



Australian Government
Civil Aviation Safety Authority

OFFICE OF THE GROUP EXECUTIVE MANAGER AVIATION

CASA Ref: F18/8025-7

24 June 2019

Mr Jason Lange
Executive Director, Office of Best Practice Regulation
One National Circuit
BARTON ACT 2600

Dear Mr Lange

Regulation Impact Statement CASR Part 101 Amendment

I am writing in relation to the attached Regulation Impact Statement (RIS) prepared by the Civil Aviation Safety Authority for proposed amendments to Part 101 of the *Civil Aviation Safety Regulations 1998*.

I am satisfied that the RIS addresses the issues raised following your first stage assessment.

CASA has added additional analysis of the consequences of remotely piloted aircraft accidents, the risks of which the preferred option is seeking to reduce. This analysis covers the potential costs to society of such accidents and provides information on how the preferred option is anticipated to generate benefits that would outweigh its costs.

In addition, CASA has added a new section to directly analyse the relative merit of the options and set out reasons for why option 2 is preferred over the other options. CASA has been careful to present this in a balanced way and not just advocate for a particular option.

Further information has been added about how the requirement for registration will be enforced under option 2. However, CASA has chosen not to reveal all of the enforcement approaches that are likely to be undertaken because signalling these to the public is likely to undermine their effectiveness.

The issue of requiring re-accreditation and the three-year time period for re-accreditation is now addressed with arguments as to why re-accreditation is considered necessary, and why the three year time period was chosen.

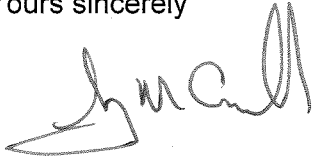
Further information has been added about comparable schemes for other modes of transport within Australian jurisdictions.

Changes have been made to the Executive Summary to clarify the description of the options and define certain terms more carefully.

Accordingly, on the basis of the feedback received on the first stage assessment, I am satisfied that the RIS now meets the best practice regulation requirements.

I submit the RIS to the OBPR for formal assessment.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Graeme Crawford', written in a cursive style.

Graeme Crawford
Group Executive Manager Aviation