



WHAT IF?

What if post the pandemic restrictions being lifted, Federal and State political statements making creating jobs and reduction of red tape holding back businesses is the number one priority became a reality in aviation reform or, as has happened in the past, will the Prime Minister's statements simply fade into distant memory?

These political statements should impact on a public service that has been hell-bent on propping up more public service jobs and increasing red tape. But, will they?

The question has to be asked is where will the government find the right public service Executives that are dedicated to a reduction in red tape and creating jobs in the private sectors and not just jobs within the public service?

These statements are no different than government findings and recommendations in the late 1980s that were ignored leading to growth in jobs in the public sector with a resounding loss of jobs in the private sector. Government also identified the need to simplify the amount of paperwork and procedures required by government departments/agencies.

The only way any government can make these kinds of changes to work is to make laws demanding a reduction in red tape and job creating legislative requirements.

Minister directions and endorsement of initiated government inquiries' recommendations have been proven as ineffective in the past.

- Adoption of a US style Red Tape legislation that states a 'Reduction Target' "*will be a reduction of 35% of the existing regulatory requirements. [2 for 1 rule] Once this target is met, Section 8 (A) will take effect [1 for 1 rule]*".
- A 35% reduction would have huge benefits for all industries including aviation operations, maintenance, manufacturing and training.

and

- This can happen if the same 3 key criteria for reform that is being used by the CAA(UK) was adopted by the Department of Infrastructure and CASA, especially for GA.

"The principles we [CAA(UK)] have/will use are:

- *Only regulate directly when necessary and do so proportionately;*
- *Deregulate where we can and delegate where appropriate;*
- *Do not gold plate and quickly and efficiently remove any gold plating that already exists."*

These CAA(UK) principles resonate with the basic government principles:

"The principles are that requirements:

- *effectively address the issue of concern;*
- *are the most efficient option;*
- *have benefits that substantially exceed their costs."*

THE QUESTION IS: How does the government achieve reform without a major re-direction of public service to find management that will concentrate on creating jobs?

Since the late 1980s we have heard policy after policy, even department/agency KPIs that promised a lot but actually delivered little. Aviation activities at non-international airports continue to decrease instead of expanding as the local rural communities grow.

If government legislated the implementation of recommendations of past inquiries (e.g. ASSR) so department/agencies had to implement the recommendations, there would be less Inquiries.

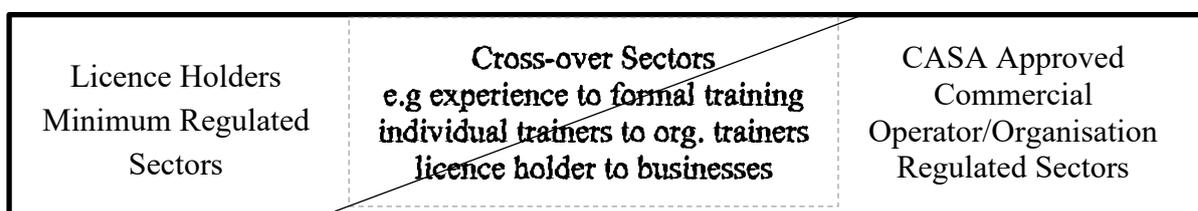
How many jobs will future aviation regulatory reform create?

If Morrison is true to his word, the Department of Infrastructure and CASA Board should demand all new/amended regulations must support creation of jobs and reduction of red tape.

1. What if the independent flight instructor (FAR Part 61) was adopted?
 - a. Flight training may return to rural Australia.
 - b. Also adopt FAR standards for businesses located on airports to hold liability insurance, employ a LAME/Pilot, meet FAR Part 43, 61, 64, and/or 91, etc.
 - c. Post COVIG-19, many airline pilots might not be employed for a number of years before international travel returns to normal – they could be excellent independent flight instructors.

2. What if the FAR A&P concept and IA (FAR Part 64) was adopted for GA?
 - a. EASA has basically adopted this approach for the B3 licence (2000Kg aeroplanes).
 - b. Combine the EASA B3 and B2L for light GA and we have an A&P.
 - i. Possible increase B3 MTOW same as previous CAR31.
 - c. Pre EASA days, AME licencing was heading for an avionic and mechanical training underpinning the maintenance sector.
 - d. AME licence capability should therefore be based on where the experience is attained.
 - i. Shift responsibility of licence capability and experience to LAME and employer.
 - ii. FAR system simply requires the LAME to be supervised when performing work for the first time before certifying for that type4 of work.

3. What if, as supported by GA, the adoption of FARs actually created jobs outside the airlines?
 - a. Airlines wanted a Line LAME and a Base LAME, (Cat A and B LAME)
 - b. FARs only recognises ‘avionics’ within Part 145 as repairmen.
 - c. Retain the B1/B2 concept but combine B1.2/B2L for GA – EASA B3 concept.
 - d. Train to match the sector of aviation. i.e. Base plus electives.



How much red tape will future regulatory reform reduce?

4. **There are many ways that red tape can be reduced so aviation businesses can create more jobs but it will require changing the regulatory language style.**

- a. Governments have stated for a long time that regulations should be written in “plain English”, they have a government guide to follow when drafting rules.
 - i. If this had been adopted there would be no need for CASA to produce a “plain English” guide to aviation regulations.
 - ii. This is what the government “recommended” in the late 1980s.
 - iii. Thirty years and no real progress to reduce red tape and simplify.

b. CASA, unlike the FAA, does not have a commercial imperative to grow and promote aviation, let alone GA, as does many other NAAs.

- i. Look at the style of ANRs and ANOs of the past and there was more responsibilities placed on LAMEs/Pilots and approved organisations.
- ii. Responsibility was placed on the approval holder to ensure they had all necessary things in place with less responsibility on the Regulator.
- iii. Pre CASA, the GA businesses were nurtured and based on “direct supervision” operators and organisations that complied with Regulations and Orders. This was Australia’s FAA fixed based operators system detailed in FAA AC 150-5190.7 FBO-SASO.
 - 1. Hundreds of direct supervised businesses folded when they were not transferred from ANR/ANOs to CAR/CAOs.
 - 2. Many small businesses each employing one or more staff.

5. **Removal of barriers between VH registered and Not VH registered aircraft**

- a. This is one of the most divisive economic restrictions that is affecting the growth of GA, especially in rural Australia.
 - i. Why aren’t all aircraft placed on the CASA aircraft register with recreational organisations being delegated the right to administer registration and issue airworthiness certificate to the standards?
 - ii. The Gliding Federation has been doing this safely and effectively for many decades.
 - iii. Transport Canada has successfully created TC pilot licences for all recreational aircraft and recreational associations have been delegated to issue these licences similar to the Gliding Federation has for decades.
 - iv. EASA has created AME licences for recreational aircraft and there is no reason why recreational associations cannot be delegated to issue the licence and/or certificate.

b. FAR Part 43 exempts certain aircraft from the basic maintenance requirements and FAR Part 91 also exempts certain aircraft but specifies minimum requirements starting from private to commercial operations.

- i. In hindsight, the development of the regulatory system should have remained FAR based.
- ii. The total number of active GA aircraft flying is not increasing.