

Aviation Regulation Review Taskforce

Report on Activities and Findings

17 December 2007

Introduction

The Aviation Regulation Review Taskforce (the Taskforce) was announced by the Hon Mark Vaile MP, then Deputy Prime Minister and Minister for Transport and Regional Services, on 4 April 2007. The then Minister said he had established the Taskforce to assist him and the Chief Executive Officer of the Civil Aviation Safety Authority (CASA), Mr Bruce Byron, set key directions and priorities for aviation regulatory reform for the next five years.

Dr Allan Hawke was appointed as Taskforce Chair. Initial membership comprised Mr Byron, Mr Rob Graham (aviation industry consultant), Mr Jeff Boyd (CEO, Brindabella Airlines) and Mr Dick Smith. Mr David Cox (QANTAS Executive General Manager, Engineering) was subsequently appointed to the Taskforce in July 2007.

The Taskforce's Terms of Reference encompassed:

- Recommending the best practice safety regulatory model for Australia;
- Identifying priorities for the Government's future regulatory reform programme, including:
 - preparing a status report on progress of the regulatory reform programme to date;
 - assessing whether the priorities and focus of the programme are currently adequate;
 - reviewing the timeframe for completion of the regulatory reform programme, with the view to concluding the programme by the end of 2008; and
- Examining the consultation arrangements between industry and the Government's aviation agencies and recommending improvements.

The Taskforce held monthly meetings between May and December 2007. Officers of the Department of Infrastructure, Transport, Regional Development and Local Government (the Department) provided secretariat services.

Regulation reform

Regulatory Principles

CASA regulates civil aviation in Australia and for Australian aircraft overseas under the *Civil Aviation Act 1988* (the Act). The Act establishes a legal framework for maintaining, enhancing and promoting the safety of civil aviation, with particular emphasis on preventing aviation accidents and incidents across the various classes of aviation activities and aircraft occupants.

Under Mr Byron's guidance CASA is adopting a risk based approach to its policies and regulation with particular emphasis on passenger transport activities. CASA's framework for regulation seeks to ensure that policies and regulations are necessary, clear and cost effective, and that they address risks, establish safety outcomes, implement Government policy and are aligned with international standards.

Outcome-based safety regulations

The principle behind outcome-based regulations is to allow for an outcome to be reached via multiple or various pathways, while maintaining an acceptable level of safety. The outcome-based approach contrasts with the traditional prescriptive approach to regulation, where specific process and procedures are set as requirements.

CASA is implementing an outcome-based regulatory framework comprising:

- Outcome-based Regulations;
- Technical Standards;
- Acceptable Means of Compliance; and
- Guidance Material.

Outcome-based Regulations involve the implementation of relatively simple and brief regulations that express high-level safety outcomes.

Technical Standards include requirements that, for the purpose of clarity and effective administration, are best contained outside the regulations.

Acceptable Means of Compliance set out acceptable methods of demonstrating compliance with outcome-based regulations. Authorisation by the regulator is assured if an industry applicant follows the relevant Acceptable Means of Compliance. The applicant retains the ability to propose alternatives for consideration should they so wish, provided those alternatives would achieve the required safety outcome.

Guidance Material provides suggestions, explanations and amplification of a regulation's policy intention.

This outcome-based safety approach allows industry the flexibility to use the most appropriate systems and procedures to meet safety outcomes, recognising that one size does not fit all. It also promotes innovation and improvement.¹

The Taskforce endorses this outcome based approach and considers that this should be the basis of on-going reform of Australian aviation safety regulation and oversight.

Industry views on the CASA regulatory reform programme

The Taskforce was established in recognition of a view of some within industry that the regulatory reform programme was not achieving its desired outcomes in a reasonable timeframe. Delays in finalising the programme had led, in effect, to two systems of regulation – the Civil Aviation Regulations (CARs) supplemented by the Civil Aviation Orders (CAOs); and the Civil Aviation Safety Regulations (CASRs).

