Royal Victorian Aero Club
Moorabbin Airport, Mentone, Vic., 3194 Australia
Tel: (03) 8586 7777 www.rvac.com.ac A.C.N. 004 128 232
R.T.O. 22465 CRICOS Provider Code 002770

Aviation Safety Regulation Review Panel
Department of Infrastructure and Regional Development
CANBERRA ACT

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Submission

The Royal Victorian Aero Club [RVAC] makes the following Submission to the Aviation Safety Regulation Review Panel.

General Aviation underpins the Australian civil aviation industry in all forms. Without a viable GA component of Australian civil aviation the industry would be bereft of professional pilots for airlines, charter, air work and training. It is possible that Australia could follow the course of other countries and recruit foreign-trained pilots, however it is unlikely that this would present a practical solution to either Australia's requirements or industry demands.

General aviation provides a vital service to Australia. Without it, communities, particularly those in rural and regional Australia, would find that many services upon which they are reliant and which are properly taken as being normally available and necessary, would, over time, come under increasing pressure without a viable GA industry underpinning them. These services, which include air ambulances, fire spotting and fighting, the Royal Flying Doctor Service, charter flights, crop spraying, shark patrols and so on may only be available to a more limited extent, if at all, should the GA industry continue to decline and particularly if that decline is hastened by proposed CASA regulatory changes.

The gulf that has become increasingly apparent between CASA and the GA industry has reached the point where the future of the industry is threatened if steps are not taken, expeditiously, to arrest and reverse the hiatus in trust and confidence between the industry and the regulator.

Constant, almost continuously on-going changes to regulations over many years and an increasingly difficult compliance regime imposed on the industry have seen an exodus of experienced people such as Chief Flying Instructors and Chief Pilots. The imposition of Part 61 training requirements has presented flying schools, small and large with serious issues of compliance and cost. Small flying schools find their existence threatened by this imposition. Maintenance providers face the real prospect of not being able to continue under the proposed new regulations, and even if they can comply, of being then faced with an unviable commercial operation directly as a result of CASA regulation. Neither in the case of instruction or maintenance is there an identifiable industry problem that justifies such wholesale change that does so much to destabilise and perhaps ultimately threaten what has been a viable, and indeed necessary, Australian industry over the last century and which is otherwise positioned to be a viable industry, providing essential services to all communities, vital to remote communities, and is an important part of the Australian economy.

It is acknowledged that CASA does consult with the industry by, for example, Notices of Proposed Rule Changes. However such notices are so frequent that in practical terms it is hardly possible for anyone to study these and respond, unless one devoted practically all of one's time to doing so. The consultation process is therefore impractical and largely illusory.

The hiatus of trust and confidence between CASA and the industry has reached a point where there is to a very large extent, a disconnect between the two. This not only stifles the growth of the industry and provides a disincentive for investment, but, more concerningly, it is counter-productive to efficiency and aviation safety.

Whilst there are many apparent problems, it is also clear that the basis for a viable, well-functioning and well regulated industry that operates in a spirit of compliance, mutual cooperation and trust exists. CASA as a regulator may have lost its way with its oversight and regulation of general aviation, however it retains many employees who are well regarded by the industry and the industry itself is welcoming of good regulation and is desirous of a productive and cooperative relationship with the regulator.

It is possible that all or most of the industry issues that presently exist could have been avoided had there been a different mindset between the regulator and the regulated.

Had the mindset of CASA been to oversee the fostering and growth of aviation in a spirit of cooperation and trust as well as to regulate it, rather than to, as perhaps the aviation industry sees matters, to regulate, impose rule changes and penalise, whilst acting as both rule maker and penalty enforcer, often in a seemingly unreasonable manner, lacking cooperation, deaf to reasonable requests and complaints, sometimes seemingly conflicted, then perhaps the outcomes would have been such that the Aviation Review Panel was not required.

Had a positive mindset been adopted by CASA and as a consequence it considered its role with respect to industry outcomes and the needs of aviation operators and aviators, then most of the complaints that have been brought to the Panel's attention probably would not have arisen in the first instance. That is not to say that there will not be disagreement between CASA and the industry; there always will be debate and disagreement, but generally it ought to be possible to achieve outcomes that are tolerable to both CASA and aviation and to avoid the litany of serious complaints and the hiatus in trust and confidence that presently exists.

