

June 30, 2014

Electronic Submission Via Infrastructure.gov.au
The Hon Warren Truss MP
Deputy Prime Minister
Minister for Infrastructure and Regional Development
Parliament House
CANBERRA ACT 2600

Re: Aviation Safety Regulation Review

The National Business Aviation Association (NBAA) of the United States submits the following comments in support of the Australian Aviation Safety Regulatory Review's Report and Recommendations. We would specifically like to support Recommendation #27.

27. The Civil Aviation Safety Authority implements a system of using third-party commercial audits as a supplementary tool to its surveillance system.

The NBAA represents the interest of over 10,000 member companies within the business aviation community. Our members are based in and travel to all corners of the world, including Australia.

Safety is a primary concern for everyone involved in the aviation industry, regulators and operators alike. Permitting the use of third-party commercial audits as a supplementary surveillance tool will allow regulators and industry to use the collective knowledge and experience of operations all over the world. Specifically, the International Standard for Business Aviation Operations (IS-BAO) developed and supported by the International Business Aviation Council is recognized by ICAO and other agencies around the globe. Currently, over 700 operators, including 5 in Australia, are already registered with IS-BAO.

Other Civil Aviation Authorities are already taking advantage of supplemental third-party audits. For example, the Bermuda Department of Civil Aviation recognizes IS-BAO and other third-party audit certificates to prove operator compliance with Safety Management System requirements.

By partnering with the industry and taking advantage of already established best-practices, the Civil Aviation Safety Authority can help increase safety in all of business aviation while reducing financial demands on the Authority. In an era of strained agency resources, implementing a system to allow operators to use third-party auditors for surveillance will require fewer inspectors in the field.

NBAA asks the Civil Aviation Safety Authority to implement a system of using third-party commercial audits as a supplementary tool to its surveillance system.

Thank you for the opportunity to submit these comments on behalf of NBAA's Members. Please contact me if NBAA can provide any additional information.

Sincerely,



Brian Koester
Project Manager, Operations