

Submission to the independent aviation safety regulation review panel:

Name: **John Anthony Welsh** *B.Bus; Dip.Av.*

I am a Glider pilot/instructor and a member of the Gliding Federation of Australia (GFA).

I am also a Private pilot and a pilot/senior instructor with Recreational Aviation Australia (RAAus).

I have recorded over 8,000 hours as a pilot in sporting and recreational aircraft over 48 years.

I have also served Australia as a civil Air Traffic Controller in control towers and en route control for 29 years in Western Australia.

I was GFA Executive Officer 2005-2009.

A thriving aviation sector that includes strong Sport aviation engagement is critical for Australia's future.

Many of the pilots I have personally trained, sent solo and coached in sporting and recreational aircraft now grace the flight decks and cockpits of major airlines and the RAAF.

The Chief of Air Force, Air Marshal Geoff Brown, AO, is a current glider pilot.

(See: <http://www.airforce.gov.au/Our-People/Our-Leaders/Chief-of-Air-Force/?RAAF-clPygzYc/Fwxxi5dCKVD3g8SFepfUGXS>)

Core messages for the panel to consider include:

- That GFA is held in high regard by aviation generally and is well placed in cooperation with CASA to build upon its existing administration and oversight of gliding in Australia;
- Part 149 Approved Organisation model is the best way forward;
- Funding and the method of fair audit of the GFA requires ongoing consultation;
- The punitive, authoritarian and disrespectful attitude currently demonstrated by the regulator is contrary to the aims of a vibrant, successful, diverse and thriving aviation sector;
- A Ministerial Policy is urgently needed directing CASA to adopt a core mission to support and promote sporting and recreational aviation;
- Regulations that apply in crowded airspace and extreme winter affected operations and airworthiness (such are in Europe) are not necessarily appropriate in Australian conditions.

- GFA is held in high regard by aviation generally and is well placed in cooperation with CASA to build upon its existing administration and oversight of gliding in Australia,
 - Gliding provides a cost effective entry into basic piloting skills;
 - The reason that it is cost effective is that labour associated with the operations of the 70+ clubs in Australia is provided for by the most part volunteers, thereby keeping costs of flying down;
 - GFA has well developed, tried and tested syllabi for both flying and airworthiness personnel;
 - Gliding has been internationally recognised as a good basis for pilot development and recently formalised at the recent 2013 RAeS International Flight Crew Training Conference:
(see:<http://media.aerosociety.com/aerospace-insight/2013/10/18/what-can-glider-pilots-teach-the-airline-industry/8629/>);
 - GFA has successfully administered Gliding in Australia since 1949;
 - It was defined as “the shining example” of self administration by the previous Horscroft Inquiry into Sport Aviation;
 - The higher levels of administration of operations and airworthiness in gliding are staffed by the more skilled and experienced in the field and is, in the majority, unpaid and voluntary;
 - GFA was a founding member of the [Australian Sport Aviation Confederation](#) and has provided the ASAC member of CASA's Standards Consultative Committee (SCC) for many years.
 - The GFA's club system (every glider pilot must belong to a club) is unique in Australian aviation in providing oversight, continuing education and development of all glider pilots;
 - The central feature of GFA's success is reliance on compliance rather than enforcement;
 - Overseas glider pilots are regular visitors to Australia, providing useful tourist income. GFA provides oversight to those pilots and our weather conditions, uncluttered airspace and safe outlanding options are envied by all visitors.
- Part 149 Approved Organisation model is the best way forward:
 - New Zealand have actioned this model successfully with Gliding New Zealand (See: <http://www.gliding.co.nz/sites/gliding.co.nz/images/downloads/MOAP/Certification/GNZ%20Exposition%202013v2.pdf>)
 - The above document mirrors GFA administration with little amendment required and Gliding New Zealand have indicated that they would agree to GFA using their Exposition as a template for GFA's easy transition to a CASA Part 149. All the other Manuals required are completed or existing and in the process of being reviewed and finalised in early 2014.

- Funding and the method of fair audit of the GFA requires ongoing consultation:
 - the funding provided by CASA to GFA to carry out CASA's functions on their behalf barely covers less than half the cost of the administration required:
 - The balance of the funding is borne by the GFA membership, with that imposition and insurance costs (including coverage of the officers exercising CASA functions) being the majority of costs in the annual GFA membership fees:
 - the audit must be appropriate to an organisation that is sporting, has limited resources and depends on a high level of voluntary effort extraneous to livelihoods and subsidy from their members rather than a profit-making purely commercial aviation company.
- The punitive, authoritarian and disrespectful attitude currently demonstrated by the regulator is contrary to the aims of a vibrant, successful, diverse and thriving aviation sector.
 - Continual education, oversight and peer pressure have been the cornerstone of GFA pilot culture and development through the gliding club system, and is generally lacking in GA Private Pilots after initial issue of pilot qualifications.
 - Again, the central feature of GFA's success is reliance on compliance rather than enforcement;
 - It could be argued that this has produced desirable, acceptable and appropriate safety outcomes comparable to the sport in the other major aviation countries;
 - Self Administration should be allowed levels of administration and safety systems appropriate to sport aviation rather than airlines;
 - It could be argued that the regulator would achieve better outcomes in a more timely manner in cooperation with, rather than in an adversarial approach to, the RAAOs.
 - The Regulator also has had, in my experience, some problems in interpretation and communication of policy between levels of management, the ever changing staff and field staff;
 - A typical example is an understanding developed on an issue is suddenly subject to “changing the goalposts” not once, but several times, resulting in diverting valuable GFA voluntary resources away from core operational roles (and indeed personal enjoyment of the sport) to mostly onerous administrative or statistical requirements.
- A Ministerial Policy is urgently needed directing CASA to adopt a core mission to support and promote sporting and recreational aviation,
 - Regulations that apply in crowded airspace, mountainous terrain and extreme winter affected operations and airworthiness (such as in Europe) are not necessarily appropriate in Australian conditions,

- Any policy of aligning sport aviation and particularly gliding, with European (i.e. EASA) aviation regulations should be a matter for Australians, not Europeans, and CASA should negotiate with the relevant Recreational Aviation Administration Organisations (RAAOs) to arrive at suitable Australian regulations.
- Unless such support from the regulator is forthcoming, it is difficult to predict how the current level of participation in the sport of gliding in Australia can be maintained or improved.

Thank you for your consideration and appreciation of the importance of the Gliding Federation of Australia in the sport and recreational aviation sector.