A further aspect that in our view bears consideration is s 3A of the CAA 1988 which states:

S 3A: Main object of this Act
The main object of this Act is to establish a regulatory framework for maintaining, enhancing and promoting the safety of civil aviation, with particular emphasis on preventing aviation accidents and incidents.

Whilst the aim of *preventing aviation accidents and incidents* is worthy, it is an obvious outcome envisaged by the main objective of s 3A: *to establish a regulatory framework for maintaining, enhancing and promoting the safety of civil aviation*. The prevention of accidents and incidents is an objective in itself that is arguably beyond practical achievement however such a requirement that compels the regulator to place *particular emphasis* on the prevention of accidents and incidents and is therefore a principal objective of the Act, distorts the balance between practical, reasonable and acceptable safety outcomes on the one hand and reasonable aviation outcomes on the other. In our view many of the issues with regulatory oversight discussed in this submission have their origins in the requirements of s 3A.

We submit therefore that

1. The CAA Act is amended to require CASA to, in a positive and practical manner, foster the continuance and development of aviation.

2. That s 3A be amended to:
   Main object of this Act
   The main object of this Act is to establish a regulatory framework for maintaining, enhancing and promoting the safety of civil aviation.

CASA Licensing
The present licensing processes are cumbersome and complicated; it might even be argued that they serve as a deterrent to those who wish to develop their interest in aviation.

The process involves a plethora of assessment criteria which is both time consuming and frustrating to the applicant and for the Chief Flying Instructors tasked with assessing applications.

An example of a highly questionable aspect of the process is the required English language assessment. A prospective candidate is required to prove that s/he can speak English and to provide documentary evidence to support this, even though s/he was born and raised in Australia - an easily demonstrable fact - or another country where English is the first language. Even if this is considered a matter requiring proof then surely a short conversation with anyone from the flying training organisation ought to be enough to put the matter promptly to rest. The response from candidates has been mixed, ranging from bemusement to bewilderment.

If an error is made in a document CASA have adopted the approach that such application forms are to be returned and re-submitted rather than the much more practical approach of consulting and correcting simple errors. This further adds to the frustration and delay in dealing with CASA and attempting to proceed to what ought to be a relatively simple process - going flying.

Student licence candidates are required to provide various forms of primary and secondary ID documentation, creating further work and time delay. What purpose this serves is unknown.

There has been a slow but continuing exodus from GA to RAA due to the bureaucratic and expensive process of gaining and maintaining pilot licences. A student permit for an RAA pilot takes ten minutes but for a GA pilot it will take several weeks. A learner's permit for a car takes a morning or an afternoon. The move to RAA has been exacerbated by CASA AVMED which will be referred to later in this submission.

The CASA Licensing process unnecessarily hinders and financially burdens persons wishing to learn to fly. This has a negative commercial effect on the general Aviation Industry.

The CASA licensing process has made it virtually impossible for an overseas pilot to visit and hire an aircraft in Australia. However the same person can hire a campervan and travel around the continent.

The tourist market for aircraft hire has been destroyed due the current licensing restrictions imposed on overseas visitor pilots. It was impossible to try and schedule assessment criteria, English assessments, security clearances etc. and rely on CASA licensing to act to provide a timely issue of a licence

It is noticed that there are progressively less qualified staff wanting to pursue a career in General Aviation due to the processes they have had to endure. It is acknowledged that CASA and Air Services staff generally have always done their best to deal with what they realise are systemic issues within their own departments and it is only through this mutual cooperation that we can hope to have resolved the issues described above but, unfortunately it is at cost to the industry and the customer.

We submit therefore that the Review Panel directs its attention to simplifying CASA administrative procedures and reducing red tape within the bounds of safety.

Class D airspace at Secondary Airports
CASA failed to adequately communicate with the industry over the issue of the introduction of Class D Airspace procedures at Capital City General Aviation Airports, resulting in considerable cost, complications, restrictions and lack of flexibility that act as a deterrent and disincentive for pilots to use these airports, all for no apparent safety gain. Further, the changed, that is, reduced, separation from cloud requirements, as compared to GAAP requirements, has had a negative affect for all

training and VFR operators at, or using, Moorabbin. Flying hours have been reduced as a direct consequence due to the prevailing weather in the cooler months, training receipts are down, but costs are to a large degree fixed. It has created an unnecessary commercial impost and a challenge to business viability. .

