

ASIC

Mr Martin Ongley,
President,
SAAA

Dear Martin,

Aviation Security Identification Card (ASIC)

I wish to comment on the uselessness of these cards.

Since 2004 when the cards were introduced I have bought one every two years. During that time my card has never been checked by any official to confirm that the photograph on the card is actually a photograph of me. In those nine years the only occasion I was asked for it was at Parafield when I had to enter through the terminal as my bags were too big to go through the side gate and the official did not check my photo identity, he simply saw a red card around my neck and ushered me through.

My card shows Orange NSW as my "home" airport but the card is required whenever I go to a public aerodrome. There is no security or other official to check the card at any regional airport in Australia unless one attends at the time of an RPT movement and wants to enter via the terminal. At Orange access to the RPT is normally through the terminal and passengers do not require an ASIC, they require a boarding pass. However, at Orange it is not uncommon to see kangaroos (without an ASIC) inside the perimeter fence so access to airside is easy for anyone who chooses to jump or climb through the fence. Even at Bankstown anyone can move freely from roadside to airside in numerous places through hangars, flying schools and other buildings without being checked. I have recently visited Cowra, Mildura, Gawler (SA), Bourke, Thargominda, Lightning Ridge, Boulia, Burketown, Cairns, Orange, Bathurst, Mudgee, Moruya, Wollongong, Julia Creek, Merimbula, (yes Merimbula!) and several others and there was no check made on my card. In other words, the card has no purpose. It was conceived at a time when decisions on security were made in haste and now causes only another layer of bureaucratic waste.

In the areas where security is necessary such as within the airlines, the airliners and the airports, management have their own security systems in place. Hanging an ASIC around my neck does nothing to reduce the chance of an airliner being hijacked or bombed. Other systems are required for that.

In truth, the Australian government, like all the others [\[1\]](#),seeks to control everything. Unfortunately, the ASIC controls nothing, it only adds to the cost of flying. It is an expensive failure without a purpose and should be discontinued. There is just a chance that this government might do so if it is interested in reducing waste.

Kind regards,

Jock Anderson

1. **Totalitarianism** is a term used to describe a [political system](#) in which the [state](#) holds total [authority](#) over society and seeks to control all aspects of public and private life.
[Robert Conquest](#); *Reflections on a Ravaged Century* (2000) [ISBN 0-393-04818-7](#),p 74.
PS:- Of course, the folks at Merimbula who are paid to produce these useless things will throw up their hands in horror, but let us be honest; it will be a hollow horror.

Hello all,

Just a few thoughts on some of the issues and the ASIC is an unnecessary after thought bought in by a government at the time to be seen to be doing something. As a licensed pilot that should be sufficient to identify.

Jandakot Airport I feel is not being upgraded to the standards it should be at due to Jandakot Holdings not giving any priorities to the airport but barging ahead with industrial projects surrounding the airport to the detriment of the airport.

Certain helicopter movements at the northern part of Jandakot out of site of the control tower quite often pose significant safety issues as witnessed by many hangar owners in the vicinity with their training manoeuvres taking place on taxi ways in close proximity to aircraft hangars. Taxi ways are for the expedient taxiing of aircraft away from hangars to the areas suited for training purposes. This is often not the case. There has been hangar damage caused by helicopters due to unnecessary lengthy hovering manoeuvres close to hangars.

Glen Fuller
SAAA Chapter 24

From: Peter Ashley [mailto:prashley@ozemail.com.au]
Sent: Wednesday, 18 December 2013 12:49 PM
To: enquiries@saaa.com
Subject: Re: Ministerial Aviation Safety Regulation Review

SAAA,refers ASIC experience at RPT airfields.

[a] at one western Queensland airfield I rang appropriate number to get airfield entry code.I advised that I had aircraft on field and required code for entry to depart.I was given code with no questions asked.

[b] at western NSW airfield I found general aviation personnel gate always open during daylight hours

[c] I have at times at airfields when departing been asked only for ASIC number over phone.I gave it but I believe I could have given any number and got access.

I mostly experience a looseness in operation of ASIC at airfields except at Horn Island where the system was rigourously adhered to.

Trust this might assist.

Regards Peter Ashley

ASIC Card

Having undertaken a police check as part of a PPL licence renewal , I continue to ponder the necessity for and wonder just what the ASIC card was supposed to achieve when applied to private and recreational aviation. Certainly has nothing to do with aviation safety and if/when I decide the time is right to change the world , I'm fairly certain the lack of an ASIC card will not impede my plans. Rampant, unnecessary , unintelligent ,expensive and ineffective bureaucracy. If I lived in the USA, I wouldn't need one , what does that tell you.

Harry Weaver SAAA 4014

G'day Ian, Shirley, ... Folks !

I can only speak freely about my own experiences re the ASIC

(but I will add that - the gist I get from EVERY other pilot I've talked to about it is : "what a #!%\$?!# waste of time and money")

Personally – as a Microlight, Ultralight and GA pilot - I have found it to be an ill conceived, poorly implemented, badly administrated, unnecessarily expensive knee jerk reaction to a political point scoring effort

I'd like to report that I have never been "asked to show it" but in all honesty – there was ONE occasion – at a small regional airport (you know the kind – the ones where they can't keep the kangaroos off the runway – but they have 10 metres of fencing either side of "the gate" – which is meant to "keep out the baddies" !?!?!?!) - where I was seeking to refuel my plane

The local flying instructor at this two bob outfit decided that I must have looked like a terrorist and "*demanded*" to see my ASIC – (which I had left IN the plane / was not wearing at the time)

It wasn't so much that he actually wanted to see it – or – his stunningly inept ability to profile someone who might just NOT be "a terrorist hell bent on blowing up the local old people's home" but the WAY he asked (*demanded*) to see it

He came across as the typical psychological profile of :
"the quickest way to create an asshole / Gestapo officer is to put a moron in a uniform & tell him he has power over others"

I went & got the card – shoved it right in his face (and I mean IN his face) – and said "I like my alcohol cold, my bacon hot and my women naked !" and then said "do I LOOK like a (insert a typical, well worn, ozzy expletive here) arab ?!?"

Some time / possibly years later, I found out that this same cretin was

“released from his contract” as the local flying instructor at that airfield
..... It was intimated that he had a tendency to rub people up the wrong
way

..... YA THINK ?!?!?

Seriously : I CAN see it’s usefulness where it comes to AIRLINE /
Commercial pilots and airside / associated
workers at LARGE airports but for us “little guys” – it
is an overpriced waste of time

If the airlines WANT it – they can PAY for it !

(like that other hair brained idea – thought up by some pen pushing,
wannabe, out of touch, sycophant) – who came up with the “If it flies – it
MUST have an ADSB in it”)

Yes – I can see it now an army of people – all over Australia -
charging up “the battery” – and then finding “somewhere” to put it in their
UNpowered plane to power up an ADSB unit yeah
right !

What ever happened to “common sense” ?!?!?

(it appears to me – that “common sense” only exists in the realm of us
“commoners”)

Sunday, 5 January 2014

Aviation Safety Regulation Review Submission

To Whom It May Concern:

I would like register my concern at the method of implementing the ASIC card which has proven to be an expensive and pointless imposition in the aviation industry.

To reduce administration costs and inconvenience I would suggest that the cards implementation be reworked to be included in the pilot's license documents where applicable, and that the renewal period be extended to mirror the currency of the source secure documentation, such as the Passport, drivers license etc. that support an ASIC application.

The two yearly expiry date of the cards is unnecessary and regarded by most as just a means of making clerical work.

Thank you for consideration my submission.

Michael Fischer
PO Box 784
Jindabyne NSW 2627

**Dr James M Auld, BDS., MSc., Dip.Soc.Sc., Dip.Clin.Hyp., FICD, FASH.
Senior Clinical Associate, University of Sydney
DENTAL SURGEON.**

**13 Allan Day Drive
Wellington Point
5978
Qld. 4160**

**Ph. & Fax +61 7 3822
jamesauld@bigpond.com**

14 December 2013

The President
Sports Aircraft Association of Australia.

Dear Sir,

I would like to make a submission, through you, to the current Australian Government Ministerial Aviation Safety Regulation Review.

I am concerned about the utility of the Aviation Security Identification Card (ASIC).

These cards were introduced as a matter of urgency and without consultation with industry after terrorist attacks in various places around the world. They were made a universal requirement for anyone needing access to a restricted area on an airfield, regardless of their business.

As a private pilot I object to their use on several grounds.

1. I have already had my identity checked, and I carry a licence to prove who I am.
2. I can fly into any airport in Australia without any need for an ASIC. It is only when on the ground that I may be asked to produce it, and it may be required to regain access to the aircraft after leaving the airfield. I have never been denied access to my aircraft even when not carrying an ASIC at a controlled airport. I have been required to identify my aircraft and demonstrate that I have the authority to use it, i.e. licence and keys.
3. When taxiing at a controlled airport, light aircraft access to the RPT apron is not permitted, nor is it permitted to enter this area on foot. Egress and access on the field is usually from a designated light aircraft area. Why is an ASIC needed?
4. My aircraft is now based at Archerfield which is not a security controlled airfield; an ASIC is not required anywhere if you have legitimate business on the field. Access is only by key, swipe card, or pad

code which is only available to registered users.

5. Why should the card be required to be renewed every 23 months? The only reason I can see is so that the Federal Police can check whether I have been involved in subversive activities, but this could very easily be done by matching data on record with any suspicious activity reports about me. In short, the requirement seems to be out of date with the available technology.

