



Australian Government
Civil Aviation Safety Authority

DISCUSSION PAPER



Safety standards for community service flights conducted on a voluntary basis

Issued for public consultation by
CASA's Standards Division

DP 1317OS – August 2014
Project Number: OS 13/25

Audience

This Discussion Paper will be of interest to the following persons in the aviation community:

- pilots of small aeroplanes and rotorcraft currently being used for community service flights and similar operations
- aircraft owners and operators who make their small aircraft available for community service flights, and other persons and organisations associated with those activities
- health professionals (medical practitioners, nurses, social workers, other health-service providers) who make requests for the use of an aircraft to undertake a community service flight on behalf of a patient
- patients and carers who may use community service flights, their families and the wider Australian community
- aircraft maintenance service providers who perform maintenance on small aeroplanes and rotorcraft
- owners and operators of aeroplanes and rotorcraft
- current holders of Air Operators' Certificates authorising charter, aerial work and aeromedical /EMS operations.

Response date

The Civil Aviation Safety Authority (CASA) is responsible under the *Civil Aviation Act 1988* for, amongst other functions, developing and promulgating appropriate, clear and concise aviation safety standards. CASA must, where appropriate, consult with government, commercial, industrial, consumer and other relevant bodies and organisations in the performance of this function and the exercise of its powers.

Civil Aviation Act 1988 Subsection 9(1)(c) and Section 16

This Discussion Paper (DP) contains options that may be pursued in a future regulatory change proposal e.g. Notice of Proposed Rule Making (NPRM). These documents all form part of the consultation process.

No action will be taken until all responses and submissions have been considered. To ensure clear and relevant safety standards, CASA needs the benefit of your knowledge as an aviator, aviation consumer and/or provider of related products and services.

You can help by completing the DP Response Form and returning it to CASA by 10 October 2014.

Foreword

In this DP, the term 'community service flight' is used to describe flights that are provided on a voluntary basis for public benefit. The term refers only to non-emergency flights provided as part of an organised voluntary or charitable activity and does not include the 'one-off' type of flight in which a pilot provides a flight to a friend or family member.

The purpose of this DP is to stimulate discussion and invite comment from interested members of the public and the aviation industry about how community service flights should be regulated under new *Civil Aviation Safety Regulations 1998 (CASR)*.

Volunteer organisations that bring together aircraft owners and pilots to provide voluntary public benefit flights to persons remote from some services have been operating in Australia since 2003. These organisations provide valuable community services by transporting community members to medical services that might otherwise be geographically out of their reach and, in some cases, transporting people to visit a hospitalised family member.

Community service flights are potentially open to a wide section of the community and are conducted by pilots with varying experience and qualification levels. Similarly, unless controls are put in place, the aircraft involved could potentially vary from an amateur-built experimental aircraft through to a turbine powered corporate aircraft. As community service flights become more widely used, the variable pilot qualifications and aircraft certification and maintenance standards become significant potential risk factors. CASA must consider and regulate appropriately to protect against an unreasonable level of risk in order to maintain an acceptable level of safety for the pilots, their passengers and the public.

This DP explains CASA's considerations for selection of an appropriate standard and describes a number of potential options for future regulatory change. CASA recognises the valuable contribution that industry consultation makes to the regulatory development process. CASA issues this DP as the first stage of consideration. The purpose of a DP is to canvas a range of options that consider whether it is appropriate for an Air Operator's Certificate (AOC) to be required for community service flights, or if other mechanisms may be more appropriate for the purpose of accommodating these types of flights while ensuring that acceptable standards of safety are maintained.

I would like to thank you in advance for taking time to consider and respond to this DP.

Peter Boyd
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August 2014

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1 Reference material

1.1 Acronyms

The acronyms and abbreviations used in this DP are listed in the table below.