The complexity of having two systems in place at the same time has led to confusion and at times, uncertainty about which system is to apply in specific circumstances. The delays have also led to increased reliance on using the CAOs as a third tier of legislation to address more urgent safety matters and to permit earlier implementation of some of the outcomes of regulatory reform, in advance of publishing the new CASRs (for example to require airline safety management systems well in advance of the ICAO deadline of January 2009).

These views, along with concerns about the effectiveness and time-consuming nature of the CASA-industry consultation process, informed the Taskforce's work.

Completion of the reform programme

In considering how best to complete the regulatory reform programme within the timeframe set by the then Minister, the Taskforce assessed the status of the programme, which had originated in 1996 as the *Regulatory Framework Programme*.

CASA reported to the Taskforce that as at 30 November 2007, of the 60 Regulatory Parts currently being reviewed, 32 have been implemented, 12 are with the Office of Legislative Drafting and Publishing (OLDP – in the Attorney-General's Department) and 16 are under further development or assessment within CASA. **Attachment A** details the programme's status.

The Taskforce noted that, notwithstanding the best efforts of those concerned, several factors would mitigate against completing the programme by the end of 2008, including limited drafting resources in OLDP, the need for further industry consultation on some Parts, and the extensive implementation activities required to transition operators to the new regulations.

The Taskforce identified the Regulatory Parts that should be considered as priority areas of focus. The Parts identified included the Operational suite (including Parts 91, 119, 121, 129, 131, 133, 135 and 136), the Maintenance suite (Parts 42, 66, 145 and 147), the Flight Crew Licensing suite (including Parts 61 and 141) and the Sport and

¹ Section based in part on information sourced from CASA Website:
<http://www.casa.gov.au/newrules/process/safeoutcomes.htm>

Recreational Aviation suite (Parts 103, 105 and 149). A graphical depiction of the complete set of Parts is at **Attachment B**.

The Taskforce requested that CASA develop a timeframe for completion of the regulatory programme based on more efficient industry consultation processes and increased drafting resources in OLDP. The timeframe is at **Attachment C**. CASA's expectation is that all policy and regulatory development work will be completed in 2008, implementation of outstanding Parts will commence in mid-2008 and the programme will be fully implemented by 2011, subject to OLDP finalising drafting.

The Taskforce endorsed the timeframe and recommends that the Minister and CASA commit to achieving these deadlines and a programme for meeting them.

Recommendation 1: The Minister and CASA commit to achieving completion of the development of the priority Regulatory Parts by submitting all drafting instructions to OLDP by the end of 2008 and full implementation of these Parts by 2011.

The Taskforce also noted the need for ongoing review of regulations and the existing CASA practice of an initial one-year post-implementation-review for each CASR Part. The Taskforce endorsed the practice of post-implementation reviews, supported by additional reviews on an as-needs basis after the Regulatory Reform Programme has been completed.

Recommendation 2: CASA continue its practice of an initial one-year post-implementation- review for each CASR Part or on an as-needs basis after the Regulatory Reform Programme has been completed.

Regulatory drafting issues

The Taskforce considered the specific issue of legal drafting, acknowledged by industry stakeholders as a significant factor in delaying the finalisation of the outstanding regulatory Parts.

Consistent with Government policy on the preparation of regulations, responsibility for drafting CASA regulations lies with OLDP. In addition to CASA's regulatory priorities, the relevant OLDP drafting unit also has responsibility for legislative drafting for the Transport portfolio (including the Department, the Office of Transport Security, the Australian Transport Safety Bureau, and Airservices Australia), the Environment, Water, Heritage and the Arts portfolio and the Agriculture, Fisheries and Forestry portfolio.

The Taskforce heard that OLDP faced internal resourcing limitations at the same time as being called on to deal with work that had been accorded a high priority by the Government, notably security issues emanating from the Office of Transport Security.

The Taskforce facilitated discussions between Mr Byron, the Department and Mr Ian Govey, Deputy Secretary of the Attorney-General's Department, to address drafting issues, in particular the OLDP resourcing problem.

The outcome, endorsed by the Taskforce, was agreement to OLDP's recruitment of two additional senior drafters for a 2-year period, one at the Senior Executive Service level and the other as a Principal Legal Officer (Executive Level 2). The two additional drafters would be dedicated to CASA drafting work. Costs are to be met jointly by CASA and the Department.