The unnecessary application of Class D at GA airports was in our observation a reaction to two mid air collisions, one at Bankstown and one at Moorabbin, which resulted in a fatality. The collision at Moorabbin according to the ATSB report occurred as a result of CASA's lack of oversight of ASA which failed to provide sufficient resources for the Moorabbin tower and which, it is alleged, also failed to ensure a sufficient level of controller competence. Thus Class D at these airports became a 'safety' reaction with little or no consultation, and with no assessment of costs and benefits to aviation, - not because of operational necessity or requirement.

The cost and restrictions to operators and pilots of Class D including the added complications of all runways being active and prescriptive taxiing requirements add nothing to safety and occupy the essential controllers in ground management rather than air traffic management. Further they are a disincentive for pilots who may be unfamiliar with these airports and perhaps put-off by the complexities together with an onerous penalty regime that appears to be enthusiastically enforced. The change to Class D has greatly increased the administrative burden on operators and staff which of course results in further cost pressures on a General Aviation industry already struggling with the burden of far too much red tape and the cost that that imposes.

Amendments to documents, maps and charts
The AirServices policy of constantly amending charts and documents on a short cycle adds a considerable cost burden and work load on industry. Often these amendments amount to little more than window dressing, for example, nothing more than a change of logo on an approach plate. Such change is also a safety issue; the number of changes, the number of pages to be replaced and the high frequency with which this occurs greatly increases the risk of a mistake being made.

Military airspace
The Australian armed forces unnecessarily control too much prime airspace. This is especially so on the Australian east coast and in the vicinity of Perth. If the RAAF controlled airspace were imposed on a comparative scale in countries with high density civil and military movements, e.g. the USA or Britain, those airspaces would be rendered non-functional. However in both instances civil aviation of all types and the military co-exist in high traffic volumes without problems and without unnecessary military control of airspace. It is understood that the RAAF and Airservices are working on a program called “One Sky” that should change, we are advised, airspace management and air traffic control in Australia. Whilst noting that such discussions have been on-going for decades without any real improvement we remain hopeful of a positive outcome.

Maintenance regulations and requirements.
The industry is totally confused at CASA’s intentions regarding Aircraft maintenance. For whatever reason CASA appears to prefer the EASA maintenance regulatory model rather than the FAA model despite the short comings of the EASA regime in respect of general aviation aircraft. However CASA is on record as saying that that is not CASA’s intention and the industry is at fault for not understanding that.

Much of CASA's proposed maintenance regime is impractical and unworkable for GA maintenance providers. Perhaps the changes may have a place for airline operators, but even then it is difficult to comprehend any existing deficiency with maintenance that can justify the greatly expanded levels of compliance, records processing, and cost that will ensue from these changes. CASA's maintenance regime as proposed will have the ultimate effect of driving maintenance providers out of the industry. Their protestations in this regard have fallen on deaf ears at CASA. Some operators have already been forced to change the nature of their business according to evidence heard at the Aviation Review Panel hearing at Moorabbin, 13 December, 2013. Further anecdotal evidence from the industry supports this.

It is clearly apparent that those reductions which have occurred, and which will occur to a greater extent in the future, are counter-productive to all desirable outcomes for the aviation industry. Whilst these changes will have the greatest impact on GA there will be an inevitable impact on commercial aviation including airlines and freight operators over time.

Most of the aircraft flown in Australia were made in the USA where, as is well known, both the number of aircraft and the number of flights is greatly in excess of those in Australia. The FAA's oversight is exemplary and in their application of standards, beyond reproach. The US safety record is at least as good as Australia's and many would say, better. Despite this CASA has seen fit to introduce maintenance requirements and time-life reductions to aircraft in Australia that would not apply to those same aircraft were they on the US register. The justification for this escapes our understanding, the more so considering the FAA's competence as a regulator. Such arbitrary reduction in service life, and/or a requirement for major maintenance which in many cases is beyond the value of the aircraft, appears to have been imposed with, at best, little consultation and without regard to the commercial effects on operators and the economic and social effects on communities - many of these aircraft possibly being vital assets for some remote communities. They would continue in service, unmodified or not so limited, in the US.

We submit that CASA should follow the FAA model for GA Aircraft.