This year I decided not to renew my ASIC. I can see no advantage for me in the activities I undertake, and it's continual renewal is both a time and cost burden which seems quite unnecessary for a private pilot.

There are individuals who do require identification due to the 'sensitive' nature of their jobs, such as refuellers, ground staff and, baggage handlers, but they are in a different category and work in different areas than private pilots.

Please review and simplify the identification requirements for private pilots when on the ground at secure airfields. A 'permanent' issue pilot's photo ID card would seem appropriate. We each must undertake a flight review every two years or less with a rated instructor, and this would seem to be an appropriate and a much less onerous method of confirming the details on such a card.

Yours faithfully,

James M Auld.

ASIC cards

The renewal costs of these cards is far too expensive. All that is required is a simple Police check to make sure that no criminal convictions have occurred over the period of the card since the original checks. \$20 or \$30 would be a reasonable renewal cost.

This tax (for that is what it is) has the effect of deterring pilots from renewing their cards and hence avoiding the use of security airports. This is a bad thing from a flight planning perspective and has implications for safety, forcing pilots to choose the long way around to their destination, and thus increasing risk.

Increasing fuel, licensing, and other costs are having serious consequences in GA and some serious relief is needed.

Another unfair cost foisted upon myself is the requirement for an annual medical due to a benign medical condition. This means I have to pay an extra \$375 each year. My specialist gives me standard letter each year to say I am OK. He would be happy to inform CASA if this were not the case, as would I, but no, bureaucrats must have their way!

John Mathieson ARN 506042

From: Chris Sperou [mailto:chrissperou@avgen.com.au]
Sent: Friday, 13 December 2013 11:14 AM
To: enquiries@saaa.com
Subject: FW: Ministerial Aviation Safety Regulation Review

In regards to the ASIC card I have no objections to it be issued to non-aviators who are employed in the aviation industry. However, I cannot see the sense in a person who is an active Pilot having the need of an ASIC card. Surely a person who has qualified as a pilot could have a background check before being issued with a licence. I believe that a pilot would only need to display or produce a valid licence, airside, when asked or challenged. I further believe the ASIC card for pilot's with a current licence is merely a money grab and an insult.
Chris Sperou

Dear SAAA,

I would like to question the necessity of having an ASIC Security Card, and suggest that it be abandoned by CASA except at International Airports, OR ELSE be a once-only ID that lasts a life-time.

Why ?

- 1) It has eroded confidence in the regulator CASA in implementing a security scheme that is totally flawed, and an unnecessary burden on all pilots.
- 2) It may have contributed to some people not flying, and therefore the industry suffering, because they do not have a current card.
- 3) If it is retained, the ASIC Card should be a ONCE ONLY purchase – lasting a life-time.
- 4) An ASIC Card does not stop a terrorist from renting a plane from a private airstrip and flying it into a building.
- 5) As a licenced pilot, CASA has all of my details, which would be there when a person hires a plane. (ARN number)
- 6) If a pilot needs to have an ASIC Card, why should it not be imposed on all passengers too (they could hijack a light plane and force it into a building)
- 7) Has there been any serious review of the effectiveness of the ASIC Card in Australia – and a cost/benefit analysis.
- 8) A professionally conducted Risk assessment would quickly demonstrate that the ASIC Card is not necessary, except at International Airports.
- 9) I have never been asked to produce an ASIC Card at Bankstown or an AVID at any airport since it was introduced.
- 10) The cost is significant for me – over \$200 every two years... this is expenditure for no benefit.
- 11) Has there been any instance of an ASIC Card preventing a terrorist attack ??
- 12) Has there been any thought to whether a terrorist needs an ASIC Card to execute a terrorist act. Would not they just walk into a flying school, grab the keys, (they have the key to the throttle lock too) - and fly a plane out without permission?
- 13)

Phil Lamb
0403 313 135

I would like to add my 2c worth to discussion on ASIC's

Basically they are costing pilots a lot of money and do nothing but make someone down the south coast rich.

Wollongong airport only has three sides to the fence and I've regularly seen people jumping the low farm fence on the 4th side.

At Mildura they have a scary blue line painted on the tarmac which must make any potential terrorists quake in their boots and prevent them from approaching the commercial jets.

Basically the ASICS are about as useless as the aviation security signature required on Australia Post items. They give the general public a warm fuzzy feeling of security but do jack all.

All I see is everyone trying to add as much cost to flying as possible and the long term outcome, for anyone with no foresight, is only going to be disastrous for recreational flying.

Submitted with all the sarcasm due the subject.

Wayne Glasser
Doby Engineering
Sydney - AUSTRALIA
Ph. (+61)-2-9668-8481
WWW.MWIGNITIONS.COM

In relation to the up coming review into aviation recently announced by Warren Truss I would like to make a submission regarding the ASIC card.

The ASIC card was the result of a knee jerk reaction to 9/11 the legislation was rushed and poorly planned and executed and we are still having to suffer the consequences of this overbearing and expensive legislation.

One must ask what is the purpose of the ASIC card and why do we need to go through an arduous expensive process every two years. It would appear that just because I am a recreational, sport or private pilot I am a security risk?? What damage can I do with a light aircraft that I can't do with a car or small truck?

To appease the perceived security threat that private or recreational pilots supposedly pose a far more reasonable approach would be to have a photo licence issued with a chip containing information required and a code embedded to access security controlled airports. This photo licence should be renewed every 10 years like a passport. This I believe would be a far more reasonable and realistic alternative to the present system.

Keep up the good work,

Regards,

David Briffa 0431898315.

My concern is the ASIC.

There is no demonstrable safety enhancement for other than airport baggage handling and passenger control.

I doubt that there was any thought given to how the card would work and how safety would be enhanced, but just a knee jerk reaction to the 9/11 attack in the USA with no thought given to checking its effectiveness.

There have not been any terrorist airport attacks in the USA and they do not have any similar legislation to the ASIC.

Our authorities are not monitoring ASIC holders. This is proved by the requirement to advise them if an ASIC holder gets a criminal conviction.

The bi-annual renewal is a farce, that we should have to supply all the information again and get it all signed off by a JP.

Local airports all seem to have a different way of monitoring ASIC holders and their requirements can be working against safety by making access to our planes for maintenance more difficult.

To make ASIC work they need to actively monitor all card holders, make the renewal process sensible and maybe only have to be re-photographed every 5 years.

As far as the photographs go, I could look completely different from my photo, just by shaving and trimming my eyebrows and I defy anyone to recognise me. So that kills the cards use anyway.

The only good thing for the government with the card is that they may be perceived to be doing something about terrorism and also it brings in some money for them.

As I see it most overseas terrorists use car or truck bombs and it would be more sense to have some means of controlling who can move a car or truck. Possibly having a security check on all those who have drivers licences. The government must have considered the car bomb possibility and to not do something about it shows a lack of will to solve the problem.

Ian Borg

7235

The ASIC is my subject.

This was brought in as a knee jerk reaction to the attack on the twin towers. I cannot believe that there was any thought given to its effectiveness, nor to how it would work.

As a counterterrorism tool it is useless as no terrorist will be slowed down by it.

The USA did not think fit to bring in any similar system for it's own use. US pilots still have free access to airports in the USA.

The 2 yearly renewal is ridiculous, our features don't change that rapidly, but in my case I could shave and trim my eyebrows and would not resemble my ASIC photo.

The beaurocracy is overworked issuing cards and replacements at high manpower costs, for no obvious reason.

The requirement for a complete renewal of all the paperwarfare is ridiculous and only ensures that the costs are maintained at a high level.

Safety is not enhanced, in fact it is lessened for several reasons, There are less people around airports to see suspicious behaviour. The difficulty of access to airports makes it difficult to maintain, refuel and generally look after a plane.

If the ASIC is to be of any use it must be the starting point of a data base by the police or counterterrorist organisations to keep tabs on people. This obviously does not happen as a requirement is to advise them if you get a conviction. I may do that, but I doubt that a terrorist would.

If the police are monitoring the cards it would be imkpossible for a card holder to retain his card after it's expiry and keep using it. I am told that people have done this.

The only positive about the card is that the government makes money, because we have to have it to fly, and maybe they will think that the electorate sees them as being pro-active.

I would like to know what prior planning was done before the legislation was brought in and also what demonstrable safety benefit has been produced.

I know the card will not be dropped, it is too good for government, but as most terrorism acts in the world seem to use car or truck bombs, I wonder what the government is going to do to cover it's ass when that sort of terorism reaches our shores. they cannot say that they did not know about it. maybe they should bring in a similar card for anyone who drives a vehicle on the roads.

Ian Borg

7235

To Whom It Concerns,

My Name is Robert Bellert SAAA No-06551 ,I had reason to post a letter to the editors of AOPA and RAA I also put a note on the forum at SAAA on the Not Our Bread and Butter Issues Re ASIC cards
In July this year myself and two friends with our wives made a trip to the gulf on a fishing trip and on the way we overnighed at Cloncurry (Qld) in our RV's the next morning we arrived at the airport ,To gain access to our planes we rang the number on the gate to get a code and where told to come around into the very small terminal on entry to the terminal we were confronted with 5 security officers ,On approaching them I showed my ASIC card and asked the officer was this all he needed and his reply was that it was of no value here and to get to our planes we would have to pass our luggage through the X-ray machine and we had to pass through the metal detector also then we would have to be checked for any residue on us and in our luggage, We told the officer we were on a fishing trip and there were long knives gaffs and hooks in our luggage and we had pocket knives on our belts his reply was because you are going to private planes it didn't matter (they would not confiscate our knives etc) .(So what was the point of this)

Then a week later we landed there again for fuel and a rest stop to find the terminal looked and no access to any toilets we and our wives were forced to go behind the hangars for our comfort stop.