Acronym	Description
AOC	Air Operator's Certificate
ASAAO	Approved Self-Administering Aviation Organisation (proposed in CASR Part 149)
ATPL	Air Transport Pilot Licence
CAR 1988	<i>Civil Aviation Regulations 1988</i>
CASA	Civil Aviation Safety Authority
CASR 1998	<i>Civil Aviation Safety Regulations 1998</i>
CofA	Certificate of Airworthiness
CPL	Commercial Pilot Licence
DP	Discussion Paper
FRMS	(Human) Fatigue Risk Management System
IFR	Instrument Flight Rules
LAME	Licensed Aircraft Maintenance Engineer
LSA	Light Sport Aircraft [defined in regulation 21.186 of CASR]
NPRM	Notice of Proposed Rule Making
PPL	Private Pilot Licence
RA-Aus	Recreational Aviation Australia
RPL	Recreational Pilot Licence
RPT	Regular Public Transport
SMS	Safety Management System
VFR	Visual Flight Rules

1.2 Definitions

Terms that have specific meaning within this DP are defined in the table below.

Term	Definition
Austroads driver's licence medical	The medical standards for the issue of an unconditional private motor vehicle driver's licence, set out in the publication <i>Assessing fitness to drive for commercial and private vehicle drivers</i> , published by Austroads in March 2012, or any later version as in force from time to time. ¹
CASR operational regulations suite	Proposed Parts 91, 119, 121, 133 and 135 of CASR. ²
Recreational aviation medical practitioner's certificate	A certificate from a medical practitioner to the effect that the holder meets the modified Austroads medical standards. ³
Passenger(s)	In relation to an aircraft, means a person who intends to travel on a particular flight on the aircraft; or is on board the aircraft for the flight; or has disembarked from the aircraft following a flight; and who is not a member of the crew of the aircraft for the flight. ⁴
Regular Public Transport	Transporting persons generally, or transporting cargo for persons generally, for hire or reward in accordance with fixed schedules to and from fixed terminals over specific routes with or without intermediate stopping places between terminals. ⁵

¹ See www.austroads.com.au/assessing-fitness-to-drive/

² Refer to draft amendment to CASR Dictionary proposed to accompany the making of Parts 91, 119, 121, 133 and 135 of CASR 1998.

³ Specified in Regulation 61.030 of CASR 1998.

⁴ Refer to draft amendment to CASR Dictionary proposed to accompany the making of Parts 91, 119, 121, 133 and 135 of CASR 1998.

⁵ See paragraph 206 (1) (c) of CAR 1988.

1.3 References

Regulations are available on the ComLaw website <http://www.comlaw.gov.au/Home>

Information about proposed regulations is available on the CASA website
http://www.casa.gov.au/scripts/nc.dll?WCMS:PWA::pc=PC_91072

Part 61 of CASR 1998—Flight crew licensing

Proposed Part 91 of CASR 1998—General operating and flight rules
<http://www.casa.gov.au/scripts/nc.dll?WCMS:PWA::pc=PARTS091>

Proposed Part 119 of CASR 1998—Australian air transport operators - certification and management
<http://www.casa.gov.au/scripts/nc.dll?WCMS:PWA::pc=PARTS119>

Proposed Part 133 of CASR 1998—Australian air transport operations - rotorcraft
<http://www.casa.gov.au/scripts/nc.dll?WCMS:PWA::pc=PARTS133>

Proposed Part 135 of CASR 1998—Australian Air Transport Operations - Small Aeroplanes
<http://www.casa.gov.au/scripts/nc.dll?WCMS:PWA::pc=PARTS135>

Proposed Part 149 of CASR 1998—Approved Self-Administering Aviation Organisations
<http://www.casa.gov.au/scripts/nc.dll?WCMS:PWA::pc=PARTS149>

2 Industry consultation

2.1 Preliminary consultation

On 25 August 2008, CASA met with representatives of Angel Flight Australia, a charity that coordinates non-emergency flights to assist rural Australians access city medical services. CASA briefed Angel Flight representatives about the proposed CASR operational regulations suite and sought their input. Future impact upon Angel Flight's established practice was discussed, as was CASA's intent to consult publicly on how such flights might be regulated in future.

On 11 January 2014, CASA met with representatives of the Little Wings group, a charity that provides non-emergency air travel support for children with cancer, and their families. The representatives outlined their organisation's structure, procedures and plans. CASA outlined the consultation process and discussed in general terms, options that may be included in any consultation process.

2.2 DP consultation process

CASA is committed to working cooperatively with the aviation community to maintain and enhance aviation safety. Publication of this DP constitutes the first stage of formal public/industry consultation on issues and proposals related to rules for flights carrying people in small aircraft on a voluntary basis for facilitating access to services.