Recommendation 3: OLDP finalise the recruitment of two additional senior drafters for a two-year period to focus solely on drafting of CASA regulations to assist with the completion of the CASA regulatory reform programme. The Department and CASA to settle remaining arrangements for these positions, and OLDP to consider other options to increase its productivity and reduce legal drafting timeframes.

Key issues and future directions for CASA

Industry consultation and communication

The issue of industry consultation and communication arose a number of times during the Taskforce's deliberations. Discussion addressed the formal structure of CASA consultations with industry through the Standards Consultative Committee (SCC), which is an industry/CASA regulatory consultative forum including more than 30 industry stakeholders. The Taskforce also discussed other specific issues such as the implementation of NAS 2c and changes to Airservices Australia's Flightwatch service.

The NAS 2c implementation process, (which was led by the NASIG (NAS Implementation Group) within the then Department of Transport and Regional Services), and the Flightwatch changes, were, in the view of the Taskforce, indicative of communication shortcomings.

The Taskforce heard of a lack of industry consultation undertaken in Airservices Australia's decision to change its Flightwatch service and transfer the function to Air Traffic Control. This apparent lack of consultation is of concern to the Taskforce. The Taskforce heard that the changes were being made to Flightwatch for cost saving reasons and users of its service were not consulted and thus had no say in the decision to change the service. The Taskforce was supportive of Airservices Australia being asked to commission an independent review of its decision to change the delivery of Flightwatch and to hold any further changes in the short-term.

The Taskforce agreed that the Government's aviation agencies can learn from these specific examples and should enhance existing or implement new procedures to ensure transparency and adequate industry awareness of new initiatives. In addition, the consultation models of leading overseas aviation countries should be considered when developing a best practice model.

Recommendation 4: The Government's aviation agencies review and enhance existing consultation arrangements and implement new procedures where warranted to ensure transparency and adequate industry awareness of new initiatives.

Standards Consultative Committee (SCC)

CASA uses the SCC and its associated subcommittees and working groups to help CASA form regulatory project teams and as a source of advice on proposed changes to regulation. Formal consultation on regulations through the SCC had previously been undertaken through a 15-step process. The Taskforce heard industry views that the 15-step process involved unnecessary process and that the CASA CEO instituted a number of improvements to CASA's regulatory processes in 2006 and 2007.

Following a Taskforce request that the 15-step process be reviewed, simplified and re-published, CASA developed a revised 10-step process that was subsequently endorsed by the Taskforce and presented to industry through the SCC. The process was

endorsed by SCC Members and published in November 2007. The revised consultative process is at **Attachment D**.

Recommendation 5: The Minister note the revised 10-step consultation process now implemented by CASA.

The Taskforce also considered the broader effectiveness of the SCC itself and took advice from Mr Graham, who has chaired the Committee since 2006. The Taskforce agreed there would be value in CASA monitoring its regulatory development processes and the use of joint CASA/industry project teams to develop regulatory policy proposals followed by more focused consultations through the SCC. The Taskforce further considered views on the role of the full SCC that meets in plenary three or four times per year. The Taskforce considered that the regulatory development process should be the subject of on-going review and evaluation in order to make the best use of the knowledge and abilities of SCC members and enhance the interaction between the CASA/industry project teams and the SCC subcommittees and working groups. The Taskforce noted that the role of the full SCC could also be reconsidered in this light.

Recommendation 6: CASA monitor the regulation development process using joint CASA/industry project teams and continue to review the role of the SCC in this process, in order to achieve further effectiveness and efficiency gains.

National Airspace System (NAS)

The Taskforce heard concerns about the implementation of the National Airspace System (NAS 2c) which was the responsibility of the NASIG, and the recent changes to Airservices Australia's Flightwatch service. In both cases, industry considers that it was not adequately consulted about proposed changes.

The Taskforce discussed these and other issues in some detail and felt it needed to better understand industry views and concerns. It therefore requested that it be permitted to review industry comments submitted to the Department as part of the post-implementation-review (PIR) of NAS 2c, with a view to establishing any 'lessons' that might improve processes, help manage risk and enhance working relationships.

