

## Closed Borders & Post Coronavirus

Without doubt, aviation is facing one of its most critical times. If things were not bad enough, the coronavirus COVID-19 required government to impose restrictions that will directly and indirectly put immense pressure on our industry. As we have previously experienced, when people find their employment put on hold, they seek employment elsewhere. When recovery starts, finding qualified staff becomes extremely hard. Much of our industry support essential services and these are provided across borders. Government is providing assistance to the industry, maybe not all. We need aviation regulatory change by introducing new principles based on re-growing the whole aviation transport system; private to airline.

Everyone is, or should be, practising the government directions during this period, even though they change daily. The feedback from members is that the decline in aviation is escalating in some sectors, whilst other sectors are surviving. There is political commitment for support of aviation, however, we now need to see government and its agencies concentrate on removing red tape and simplifying the system to stimulate recovery wherever possible.

### Contents

**1. The Effect of Closed Borders? 2**

*The aviation industry, both commercial and private operations, faces unknown pressures and restrictions that many have not considered. Irrespective whether you work within the airline sector and just operate privately, we are all feeling the effects. General aviation works across borders and many maintenance businesses clientele come from another State or Territory. Industry was already under a decade or two of changing regulatory reforms that mainly added red tape and confusion. Government must demand regulatory reform that will enable job growth. 2*

**2. Aviation ‘Statutes’ not “Fit for Purpose”? 3**

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**3. Where Will the Future Workforce Come From? 4**

*Aviation already has an ageing workforce and the coronavirus effects will lose more personnel who will take employment wherever they can find employment during the recovery period. The costs for maintenance personnel to become qualified has escalated in recent years as it has in the pilot training sector. With the unknown facing us and an ageing workforce, we need to plan for a more complete but streamlined training environment that uses modern on-line training principles. We need a system where the National Vocational Education Training system provides full time trade training covering modules 1-17, except module 10, starting from Y10. The USA has been doing this for decades, 2-year full time courses with FAA (A&P) trade qualifications enabling maintenance certification. 4*

Ken. R. Cannane  
Executive Director  
[amroba@amroba.org.au](mailto:amroba@amroba.org.au)

## 1. The Effect of Closed Borders?

*The aviation industry, both commercial and private operations, faces unknown pressures and restrictions that many have not considered. Irrespective whether you work within the airline sector and just operate privately, we are all feeling the effects. General aviation works across borders and many maintenance businesses clientele come from another State or Territory. Industry was already under a decade or two of changing regulatory reforms that mainly added red tape and confusion. Government must demand regulatory reform that will enable job growth.*

Air transport, like all other types of transport, is classified as essential services as it supports all levels of commerce and emergency services. All transport systems play an important role in connecting commercial businesses.

Businesses that were dependent on the airline industry have been the hardest hit as so many aircraft are no longer operating. Some areas like larger charter and emergency services are surviving, some with assistance from government. Manufacturing is essential to support but depends on sales.

However, we have many other members stating they are being affected by the downturn in training and normal operations. Many businesses, as they tightened their budgets, have reduced the use of aircraft and this affects maintenance sector.

Many AMO customers, especially in rural Australia, come from other States and the loss of rural pilot training capability is adding to the impact on survival. However, some of these issues were present before the coronavirus restrictions were applied.

Border restrictions are having an effect on many small rural businesses. AMROBA has had many businesses highlighting the downturn and bleak future for the immediate future. There is government assistance that can be accessed but we need assurance that it will address costs associated with lack of flying.

An article in the Financial Review, March 4, demonstrated the attitude of indirect aviation's support industry.

Mr Little said the slowdown in VIP traffic was not a problem for the Melbourne Jet Base as its other businesses of hangarage and maintenance were doing well.

"If people have planes hangared if they're not flying, that's not a problem for us, because they're paying to have their planes here," Mr Little said.

Basically, this is the same attitude most airport owners/operators have. You have no income but they do.

Many members have brought to our attention that airport owner/operators are hiking airport fees on an industry that is experiencing a downturn to the point that some of these businesses simply cannot absorb the rental increase.

The simple fact is that there needs to be a "Recovery Plan" implemented by government. Direct "Regulatory Reform" to be officially focused on "Regulatory Recovery" with a major emphasis on simplifying the regulatory structure by devolving responsibilities to industry, like the FARs, and by removing red tape iaw Government Guidelines.

[Back to the Top](#)

## 2. Aviation ‘Statutes’ not “Fit for Purpose”?

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If you look at the ‘Objective’ of the Act and CASA’s Functions and Responsibilities and compare them to the above Annexes, it becomes apparent that the Act provide the enabling powers for CASA to apply same standards as other countries have with relation to the listed Annexes. The Act must require CASA to have an “International Office” dedicated to obtaining recognition of Australian aviation businesses wanting to trade in foreign markets.

National aviation authorities typically **regulate** the following critical aspects of aircraft airworthiness and their operation:

- design of aircraft, engines, airborne equipment and ground-based equipment affecting flight safety;
- conditions of manufacture and test of aircraft and equipment;
- maintenance of aircraft and equipment;
- operation of aircraft and equipment;
- licensing of Pilots, Air Traffic Controllers, Flight Dispatchers and Maintenance Engineers
- licensing of airports and navigational aids; and
- standards for air traffic control.

ICAO’s core mandate is to help States to achieve the highest possible degree of uniformity in civil aviation regulations, standards, procedures, and organisation.

This is why CASA must have a dedicated ‘*internal international office*’ dedicated to achieving “the highest possible degree of uniformity” for the benefit of the Australian engineering industry and international involvement.

For instance, Annex 8 relates to the airworthiness of aircraft and increasingly, supporting standards for AMOs. The ICAO provides guidance material for each Annex:

*“Use of the guidance material in the Airworthiness Manual (Doc 9760). Contracting States are invited to note that the material in the Airworthiness Manual is intended to guide them (Australia/CASA) in the development of their detailed and comprehensive national codes with a view to introducing uniformity in those national codes.”*

“Uniformity” with the FARs is the Objective of Australia’s engineering sectors.

[Back to the Top](#)

### 3. Where Will the Future Workforce Come From?

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Any regulatory framework that does not allow Australian aviation businesses to participate internationally is a failed regulatory system.

Uniformity with international standards means international personnel standards.

Australia's maintenance personnel qualification stopped being harmonised in the mid-1990s when the Airline Agreement split the 'Mechanical' trade into 'Mechanical System' and 'Structures'. This split did not happen outside the Airline sector nor has it changed globally. Canada has a 'Structures' trade but it is a subset of the 'Mechanical' trade.

The EASA modules we have adopted does not include a separate "Structures" person but our industry does use specialised Structures tradespersons, mainly in major businesses. The FAA system does not have the avionic/mechanical split but the EASA system does.

EASA is also considering whether to combine the B1 & B2 into a single B licence.

In the USA, fulltime A&P mechanic qualifications also enables those that qualify to take employment in other trades and technical jobs.

#### ***Full Time Training***

North America, Europe and many Asian countries now provide 18 months to 24 months full time AME trade training based on Modules 1-17, excluding module 10.

To recover, we need to introduce fulltime AME training by dedicated RTOs under ASQA regulation and oversight.

CASA must accept the Australian Competency Based Training system regulated and oversighted by ASQA for all trade levels contained in Modules 1-17, except module 10.

ASQA, the education regulator, should be held responsible for providing trade training meeting the minimum standards promulgated by CASR Part 66.

You could list Module 10 as post trade training to qualify for a CASA licence. Module 10 is the only module that is licence specific.

[Back to the Top](#)