CASA will consider comments made in response to this DP prior to any specific change proposals put forward in a subsequent NPRM.

2.3 What CASA does with your comments

CASA is required to register and review each comment and submission received, but will not individually acknowledge a response unless specifically requested to do so. A summary of the comments provided in each submission will be published without attribution in a Summary of Responses, typically provided as an Annex to a subsequent NPRM. If consent is provided the contributor's name will additionally be published as a List of Respondents, typically provided in a subsequent NPRM.

At the end of the response period for public comments, CASA will consolidate and consider all submissions received in response to this DP. The outcomes from the evaluation of comments on the DP may lead to development of an NPRM. If an NPRM is developed and CASA decides to make a rule change, the responses to the NPRM would be published with the proposed final rule in the form of a Notice of Final Rule Making (NFRM) concurrent with the making of the final rule.

3 Discussion

3.1 Objectives

CASA is issuing this DP in anticipation of the commencement of the CASR operational regulations suite in early 2015. The objectives of this DP are to:

- assess whether the legislative requirements that presently apply to community service flights are appropriate, and identify potential improvements that may provide for a better safety outcome without resort to requirement for an AOC
- explore the ramifications for industry and people who may use the services provided if community service flights are regulated as an air transport operation and required to be conducted under an AOC
- explore industry's concerns regarding the future regulatory treatment of community service flights
- articulate the options being considered by CASA that may be more appropriate for accommodating community service flights under the new regulations, while ensuring that acceptable standards of safety are maintained.

3.2 Background

Proposed Part 91 of CASR 1998 will regulate the carriage of persons on an aircraft as a guest of the pilot in a similar way to carriage currently classified as 'private operations'.

A person travelling in a general aviation aircraft cannot be assured of the same level of safety as a passenger with an airline or on a charter flight. If everything else were equal, the fundamentals of the aircraft's certification standards (such as the redundancy systems of the aircraft) and maintenance standards would mean that the airline passenger would have a greater assurance of safety.

Future legislation will require all forms of passenger transport (including operations currently known as charter flights) to meet the same high standards, thereby assuring the safest possible outcome (given the size of the aircraft) for their passengers.

3.3 Key considerations

This DP raises questions about how community service flights should be regulated, given that the flights are generally provided at no cost to persons in need within the community by a substantially volunteer based organisation. CASA's analysis of recent accident reports involving community service flights has highlighted the fact that pilots carrying out the flights have varying qualifications and experience levels, and the aircraft involved vary in size/power and certification basis including the utilisation of aircraft from manufactured as far back as the 1950s, training aircraft and modern turbine-powered corporate aircraft.

It is widely recognised that the availability of community service flights fills an important community need, and as community service flights become more widely used, pilot

qualifications, pilot experience and aircraft certification and maintenance standards could become significant risk factors. CASA must consider these risk factors and manage them through appropriate regulatory mechanisms in order to maintain an acceptable level of safety for the pilots, their passengers and the public.

For community service flight operators, full compliance with Parts 119 and 133/135 of CASR 1998 could well impose costs and other burdens that would make the continuation of such flights untenable. The valuable societal benefits that community service flights provide must be considered against the probable additional costs of any additional safety requirements, while at the same time ensuring the safety of air navigation.

This DP seeks to establish public and aviation community opinion on how CASA should balance the safety standards for all flights that carry passengers on a publicly available basis against the likelihood that if the same requirements were applied to community service flights, they would no longer be available to communities due to high compliance costs.

3.4 Options for discussion

In response to these issues, this DP presents ten principal options for consideration.

Options 1–6 provide a range of **administrative options**, some of which may be combined with elements of other options to minimise risk:

- Option 1 – do nothing
- Option 2 – status quo with passenger safety briefing/acknowledgement
- Option 3 – additional pilot training and checking requirements
- Option 4 – implementation of a volunteer community service pilot registration system
- Option 5 – use of an Approved Self-Administering Aviation Organisation (ASAAO)
- Option 6 – conduct of operations under an AOC.