Security
The Aviation Transport Security legislation, as it is applied to general aviation, is a very much over done and in general terms serves no purpose. At many airports the requirement to carry and correctly display an ASIC card appears to serve no purpose, however failure to do so attracts severe penalties. While appreciating the need for the highest standard for the Air Transport sector we suggest that one size does not fit all and that security equivalent outcomes for general aviation can be achieved in other ways for less cost, inconvenience and impediment.

The requirement for, and process of, security check requirements for the gaining of an ASIC is a costly, time-consuming impost on the industry, carried out under the all-encompassing mantle of Safety. The requirement for security at GA airports [other than capital city primary airports and airports with international flights] is disproportionate to the risk to the community, if such risk is identifiable at all, in comparison to the risks arising from other undertakings that are normal aspects of community life, but which in themselves may present a risk to the community.

Students learning to fly a GA aircraft and who fly at, or transit through, a Security Airport are required to hold an AVID or ASIC. There appears to be an inconsistency with what a Security Airport is and who can and can't fly into these airports. The process of obtaining these is flawed and an unnecessary impediment to students, particularly those from overseas, who often must conform to time-deadlines. Some aspects are farcical - e.g. students cannot provide two primary documents, for example a birth certificate and a passport, but must present one primary document plus one secondary document - for which a student card is acceptable - when applying for an ASIC.

The use of ASIC's is not uniformly applied at all airports. At some regional airports, for example Mildura and Broken Hill, an ASIC will allow the holder to pass from the airside but not to re-enter the airside via the same gate. An ASIC is arguably the highest form of [non-Defence] security clearance that an Australian will possess and as such those granted an ASIC should not face any encumbrance to their passage through any airport boundary.

Drug and alcohol testing
The requirement for this is questionable. There was never any known or apparent issue with drugs and alcohol with respect to flying operations or associated ground based services. Indeed the industry is known for the seriousness with which it takes its compliance responsibilities in this regard. Not only are individuals aware of their responsibility and comply, but strong peer over-sight ensures this. The RVAC is not aware of data supporting the case that a problem existed. Since the Drug and

Alcohol testing regime commenced there has been, to our knowledge, no known compliance issue; that is, no one has been apprehended over a limit. This testing regime should be revoked or limited to situations where there are grounds for presumption of non-compliance.

Aviation medicine.
This area of CASA oversight is a source of a great many complaints throughout the whole of Australian aviation; perhaps the most, based on anecdotal evidence. It is our view that CASA Avmed needs to be completely restructured so that it is able to commence providing a medical service that is professionally contemporaneous with that provided by leading aviation regulators elsewhere, for example in the USA and Britain.

As is well known DAMES are qualified and experienced Doctors, usually General Practitioners. We don't intend to comment on the training and qualification of GPs as that is outside our competence other than to say that a GP can be taken to be medically competent to a high degree. Such GPs are appointed by CASA as DAME's after successful completion of a course in aviation medicine. Such appointment is therefore an acceptance of competence. However the medical advice of DAME's is regularly re-interpreted by CASA and their decisions over-ridden. In our view if CASA no longer trusts or accepts the medical competence of these Doctors they should withdraw their DAME medical approval. Alternatively, CASA, having accepted their competence, should allow them to issue medical certificates for all categories. CASA Avmed's role should be that required by the Act, that of oversight only.

Therefore it is our view that AVMED should be restructured so that:

1. CASA accepts the qualifications and expertise of GPs and appoints them a DAME after they have successfully completed a course in aviation medicine and that CASA allows DAMEs to issue all medicals.

2. It should be the responsibility of the DAME to seek expert specialist opinion if needed, as would usually be the case in medical practice, not as now when such opinion is often required due to CASA second guessing the DAME, but without the benefit of CASA having made a direct assessment of the applicant.

3. Should CASA dispute a medical assessment then CASA should:
    a. Show cause to the issuing DAME as to why the assessment is queried
    b. Adhere to a [to be] defined assessment review and resolution process with the DAME
    c. Show further cause, if necessary and only if there should have been no resolution from [a] and [b], based on a medical assessment at CASA's cost, as to why the validity of an issued medical certificate should not be upheld [rather than as at present where competent assessments are set aside]
    d. Allow the pilot the benefit of the doubt whilst this process continues, with an assumption of DAME competence.
    e. Avmed to be the CASA overseer - the Regulatory issuing authority for medicals as required by the Act - but not the issuer.

