



Tuesday, 30th October 2018

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CASA ‘Stakeholder’ 2018 Report - AOPA Australia calls for report’s immediate withdrawal and for CASA to conduct a genuine ‘like for like’ survey.

Deputy Prime Minister,

Further to the release of the Civil Aviation Safety Authority’s Stakeholder Satisfaction Research Report 2018 prepared by Colmar Brunton between 18th April 2018 and 12th June 2018 and statements made by the CASA Director of Aviation Safety in the Friday 26th October 2018 CASA electronic newsletter.

CASA Director of Aviation Safety, Mr Shane Carmody in his newsletter states;

“We have just released the results of our second survey to evaluate the health of CASA’s relationship with the aviation community... I am pleased to advise that our aviation community satisfaction with the performance of CASA has risen markedly since the 2015 survey... This is the result of a lot of hard work right across our organisation, led by a clear focus from management on getting results that benefit everyone in aviation... The survey, conducted by research organisation Colmar Brunton, canvassed the views of more than 1100 aviation industry participants... Clearly this survey shows CASA has come a long way in a relatively short time...”

With respect to the Stakeholder Satisfaction Research 2018 report, Page 7 Section 1.1 the introduction states;

“...the stakeholder survey followed the Aviation Safety Review (2014), which identified a need for CASA to improve its service delivery and its relationship with industry stakeholders... The 2018 research was required to: Explore current stakeholder perceptions with regard to CASA’s service provision and relationship with industry, and measure changes in perceptions since the 2015 benchmark; and Provide guidance on how CASA could continue to improve both service delivery and its relationship with industry stakeholders...”

On Page 15, Section 2.1 the report's background information states;

"...the Government response to the (ASRR 2014) Review accepted that the majority of recommendations made by the Review, including those recommending that CASA;

- Identify and understand industry priorities, concerns and perceptions;*
- Undertake regular anonymous stakeholder surveys to monitor these factors;*
- Change the underpinning regulatory philosophy to move from an adversarial relationship to a collaborative relationship with industry; and*
- Build and demonstrate a philosophy of a just culture".*

CASA's continued failure to genuinely consult with the general aviation industry

With the above references in mind, on page 17, Section 3.1.2 the report acknowledges that it did not consult with AOPA Australia, SAAA, GFA, AMROBA or any other partner to the Australian General Aviation Alliance. In total, some 16 key general aviation industry associations which have been highly critical of CASA's decision making over the past five years were excluded from the survey in 2018. These associations represent the vast majority of the general aviation aircraft owner, pilot and business community, collectively representing the interests of some 15,000 participants.

Associations that CASA did survey were; Qantas, Virgin, AAA, RAPAC, TAAAF, RAAus, RAAA and the AAAAA. All of those surveyed are members of the CASA Aviation Safety Advisory Panel, of which none directly represent the interests or views of the vast majority of general aviation community. Furthermore, the RAAus, RAAA and AAAAA are all members of the TAAAF.

Throughout 2016, 17 and 18, the AOPA Australia has continued to call on CASA, to ensure that the general aviation community are fairly and genuinely represented, seeking the right to be included in CASA's industry consultation frameworks. Yet despite our determined efforts, CASA has continued to exclude AOPA Australia and our AGAA partners, thus denying our community the ability to provide a meaningful and consultative contribution.

CASA's continued refusals (since 2016) to permit our involvement can only be seen as promoting and fostering an adversarial relationship that has served to silence considered, valuable and constructive criticisms that would afford you our Minister an understanding of the challenges facing our industry. CASA is not demonstrating an open willingness to engage, but rather appears to be seeking cheerleaders in support of its agenda – whatever that may be.

The 2018 report on page 24, Section 4.1 openly identifies the above issue and reinforces our concerns that CASA is seeking only to engage with associations/peak-bodies where they can rely on 'positive and supportive' responses;

"Targeted stakeholders (associations/peak-bodies) participating in the study were typically more positive in their attitudes towards CASA overall... Whereas previously targeted stakeholders had raised issues... finding CASA senior management to be either unresponsive or unwilling to engage on topics of concern..."