The Taskforce's consideration of the PIR comments clearly showed that industry felt confused during the implementation of NAS, in the absence of easily understood status or progress reports. It was clear that implementation, rather than the thrust of NAS 2c proposals, was the issue. The Taskforce agreed that an adequate risk or cost benefit assessment did not appear to have been undertaken by the NASIG, and that this posed a potential risk to industry and the travelling public. The Taskforce considered that decisions should be made based on risk and risk management practices.

Recommendation 7: Consistent with its general obligations in relation to regulatory changes, CASA needs to ensure that airspace procedural changes are subject to risk and cost benefit assessments and that accessible progress reports are provided to industry. In cooperation with the other Government aviation agencies, CASA needs to lead, facilitate and ensure that industry training and education programmes are implemented for all airspace reform initiatives.

The Taskforce also agreed that the PIR submissions provided by industry were very constructive and would be of benefit to other aviation-related bodies of work. The Taskforce agreed that CASA's Office of Airspace Regulation (OAR) would benefit by having access to these comments to understand industry concerns better, including in relation to its recent discussion paper on Common Traffic Advisory Frequency – Radio (CTAF-R).

Recommendation 8: CASA review the industry submissions on the PIR of NAS 2c as part of its review of CTAF-R, subject to the agreement of those that had originally lodged the submissions.

Other Airspace Management

The Taskforce considered the initiative to provide Unicom services at certain aerodromes. A Unicom is a non-regulated aviation service that provides limited traffic services in the form of an information service to enhance situational awareness about surface movement and within the airspace adjacent to the aerodrome.

The Taskforce noted that Airservices Australia was undertaking a Unicom trial at Dubbo and Wagga Wagga and had developed operational guidelines that were also being assessed as part of the trial. Both CASA and Airservices Australia were working together on the Unicom trial and would engage with the wider aviation community to assess the risk and cost benefits of this type of service.

The Taskforce was advised that the Unicom trials would be concluded and the results known early in 2008.

Recommendation 9: Airservices Australia and CASA complete a full review of the Unicom trial and brief the Minister early in 2008 on the results of the trial and include an options paper for progressing the Unicom initiative.

Avalon Airport

Taskforce Members discussed Avalon Airport airspace management issues. Air traffic and passenger numbers have increased significantly in recent times, yet the airspace remains Class G with CTAF(R) procedures. Whenever the control tower is manned, which is rarely, the surrounding airspace becomes Class C.

Representations from industry argued that increased traffic levels at Avalon airport warranted a D classification and the provision of air traffic control tower services. The Taskforce heard that CASA was completing a full aeronautical study of Avalon airport in early 2008 to assess the need for tower services. Meanwhile, Airservices

Australia implemented changed air traffic measures in November 2007 to minimise risk.

CASA advised that international air services were expected to commence at Avalon airport in late-2008. Airspace classification and the provision of air traffic control tower services will need to be considered prior to these air services commencing.

Military Airspace

The Taskforce discussed an issue raised by various sectors of the aviation industry in relation to military aerodromes and civilian access to military airspace. The airspace and air traffic control service provision for civilian aircraft at Williamtown air base near Newcastle being a case in point.

The Taskforce Members agreed that this had been an issue for quite some time and the risk profile of the aerodrome was increasing, noting the matter was complex with numerous significant stakeholders. The Taskforce agreed that the matter should be raised at very senior levels with the RAAF to ensure that a solution could be agreed and implemented as soon as possible.

Given the history of this matter a solution will only be forthcoming if the respective Ministers oversee and reach agreement on a new approach. As part of these discussions, the safety of the travelling public at aerodromes such as Williamtown needs to be considered as the first priority, without limiting Regular Public Transport growth or necessarily changing the status of the aerodrome.

Recommendation 10: The Minister for Infrastructure, Transport, Regional Development and Local Government raise concerns about air traffic and airspace management at Williamtown and other military aerodromes with the Minister for Defence, to ensure that safe and reasonable practices are implemented to protect civilian aircraft and fare paying passengers in accordance with existing safety principles.

