

TAAAF

The Australian Aviation
Associations' Forum

TAAAF Policy – Election 2019

The Australian Aviation Associations Forum is an alliance of the majority of Australia's major aviation associations to ensure the industry presents a united voice to Government on key aviation issues and policy, characterised by expertise and a wide representation of people and organisation committed to aviation. The Association currently comprises 13-member organisations collectively representing more than 12,500 individual and business members.

Industry supports a resilient, independent aviation regulator that employs best practices as measured against international benchmarks. However, the regulator can assist industry to thrive by discharging its obligations with pragmatic and collaborative engagement and consultation. This policy is aimed directly at strengthening and improving the operational and strategic output of the regulator so that it is more effective and efficient while still remaining focussed on continual improvement in safety and risk management. While there are many other issues relevant to aviation policy, the primary focus should remain on ensuring CASAs commitment to modernise and innovate in order to deliver safe and pragmatic objectives through prudent and responsible management while not obstructing the industry's efforts to do the same.

1. **Legislative reform of CASA** - CASA remains in need of substantive reform by way of a major review of the Civil Aviation Act. The proposed Civil Aviation Amendment Bill that lapsed with the 45th Parliament should be reintroduced with bipartisan support and include:
 - a. Amendments that address the aviation safety issues and the challenge to the primacy of the Civil Aviation Act raised by the High Court decision in the Outback Ballooning / WHS NT case.
 - b. Addition of the cost and sector risk approach considerations outlined in the previous Bill
 - c. A major readjustment of the CASA Board to have full powers over strategic, operational and administrative direction and actions of CASA
 - d. The CASA Board must have a majority membership of people with significant and relevant experience in the aviation industry
 - e. Change of DAS board membership from director to ex-officio member of the board per standard corporate practice.
 - f. Review of the position of DAS/CEO with a view to revising the responsibilities of the role and increasing accountability to the board of CASA.
 - g. Establishment of a formal consultative mechanism with industry focussing on peak body engagement with both the Board (on strategic issues) and staff on lower level issues

2. **Structural Reform of CASA** – CASA structure to be reformed to better reflect industry including the removal of internal bottlenecks and the facilitation of fair and equitable decision making that is consistent across regional and national offices. The legal branch should be adequately resourced and given stronger direction to deliver timely outcomes. Sector Risk Profiles coupled with post implementation reviews of regulatory reform must play a greater role in determining operational policy and CASA structure.

Action is required to ensure that industry requirements are met in a timely manner in accordance with published service delivery targets. Consistent delays in delivery of regular items (medicals, licence processing, etc.) along with regulatory reform, consultation, investigations and other CASA responsibilities create uncertainty for industry and constrain investment.

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- 3. Matching risk, regulation and cooperation to sector** – In accordance with proposed changes to the Act (see above) and the Minister's Statement of Expectations to CASA, the Board and the CEO/DAS should construct, with close industry involvement, an improved sectoral approach to risk management that aligns CASA's response to individual sectors. In particular, aerial work, private operations and activities involving only informed participants should have a simpler rule set; direct recognition of 3rd party audits and industry safety programs in place of CASA involvement; and a greater commitment to research, education and explanation.
- 4. CASA Staff and Recruitment Strategy** – With respect to recruitment of CASA leadership and executive, the philosophy should support a recruitment culture representative of industry through relevant experience and knowledge commensurate with respective position requirements. Military experience should not be considered adequate by itself. CASA must establish a recruitment policy that creates a culture of competence, consultation and cooperation relevant to different sectors.
- 5. Aviation Training Initiative** - Immediate action must be taken to align aviation training and licence outcomes and support for both pilots and LAMES.

For pilots - recognising all CASA approved training schools delivering a CPL and further specialised training relating to the needs of industry (e.g. aircraft ratings and operational ratings essential to the industry) by granting access to Government sponsored student loan programs or a related loan support program. Recognition of relevant aeronautical experience (e.g. 3-axis experience gained through self-administered organisations) for all flight crew licences.

For maintenance professionals - significant direct investment in apprenticeships for LAMES and further simplification and alignment with existing apprenticeship requirements through CASA regulatory reform. Furthermore, recognising prior learning for trades outside of aviation and creating clear pathways for people with these qualifications to move into the sector.

- 6. Continuous Improvement Program for CASA** - Establishment of a joint industry/CASA task force to identify and recommend to the Minister the removal of poor outdated regulations, systems and practices within CASA while also identifying opportunities for cooperation with relevant industry bodies to improve safety. This should also include work with Attorneys General to improve and simplify the current complexity of drafting style in regulation.

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ENDS