When we arrived home I had a meeting with my local federal member Ian Macfarlane to tell him how stupid and frustrating these ASIC cards are his response was because you are a pilot you are a perceived terrorist threat due to Sept 11Th and that the card was not going to go away,I suggested to him that if I wanted to do some damage I would fill my truck with fertilizer and use that,Why then don't drivers have to have DISC(driver identity security card)and his answer was that would be to hard, However he did ask me to gather any information from pilots that have had problems like this and bring them to him and he would take them to Warren Truss to see what could be done.

I have about 8 documented email with problem of which cost one person \$8000 in court to have it thrown out, I also have 1 email from a pilot in the USA and 1 from a pilot in Canada and they do not have any security cards or problems accessing there plane over there. I have also had phone calls from several pilots who carry bolt cutters with them and just cut the fence when no one will come and unlock the gates etc also some pilots just make a fake one and use that so it shows how silly this thing is.

My problem with the ASIC card is I pay \$180 (RAA) every 2 years and I am checked by who ever and then I still can not access my own plane or toilets ,As a pilot I have spent a lot of money getting my license and a lot more on purchasing and maintaining my aircraft so why would I or any other pilot want to do some thing that has never been done in this country (fly my little plane into a building) have to put up with this fisciao when in the USA our counterparts don't.

If we have to have this so called security it should be on our license and have a chip that allows us entry to our planes and the rest rooms and should last at least as long as our passports do.

Cheers Rob

To whom it may concern.

I have held a private pilot licence since 2003. I went through security checks at that time to gain my licence.

I have had an ASIC for about eight years (or since it was first introduced).

Not once have I been asked to produce it, or show it to any one; yet I am required to carry this useless adornment around my neck when I fly.

It does nothing to increase security at any of the airports I have ever flown into across Australia.

It increases my costs and is an increased cost to the community.

It just causes another layer of useless bureaucracy.

I have no faith in it whatsoever; it does nothing to increase my feeling of security at an airport; either as a passenger on the larger carriers or as a private pilot.

The 'experiment' has been tried. It has patently been shown to be of no benefit to any one. Get rid of it.

I respectfully request that the requirement for this useless system be terminated - at least for PPL pilots.

Robert E. Main.
ARN 589084=

When the ASIC/AVID were first mooted (generally in response to the New York disaster I always believed) I was in my 60s.

Having flown since 1961, a fifth generation Australian etc etc I was aghast if not affronted at the thought of being bundled together with those few individuals considered security risks and being required to apply for security clearance to fly.

The consequence was that I didn't continue to fly for some time - if those were the new conditions.

Since then I have flown but outside security areas but now having built an airplane which I am about to begin flying (I hope) I can see that without the ASIC my scope will be limited. Thus against the same old gut feelings I have recently applied for the ASIC with those same feelings as before but coupled with the thought that it is perhaps now more a revenue raising process than something of value against terrorism.

That regular renewals of ASIC are still required seems quite an unnecessary expense as I believe it not unreasonable to expect that once issued to an individual it remains valid like one's pilot licence.

Thank you,
John Allen,
2 McColl Lane, Acheron, Vic., 3714
P: 03 5772 2000 M: 0407 825 241

SAAA,

the fact that the ASIC requires renewing every 2 years is a large and unnecessary cost. Each renewal exactly the same information is submitted . Surely a currency of 5 years at least is appropriate , if these things are needed at all !!!!

I have been in the absurd situation of being denied entry to a terminal building from airside, due to airport staff asserting that the terminal building, unsecured and accessible to everyone, was actually the secure area. No amount of arguing could convince them that the tarmac area was the secure area, not inside the terminal building. This was at a modest size regional airport, not a capital city or major centre.

Regards Terry Cheese

Hi Shirley,

Thanks for the invitation. Whilst there are a number of issues on offer, I think that the one that provides no benefits, only costs, is the ASIC requirement. I, like many of my fellow pilots, do not hold a current version and have no intention of applying for another. It is an ill-thought out impost on the most disciplined, law-abiding section of the community and should be rescinded, or at least if the Govt. is convinced somehow that it offers security, then it should be free, and part of the licence.

The other PITA item is the use of ICAO-speak with the aviation weather. People have been clamouring for ages for a plain language version, particularly with the decreasing frequency of flying activities for recreational pilots.

Best Rgds

Martin Hone

My thoughts on the ASIC system are upermost in my list of what I consider unsatisfactory and in the main, un-necessary, and in probably most cases, unworkable regulation. If it can be explained to me, why it is necessary to go through identifying myself every 2 years, I might consider renewing my ASIC next time around. If my pilots licence is not enough to allow me to exit and enter an airfield with my aircraft on it, there is something very wrong with the whole licencing system. It needs to be corrected, and soon. I don't expect to receive a n explanation, let alone a satisfactory one, so at this stage, I am seriously considering withdrawing from this idiotic system. Regards, Cliff Killeen

Dear Shirley,

I am not a member of SAAA but am a member of AOPA and a pilot owning a C172. I have a friend who is a member and he suggested I give my thoughts on the ASIC card issue.

To put you in the picture, I live west of the range, which is where most of my flying is done, I have my own strip on my property and fly mostly to other private strips of friends. From time to time we go on trips across the country.

In spite of the fact that I have an ASIC card it seems to be getting harder and harder to gain access to the airside, where my aircraft is and the facilities of our regional airports when I want to, which I might add charge me a landing and some a parking fee.

Now, one has to question the point in having gone through the process of a Police and ASIO check as well as paying a fee every two years if the object of the exercise cannot be achieved.

I strongly suggest that there be some sort of mechanism put in place for the holders of ASIC cards to be given the freedom to go about their lawful business at airports they wish to have access to when they want and need to.

I also consider it to be an unnecessary impost for this card to have to be revalidated every two years, a five year period could be more acceptable, or more favourably have it linked to one's pilots licence, when that is relinquished so is the ASIC card.

I put my case and wonder if this card really is a deterrent to unauthorised personnel any way.

I hope this is not too late to add to your submission.

Yours faithfully,

Andrew Balmain.

To whom it may concern.

ASIC:

The introduction of the ASIC card following the 9/11 event was clearly not thought through in any detail but merely a knee jerk reaction by government. The question which needs to be asked is what was hoped to be achieved by introducing the ASIC and making it mandatory at all RPT airfields? I attach a few possible answers as follows:

- Would it prevent anyone from filling their aircraft with explosives and fly to a major airport or military establishment? NO.
- Does it do anything to protect the hundreds of RPT country airfields throughout Australia? NO. I have flown extensively throughout country Qld and NSW and every time I land at an airfield such as Charleville or Birdsville as see the ridiculous electronic gates I shake my head in wonder. The codes for these gates are readily available and in some cases the gates are permanently left unlocked or the code is on clear display.
- Does it help manage major airport staff movements? YES.
- Is it most useful at major airports such as Brisbane, Melbourne etc? YES.
- Does it really need to be updated every two years? NO. We have drivers licences and shooters licences that are valid for five years. Why is the ASIC so precious? Again an overreaction.
- What is the difference in requirement between the AVID and ASIC? Much as I read the legislation the definitions of both overlap and the explanations are confusing as to which is required for what purpose. So even the legislators are confused.

So all persons who are associated with aviation and who do not work at major airports are disadvantaged by this ridiculous legislation. Not only that but the cost involved in maintaining this plastic nonsense card is significant and is a significant impost on the Australian tax payers. I'm sure a more appropriate system could be teased out if our friends in the bureaucracy took the time to consult interested/impacted parties before introducing this ridiculous (for most country aviators) solution.

CHARTS:

Another money capturing adventure. Why is it critical to aviation of change ERSA every three months? Why do VNC charts have to be updated every five/six months? And so on it goes. In these days surely most significant changes could be incorporated in a yearly update at worst or even every two years if ASIC has to be every two years. What changes in the three months between ERSA's that is critical to aviation safety? Absolutely nothing that is critical (there may be exceptions but these could be promulgated by e media).

I think it's about time the legislators took a hard look at how things are done. Currently its jobs for the boys and covering our bums without any imaginative thinking. It's time for a paradigm shift in the legislators.

Cheers, Mike.

Mr Robert Lawrence
Redman
rlredman@bigpond.com
Sports Aircraft Association of Australia
Member # 06384
NSW
Home: 02 49470768

Background:

RAAF 37 years, Vietnam tour 1970/71 , USN Test Pilot School 1974, Flying Instruction 1977-79, and 2002-04. Retirement: built RV-7 aircraft planned for recreational VFR flight only, voluntary work for Veterans, SAAA, community.

Comments

Pilot Training – regulation/process good. Cost – expensive. Job prospects – difficult and conditions declining, experience being exported. Focus shifting to ultra lights etc to reduce flight costs. Certified aircraft being replaced by recreational aircraft due to cheaper cost of purchase and operation.