Furthermore, on Page 24, Section 4.2 the report goes on to state that;

"General industry stakeholders (industry participants, not associations/peak-bodies) were commonly less positive in their assessment of the relationship between industry and CASA..."

The above statement reinforces our argument that CASA's approach to hand-select 'Targeted Stakeholders' has been an abuse of process and has rendered the outcomes and findings of the report as unreliable.

Problems with the 2018 report that make it entirely unreliable

Page 18, Section 3.1.3 of the report states that;

“...the quantitative questionnaire was largely the same as that used in 2015 in order to allow for comparisons to be made to the 2015 benchmark study... the aim of the quantitative survey was to explore the indicators of relationship health with all CASA stakeholders.... While the questionnaire was largely unchanged, the sampling approach did change... from a self-select opt in... to a random sampling approach...”

Page 18, Section 3.2.7 of the report states that;

“In 2015... the survey was emailed only to those who had opted in to research & stakeholder consultation processes, while all other stakeholders were offered the opportunity to undertake the survey via a generic link published across a range of CASA’s communications channels... Due to the change in sampling approach... (for 2018) Colmar Brunton has not undertaken significance testing between 2015 and 2018 survey results. Instead commentary has been included which discusses the observed changes in stakeholder perceptions.”

It is somewhat concerning that CASA has refused the opportunity to re-survey the original 2015 benchmark report participants. This refusal has rendered the 2015 to 2018 comparisons in the report as unreliable, as they do not provide a genuine ‘like for like’ measurement.

The report clearly identifies that Colmar Brunton had no involvement in the selection of survey respondents and relied on CASA to inform as to who should be contacted for the 2018 report. The report identifies that CASA undertook the ‘random selection’ of the survey participants and fails to identify or quantify how CASA determined the contacts to be random in their selection, nor does it identify who in CASA made this decision.

Without question, the report cannot be viewed as independent and clearly demonstrates a strong bias towards presenting a positive view of the regulator and its purported progress since 2015.

Summary and Recommendation

The AOPA Australia highlights that;

1. CASA sought to exclude the general aviation industry’s associations/peak-bodies which are on the public record as constructively criticising the regulators decision making and performance;
2. CASA is promoting and fostering an adversarial relationship between the regulator and industry by refusing to permit fair and equitable involvement in the available consultative frameworks;
3. CASA refused to re-survey the original benchmark 2015 participants who criticized the regulators decision making and performance, rendering a like for like (2015 to 2018) comparison as impossible;
4. CASA by way of the report’s admissions hand-selected the survey participants, explicitly providing Colmar Brunton with the list of ‘who to survey’, demonstrating that the participant selection process was not independent, creating an environment to achieve survey result bias; and that
5. CASA rejected broad voluntary survey participation by not allowing individual industry representatives who are actively seeking to provide comment/feedback with public access mechanism to participate in the survey.

For the CASA Stakeholder Satisfaction Research 2018 report to be of any value to yourself or Government, the survey must be conducted in an open and transparent manner, enabling participation by any industry participant that relies on CASA for access and involvement in our aviation industry.

In view of the above, the AOPA Australia is calling on you as our Minister to immediately withdraw the 2018 report and to require that CASA and Colmar Brunton re-survey the benchmark 2015 respondents in the same methodology as was conducted in that year, along with permitting all of the industry association/peak-bodies and individual representatives to participate without restriction.

Furthermore, we are seeking your assistance in requiring CASA to include AOPA Australia and our AGAA partners in the CASA ASAP panel, along with all the various Technical Working Groups to ensure that our general aviation community is afforded fair and equitable representation in all consultative frameworks available within CASA.

Thank you for your time and our association awaits your response.

Yours Sincerely,



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Executive Director

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