Additional issues considered by the Taskforce

The Taskforce considered a number of issues of interest to its members and of concern to the industry as a whole. These issues, which the Taskforce determined as falling within its terms of reference, are summarised below.

Critical skill shortages in the Australian aviation industry

The Taskforce considered issues associated with flight crew training and the relevant CASA regulations, including multi-crew pilot licensing (MPL) and current skills shortages across the aviation industry, particularly regional airline pilots and licensed aircraft maintenance engineers and flight training instructors.

The Taskforce asked CASA to examine the costs faced by individuals wanting to become pilots. CASA produced a report, the outcome of which established the cost of becoming a pilot on a regional airline was in the order of \$80,000 to \$100,000. The Taskforce noted the likelihood that these costs would be prohibitive and a barrier to entry for many young people.

The Taskforce also noted developments such as the possible inclusion of aviation studies in a high school curriculum, along with suggestions of HECS-funded places for aviation studies in Australian TAFE and tertiary education systems.

The Taskforce acknowledged recent actions in this area by Government, including recognition of the avionic and mechanical aircraft maintenance engineer occupations as 'occupations in demand' for immigration purposes, the work of an Interdepartmental Committee addressing skills shortages in the aviation industry, a General Aviation Industry Action Agenda and commitments to fund appropriate training and education targeting people wanting to enter the industry.

Recommendation 11: The Government work across its aviation, education, industry, immigration and workplace relations portfolios to consider further initiatives to assist the aviation industry address skills shortages.

Pilot and maintenance training

The Taskforce discussed the multi-crew pilot licence (MPL) which CASA is considering implementing. The MPL has the potential to develop the abilities needed to fly multi-crew airline aeroplanes and has been identified as a possible solution to accelerated pilot training through the use of modern simulation technologies and better training practices. The Taskforce was advised that much of the industry is supportive of the introduction of an MPL.

Maintenance training, specifically the B3 licensing category for the general aviation industry was also discussed. The Taskforce was advised that the regulation underpinning the B3 category should be in place by mid-2008 and that early implementation through the CAOs was being considered. The Taskforce endorsed the work CASA was doing in relation to the B3 licence.

The Taskforce also discussed difficulties being experienced by the aviation industry in acceptance of overseas maintenance engineer qualifications. The industry has expressed significant issues with manufacturer endorsed training not being recognised by CASA. The Taskforce heard that this was a frustrating and costly exercise for industry, particularly the smaller operators.

The Taskforce agreed that CASA should consider additional steps to recognise acceptable overseas maintenance qualifications, in order to remove unnecessary barriers and costs to industry.

Recommendation 12: CASA urgently consider additional and alternative approaches to accepting foreign qualifications for maintenance licence issue in Australia.

Industry costs and international comparisons

The Taskforce discussed cost issues, including security and other compliance costs, affecting the Australian aviation industry and also explored how these costs compared with countries with a comparable aviation policy environment.

It was put to the Taskforce that many smaller aviation operators, in both the general aviation and regular public transport sectors, were not aware of their detailed regulatory cost structure and did not have sufficient resources to ensure they were operating efficiently. It was argued that this made it imperative that CASA's regulatory oversight impose only those costs that were justified on safety grounds and in accordance with the Government's cost recovery policy.

The Taskforce discussed CASA CEO Directive 16/2004. The Taskforce heard concerns from industry that the Directive, which provides guiding principles for the development of aviation safety regulations, did not include specific reference to costs.

Following a request from the Taskforce, Directive 16/2004 was reviewed and the result was a new Directive 1/2007, explicitly addressing costs, being issued by Mr Byron (**Attachment E**). The Directive establishes that aviation safety regulations must take into account CASA's classification of activities policy; be necessary to address safety risks; provide for the most efficient allocation of industry and CASA resources; not impose any unnecessary costs; and be aligned with the standards and practices of the leading aviation countries. The Taskforce endorsed the new Directive and noted the desirability of its review on a regular basis. This regular review should also include and CASA's adherence to the Directive's overarching principles.

