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Subject: AHIA Response to the Government's Future of Aviation Paper

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Submission of the Australian Helicopter Industry Association to the Dept of Infrastructure's "Future of the Australian Aviation Sector" Paper

Overview

The Australian Helicopter Industry Association represents a significant percentage of commercial helicopter companies and operators in this country. The membership is made up mostly of Australian companies and operators plus a small but significant group of international members that supply services to the domestic helicopter market.

Australia has the world's second largest civil helicopter fleet, with approximately 2350 airframes. It is ironic in some ways that the quality of the Australia's helicopter industry is well known internationally but somewhat less recognised at home.

The USA has the largest fleet. There is a strong and growing industry relationship between both countries.

The versatility and relatively light infrastructure footprint of the helicopter enables it can carry out a wide range of vital tasks including EMS, firefighting, search and rescue, aerial application, off shore crew transfer, police and security operations, mustering, charter, and training to name just a few. The helicopter is ideally suited to service Australia's relatively small population dispersed across a large continent.

The next generation of helicopter and rotary aircraft is about to arrive on the market. These aircraft have significantly increased speed, load carrying and fuel efficiencies.

This means that they can be tasked on a wider range of operations with relatively small amounts of ground based support and at fixed-wing speeds.

Australia's aviation policy makers need to be aware of these emerging platforms/capabilities on offer from the major helicopter manufacturers, and design the aviation regulatory frameworks that will best advantage the Australian economy and community. There is no doubt that in the short to medium future helicopter and rotary operations will make up an increasingly larger proportion of Australia's total aviation operations. These opportunities and challenges need to be analysed carefully. For example, the decision not to have helicopter operations catered for during Stage 1 of the new Western Sydney Airport is a glaring and highly problematic oversight.

CURRENT ISSUES

There is a pressing need to finalise within a year the essential regulatory work on CASR Parts 61 and 138.

These Parts, covering Licensing and Aerial Work operations respectively, have been under development for over a decade.

The industry needs these Parts to be fit for purpose as soon as possible.

The regulatory development work has dragged on for too long and has cost the industry thousands of hours, all provided on a voluntary basis. It has almost become a case of paralysis by analysis, but it is imperative that these essential regulations do the job for which they are intended.

Improve pathways to the Flight Examiner(FE) Rating;

The Australian helicopter industry has a pressing need for new Flight Examiners.

The best way to achieve this is to draw from industry appropriately qualified people who aspire to achieving this Rating, and then offer a clear pathway to reaching this professional goal.

Flight Examiners are at the apex of the helicopter training and checking structure.

CASA cannot supply the FEs needed, nor should that be its role.

All new FEs should come from industry, with CASA providing audit oversight.

Without well trained, available and geographically dispersed FEs, the industry can grind to a halt.

Remove impediments to Multi engine class rating for helicopters below 5700KG;

The current convoluted path to this class rating is a serious impediment to industry growth.

There is no safety argument that supports making the helicopter multi-engine rating so much more complex than the fixed wing multi-engine rating.

Reform in this area is long overdue and is another major impediment to helicopter industry growth.

Develop better training pathways for helicopter LAMEs (due ageing workforce);

The now rapid ageing of the LAME workforce has not been balanced by commensurate encouragement by government for training new LAMEs, both helicopter and fixed wing.

Put simply, if we do not have replacement LAMEs coming on line regularly, the industry literally is not be able to provide essential services.

This issue has been known for many years, and yet there now appears to be even fewer institutions where applicants can gain the necessary qualifications.

This issue needs to have a very high priority within government.

Strengthen the national coordination of aerial firefighting through NAFC, including ;

Reducing sovereign risk by providing motivation for Australian operators to invest in their fleets and further develop local capabilities.

Fire seasons vary in intensity but it is essential, with longer seasons now apparent and overlapping with northern hemisphere operations, Australian companies and operators need the policy settings to encourage the strengthening and investment in the local aerial fire-fighting fleet.

Australia's aerial fire-fighting skills are world class but more needs to be done to enable Australian capabilities to develop further.

Ensure all major and large regional airports have adequate helicopter facilities, particularly for fire-fighting and EMS operations;

As mentioned, helicopter airport infrastructure needs are relatively light compared to fixed-wing aircraft.

Investment in helicopter facilities at airports is relatively cheap and can provide communities with a range of essential services.

These advantages need to be part of any plan covering the future of Australian aviation.

Understand and plan for the new generation of helicopter/rotary aircraft;

With a new generation of helicopters about to arrive, civil tilt wing/engine aircraft on the market, and the rapid expansion of drone technologies, there is a need for a comprehensive and flexible airspace and facilities plan.

Some of this work is already underway but the pace is too slow.

More government resources need to be applied to the vertical lift space as this area of aviation increases in utilisation and amenity.

In the near future, demand for aircraft of all types with vertical lift capability will increase significantly and Australia needs to be ready.

Expand the application of Satellite-Based Augmentation System (SBAS) to helicopter operations;

SBAS provides for precision IFR approaches in up to zero visibility conditions.

When used in helicopters it is possible for landings at hospitals and emergency sites during challenging weather conditions.

This life saving technology is available now and, as a priority, should be investigated further for its application to EMS and security operations.

Accelerate the airspace design work that will guide integrated helicopter and drone operations;

Significant work has already been undertaken but with drones moving into commercial operations it is vital that all new airspace structures be fully tested and analysed to ensure safe operations alongside existing helicopter operations.

The helicopter industry is ready to assist in this vital airspace design and safety research.

Develop a national database for wires and obstacles that can be used on common GPS platforms eg Avplan and Ozrunways;

Given the low altitudes that helicopter often need to operate at, it is essential that comprehensive obstacle information is available.

Most of the data already exists but it needs be in the cockpit and easily accessible.

It is suggested that industry works with the ATSB to develop an upgradeable national obstacle database that can be uploaded to common GPS platforms, capable of issuing visual and audible warnings to pilots.

Implement nationally consistent Work Health and Safety regulations appropriate for all Australian registered helicopter operations;

With the increasing complexity of State and National Workplace Safety regulations, including emerging industrial manslaughter laws, it is essential that the unique nature of commercial rotary and fixed wing operations be recognized in Workplace law.

This recognition has already been provided to the maritime industry, and a similar Act should be developed for aviation.

CASA's rules and regulations are comprehensive and cover all aspects of aviation operations in detail.

There is no need to burden the aviation industry further.

To do so will encourage significant flight away by prospective aviation entrepreneurs and professionals.

SUMMARY

Australian helicopter operations will only expand in the future.

Helicopters can offer an aviation solution to many operational challenges that cannot be met by fixed wing aircraft.

Given Australia's demographic, growth and size, it is highly likely that helicopters will be an increasingly important part of Australia's aviation future.

Having the world's second largest civil fleet, an enviable international reputation, and a skilled workforce the industry wishes to engage with government to shape the design of the helicopter and vertical lift component of Australia's aviation future.

The AHIA would welcome opportunities to speak further with government on reducing all impediments to what should be an exciting industry expansion for helicopters and rotary aircraft.

Paul Tyrrell

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