Options 7–9 provide a range of **operational requirements** that may be implemented in conjunction with one or more administrative options:

- Option 7 – flight-crew licencing requirements
- Option 8 – aircraft operational limitations
- Option 9 – aircraft certification and maintenance requirements.
- Option 10 – public education program

Administrative options

3.4.1 Option 1 – do nothing

Option 1 would treat community service flights as private operations. That is, Part 91 of CASR 1998 and associated legislation that governs private operations would be the applicable regulation basis.

As with Options 2, 3,4 and 10 (discussed in the following sections), this option eliminates the financial burden of application and processing fees incurred with an AOC application, thus allowing volunteer organisations to direct their financial resources to their primary role. However,

this option places the volunteer organisations outside of the AOC approval structure and associated CASA safety oversight, and would not address any of the identified safety concerns articulated in section 3.3 (Key considerations), particularly varying pilot qualification and experience levels, and aircraft certification and maintenance standards.

The safety of the operation would continue to rely on the individual pilots who offer the use of their time, skills and aircraft to provide the transportation. Further, those in the medical profession who are responsible for deciding whether a person's (i.e. patient's) circumstances warrant the services of the volunteer organisation would be unable to assess the operation.

There is a lack of transparency as to the volunteer organisation's choice of aircraft and pilot, and whether safe transportation can be assured on any particular mission on any specific day. Another issue with this structure is the lack of clarity as to the level of responsibility and liability that each agent (i.e. medical professional, pilot and organisation) assumes when a community service flight is conducted.

3.4.2 Option 2 – status quo with passenger safety briefing/acknowledgement

If option 2 were adopted, CASA would add a requirement that passengers must be made aware of, and voluntarily accept, the risks associated with flights that are not subject to the higher standards applicable to passenger transport operations. The personal acceptance of the aviation risk is not a new concept in the Australian aviation environment—it is routinely used in connection with certain kinds of sport and recreational aviation activities. Implicit in this approach is some form of agreement, signifying that the participant (or their guardian/carer):

- has been briefed on the risk of the aviation activity
- is aware that the aviation activity does not come with an assurance of airline-level safety
- accepts the risk of the aviation activity.

In all other respects, the advantages and disadvantages discussed in Option 1 would be applicable. Additional costs associated with this option would be negligible: If required, a simple acknowledgment form could be generated and printed on a home computer.

3.4.3 Option 3 – additional pilot training and checking requirements

Option 3 proposes that, instead of introducing new (or expanding existing) operational-based regulations, CASA would introduce specified and appropriately rigorous requirements that would apply to pilots who wish to conduct community service flights. A pilot conducting community service flights who was not covered by another appropriate flight crew training and checking regime (i.e. the pilot was not an active professional pilot) would be required to undergo more regular proficiency checks with a qualified examiner, in accordance with a checking syllabus approved by CASA. The syllabus would focus on matters germane to the operation of community service flights, such as:

- aircraft loading
- inadvertent flight into instrument meteorological conditions
- flight planning
- fuel management.

An additional requirement would be the pilot's obligation to ensure that those travelling on the aircraft are made aware of, and voluntarily accepted, the risks associated with flights that were not subject to the higher standards applicable to passenger transport operations. This requirement is discussed in detail in Option 2.

This option would impose additional costs on community service pilots who are not subject to any form of proficiency checking other than the two-yearly flight review. The checks would be required to be undertaken at least on an annual basis to be effective and would cost approximately \$500 per check. Some of this cost could be offset by combining every second check with a flight review.

There is the potential to combine this option with Option 4 - Volunteer community service pilot registration system.

3.4.4 Option 4 – volunteer community service pilot registration system

This option proposes a simple pilot registration scheme and associated Registration Certificate. This option would provide CASA with 'visibility' of pilots conducting community service flights, including information about their qualifications, experience and routes flown, and provide a more informed view for decision making than is presently the case for this industry segment.

A pilot registration system, as distinct from the concept of an AOC or an organisational approval, could be used to allow qualification as a 'Registered Flight Provider' (or similar title). The registration process could involve:

- submission of a simple registration/notification for pilots
- an undertaking to operate to the required standards of a 'Registered Flight Provider' (which would be specified in an appropriate document)
- a statement that the pilot holds all required qualifications and prerequisite experience for being a 'Registered Flight Provider'
- the potential to be subject to a level of oversight by CASA, in keeping with the relatively simple nature of the operation.