Further to the revision of the CEO Directive, the Taskforce requested that CASA regulatory Parts be reviewed to ensure the Directive's intention with regard to costs was being reflected. These reviews have been incorporated into CASA's normal regulatory development processes.

Recommendation 13: CASA commit to the adherence to the principles of CEO Directive 1/2007 and to review its requirements on a regular basis.

Noting the interest in assessing where Australia stood with regard to other countries, the Taskforce requested that CASA commission work comparing Australian pilot licensing costs with those in countries with a similar aviation policy environment. The results (**Attachment F**) showed that Australia's costs were largely comparable to other countries but that different philosophies on cost recovery pertained in the different jurisdictions.

The Taskforce sought similar research through CASA on the issue of maintenance training costs for Licensed Aircraft Maintenance Engineers. As the initial research did not include full consideration of Australian licensing costs, the Taskforce asked CASA for further information on full licensing costs, which CASA added to its report. The results (**Attachment G**) showed that similar to the pilot licensing study, Australia's costs were comparable to or lower than other countries but that different philosophies on subsidies pertained in the different jurisdictions.

The Taskforce noted the desirability of ensuring that industry had access to these studies and requested that they be made available on CASA's website. These reports were posted on CASA's website in September and December 2007.

Australian Airworthiness Directives

The Taskforce considered the status of Australian Airworthiness Directives (AADs). The issue, raised within the Taskforce and by the Aviation Maintenance Repair and Overhaul Business Australia (AMROBA), was that approximately 3,600 AADs unique to Australia had accumulated to address specific safety circumstances. It was clear that many of these were outdated, had been superseded or were simply no longer necessary.

The Taskforce endorsed a review of the AADs that CASA had already commenced including a process by which those that were no longer relevant would be culled. The Taskforce also asked CASA to provide it and industry on an ongoing basis with updates on the cancellations.

Advice from CASA was that at 10 December 2007:

- 224 had been reviewed;
- 141 had been recommended for cancellation; and
- 3,373 were yet to be reviewed

CASA advised that while good progress was being made, the process was resource intensive and would take some time. The Taskforce acknowledged this and asked CASA to keep industry updated on progress.

Further, the Taskforce expressed an expectation that any new AADs implemented would be consistent with the principles within CASA CEO Directive 1/2007.

Recommendation 14: CASA provide regular updates to the Minister and industry on the progress of its Australian Airworthiness Directives review process.

New technologies

New technologies - in particular, Traffic Alert and Collision Avoidance Systems (TCAS), Terrain Awareness and Warning Systems (TAWS) and Automatic Dependent Surveillance – Broadcast (ADS-B) – were discussed by the Taskforce.

Discussion addressed new technologies from both operational and safety perspectives. The Taskforce acknowledged the significant potential benefits of some new technologies, while noting practical, secondary back-up systems and cost issues, particularly for regional aviation.

In this context, the Taskforce was advised that the estimated cost of purchasing and installing a TAWS B unit on a smaller six to nine passenger seat aircraft would be in the order of \$20,000-\$25,000. This does not take into account the downtime associated with installation. The industry, through the SCC, was encouraged to make submissions to CASA in this area.

While supporting the implementation of new technologies that could have significant safety benefits for the aviation industry, the Taskforce noted that proper consideration of these technologies, and at what passenger capacity level they should be introduced, would require more research and active consultation with the industry as a whole. In particular, an emphasis on details of how the proposals will change the operational concepts and an accurate assessment of costs would be required.

Recommendation 15: The Taskforce agreed that Australia should continue to benchmark and harmonise with other leading aviation countries in relation to new technologies, subject to risk and cost-benefit considerations. Consideration should also be given to the ability of operators to absorb the costs associated with these technologies and what initiatives might be available to minimise cost impacts.

Summary of recommendations

Recommendation 1: The Minister and the Civil Aviation Safety Authority (CASA) commit to achieving completion of the development of the priority Regulatory Parts by submitting all drafting instructions to the Office of Legislative Drafting and Publishing (OLDP) by the end of 2008 and full implementation of these Parts by 2011.