Construction, Maintenance & Repair. Regulation, process and policing – good. Cost – expensive. Job prospects – difficult and conditions declining, experience being exported. Focus is shifting to recreational aviation due cheaper cost of purchase/construction, maintenance and repair. While existing regulations generally are appropriate for operation of certified aircraft for transport of public and IFR operations, the regulations are too complicated for an owner operating a single recreational aircraft. Simplify regulations for private recreational operations to minimise cost so as to optimise training the next generation of aviation people, and maximise fun.

Security – ASIC Card. Did the ASIC duplicate existing airport/airline security when it was introduced ? If so, probably an expensive (knee-jerk ?) way of fixing lapses in the previous system. Opinion – imposition of the current ASIC system (renewal every two years) is an expensive (time/\$) and probably futile way to try to prevent a terrorist incident which planned to use GA/recreational aviation assets. There are plenty of airfields in Australia from which you can operate an aircraft without the need of an ASIC card; but many still need the card to refuel at important destinations and enroute stops. We would be better off financially (& morale wise) by removing the need for private operator ASIC cards and importing lots of posters from the UK exhorting all Australians to STAY CALM and CARRY ON !

SAAA NC,

I have an aircraft in the private category in which I maintain my PPL , the local airport has RPT aircraft operating at different time during the day so an ASIC is needed.

I am proposing the ASIC should have a life similar to an Australian passport which is ten years, there is no need to reprint this card for that period.

If there is a need to review the individuals proprietary at a five year period you could set up a data base similar to a Australian drivers licence, security police would be able to verify the ASIC is valid.

It is my thoughts that this type of system will have to be put in place in the future in any case to stop fraud.

I hope you will give this suggestion the consideration it is needed for future security.

Regards
Noel Stoney

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Regulatory Reform

1. The Regulatory Reform Program has gone on for far too long with millions of dollars spent/wasted, and no end in sight, it is a disgrace. Every single “final deadline” published by CASA for it all to be finished has overshot the mark by years.

2. Regulations are clearly designed/written for complex dissection/discussion in a court, not for operational use by pilots and aircraft operators.

3. CAAP’s contain the following statement (my bolding)

*A CAAP is not intended to clarify the intent of a CAR, **which must be clear from a reading of the regulation itself**, nor may the CAAP contain mandatory requirements not contained in legislation.*

Civil Aviation Safety Regulations (CASR) 1998 and Civil Aviation Regulations (CAR) 1988 are often extremely difficult to read and are subject to differing “interpretation” by different people. Much use of cross-referencing of other regulations is done, adding to the confusion. One must go to the cross references to work out what the original regulation was talking about.

4. Looking at our current regulatory structure we have at least five basic levels of regulation:

CASRs, CARs, CAO’s, Exemptions to **any** of those that don’t suit us, and Approvals (by whatever name) for anything else not explicitly covered by any of the above.

5. “Safety” is the common buzz word for all of CASA’s publicity. What other international agency uses “Safety” to the same degree to hide behind everything they do? Aircraft Registration Marks for example (CASR Part 45) have nothing to do with Safety.

6. The US FAA system of Federal Aviation Regulations or the New Zealand system of Civil Aviation Regulations are far easier for aircraft operators to understand.

7. CASA requires “approval” of Manuals and all sorts of things, but in many cases does not actually issue any such approval. The closest result is usually an email saying merely that the documents submitted are accepted. No certificate of approval (by whatever name) is ever forthcoming.

8. CASA Service Charter:

Taken directly from the CASA website

When reviewing any regulation for which we are responsible, we will

- undertake the process in a transparent and consultative manner with those most likely to be affected;
- consult widely to ensure that the legislation is less complex, more relevant and harmonised with international standards wherever possible;
- seek to achieve legislation that imposes the least impediment to an efficient and safe aviation community; and

- continue to review legislation to ensure its relevance.

In many/most cases, new regulations introduced are more complex, incur more cost to implement, and still do not harmonise with modern international or ICAO standards, leaving industry asking... *why??* "Consultation" is often just one month to find out about it, read 500+ pages of confusing material, then prepare a submission only to find it totally ignored.

9. New Zealand CAA regulations:

- Written in plain English that anyone can understand.

10. Useless ASIC Cards and checks.

While we know ASIC has *nothing* to do with CASA (it's a Dept of Infrastructure & Regional Development thing..) SAAA has been told it's on the agenda.

I work on a capital city airport where everyone is supposed to wear the ASIC I.D. Or do they.....

- **Except** if you work in the cafeteria.
- **Except** if you are a "suit" on an official visit.
- **Except** if you are driving an unchecked delivery truck and are ushered straight in through Checkpoint Charlie to your drop off point.
- **Except** if you are *disguised* in a Santa suit to conceal your real identity, complete with and followed by a camera crew. Here's the proof:

<http://www.airservicesaustralia.com/santa/2013/12/17/santas-visit-to-australia/>

I have never been challenged once to show my ASIC when on a "secure" country aerodrome. There is nobody there to check.

11. Regulation comparisons:

Registration Markings

USA	NEW ZEALAND	AUSTRALIA
Part 45 – 8 regulations	Part 47 – 15 Regulations	CASR Part 45 – 22 regulations

If we are to accept that unenforceable law is bad law then equally , we must concede that regulation or laws that require inordinate amounts of time to research in the hunt for contradictions and conditions in other places (sometimes multiple other places) that may frustrate your best efforts to comply, must also fit that description. As things are ,

hours of searching are finished without any feeling of comfort and the certain knowledge that soon, if not already, things will be changed anyway. The question is ,why bother , and that **IS** bad. Rather spend the time actually keeping my aircraft airworthy. Only a few amateur built aircraft are flown by lawyers and the couple I know are just as confused as anyone else. At present , things get steadily worse when the need is for simplification and clarity of requirements to a comprehensible level.
Harry Weaver SAAA 4014

Submission to Aviation Safety Regulation Review

There are currently many issues emanating from the regulator (CASA) that are inhibiting the aviation industry.

These issues are adding significantly to the cost of maintenance and compliance. Additionally, aircrew are being micro scrutinised at the time of their periodic medical renewal.

Doubtlessly, these regulations have been enacted in the name of safety; but they are obviously written in legal terms making many of them unintelligible to the industry (including members of CASA's own compliance team). The penalty for any unintentional non-compliance can be severe to Approved Workshops and LAMEs

Specifically, the following issues need urgent roll back to a less bureaucratically driven era.

Maintenance Oversight.

1. Regulations are working references and **MUST** be designed to be user friendly. This means the use of clear, logical and concise English **MUST** be mandated. Also multiple references to other areas of various regulations **MUST** be avoided to the maximum practicable.
2. CASA safety audits should be conducted in a manner that looks at the end result. E.g. A maintenance audit should not totally focus on an extensive paper trail but actually look at the end product.
i.e. Is the aircraft airworthy in the physical sense?

Aviation Medical.

3. Not to put too fine a point on it but this branch is completely out of control. Doctors are now completely bypassing DAME reports and operating in paranoid manner to satisfy themselves of the "fitness" of aircrew.
Follow on medical testing is often prescribed before a candidate's medical is approved. This is often expensive, unnecessary and time consuming.
4. The on line medical form is now so extensive that it takes the DAME almost an hour to complete. Much of this information is irrelevant to flying fitness and should be deleted from the questionnaire. If an **approved** Aviation Medical Examiner (DAME) is happy with a candidates medical review, then so should the

doctors at CASA!

5. The overarching purpose of medicals should be simply to obviate the probability of sudden incapacitation in aircrew either through a medical condition or treatment of such. This means that diseases like as prostate cancer and melanoma, for example, can readily be compatible with safe operation of an aircraft.

i.e. Is the pilot likely to suffer sudden incapacitation?

Denis Macneall
ARN: 041023

Submission to Aviation Safety Regulation Review

In light of the terms of reference of this review, I would call into question;

"the suitability of Australia's aviation safety related regulations when benchmarked against comparable overseas jurisdictions".

I also believe that CASA is out of touch with grass roots aviation in this country. We can only envy aviators in the USA, where general aviation thrives.

I feel obligated to express my disappointment at the direction CASA takes in the name of

"safety", especially in the case of the current project CS13/01.

I feel I am in a good position to give you a realist's view on this topic.

Not only do I fly for an Airline, but I also fly GA Aircraft, both VFR and IFR. I also own a number of aircraft.

It would seem easy to just mandate that "certified" instruments have to be installed if you

want to fly IFR. (Everyone is now safe, but are they?) Most certified IFR GA aircraft fly around with antiquated vacuum driven flight instruments, but they are certified! The nice modern EFIS systems that are certified are just TOO expensive for all but the commercial operators to install.

Whilst most pilots I know believe CASA would like to only have to deal with commercial operators, let me tell you that we in the Airlines still rely on General Aviation to find our future Airline pilots, and they are becoming hard to find in Australia.

If we are to keep General Aviation alive in this country we could learn a lot from the USA.

They acknowledge the safety and reliability enhancements that modern affordable EXPERIMENTAL flight systems bring, and allow them to be used IFR so long as they pass the required periodic tolerance inspections.

I have a lot of experience with such equipment, and I can tell you that I and "the general public" are safer when using this equipment rather than flying around with "certified" antiquated systems.

To demonstrate how out of touch with grass roots aviation CASA is, the following is part of a response received from project CS13/01:

"We do not envisage removing the option for an individual to make an application to CASA for approval of specific instruments and equipment, however, the applicant would be required to demonstrate that the instruments and equipment are capable of accurately and reliably providing the necessary information to an acceptable standard."