Cost Recovery
CASA cost recovery is a disincentive to the industry with respect to building working relationships with the regulator. It arguably mitigates against the safety outcomes that CASA claims to aim for. In some respects cost recovery may be compared to, for example, the police charging for a callout.

The charging of travel time to the industry, at labour rates that are very high; exorbitant compared to GA industry rates, is not only unrealistic and unfair to a General Aviation industry presently struggling to survive, and in the case of many organisations, to compete internationally, but as it is applied, it unfairly discriminates against those not fortunate to live or operate within the city limits of Melbourne, Sydney , Brisbane etc. Even then the already onerous costs are far greater than necessary as CASA

chooses to locate its resources far from any airport and insists on over-servicing, by way of attendees, audits and reviews. All attendees are at a cost even if they make little or no apparent contribution. This already poor situation is worsened by CASA's practice of, on multi-day audits for AOC evaluation or changes, leaving early, before the end of normal business hours, thereby necessitating more travel to return to complete the audit, all of which incurs costs which CASA recovers: every hour, for every person including travel time.

Some further brief, illustrative, examples include:

- The issuing of an approval for a formation flyby at upwards of $160.
- CASA charge a flight test travel cost of $240 to travel from Melbourne CBD to Moorabbin and return however conveniently for the test personnel they are able, and do, return directly home. The cost of the test is in addition; it is in excess of $700.
- CASA require the reissue of the Chief Pilot's Instrument of Approval as CFI when the CFI elect goes on leave, even briefly. The effect of this is that when the CFI takes leave, then the Chief Pilot, who has oversight of all flying operations at the RVAC including the CFI and who is a highly experienced CFI in his own right, is required to be re-certified as a CFI at a cost each time in the order of $190. This is the case in any organisation large enough to be deemed by CASA to require both a CP and a CFI.
- The initial issue of all Grade 3 instructor ratings is charged for by CASA at $700-800 per test, plus travelling expenses.

Such charges and practices present a clear demonstration of the extent to which CASA has lost touch with commercial reality, the needs of the industry they claim to serve or the industry's capacity to pay. This is exacerbated as they are levied by the monopoly supplier, who is also the concurrent regulator and enforcer; it is a 'take it or leave it' situation. The charges are beyond being merely excessively costly; they move into the realm of price exorbitance and are unreasonable, unrealistic imposts on the industry. It is little wonder that Australia is now far less favoured than it was as a destination for international students seeking quality training and a well respected licence so as to pursue a career in aviation when they can achieve this result at far less cost in other countries, which we cannot help but note, take a far more progressive attitude to aviation regulation than Australia. Whilst CASA charges are a minor part of the total cost of such a licence, it is important to note that, whereas the Australian competitive position has been disadvantaged by various factors such as exchange rates, the high CASA charges are within Australia's control and arise from inefficiency.

CASA appoint suitably qualified people as Authorised Testing Officers. Such appointment of course comes at some considerable cost, considering the necessary training, licensing and approval regime and the associated CASA charges to the individual and/or their organisations to achieve such status. Having appointed ATOs, CASA nevertheless makes a practice of then assessing and issuing Grade 3 Instructor Ratings themselves. This offsets the value of the cost of attaining ATO status and it also denies the training organisation the income from the Instructor rating tests. This practice is manifestly unfair.

It is at least unreasonable, and arguably unethical, for the monopoly provider, CASA, to charge for the appointment of ATOs on one hand and then deny both the ATO and their organisation the income from testing, on the other. It ought to be that arms of Government act in a manner that is beyond reproach. Such is not the case with CASA.

It is disturbing to note that an arm of Government not only acts this way with respect to its charges, but does so whilst proposing to the industry that it claims to serve that its actions and operations are a model of public service rectitude.

CASA appears to charge whatever is required to cover costs after a retrospective performance analysis of its intra-departmental costs, apparently without regard to efficiency or performance requirements, or if these exist, that they are of inadequate standard.

CASA acting as the safety authority and charging the industry for oversight of safety related matters creates a conflict of interest in respect to such oversight. CASA's oversight ought to be conducted, as far as possible, at arm's-length from, not subject to, or directly related to, commercial considerations.

CASA, having accepted the competence of ATOs, should allow them to test for licences and ratings as provided for under their ATO privileges. CASA's role should be that required by the Act, that of oversight and the issuance of licences and ratings only, but not testing.