Recommendation 2: CASA continue its practice of an initial one-year post-implementation-review for each Civil Aviation Safety Regulation (CASR) Part or on an as-needs basis after the Regulatory Reform Programme has been completed.

Recommendation 3: OLDP finalise the recruitment of two additional senior drafters for a two-year period to focus solely on drafting of CASA regulations to assist with the completion of the CASA regulatory reform programme. The Department and CASA to settle remaining arrangements for these positions, and OLDP to consider other options to increase its productivity and reduce legal drafting timeframes.

Recommendation 4: The Government's aviation agencies review and enhance existing consultation arrangements and implement new procedures where warranted to ensure transparency and adequate industry awareness of new initiatives.

Recommendation 5: The Minister note the revised 10-step consultation process now implemented by CASA.

Recommendation 6: CASA monitor the regulation development process using joint CASA/industry project teams and continue to review the role of the Standards Consultative Committee (SCC) in this process, in order to achieve further effectiveness and efficiency gains.

Recommendation 7: Consistent with its general obligations in relation to regulatory changes, CASA needs to ensure that airspace procedural changes are subject to risk and cost benefit assessments and that accessible progress reports are provided to industry. In cooperation with the other Government aviation agencies, CASA needs to lead, facilitate and ensure that industry training and education programmes are implemented for all airspace reform initiatives.

Recommendation 8: CASA review the industry submissions on the post-implementation-review of NAS 2c as part of its review of Common Traffic Advisory Frequency-Radio, subject to the agreement of those that had originally lodged the submissions.

Recommendation 9: Airservices Australia and CASA complete a full review of the Unicom trial and brief the Minister early in 2008 on the results of the trial and include an options paper for progressing the Unicom initiative.

Recommendation 10: The Minister for Infrastructure, Transport, Regional Development and Local Government raise concerns about air traffic and airspace management at Williamtown and other military aerodromes with the Minister for Defence, to ensure that safe and reasonable practices are implemented to protect civilian aircraft and fare paying passengers in accordance with existing safety principles.

Recommendation 11: The Government work across its aviation, education, industry, immigration and workplace relations portfolios to consider further initiatives to assist the aviation industry address skills shortages.

Recommendation 12: CASA urgently consider additional and alternative approaches to accepting foreign qualifications for maintenance licence issue in Australia.

Recommendation 13: CASA commit to the adherence to the principles of CEO Directive 1/2007 and to review its requirements on a regular basis.

Recommendation 14: CASA provide regular updates to the Minister and industry on the progress of its Australian Airworthiness Directives review process.

Recommendation 15: The Taskforce agreed that Australia should continue to benchmark and harmonise with other leading aviation countries in relation to new technologies, subject to risk and cost-benefit considerations. Consideration should also be given to the ability of operators to absorb the costs associated with these technologies and what initiatives might be available to minimise cost impacts.

Member Attendance at Taskforce meetings in 2007

	14 May	04 Jun	02 Jul	27 Aug	24 Sep	29 Oct	26 Nov	10 Dec
Dr Allan Hawke	✓	✓	✓	✓	✓	✓	✓	✓
Mr Bruce Byron	✓	✓	✓ (a)	✓	✓	✓	✓	(f)
Mr Rob Graham	✓	✓	✓	✓	(d)	✓	✓	✓
Mr Jeff Boyd	✓	✓	✓	✓	✓	✓	✓	✓
Mr Dick Smith	✓	✓	✓	✓	✓	(e)	✓	✓
Mr David Cox	n/a	n/a	✓ (b)	✓ (c)	✓ (c)	✓ (c)	✓ (c)	✓ (c)

- (a) Mr Byron attended the meeting via telephone hook-up from Brisbane.
- (b) Mr Cox was represented by Mr Rob Kella, QANTAS Chief Risk Officer.
- (c) Mr Cox was represented by Mr Ron Bartsch, QANTAS Group General Manager Safety Compliance and Operational Risk.
- (d) Mr Graham was unable to attend due to overseas travel.
- (e) Mr Smith was unable to attend due to overseas travel.
- (f) Mr Byron attended via telephone hook-up from Melbourne.