So rather than adopting TRIED and PROVEN FAA regulations which encourage aviation, CASA would have every individual pilot of an experimental aircraft apply for approval.

I can only imagine the time, the money, the frustration, the continual hurdles, and never

quite finding someone within CASA, who is willing to put their signature on such approval.

This is just one example of how Australia's aviation safety related regulations, when benchmarked against comparable overseas jurisdictions, are clearly not suitable.

Yours faithfully

Peter Hicks.

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Flight training

Submission to Aviation Safety Regulation Review

Frederick E. Moreno, P.O. Box 778, Denmark WA 6333 frederickmoreno@bigpond.com

Author thumbnail biography at bottom

Topic: Regulations constraining pilot training in amateur built experimental (“Homebuilt”) aircraft

Background

Recent detailed reviews of amateur built aircraft by the U.S. A. National Transportation Board (NTSB) (1) and the Australian Transport Safety Bureau (ATSB) (2) have shown high accident rates, particularly in the Phase 1 test flight period. Simplifying a bit about 80% of the accidents arise from pilot error due to lack of training in type. The balance is attributed to mechanical problems. In the latter group, perhaps as many as 80% arise from fuel interruptions, and these in turn lead to fatal accidents while manoeuvring to land “dead stick.” Many of these could have been avoided by adequate pilot training of emergency manoeuvres in type.

Currently CASA pilot training in “experimental” aircraft is largely forbidden by regulation contributing in large measure to these accidents which could be avoided by changes in training restrictions now placed on instructors.

Example

In the capacity of a Sport Aviation Association of Australia (SAAA) Technical Counsellor (TC), I have been advising an aircraft builder who recently completed construction of a Van’s Aircraft RV-7 kit experimental aircraft. The pilot-owner is a PPL with about 300 hours PIC time in certified single engine aircraft.

The aircraft was prepared for final review by the CASA delegate “Authorized Person” (AP) who can grant the aircraft Phase 1 Test Flight Period Certificate of Airworthiness after appropriate risk assessment and assignment of risk- reduction restrictions during the test flight period. In this case, the AP, cognizant of NTSB and ATSB reports and need for training in type required the pilot/owner to use the services of an experienced test pilot familiar in type to fly the first five hours. The pilot/owner was also required by the AP to be “signed off” by an instructor for flying “in type” (same or comparable RV aircraft) before undertaking the balance of the test flight program.

The pilot/owner and AP quickly found that under current rules, instructors ARE FORBIDDEN to instruct in experimental aircraft, and so are forbidden to provide training (even “familiarization flights”) in type. There is one exception: the instructor can instruct an experimental aircraft owner IN HIS OWN AIRCRAFT AFTER completion of the Phase 1 test program has been completed and the aircraft has been granted its final certificate of airworthiness.

The owner/operator is thus UNABLE to gain instruction in type BEFORE undertaking the Phase 1 test program.

It is no surprise that the accident rate is high during the Phase 1 period. We have met the enemy, and the enemy is anti-safety regulation.

Recommendation

We researched the problem in depth, and devised a “work around” based on FAA Advisor Circular documents. We suggest that CASA adopt a program based on our “work around” as the required training program for pilots transitioning into experimental aircraft, whether 1) as builder needing to complete the Phase 1 test program, or 2) a buyer (second or subsequent owner) of an experimental aircraft with no prior experience in type since these pilots also experience much higher than normal accidents early in their flight experience with these aircraft.

Approach

The FAA has prepared two Advisory Circulars to assist pilots in transitioning to experimental (“homebuilt”) aircraft:

AMATEUR-BUILT AIRCRAFT AND ULTRALIGHT - FLIGHT TESTING HANDBOOK AC No: 90-89A

Airmen Transition to Experimental or Unfamiliar Airplanes AC No: 90-109

The first provides generalized guidance for a wide range of aircraft types. The second is more specific with two parts, the second of which breaks down the universe of experimental aircraft into “families” having similar characteristics, and then presents tables including one listing specific experimental aircraft types and directing the reader to specific appendices tailored to address the unique characteristics of each family. The table headings include the following:

- Light Control Forces and/or Rapid Airplane Response (Appendix 3)
- Low-inertia and/or High- drag (Appendix 4)
- High Inertia and/or Low-Drag (Appendix 5)
- Nontraditional Configuration and/or Controls (Appendix 6)
- Nontraditional and/or Unfamiliar Airplanes System Operations (Appendix 7)
- Nontraditional and/or Unfamiliar System Component Maintenance Requirements (Appendix 8)
- Specialty Airplane (Appendix 9)

For the RV family of aircraft, the reader is directed to review Appendices 3 and 5 for specific guidance.

The program we developed and which was approved by the AP consisted of the following steps:

- 1) Owner/pilot to carefully read both FAA Advisory Circulars and apply recommendations to his flight test program.
- 2) Owner/pilot to fly with a flight instructor in a certified aircraft (only option available for instruction in current regulations) and conduct a training regimen in accordance with the

guidance of Appendices 3 and 5 which apply to the specific aircraft in question.

- 3) Upon completion of instruction, owner/pilot to fly with another RV aircraft pilot/owner in a familiarization flight in that owner's aircraft (owner in left seat as PIC, new pilot/owner in right seat, dual control aircraft) and duplicate/demonstrate the manoeuvres earlier undertaken in the certified aircraft with instructor including simulated engine failures and simulated forced landings.
- 4) Upon completion of this two part instruction and familiarization program, the owner/pilot is authorized by the AP to complete the Phase 1 test program of the aircraft which he has constructed, and will fly it in accordance with the previously-approved flight test program.
- 5) Upon completion of the Phase 1 test program, the owner/pilot will present the aircraft, results of testing, filled in flight test guide and other documents and results as specified to the AP to obtain the aircraft permanent airworthiness certificate.

Conclusion

We believe that a CASA-mandated program based on the broad outline presented here and based on the FAA documents cited will substantially reduce accidents arising from insufficient pilot training in experimental "homebuilt" aircraft while staying within the counter-productive current regulations restricting instruction in these aircraft. Longer term CASA should overhaul its training regulations to reflect the reality of current amateur built aircraft capabilities and characteristics, and use a data-based approach to guide such regulatory formulation.

Footnotes

- (1) The Safety of Experimental Amateur-Built Aircraft, NTSB/SS-12/0
- (2) Amateur-built aircraft. Part 2: Analysis of accidents involving VH-registered amateur-built aeroplanes 1988-2010, Aviation Research Investigation – AR-2007-043(2)

Thumbnail CV of Author's relevant training and experience

USA PPL for 45 years, USA IFR for 40 years, Australian PPL for 6 years.

Owner/operator of series of single engine certified aircraft for 35 years

Builder/owner/operator of Lancair IV amateur built experimental flying since 2008

SAAA Technical Councillor; instructor of CASA-approved Maintenance Procedures

Course tailored to the needs of builders/owners/operators of "homebuilt" aircraft

B.S. Mechanical Engineering (Hons) University of California, M.S. Mechanical

Engineering Stanford University

From: Breddish1@bigpond.com [mailto:Breddish1@bigpond.com]

Sent: Wednesday, 18 December 2013 7:52 PM

To: enquiries@saaa.com

Subject: Re: Ministerial Aviation Safety Regulation Review

Dear Shirley,

Please refer to my attached summary sent recently to Paul Phelan (mentioned below) . I wish to submit my submission to CASA and the Minister for Aviation

Please advise if you would like me to send my submission direct to CASA or as you requested in your email, via SAAA.

My main submission relates to

(A) The aims and Objectives of the SAAA executive involved in setting up suitable safety training and testing guidelines in particular AFT/HFR's and training (**refer (d) below**)

(B) To conduct further investigations to my attached statement (above) and thus investigate CASA as regard the following. The following are part of the review and fall within the terms of reference All of these allegations are listed in articles They have certainly 100% applied to my situation and loss of a very successful operation with Nil accident history

- Perjury;
- Conspiracy to pervert the cause of justice; and
- Misfeasance in public office.
- Two other areas of misconduct which perhaps could have been included in the Investigator's terms of reference are:
 - Injurious falsehood; and
 - Negligent misstatement.

(C) With 40 years of experience and highly qualified pilot .I am extremely concerned with the RA Aus Ultra light standards and qualifications . (It takes a GA instructor \$16,000 and 6 weeks to obtain the training to be a basic instructor . RA Aus instructors are not required to have past experience in Commercial operations they can be a private pilot with minimal hours and absolutely NO Instructional experience or training (one I spoke with recently did not know what I meant by the Learning curve or assessment standards and procedures) I understand their Instructor training course is a week and with minimal cost.

I personally have observed the following with Ultra light organisations over the past three months:

- (i) I know of a recent ultra light pilot who went solo, she had never been taught how to do a Go-Round. I ask how would she have coped if her first solo approach was not suitable , would she have continued and crashed,
- (ii) She was told on her first solo to use the radio and call her ultra light instructor as a priority , prior to carrying out immediate ,such as , lower the nose, change fuel

tanks.fuel pump on etc.. She was never taught during lost procedure or an emergency a common standard of "AVIATE (fly the aircraft), NAVIGATE (plan where to go), then Communicate ,(if time permits).

(iii) The carriage of passengers including the instructor on alleged solo exercise. With the instructor the Navex was effectively Dual and did not assist the student with confidence in his ability.