An additional requirement for option 4 would be that those travelling on community service flights must be made aware of, and voluntarily accept, the risks associated with flights that are not subject to the higher standards applicable to passenger transport operations. Option 2 discusses this requirement in detail.

Although this option removes aspects of the safety oversight regimes associated with Option 5 (use of an ASAAO) and Option 6 (AOC), the risk elements highlighted in Option 6 could be mitigated in Option 4 by measures such as:

- specified oversight arrangements by CASA
- specified entry control requirements
- a requirement to operate to a generic operations manual
- a mechanism for the regulator to monitor safety performance of pilots and take remedial steps if required.

This option would involve some setup and administrative costs to CASA but would not impose any compliance costs on the service provider organisations or their pilots.

3.4.5 Option 5 – use of an Approved Self-administering Aviation Organisation

Part 149 of CASR 1998 is currently under development to allow CASA to approve organisations to administer particular kinds of aviation activities. Part 149 facilitates self-administering aviation organisations and provides a model for CASA's oversight of organisations that have a history of being able and willing to administer specified operations and activities on a responsible basis. Eligible organisations, and the persons whose activities they govern, would be required to operate in accordance with a set of procedures and standards approved by CASA but administered by the approved organisation.

CASA expects that Part 149 of CASR 1998 will regulate CASA's approval of organisations. Such approval would be subject to, amongst other things, approval of relevant operational and technical manuals with which participants would be required to comply. Part 149 of CASR would provide for a generic regulatory framework, governing a variety of ASAAOs, including organisations established to oversee aspects of community service flights. CASA's expectation would be that pilots wishing to conduct community service flights would be appropriately affiliated with an organisation approved by CASA to self-administer community service flights.

There are charitable organisations that already function as a kind of 'booking agency' for the conduct of community service flights. If this proposed regulatory model is adopted, such organisations (or affiliated entities) would be expected to ensure that the pilots and aircraft meet specified standards when conducting such activities under the organisation's auspices. The ASAAO's responsibilities could include:

- task-specific training
- assessing and authorising pilots
- monitoring pilot currency
- assessment and approval of aircraft for the type of operations
- regular pilot proficiency checking
- pilot and aircraft tasking.

The ASAAO would be required to produce an exposition detailing how it would perform the specified operations for which it sought approval. CASA would assess and if satisfied, approve the exposition and any associated manuals; these would then constitute the guiding document(s) for the activities of the organisation, and provide a set of benchmarks by which CASA would monitor the organisation's record in meeting its safety obligations.

Option 4 would ensure an acceptable level of safety by providing a mechanism for CASA to monitor pilot and aircraft standards without imposing what could be unduly burdensome regulatory requirements. CASA acknowledges that this option is dependent upon a suitable industry body adopting this self-administering function. In the absence of that happening, other options would have to be considered.

The cost to set up an ASAAO would depend on the range of functions to be undertaken and the level of existing infrastructure that an applicant could draw upon, however, administrative costs

such as preparation of an exposition, establishing an SMS and CASA fees, would be similar to the cost of establishing an AOC which is discussed in more detail in option 6.

3.4.6 Option 6 – conduct of operations under an AOC

Option 6 proposes that, in future, the CASR would require community service flights in small aircraft be conducted under an AOC.

An AOC provides safety assurances associated with the high standards and close regulatory oversight of an operator such as:

- higher maintenance standards
- higher flight crew standards
- more frequent oversight by the aviation safety regulator
- entry control requirements for new operators
- ability for the regulator to detect and act on non-compliant conduct by operators
- consistency with International Civil Aviation Organization requirements
- mandatory management systems (i.e. SMS, Training & Checking, FRMS, change management)
- specified key personnel with defined role responsibility, qualifications, experience
- standardised operations associated with use of an exposition, manuals and procedures.

The cost of establishing a simple AOC would vary depending on the standard of an application but indicative figures would be:

CASA fees and charges	\$7000
Operations manual preparation	\$3500
SMS	\$4100
Total	\$14600

Operational requirements

CASA proposes some safety based requirements that would apply regardless of any administrative model that may be adopted.

