broader regional economic growth and potential, as well as to the social and community benefits a project will deliver."

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