(iv) The son of a close relative (an ex SQN. Leader and then a Senior Air Traffic Controller in the RAAF) is learning to fly an ultra light . This is a copy of an email sent to me by his Father.

" Tim has done about 6 hrs in a Jabaru with (///// name withheld) but a Launceston ultra light school teaching him. " Mostly the scheduled hour is cut short to .5 or .7 or so as his instructor said it was pointless doing 1 full hour of climbing and turns" . He is not receiving any briefings or debriefing . This occurred at a primary airfield 0.5 or 0.7 each sortie would mainly be spent taxiing, receiving airways and take off clearances and establishing themselves in the training area.I ask how could two sequences climbing and descending + turning in 0.5 or 0.7hours

(v) I have listened in to briefings given at another school , they last approx. 15 minutes and are so incorrect, misleading and incompetent). It is obvious they have no instructional training . Not one question was asked of the student to ascertain his knowledge or standard prior to introducing a new sequence.

(D As part of my submission I do not believe (based on my past 40 years) How two vastly different standards GA / RA Aus operate in exactly the same airspace with grossly different standards.

All operations >400ft AMSL should be administered under one organisation not two to three . I believe that as Sports aircraft constitute the majority of private flying that the SAAA should be in close co ordination with CASA be the responsible authority with the same Rules / Regulations/ flight standards . We cannot have two different standards with different rules and abilities flying in the same environment

I feel that I am suitably qualified to add to the safety Review.

Regarding a Ministerial Aviation Safety Review. I feel that I have suitable qualifications and experience to assist in the review. I base this fact on the following.

(a) I have over 11,000 hours and forty years experience in the aviation industry, I am an ex Military pilot , held a Command Instrument rating , a grade one instructor rating BOTH Aeroplane AND Helicopter , an ATPL licence both aeroplane and Helicopter, Have been a CP/CASA delegate/ATO/CFI for over 20 years . I have been a CP of an RPT operation . I held and operated my own profitable (accident free) charter firm and

flying school (both Helicopter and Aeroplane) for over 10 years

(b) I know our current Minister for Transport The Hon Warren Truss , he assisted me in a problem I encountered recently (refer attached statement) with CASA where he stated *“my case was the worst case of a travesty of justice he had ever encountered with a Government body”* .. Dick Smith also stated publicly *“that my case was one of the main reasons he resigned as the chairman of the CASA Board”*

Both assisted me in a case against CASA and will continue to do so regarding my current problems associated to the situation where CASA treated me unethically and dishonestly

Both Dick and Warren remain friends . I could contact , personally at any time.

(c) I have recently been contacted by a Paul Phelan as part of the review the past editor of Australia Flying magazine” Please refer to my attached letter to a Paul Phelan the editor of Aviation Trader

Mr Paul Phelan, Online Magazine Editor

Email: mailto:paulphelan@aviationadvertiser.com.au

Mobile: 0412 965 643

Skype: paul.phelan3

(d) I am on the executive of SAAA with Mike Horneman, Griffith Uni , Mike Nolan, the President of SAAA and two senior Check and training Captains one with Qantas the other Virgin. (refer attached emails)We have had four interstate meetings and a few teleconferences.

Our aim is to first of all obtain approval from CASA to conduct Aerodrome and helicopter Flight reviews, currency and regency training in Sports aircraft. A secondary aim is to eventually conduct flying training.

The most recent email I received from Mike Horneman is:

From: Mike Horneman

Sent: Thursday, November 14, 2013 2:14 PM

To: Breddish1@bigpond.com

Subject: RE: FAR PROJECT

Hi Brian Very quickly, The meeting in SID went like they recommended we go via the Part 61 and Part 141 which is OK but a full reboot of the application and they don't have a MOS yet We have completed the Org Exposition and now want sign off by NC for the next step. This week end is a NC meeting in NRM and should provide a result and commitment for the future and point us in the direction of Part 149 which is where CASA wants us.

I will give you a call next week. I plan to put a project bulletin to all the volunteers next week.

Regards Mike

From: Breddish1@bigpond.com [mailto:Breddish1@bigpond.com]

Sent: Thursday, 14 November 2013 12:44 PM

To: Mike Horneman

Subject: Re: AFR PROJECT

Hi Mike,

Are there any further developments re the AFR/BFR project? I have not heard from you for a while. How did the risk workshop with CASA mentioned in your attached email go? Talk about risk management , the following is an example of a local ultra light school.

I have a 2nd cousin who is doing an ultra light course, (against my wishes) .. His Father (my cousin) stated to me in a recent email the following" ((Names removed) "> ??? has done about 6 hrs in a Jabiru with ????? teaching him. Mostly the schedule d hour is

Comment [1]: Really?

cut short to .5 or .7 or so as ??? said it was pointless doing 1 full hour of climbing turns etc. He does not even get a pre flight briefing or de briefing" His Father is an ex Sqn. leader (Air Traffic Control) and knows the drill. When I operated my AOC If I had an instructor coming back with that sort of flight time . I would assess the instructor as either bored, loss of interest or incompetent and without the students interest at heart. I always insisted on 1.1 –1.2 hours for each sortie, as the time to do pre flight checks / clearances, taxi etc. etc. would be duplicated that many times and the student should get as much upper air work for each sortie possible. My cousins training is ex Launceston and as a Primary it must take 0.2 – 0.3 hrs getting airborne and if the are doing 0.5hrs each flight must leave only 12 minutes to teach a sequence. In GA we always insisted on revision of the past sequence then evaluation of the new sequence on each sortie . How can they teach medium turns , climbing and descending lessons in 0.5 hour It goes to show the poor standard . Talk about CASA holding a risk management course for SAAA .. What about a risk management course for RA Aus, My Son lives at Redcliffe , he is a Virgin pilot and needs hangarage for a 4 place aircraft, he wishes to purchase . I think you said your RV is a Redcliffe . Do you know of any hangarage there and if so, the cost. Let me know what is happening re the AFR project and if there is anything I may do.Regards Brian Reddish

From: Mike Horneman **Sent:** Tuesday, August 06, 2013 10:52 AM **To:**

Breddish1@bigpond.com **Subject:** RE: AFR PROJECT

Hi Brian, Good to see you are somewhat on the mend. Re the AFR project we are inking along at glacial pace we go 6 to 8 weeks at a time of silence. The latest is CASA wants to have a Risk workshop in 2 weeks time. This might be good as we want all the players in the room at one time and nobody leaves until we get a result one way or another. It is planned for BNE no date or details my guess it will take 6 weeks to plan an event in 2 weeks' time. They are the most frustrating lot.

Thanks for asking as I must send out an update that says nothing.

Regards Mike

Mike Horneman

Email: mike.horneman@saaa.com Web: www.saaa.com

National Council, Tech. Ops. Committee Member & Safety Manager

| P 61 (0)7 32162276 | M 61 (0) 417931872 | Skype **RV6MJH** |

I have just been made aware of the attached article.

I am mentioned in the article due to the unethical, dishonest closure of my ten year old aviation business, a business that had nil accident history and operated to the highest standards. The closure of this business has affected me in all aspects including my health. Advice by Dick Smith was appreciated, he stated "*Brian you just have to get on with your life and place this unethical behaviour by CASA behind you*" I have done this but am still suffering as a result of their actions.

The problem boiled down to the fact that I was a delegate of CASA an approved Testing Officer ATO, with CP and CFI approval both Aeroplane AND Helicopter. (I was at the time the only Grade 1 Aeroplane and Helicopter instructor in the system) I failed a student. (He got seriously lost on his CPL lic test).

Prior to conducting the Commercial test. I was threatened by his instructors (they all lived together for six months, including the student. They all socialised and formed a bond).

Two of them a Michael Lutz (the student's helicopter grade 2 instructor) and Benjamin Dicks (the student's aeroplane instructor) threatened that should I fail him they would make trouble for me with CASA. They all complained to CASA stating that the helicopter had a faulty compass correction card and that my assessment was unfair. The

Compass card was checked by CASA and an engineer and found to be accurate.

Being previously told by the FOI's responsible for my operation, FOI Ian Paull, FOI Quentin Marais and FOI Karl Wally that I ran a tight ship and had an excellent reputation together with the fact being a CASA delegate and approved ATO. I felt that CASA would support me in my decision to fail a student. Never had CASA given me any warnings or threats that I was not performing.

Should I have become pressured by the three threats and passed the student and he subsequently went out and killed a member of the public, by all means I would have accepted the cancellation of my CP and CFI approvals. Even today I am happy I made the decision to fail the student at least I do not have to live with decision to pass him due to an outside influence, if he had killed someone I would even today feel a lot worse. Instead I only lost a multi-Million dollar business and CASA got away with unethical, dishonest behaviour.

TO back up my decision I understand that the student had to complete a further 15-20 hours of training to reach standard, this supports my decision to fail him in the first place and emphasises that CASA did not support my assessment as a delegate and approved ATO.

A CASA FOI Richard Snell visited my operation (a person I had an argument with previously and obviously held a grudge against me) together with the senior airworthiness Inspector, they after inspecting the aircraft stated "We did not find what we expected to find". Richard Snell searched for other discrepancies in my operation and to date none of them have been proved.

