

26 November 2020

The Future of Australia's Aviation Sector

Thank you for the opportunity to provide input to the consultation on *the Future of Australia's Aviation Sector*.

The Royal Flying Doctor Service (RFDS) is a vital part of remote and rural communities, providing critical health services to areas of great need, particularly in places where low population numbers make it unviable for permanent services to exist. This includes hospitals, emergency departments, pharmacies, General Practitioners and other primary healthcare services. For over 90 years, the RFDS has filled this gap, bringing health services to rural and remote populations, providing emergency aeromedical retrievals; inter hospital transfers; GP, nursing, mental health and dental health clinics; allied health services as well as health promotion activities, supported by a 24/7 telehealth service. With 79 aircraft across the country at 23 aerobases, last year the RFDS transported 37,666 patients by air; provided 20,134 primary healthcare clinics at an average of 55 per day; and flew 27,250,793 km – equivalent to 34 return trips to the moon.

In a collaborative partnership with the Australian Government, the RFDS has also been an important part of the response to the COVID-19 pandemic, not least through aeromedical retrievals in rural and remote Australia. Between 2 February and 23 October 2020 the RFDS has conducted 2,067 patient episodes of care by air and road for confirmed or suspected COVID-19.

The RFDS is contributing to this consultation as a service that provides health care throughout Australia, relying on not only critical health infrastructure but also aviation infrastructure, expertise and capacity that is vital to enabling the delivery of many RFDS services in rural and remote parts of our country. As such, the RFDS is responding to both the *Future of Australia's Aviation Sector* and the *Regional Aviation Policy* consultation processes.

Challenges resulting from the COVID-19 pandemic

As is well identified in the consultation paper, the COVID-19 pandemic has created unprecedented challenges, with aviation one of the hardest hit sectors. In particular, there are three key aspects of the impacts on aviation that the RFDS would like to note as pertinent to ongoing planning and industry support:

1. A reduction in aviation activity including, and in many cases particularly, to remote and regional locations, has seen reduced cash flow for aerodrome operators. While aircraft movement may remain decreased for some time, remote airstrips and related infrastructure remains critical for the operations of organisations like the RFDS. It must be ensured that infrastructure is maintained and improvements move ahead to ensure locations are accessible, noting that in some rural and remote locations the condition of aviation infrastructure was inadequate prior to the COVID-19 pandemic.
2. There is some significant uncertainty in employment in various areas of the aviation sector, including maintenance and engineering. It is pertinent to ensure that a skills gap does not emerge as a result of reduced demand in the commercial airline sector, that would have the potential to impact other areas of the industry. Moreover, there may be the opportunity to divert parts of the current workforce (e.g.

from commercial airlines) to other operators, noting that there may be the need to address salary shortfalls.

3. The importance of regional areas having access to air connectivity cannot be overlooked, not least for the purposes of moving workers from a variety of sectors, as well as transport, freight and to ensure the reliability of supply chains that are at risk of taking longer to recover than other parts of the economy. In these cases a national approach is required to ensure minimum access to essential aviation services for rural Australia.

The RFDS is acutely aware that necessary precautions and restrictions to ensure the management of COVID-19 is ongoing and will be for some time, while there is also a need to plan for a recovery. Government and regulatory bodies must be appropriately resourced for these tasks, in order to ensure agility and responsiveness that provides support to the relevant sectors, and this includes in aviation.

Opportunities resulting from the COVID-19 pandemic

1. The RFDS is aware that during the acute period of the COVID-19 pandemic and associated restrictions, alternate arrangements were made to some regulatory processes in the aviation sector. In some cases this amounted to streamlining, decentralising and cost savings. There is an opportunity to review, learn from and continue such arrangements going forward.
2. With commercial regional airline schedules likely to be limited or some time yet, there is an opportunity to look to other alternatives to meet the air transport needs of workers seeking to access to regional areas. This could mean looking to utilise and build on infrastructure and systems to support an expansion in the air transport component of services, such as the RFDS, to assist movement of, for example, those in the health care and community sector.
3. The COVID-19 pandemic has had a significant impact on the Australian economy, nowhere more so than in rural and remote parts of our country. Investment in infrastructure, including in critical aviation projects such as the maintenance and enhancement of airstrips, hangars, small airports and related facilities, will be a key element of efforts to stimulate the Australian economy and promote recovery.

Regulation

The RFDS supports the view that reducing the regulatory burden wherever possible should be a key focus and is particularly pertinent in the current climate. Additionally, any new regulation should provide a value add and the impact on operations across the sector carefully analysed. It is noted that current processes, such as CASA Industry Working Groups, already provide effective means to consult with the sector on regulatory matters.

Kind regards,

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Federation Patron: His Excellency General the Honourable David Hurley AC DSC (Retd),
Governor-General of the Commonwealth of Australia