The RVAC submits that the Act and regulations be so amended

Airports / DOIRD and CASA oversight

The RVAC is concerned at an apparent lack of oversight by the relevant Commonwealth department, that is DOTARS and now DOIRD, concerning compliance with Commonwealth airport leases issued under the Airports [Transition] Act and Airports Act at Capital City General Aviation Airports. There are clear examples of non-compliance where the main use is no longer as an airport, as required, and more relevantly to this submission, where airport infrastructure has been reduced or removed in breach of the Act and Lease requirements. The fact that Commonwealth oversight is an on-going requirement is well established. In this respect The Australian National Audit Office Report, 4 June, 2004 [1] states that:

3. The airports privatisation program involved leasehold, rather than freehold, sales. As a result, the Commonwealth has an ongoing involvement in airport operations. The Department of Transport and Regional Services (DOTARS) is responsible for administering the Commonwealth's ongoing interests in the operation and management of Federal airports under both the statutory regulatory framework of the Airports Act 1996 (Act), and the contractual arrangements entered into as part of the sales processes.
4. The Act and its regulations provide for regulatory oversight of the operations at the privatised Federal airports. The stated objectives of the Act include: promotion of the sound development of civil aviation in Australia; establishment of a system for the regulation of airports that has due regard to the interests of airport users and the general community; and promotion of the efficient and economic development and operation of airports.

The legislated requirement for maintenance of airport infrastructure, both under the Act and the Commonwealth's lease to the operator will be known to the panel.

Moorabbin airport was constructed with a runway 22 of an operational length appropriate to the then and foreseeable future airport needs. The operational reason for this runway provision and alignment is clear from the Bureau of Meteorology records. [2]

Runway 22 has been shortened to such a reduced length that it is only operationally suitable for very small aircraft and not suitable for most aircraft that are either based at Moorabbin airport or likely to use it.

Therefore, on upwards of 50 occasions every year, a pilot landing at Moorabbin airport, an airport that has a high traffic volume including a high percentage of inexperienced pilots and the bulk of the Victorian pilot training industry, required the use of runway 22 to ensure a safe landing due to the onset of weather conditions which prevented a safe landing on any other runway.

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[1] ANAO 2003 2004_audit_report_50.pdf

[2] http://www.bom.gov.au/climate/averages/tables/cw_086077.shtml
http://www.bom.gov.au/clim_data/cdio/tables/pdf/windrose/IDCJCM0021.086077.9am.pdf
http://www.bom.gov.au/clim_data/cdio/tables/pdf/windrose/IDCJCM0021.086077.3pm.pdf

Advice from Air Services Australia [ASA] personnel is that that ASA doesn't record the number of runway 22 landings and that 'MAC advise that there are now less than 50 per year'.

The shortening of runway 22 presents a safety risk for aviators when weather conditions dictate the use of runway 22. How many times it should have been used and wasn't thereby creating a potentially dangerous situation is unknown however evidence does exist that there have been several landing accidents on runway 17 by solo student pilots, which have been attributed to excessive crosswind; these pilots were prevented operationally from using runway 22.

A further issue with respect to the shortening of runway 22 is that it does not make proper provision for the airport's future use as an airport that is the major training airport in Victoria.

The Master Plan makes provision for additional building development on the east side of Moorabbin Airport. Presently part of this area is used for helicopter pilot training. Helicopter pilot training will be forced off Moorabbin Airport if this development were allowed to proceed.

The helicopter operators have already lost a considerable area with the initial development on the eastern boundary. Due the nature of helicopter operations a far greater safety area to the side of the take off path is required for emergency manoeuvring. This already reduced area is now further threatened.

Any such development would appear to RVAC to be contrary to the Act, Division 6 s32 - Restrictions on Leases and to the Commonwealth's lease with MAC.

RVAC therefore contends that DOIRD has failed in its oversight and that CASA has also so failed in that it has not prevented the shortening of a runway essential for safety at Moorabbin and ensured the existence of all of the suitable and safe helicopter training area. This is not simply a matter for Moorabbin aviators. Removal of cross runways has occurred elsewhere, for example Bankstown. If helicopter training has to take place in an area other than an airport a number of operational complications are likely to arise as well as an expected community reaction.

Conclusion

RVAC thanks the Review Panel for the opportunity to assist in its deliberations. We are happy to expand on any point that might have raised a question or to attend a face to face meeting if appropriate.