CASA and the Manager of the Brisbane office and the CASA CEO Mick Toller cancelled my CP and CFI approval. Due to the unfairness of the situation, two very senior instructors offered to take over the appointments thus allowing my business to continue to operate, till the CASA problem was resolved. One of them was a particular well known and respected CP and CFI a Peter Clemence, the CFI and CP of Jayrow helicopters at the time. CASA delayed and eventually would not approve their appointment and with over \$10,000 of commitment each month to the bank I was forced to liquidate the business and sell all my assets including four aircraft and my home and assets. (Thankfully I just avoided bankruptcy) I have been suffering financially since and today suffer with a serious medical condition caused by the anxiety and stress the situation caused. I am now medically retired at the age of 67.

I appeared on the Channel Nine "Today show" where our present deputy Prime Minister The Hon Warren Truss stated on the "Today show" that the situation was the worst case of travesty of Natural justice from a Government Department he had ever encountered. At the time Warren was my local member, a personal friend and was the opposition aviation Minister.

AS an example of the unethical, dishonest and false allegation CASA made against me via FOI Snell, apart from the alleged compass card allegation (that was subsequently proved false)

He also took me to the magistrate court stating I flew on a private flight a C172 12 kgs overloaded.

He used my last medical weight taken 9 months previous. In the mean time I had gone to "Jenny Craig" and lost 15 kgs.

He guessed the weight of my 4 year old at 68kgs he was 36kgs at the time of the flight He stated the aircraft had full fuel. I proved with fuel records that it was deliberately not full of fuel

Being a helicopter FOI his calculations were wrong and he did not allow for the difference between ramp weight and Take-off weight (sheer ignorance, misuse of the flight manual and a mistake one would feel an FOI should have the correct knowledge) I and other suitably qualified instructors proved the aircraft was in fact approx. 80kgs under the MAUW. The case was dropped by the magistrate.

A large article supporting my allegations appeared in AOPA.

I ended up with two very experienced lawyers a Bob Hamilton and Spencer Ferrier but both had difficulty dealing with such a corrupt and dishonest organisation as CASA. CASA tried to combat the situation with red tape, delays and incorrect statements. I also had just reached the point of bankruptcy and could not continue with the finance affording legal representation.

Dick Smith publicly stated my situation was one of the reasons why he resigned as the Chairman of the Board of CASA.

Even though this situation occurred some years ago, the effect of the allegations has affected my life, my family's life our financial situation and ruined my professional 40 year career. My reputation suffered as I was unable to defend myself effectively and the truth was never made known. Meanwhile CASA FOI's have resigned and in one case discharged, they have forgotten the event yet still continue to be criticised and operate unfairly and unethically in the industry.

I and many others believe that in my case CASA's should have been charged with the following offences. As stated the problem was that they confused and delayed the investigations to the stage I could not afford effective representation.

- Perjury;
- Conspiracy to pervert the cause of justice; and
- Misfeasance in public office.

Two other areas of misconduct which perhaps could have been included in the Investigator's

terms of reference are:

- Injurious falsehood; and
- Negligent misstatement.

SAAA should go for the big changes for two reasons - 1 you never know what you can get unless you try and
2 you put yourself in a better bargaining position

here is my wish list for recreational flying - not for commercial, business, personal transport, goods delivery etc etc - just recreational.

1. solo rec pilot medical to be drivers licence only - no extras at all. The minimum extra for passenger flying that can be found acceptable to reasonable pilots and passengers - there are many models.

2. rec pilot licences to be perpetual - My original UK and US licences are still valid - they can be subject to revocation only on proof of inability or repeated rule breaking. They can require currency and a flight test for the not current that requires only safe demonstration of one flight.

3. Annual or biennial reviews to be encouraged and not mandatory - no minimum hours - only standards

4. no mandatory inspections or limitations on who can inspect or maintain rec aircraft - same as cars are and for the same reason - most people are sensible and the idiots will always ignore the rules anyway - different from cars as having no pink slip system at all.

5 rec ac that fly over built-up areas or into controlled airspace can be subject to higher requirements but only if the controlled airspace is reduced to the minimum required, not the all the best parts of the whole sky policy we have now. All military reservations to be revoked.

6 mandatory weather forecasts only if and when they are freely available (ie on the website and no passwords or usernames) and open to use by all including all commercial flight planning services in real time - and in plain English with local times and dates and no use of coded identifiers - and can use any commercial source instead.

8 Abolish the present nonsense of out-of-date despite constant updating databases with detailed, incomprehensible, and semi-permanent changes being designated as NOTAMS - the system long ago collapsed. One database - constantly in date, online at all times to all, please.

7 Flight planning and notifying software that is user-friendly and is not put into place without testing on new users. The present system can continue to be used by commercial pilots on commercial flights if they wish.

8. no tax-payer funded searches for pilots who disappear, call mayday fail to arrive etc and no restrictions on SAAA or anyone setting up a volunteer search system to replace the present hugely expensive system.

9 No restrictions at all on use of and reliance on, any source of navigation, regulation, flight aircraft, fuel and engine data for any purpose, provide it is reasonably fit for the purpose - recreational flying.

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Richard C Pincus

Shirley,

The aviation items that spring to mind that affect me are:-

1) Lack of support for smaller airfields across the nation

Economic pressures arise to encourage local Shires and Councils to relinquish airfields in their territory to developers. Of course, I personally think this short sighted, but I also think that national government could do a lot more to encourage and help local councils to see the money they have spent building or maintaining an airfield as an investment in the future development of their community, rather than simply an expense. There are many difficulties and expenses put in the path of businesses that might seek to expand their business area via aviation. The fact that it is common for Shires to try to recoup the costs of maintaining their airfield by "user pays", actually serves to keep people away. I have a classic example at my doorstep, Rottnest Island. There is of course, the added safety flow on of having more airfields available across the nation.

2) Processing Aviation Medicals Class 2

Many countries, including Australia, require a "DAME" to do an assessment on a pilot for continuing fitness to exercise his/her privileges. However, they also then trust the DAME to issue the medical Certificate, but Australia does not. Why does Australia think it's DAMES are not appropriately trustworthy in this respect? And, having assumed the responsibility of issuing medical certificates, CASA/AVMED is so inefficient that they have a huge backlog. My personal example is I conducted a visit to a DAME on 13th November, the form was submitted on-line with all relevant documentation on that day, and as of today 15th Dec I still have not received the certificate, although I have now, after enquiring, been advised that it has been approved and is being processed. 5 weeks for routine processing? Completely ridiculous. And absolutely no benefit in safety, unless they can prove their own DAMEs are untrustworthy.

3) ASIC cards

The concept that there is a bureaucratic means like an ASIC card to prevent aircraft hijacking, or other terrorist activity, is just laughable.

First, the need. How many examples are there of terrorist activity within Australian territory since the inception of this scheme which target light aircraft, and of those, how many have been successfully negated? If I am intent on committing some form of aviation terrorism, do you really think the ASIC requirements will stop me.

Secondly, the implementation. My brother, working legally on his own aircraft in

his own hangar at Albany Airport, was advised it was not sufficient simply to have is ASIC at hand, he should have it on his person at all times. How ridiculous. How do rules like that enhance safety and prevent terrorism? And, if I am flying over a security controlled airfield and require fuel, but do not have my ASIC with me, why shouldn't I land and get fuel, it's safer that continuing and burning into fuel margins. How can this be protecting us from terrorism.

Thirdly, cost. This is a case, I think, where, if the government sees the need for this kind of security arrangement, which is highly intrusive into normal aviation activity, then the government should bear the entire cost. Having been security cleared once, when my ASIC was initially issued, why should I have to pay every 2 years for that check to be repeated.

4) Owner maintenance of privately owned aircraft

Our organisation has been asking for some time now for a means for owners of private aircraft, not used for commercial purposes, to have a way to prove their competence to maintain their own aircraft.

We recognise the privileges we have, as owner builders of amateur built aircraft, to maintain our aircraft, once we have met all the requirements which indicate we have that competence.

We ask, why shouldn't other owners of private aircraft, not used for commercial purposes, also have a means to prove their competency? If they are given the means to prove their competence, then they should be able to exercise that competence?

If the argument that owners may not meet a required standard is raised, I say simply, include a requirement in the assessment of their competence that they prove they can meet the required standard.

I ask where is the safety case for denying competent owners the ability to maintain their own private use aircraft?

Thanks & Regards,
Bo Hannington
(08) 9524 2000
Email: Bo@elbo.com.au
Mob: 0427 044 156

Hello,

Following the request from Shirley HARDING to participate in commenting on the Minister's Aviation Review, I am pleased to add the following :

I am based at Jandakot airport where the operators have shown total disregard to proper development of the airfield. This has been illustrated at length especially by the Cockburn Chamber of commerce over the last ten years.

These operators have been approached by a number of people (including myself) concerned with the safety aspect of the operations at the airfield. They have totally ignored our requests and have made a number of promises and comments which have proven to be nothing more than insults to our intelligence. The helicopters operations have been unsafe and do not comply with the relevant regulations. When approached on this matter, the operators only comment was that : "we can not see them from the control tower because there is a big tree in the way.....!!!" We asked them to cut down the tree and the reply was that " this would be expensive....!"

At the last meeting we requested for the minutes of the meeting to be distributed and of course they never were.

Helicopters operations including flight training between rows of hangars, running of engines for maintenance for hours at a time carry on. Damage to aircraft and hangars has been sustained.

As tenants at the airfield we feel bullied and scared to say too much for fear of reprisal (which has been insinuated).

