



Sunday, 16th September 2018

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LETTER TO THE EDITOR: Questions for the Recreational Aviation Australia Limited

Dear Mr Mark Smith,

Thank you for the opportunity to provide a letter to the editor, seeking the feedback of the Recreational Aviation Australia Limited (RAAUS), enabling the industry to help 'set the agenda'.

AOPA Australia's 3,600 members and every GA RPL and PPL holder would like to know;

1. Why did the RAAus Chairman/CEO respond to CASA's Medical Certification Discussion Paper, pressuring CASA to deny all GA RPL and PPL holders of a self-certification private driver licence medical standard?

Important excerpts from the RAAUS Medical Certification Discussion Paper Response;

- a. **Page 4 – 4. Aim of the submission:** *The aim of this submission is to outline any direct, adverse or unintended consequences that changes to the medical certification regime might have on RAAus...*
- b. **Page 4 – 5. Key concerns generally: Concern 3:** *Possible negative economic effects that RAAus may experience by any reduction in the current RAMPC regime.*
- c. **Page 8 – Q7. What are the likely cost implications of any changes:** *... Direct cost to RAAus – potentially significant loss of revenue specifically if the RAMPC medical requirements are reduced. This could mean that the Recreational Pilots Licence (RPL) requirements will have a direct advantage over the RAAus Pilot Certificate with the possibility that members will leave RAAus to access CTA and MTOW, as has happened since CASA introduced the RPL. RAAus maintains its position that the RPL was an unnecessary introduction....*

This could result in a dramatic effect on the financial position of RAAus, which is a significant risk to the regulator should RAAus become unviable. IF this did occur CASA would be left to manage some 10,000 pilots and 3,200 aircraft; it is questionable whether CASA has the capacity to undertake this responsibility. So, any changes to medical standards must be made in light of ensuring RAAus remains a viable and safe alternative.

- d. **Page 12 – 12. Summary** RAAus believes its track record of over 30 years with self-certification of pilot medical status demonstrates self-certification could have positive impacts on the General Aviation sector (through reduced red tape and compliance costs) without compromising safety... However RAAus also is apprehensive of the potential impact CASA offering its pilots the same medical requirements as RAAus (a key point of differentiation in the market at present) could have on the ongoing capacity of RAAus to perform the functions it currently performs on behalf of the regulator... Adoption of a self-certification model by CASA would put CASA in direct competition with RAAus and create the untenable situation of RAAus having to compete with the body that controls its very existence – a conflict of interest for CASA that could have significant adverse consequences.
2. Why did the RAAus Chairman/CEO vote on the 22nd November 2017 at the CASA Aviation Safety Advisory Panel meeting, against a self-certification private drivers licence medical for GA RPL and PPL holders, endorsing CASA’s proposal to deny all GA private pilots of important and essential medical certification reform?
- a. Attached is the 22nd November 2017 CASA Agenda Item 5.1 obtained under freedom of information;
 - b. Attached is the Minutes of the 22nd November 2017 CASA ASAP Meeting;
 - c. **IMPORTANT TO NOTE:** The panel members that voted to deny GA RPL and PPL holders of a self-certification private drivers licence medical were;
 - i. **Mr Jim Davis**, Chairman of the Regional Aviation Association of Australia and member of the TAAAF;
 - ii. **Mr Michael Monck**, Chairman of the Recreational Aviation Australia Limited and member of the TAAAF;
 - iii. **Mr Greg Russell**, Chairman of the TAAAF
 - iv. **Mr John Gissing**, Group Executive QANTAS
 - v. **Mr Rob Sharp**, Group Executive Virgin Australia
 - vi. **Ms Caroline Wilke**, CEO Australian Airports Association
 - vii. **Mr Graeme Crawford**, Group Manager, Aviation Group CASA
 - viii. **Mr Rob Walker**, Group Manager, Stakeholder Engagement Group CASA
3. Given that the RAAus Chairman/CEO proudly proclaim that they represent the views and interests of 10,000 members;
- a. Prior to submitting the RAAus Medical Certification Discussion Paper Response that clearly pressured CASA to deny all GA RPL and PPL holders of a self-certification private driver licence medical, did the RAAus undertake a survey of its members seeking their input, feedback or consensus on this important issue?
 - b. Did the RAAus Board of Directors approve and/or sign-off on the discussion paper response that pressured CASA to deny all GA RPL and PPL holders of a self-certification drivers licence medical?
 - c. Given that there are thousands of RAAus members who would like to exercise their GA RPL and PPL licences, how should these members view the actions of the RAAus Chairman/CEO to deny this essential reform? Should they as members not feel utterly betrayed and totally taken advantage of by their Chairman/CEO?

4. In view of recent editorials published by the RAAus Chairman/CEO in Australian Flying magazine, which claim that the RAAus is the victim of unfair attacks by GA industry associations and that the RAAus is in fact the future for GA in Australia;
 - a. *Why should the GA community support the RAAus, when they are so actively seeking to remove the GA community's freedom to fly, seeking to force pilots into a private business to continue enjoying aviation in this country?*
 - b. *Why does the RAAus believe that the only future for GA is one that involves our community paying fees and charges to RAAus?*
 - c. *Why does the RAAus stand opposed to the GA industry achieving reforms that would enable pilots to fly free of unnecessary cost and restrictions?*
5. Given that the RAAus Chairman/CEO have now communicated to CASA that GA RPL and PPL pilots operating aircraft between 600 and 5400kgs should not be allowed to fly on a self-certified private drivers licence medical, does this now send a clear message to CASA that aircraft between 600 and 1500kgs MTOW can't be flown on a self-certified private drivers licence medical, entirely undermining the RAAus push for a weight limit increase?
5. Assuming that the RAAus Chairman/CEO did not consult with their 10,000 members, and with clear evidence that they have actively campaigned to undermine the Australian GA RPL and PPL private pilot community, with the sole intention of forcing pilots into the RAAus system (where a private company owns your pilots licence, your aircraft registration and ultimately your freedom to fly) should the RAAus continue to be allowed to influence industry consultation panels or should it be removed to avoid further conflicts of interest?
6. Finally, a question for you directly Mark. Given your past personal involvement with the AOPA Australia as our Editor and as a vocal industry spokesperson for the need for self-certification private drivers licence medicals for GA RPL and PPL holders, how do you view the actions of the RAAus to deny the GA community of this essential reform, given that it has denied you an opportunity to continue flying in GA?

I thank you again for the opportunity and I look forward to a detailed RAAus response soon.

Yours Sincerely,



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Executive Director

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