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From: David Allard [REDACTED]
Sent: Thursday, 25 July 2019 12:18 PM
To: Civil Aviation Bill
Subject: Civil Aviation Bill

I am writing in support of the submission made by GAA IQ on the Draft Civil Aviation Bill. In particular I support the submissions made relating to the "Just Culture" provisions in the Bill. I think that the definitions for describing the circumstances under which enforcement or administrative action may be appropriate, in terms of Just Culture need to be the same across the aviation industry. These are Gross, Deliberate and Wilful. These terms are used by ICAO and are reflected also in the Just Culture models of Airlines. To use other terms will be confusing and be a likely cause for litigation at some point.

I am also a strong supporter of the submission's call for openness when it comes to establishing fees etc that will be imposed in the industry.

Thank you for the opportunity to make this submission.

David Allard