

[REDACTED]

From: Grant White [REDACTED]
Sent: Monday, 22 July 2019 11:33 PM
To: Civil Aviation Bill
Subject: Support of Aviation Forum Submission

To Whom it may concern

Good Evening

I would like to offer my support to the submission regarding the Civil Aviation Bill made by the Aviation Forum.

I strongly agree with the submission view that the regulator needs to provide consistent interpretation of the rules applicable to each Civil Aviation Unit for example the Helicopter and Agricultural Unit so that participants in the aviation industry are not constantly faced with a moving target of interpretation depending on which regulatory inspector is reading the rule. This inconsistency adds workload and cost to the regulator and the participant and is not usually of any safety value. Consensus and consistency in interpretation would add value to the regulator safety focus and allow the participant to focus on the safety side of their business instead of constantly changing expositions to meet a new interpretation.

Another area that requires review is the importance of the Human Factors in Aviation Safety that should be given more attention as Humans are the only ones that make decisions towards safe or unsafe outcomes.

The CAA needs to have a Helicopter Rule that would consolidate all things applying to Helicopters Operations. This would in effect streamline helicopter safety and compliance that considers modern machinery, technology, greater collected data and new ways of thinking. Streamlining would allow Flight Operations and Airworthiness Inspectors to be conducting education and surveillance of the industry. The industry wants this and it would level up the playing field of the industry.

Documentation (Paper work) does not necessarily mean safety in fact greater documentation detracts from the physical safety by being a distraction. Less paperwork then greater staff retention at the regulator thereby greater consistency and experience to take to industry.

Regards

Grant White
[REDACTED]