



RAAA SUBMISSION

**DEPARTMENT OF INFRASTRUCTURE
AND REGIONAL DEVELOPMENT**

AUSTRALIA'S DRAFT STATE SAFETY PROGRAMME (SSP) 2016

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

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15 February 2016

The Department of Infrastructure
and Regional Development
ARFFS Regulatory Policy Review
GPO Box 594
CANBERRA ACT 2601

Dear Sir,

RAAA SUBMISSION

Department of Infrastructure and Regional Development

Australia's Draft State Safety Programme (SSP) 2016

The RAAA is pleased to provide this submission in response to the Department of Infrastructure and Regional Development on the Draft State Safety Programme for 2016.

I. RAAA Background

The RAAA and its Members

The Regional Aviation Association of Australia (RAAA) is a not-for-profit organisation formed in 1980 as the Regional Airlines Association of Australia to protect, represent and promote the combined interests of its regional airline members and regional aviation throughout Australia.

The Association changed its name in July 2001 to the Regional Aviation Association of Australia (RAAA) and widened its charter to include a range of membership, including regional airlines, charter and aerial work operators, and the businesses that support them.

The RAAA has 29 Ordinary Members (AOC holders) and 65 Associate/Affiliate Members. The RAAA's AOC members directly employ over 2,500 Australians, many in regional areas. On an annual basis, the RAAA's AOC members jointly turnover more than \$1.5b, carry well in excess of 2million passengers and move over 23 million kilograms of freight.

RAAA members operate in all States and Territories and include airlines, airports, freight companies, engineering and flight training companies, finance and insurance companies and government entities. Many of RAAA's members operate successful and growing businesses providing employment and economic sustainability within regional and remote areas of Australia.

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RAAA Charter

The RAAA's Charter is to promote a safe and viable regional aviation industry. To meet this goal the RAAA:

- promotes the regional aviation industry and its benefits to Australian transport, tourism and the economy among government and regulatory policy makers;
- lobbies on behalf of the regional aviation industry and its members;
- contributes to government and regulatory authority policy processes and formulation to enable its members to have input into policies and decisions that may affect their businesses;
- encourages high standards of professional conduct by its members; and
- provides a forum for formal and informal professional development and information sharing.

The RAAA provides wide representation for the regional aviation industry by direct lobbying of Ministers and senior officials, through parliamentary submissions, personal contact and by ongoing, active participation in a number of consultative forums.

II. RAAA Response to the Draft State Safety Programme

The Regional Aviation Association of Australia (RAAA) finds no significant issues with the Policy Statement as it is written. However we have serious concerns about the delta between the proposed situation and reality. The RAAA can cite numerous examples, but recognise most should be addressed in a separate forum to this submission. Therefore this submission will only identify high level concerns.

Policy statement paragraphs 3 and 9 claim that sound assessment of risks and service provider's safety performance indicators are used to guide the regulatory development approach.

Just one example of where this policy is not applied is in the philosophical design approach to Civil Aviation Order 48.1. The current version is out of step with sound assessment of the actual risk faced by many mature Australian operators, and not based on empirical evidence in the Australian context.

Policy statement paragraph 6 claims that recognition of Australia's safety regulatory system will ensure that Australia has a competitive aviation industry.

An increased focus is required in this area. Particular emphasis should be given to Bilateral Agreements with international service providers, particularly in the aviation maintenance sphere. The industry has agreed with the international harmonisation route on the basis that our regulations would be recognised and Australian operators could enjoy the associated obvious benefits. However the efforts and results from CASA in this regard are disappointing to date, despite numerous and costly investments in international face to face meetings.

Policy statement paragraph 10 claims that the appropriate personnel will be appointed to discharge their responsibilities competently.

Whilst sufficient financial and human resources have been allocated within areas of CASA, certain staff do not have the proper technical, people management, financial skills or appropriate industry experience to discharge their safety oversight and management responsibilities competently.

One final issue of significance that must be documented at this time is the disappointing lack of progress on the implementation of the Aviation Safety Regulation Review (ASRR). Page 8 of the draft State Safety Programme refers to the 'Aviation Policy Group (APG) monitoring the progress of the delivery of the SSP and the SSP gives effect to the Aviation Safety Regulatory Review (ASRR) recommendations'. The RAAA has serious concerns on the lack of progress and the lack of visibility and surety that the policy intent of the recommendations has been correctly understood by CASA. A Post Implementation Review by mid-year to ensure the correct application is required.

III. CONCLUSION

The RAAA is grateful for the opportunity to provide our views for the Department of Infrastructure and Regional Development's Draft State Safety Programme. If you would like further information about the items contained in this submission, or clarification on any of the points we make, the RAAA would be more than happy to assist.

Regards


Mike Huggins
Chief Executive Officer