3.4.7 Option 7 – Flight-crew licencing requirements

Option 7 proposes that, when regulated under the proposed CASR operational regulations suite, community service flights would be limited to flights undertaken by pilots who hold one of the following qualifications and levels of experience:

- an Air Transport Pilot Licence (ATPL) with any experience
- a Commercial Pilot Licence (CPL) with any experience
- a Private Pilot Licence (PPL) with both of the following:
 - the experience requirements for the grant of a CPL as stated in regulation 61.610 of CASR 1998 for an aeroplane or regulation 61.615 of CASR 1998 for a helicopter
 - at least 10 hours' flight time as pilot-in-command of an aircraft that is the same type as, or similar to, the community service flight aircraft, unless the pilot:

- o has at least 500 hours' flight time as pilot-in-command of an aircraft
- o has at least 100 hours' flight time as pilot-in-command of a multi-engine aeroplane, if the community service flight aircraft is a multi-engine aeroplane.

In addition, the pilot must also hold a current Class 1 or Class 2 medical certificate.

The requirement for the pilot to have a PPL (or higher) as a minimum qualification, with at least CPL prerequisite experience and a current Class 2 medical certificate, would prevent persons with a (Part 61 of CASR 1998) Recreational Pilot's Licence or only Recreational Aviation Australia (RA-Aus) qualifications, from commanding a community service flight.

The medical requirement would require a minimum (CASA) Class 2 medical rather than a Recreational aviation medical practitioner's certificate or an RA-Aus equivalent.

This option would impose no costs on the service providers and would minimise risk associated with pilot skill and experience levels.

3.4.8 Option 8 – Aircraft operational limitations

Option 8 proposes that, when regulated under the proposed CASR operational regulations suite, community service flights would have the following limitations:

- Visual Flight Rules (VFR) flights would only be permitted by day and with not more than six persons on board
- Instrument Flight Rules (IFR) flights would only be permitted with not more than six persons on board (either day or night).

This option would have the effect of preventing night VFR flights for community service flights. Further, this would preclude community service flights with more than six persons on board, thereby limiting the consequences of any potential accident.

3.4.9 Option 9 – Aircraft certification and maintenance requirements

Option 9 proposes that, when regulated under the proposed CASR operational regulations suite, community service flights would be limited to aircraft of a standard category Certificate of Airworthiness (CofA) that are maintained by a Licenced Aircraft Maintenance Engineer (LAME) to manufacturers' requirements or as approved by CASA.

This option would have the effect of (a) excluding the use of Light Sport Aircraft and (b) preventing the unlikely scenario of an experimental, limited category (e.g. warbird aircraft), owner-maintained or on-condition engine/propeller aircraft from being used to conduct a community service flight.

3.4.10 Option 10 – Public education program

If option 1 or 2 should emerge out of this discussion as a clear community and industry preference, CASA could couple either option with a targeted program of public education, which would aim to ensure that prospective community service flight passengers are fully advised of the risk levels associated with such flights. CASA's Safety Education and Promotion branch could create a package of information, which would compare the levels of safety management in passenger transport operations under an AOC against operations conducted under Part 91.

3.5 CASA's preferred option(s)

CASA's first priority is to protect the safety of passengers who are least able to control the aviation-related risks to which they are exposed while maintaining the least possible regulatory compliance costs for the providers of the community service flights.

For this reason, CASA considers that a full AOC option is not required. Equally, CASA does not regard a continuation of the status quo (i.e. use of any aircraft, any pilot licence etc.) to be sound safety regulation.

Option 5—establishment of an ASAAO—is CASA's preferred method of meeting safety management goals within reasonable regulatory constraints. This option would allow the industry sector (community service flights) to address safety appropriately, once a self-administering organisation receives CASA approval.

In the absence of an industry-based organisation to take up such a role, CASA's second preference would be to consider a pilot registration system with specific pilot experience and training requirements, operational limitations and minimum aircraft standards (a combination of options 3, 4, 7, 8 and 9).

3.6 Conclusion

It is important, particularly in the area of the aviation community with which this DP is concerned, that CASA recognises the community benefits of a regulated community service flight sector and adopt a regulatory strategy that properly balances consideration of the safety risks inherent in a particular activity with rational approaches to the mitigation of those risks. CASA believes that there is a need to ensure appropriate boundaries around activities of this kind, with a view to ensuring the safety of passengers, pilots, other airspace users, people and property on the ground.

Additional information is available from:

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