On another matter, traffic controllers in general are pleasant and do their jobs properly. However one or two are very aggressive in their handling of situations. For example, when addressing a student pilot from Singapore Airline, the controller would ask the same question five times without giving the student a chance to reply. Imagine the state of the student preparing to go flying.....

I myself had to contact the control tower manager to comment on the unnecessary aggressive behaviour of one of their operators. I did receive a letter of apology.

Another matter is the ASIC card. This is another one of these additional costs which are totally unnecessary. We already pay heavily for medical reviews and handling fees etc. Why cannot we have one single Pilot's Licence which includes a photograph and acts as both a licence and ASIC. As it is ASIC cards are not recognised as proper identification by most agencies such as the State Police or Federal Police. A bit of a joke ?

At Jandakot , we are requested to pass a driving test and of course pay a yearly fee for the privilege to drive our car on the taxiways to access our hangars. We might only need to do that once every two or three years.....and yet we are licensed pilots who can taxi an aircraft anywhere on the airfield.....

Overall my feeling is that many of the sub-regulations being applied are there in contravention of CASA regulations and dreamed by people who have either no idea of reality or only wish to raise revenue.

Hoping that this message is not confusing and will serve some purpose.

I would request that my name be kept out of any communications especially with Jandakot Holdings as I fear the backlash expected.

Kind regards,

(Name withheld at writer's request)

To SAAA review committee.

Owner and primary co-builder of VH-TDB and pilot of many years. (my student licence issued in 1982)

With the extremely high cost of private flying and aircraft ownership it is hard not to 'winge' about so many of the costly and inefficient regulations. But i think the ASIC is worth a major complaint.

I personally applied and received my card when they were first dreamt up. Little did i realise that these were not a one issue but recurring cost.

Subsequently i have never repeated the process.

Instead i avoid Primary airfields (not a big issue except for Darwin). However i find myself generally exiting through hangers or over fences, or just entering with another pilot, when exiting or returning to my aircraft. It is entirely unsatisfactory, but does highlight how the ID is useless. Most pilots would also be aware that gate numbers are scratched on nearly every sign prohibiting entrance to their planes.

SUGGESTION

1. Scrap completely. Can anyone PROVE it has enhanced safety??
2. Either issue FREE or renew FREE to ALL current pilots.
3. Allow other ID, such as-: Pilots licence, Drivers Licence or PASSPORT as alternative ID. (We go thru similar checks to obtain a passport, and they allow access to airports worldwide).

A second and equally idiotic regulation brought in during the post 911 hysteria was the-: 3rd Lock system.

Statistically there is NO argument for 3 locks improving the public's safety.

(Statistically Automobiles are the most dangerous things in the hands of someone intending harm of this nature, readily available and not requiring 3 locks)

SUGGESTION

1. Remove this requirement.
2. Reimburse aircraft owners for this waste of money.
3. Let insurance companies assess whether lots (any) aircraft are stolen and market forces will come to play.

Further (and little reported), was a crazy waste of money putting fences around small country strips. Most security fences stretch across the front entrance of these airstrips, then finish 20metres and become 2 strand stock fences. They are a huge inconvenience to loading and unloading aircraft and ZERO security. Probably makes the 'Pink Batts' scheme look clever!

Lastly an observation that the regulators by stealth seem to be making VFR aircraft more and more pseudo IFR aircraft. The principles of Visual Flight rules....should be LOOK OUT and AVOID other aircraft in conflict. Technology as it becomes affordable in terrific and a luxury we enjoy. But making each piece compulsory (often before its affordable) is contrary to the good will and principles of a free country.

The use of any new technology is only as good as the user. Overly complex systems will lead to more user error and perhaps FALSE safety.
It seems ALL of these regulations are imposed WITHOUT statistics to prove the need. They just SOUND like a good idea to the uninformed, the public (sometimes) and the people that DON'T have to fund them!

Regards Rick
Jobson
SAAA 04164
Licence #179566

In my opinion the ASIC card is of little value. Most security airfields such as Bankstown, Camden, Wollongong, Mudgee, Bundaberg and Hervey Bay all of which I have visited have no real security. My ASIC card has never been examined. All of these airports have the push button lock code easily accessible often on the back of the gate and Mudgee has it prominently displayed as an CTAF frequency. The fence at YWOL is stranded wire for most of the circumference. In my opinion pilots could be part of the solution by being trained to report suspicious activity instead of part of the problem by being reliant on an unreliable security system. It should be mandatory for every pilot to have a biannual police check anyway in the same way that schoolteachers or JP,s are checked. It should be cost free and would serve to keep us all honest with felony offences such as PCA.

I hold a PPL (144108) and an RA(Aus) Certificate. I would be prepared to subscribe the annual cost towards Safety Initiatives. RA (Aus) is becoming increasingly officious with new silly rules such as Level 1 maintenance examinations which if at the same level as ALL of their other exams will save no lives at all. It is obvious that the reporting requirements are being flaunted and little is done to keep pilots informed in detail of accidents/incidents.

In 2013 I completed a BFR and an AFR the AFR was carried out by Forsyth Aviation at Murray Bridge and included a thorough ground briefing and practical exercises as well as a comprehensive flying sequence. It felt good to come up to a required standard. It was not an expensive exercise and took less than four hours overall. If this is the norm and my discussion with others tends to confirm that it is then GA standards are significantly higher than RA standards.

Safety is the most important issue facing amateur pilots. Passengers and people on the ground have little say. I for one will not fly if I am not saferds,.

Good luck with your submission. Please continue to push for improved safety.

Regards,

John Hey(Dr)=

Hi Team,
A few thoughts on a couple of subjects.

ASIC cards, whilst I am sure these are necessary for commercial operators and for customs operations, extending them as a mandatory requirement for GA is a nonsense, I give a couple of examples, Shepparton airport, no gates no fences, Broken hill airport gates with no locks, Bourke airport broken locks on gates, Alice Springs airport gates with no locks, locked gates with the combinations written next to the lock and so on. I do not disagree in principle however a charge of \$130 every two years is not necessary, and the most galling of all is having to establish that I have not changed my identity during the last two years! IT SHOULD BE PERPETUAL once you have been identified as someone who will not crash your Cub into the Eureka tower, and cannot climb over six foot high fences.

Drivers licence medical

Have you read the three page preamble, The first two pages suggest that it would seem that half the population shouldn't be allowed to drive, then CASA adds their page which simply replicates the current class two medical, THERE IS NO DIFFERENCE other than any licenced Doctor can issue a licence rather than a DAME. on another related subject I don't believe properly controlled diabetes should exclude licenced experienced pilots from flying, I don't have diabetes.

Why does a ferry permit cost \$300 to \$400 if an annual or 100 hour period is overrun by a few days, what safety issues do CASA control by issuing a permit? it is simply a money grab.

CASA is prepared to hand self regulation to organizations like SAAA, but wants to retain control to impose unnecessary fees and in particular fines, reading any of their regulations shows their true mission, IT IS ALL ABOUT CONTROL, every second sentence is about fines and what we will do to you if we catch / find you doing something that we have mandated.

SAAA should merge with RAA to give one voice to the sporting aviation community, it can't be hard, the role model is there, the EAA

There now I feel better.

Bruce thomas
SAAA 5262 Ch 20
PPL 555216

CASA's approach to sport aviation compared to the FAA

I've been flying for only 8 years. In that time, I've earned an RA Aus licence, a GA licence, a heap of endorsements and I compete at the national aerobatic level. What struck me from the start in aviation was the almost universal disdain for CASA and the way it operated. I was amazed at the stories I was told from the local weekend flyer, through the Ag. pilot to the Qantas Captain. The criticism seemed worse than for the Tax Dept. Initially, I thought it had to be overdone, but after being involved with flying for the last 8 years, I have to agree that the way the GA part of the aviation industry is run is appalling for its costs, admin burden and disincentives ... and in a country with the huge open spaces like Australia.

I have run a number of companies with many thousands of staff, I have been on the Board of Government Authorities like the Environmental Protection Authority and I have been a Director of little private companies to Publically listed companies. I think I have a fair appreciation of how to change "the way things are done around here". Putting aside the emotions and the long list of staggeringly inefficient and annoying practices that have been dealt to GA by CASA, I believe the problem is best fixed by changing the direction of CASA through its legislative base, not trying to change specific aspects of the system.

To my mind, the single most important thing that could happen to CASA is for its legislative base to be changed and have added to it that CASA should promote General Aviation in Australia and that it is to embark on constant efficiency improvements so that the administrative burden and tax imposts are minimised for the aviation industry (i.e. world wide best practise). In other words, shift more towards the USA model.

I think we can complain all we like about specifics such as the tax on aviation fuel; the loss of LAME's because the paperwork is a killer; the administrative burden on GA from ASIC cards through to the latest move for changes in flight reviews and endorsements, but this will change our situation little. On the other hand, if CASA simply had a legislative requirement to grow/promote GA, keep efficiencies to a maximum and keep costs to a minimum, then over time I think we would see a major change. Without this change in *raison d'être* then I think GA will continue to suffocate and die slowly.

I'd also add that the focus on safety is simply a way of CASA escaping responsibility for the way the industry functions. The general public are all for safety and little understand the industry and so CASA just has to say its for safety and its justified. I find it instructive that the Regulation Review is called a Safety Regulation Review which immediately elevates the CASA position to high moral ground and to avoid querying the dog's breakfast of a system they run for us GA pilots.

Regards Simon
Dr Simon Stone
Adelaide SA