



Submission

To

Senate CASA Enquiry

26 June 2008

Serving regional aviation, and through it, the people and businesses of regional Australia

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Submission to Senate CASA Enquiry Regional Aviation Association of Australia (RAAA)

Result of Administrative Reform

The administrative reforms have resulted in delays in issuing delegations now extending out to 16 weeks.

New initiatives such as the new centralised mailing system have placed additional barriers between the operators and CASA staff for regulatory services.

The change in the CASA emphasis from regulatory services to surveillance has added delays and costs due to the non-availability of CASA staff for regulatory service provision.

CASA charges have increased but the CASA product and service delivery appear to have declined.

Governance

It is government policy to appoint a competent CASA Board. The RAAA strongly supports the establishment of the new Board.

The recruitment of high level management personnel is not transparent and seems to favour GAPAN appointments, giving the appearance of an old boys' network. As a result GAPAN appear to have an undue influence on CASA as exemplified by the promotion of threat and error management.

The regulatory reform process has lost its way eg the switch from FARs to EASA. Since 2003 CASA has made little or no progress in the high risk area of Transport category operations (CASR 19 and CASR 121) and General Operating and Flight Rules under CASR 91 – two core areas of aviation regulation.

CASA seems focussed on theories of Safety Management instead of the practicality of creating a set of regulations that comply with ICAO standards. There has been no audit or quality control of inspectors' decisions leading to inconsistencies between offices.

CASA Relations

The industry has lost considerable confidence in CASA and considers that a strengthening of leadership is required.

To restore industry confidence in CASA the organisation must:

Deliver comprehensible legislation that is compliant with ICAO standards and recommended practices.

Implement training of CASA personnel to ensure consistent interpretation of the legislation. This will be imperative if non-prescriptive, outcome-based legislation is introduced.

Reform its regulatory service processes to ensure timely and accurate delivery to the industry.

Implement a non-punitive safety reporting system to replace the current system where the reporting of safety outcomes results in punitive action by CASA inspectors. This could be described as building a 'just safety culture'.

CASA needs to re-skill to restore its knowledge and capabilities to deal with both present and future safety systems.

CASA should focus on core issues of aviation regulation instead of esoteric and academic aviation safety theories.