



SUMMARY OF CONSULTATION

PP 2616CS - Proposed annual registration for VH aircraft

We asked

The Australian Government announced in the 2026–27 Budget that an annual VH aircraft registration scheme would be introduced from July 2027. The consultation sought feedback from aircraft owners, operators and other aviation stakeholders to support development of the scheme and associated implementation arrangements. The proposal will support improved safety outcomes and accuracy of the Australian Civil Aircraft Register through annual renewal and validation of aircraft information.

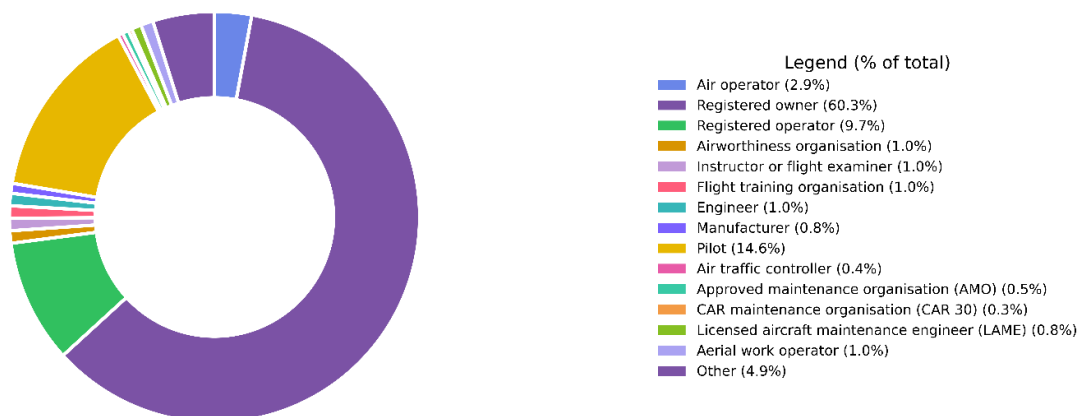
The annual scheme would require regular validation of contact information, aircraft operational status and potential collection of additional information. An annual levy is proposed to be collected from 1 July 2028 to provide a sustainable cost recovery mechanism for administration of a modern digital aircraft Register that meets the intended safety and compliance objectives and is compliant with International Civil Aviation Organization standards.

We invited the aviation industry and broader community to comment on key aspects of the proposed annual aircraft registration scheme and to highlight any operational or safety matters to help inform the development of the scheme.

You said

CASA received 718 submissions from a range of stakeholders, including aircraft owners, operators, pilots, engineers, aviation organisations and other members of the aviation community. The range of respondents is outlined below.

Chart 1: showing the distribution of survey respondents by stakeholder group. Registered aircraft owners represent the largest respondent group are displayed in the chart.



Nearly 60% of respondents consented to having their written submissions published, with the remaining 41% requesting their submissions remain confidential.

Twenty percent of the submissions were made on behalf of an organisation and 80% were submitted as the respondent's personal views.

While many respondents expressed concerns about the introduction of an annual registration scheme, associated costs, levy design, administrative burden and implementation arrangements, the feedback generally focused on how the scheme should be designed and implemented rather than whether it could proceed. No recurring theme emerged that would make the scheme unworkable or prevent implementation.

Respondents were generally more focussed on the design and implementation of the scheme than on opposing the concept outright.

Next steps

The consultation identified a range of views on the proposed levy models, annual registration responsibilities, collection of additional information and digital renewal arrangements. Feedback also highlighted broader implementation considerations relating to affordability, administrative burden, data collection, digital accessibility and the operation of different sectors of the aviation community.

Respondents consistently emphasised the importance of practical implementation arrangements, including minimising administrative burden, avoiding unintended compliance consequences and providing adequate system functionality and support.

The feedback received through this consultation will be considered as part of the ongoing development of the annual VH aircraft registration framework, supporting legislation, implementation planning and future consultation activities.

We will continue to consider the operational impacts, implementation issues and stakeholder views identified through consultation as policy development progresses. Information about future consultation opportunities will be published on CASA's Consultation Hub.

About this consultation

The consultation sought feedback on:

- proposed annual registration levy models
- whether annual registration obligations should sit with the registered operator rather than the owner
- collection of additional information to support safety outcomes, including aircraft utilisation and equipment information
- delivery of annual registration through a primarily digital renewal process.

The public consultation opened on 16 July 2026 and closed on 13 August 2026.

We thank everyone who took the time to review the consultation material and provide feedback.

Use of artificial intelligence

Artificial intelligence (AI) tools were used to assist with drafting, editing, summarising, information synthesis and document structuring activities. Any AI-generated content included in this document has been reviewed, validated and refined by a human and has not been relied upon as a substitute for evidence gathering, analysis, or findings.

Summary of feedback

Registration levy model

General feedback on an annual levy

Feedback on the levy proposals was dominated by concerns about the introduction of an annual charge to maintain aircraft registration but did not identify issues that would preclude any of the proposed models from being adopted.

Respondents frequently raised concerns about increasing costs across the aviation sector and the cumulative effect of regulatory charges on aircraft ownership and operation. Many stakeholders considered affordability and ongoing participation in general aviation to be important considerations for implementation of the scheme.

Many respondents questioned the need for an annual registration scheme and sought further explanation of the safety benefits. Many respondents also expressed the view that improving the accuracy of the aircraft register should not necessarily require the introduction of a recurring annual fee. Further concerns were raised about future fee escalation.

Support for the proposal focused on the benefits of modernising the register, digital renewal processes and improving data quality.

Flat-rate levy

Respondents identified simplicity as the principal strength of the flat-rate model. Stakeholders noted that a single fee applied across the fleet would be straightforward to administer, easy to understand and simple to implement.

A common concern was fairness. Many respondents considered that a flat-rate levy would not adequately reflect differences in aircraft size, operational use, frequency of use or financial capacity.

Conversely, some respondents argued that levy models based on aircraft characteristics may not accurately reflect the cost of administering the registration system. These respondents noted that the administrative task of renewing a registration is largely consistent regardless of aircraft weight or category and suggested that differential charging arrangements could result in cross-subsidisation. Many submissions also suggested that a flat-rate model could have a disproportionate financial impact on private owners, flying clubs, volunteer organisations, historic aircraft operators and operators of aircraft that are flown infrequently.

Weight-based levy

Respondents that indicated a preference for a weight-based model considered it more equitable than a flat-rate levy because it recognised differences across the aircraft fleet. Respondents frequently contrasted private and recreational aviation with larger or commercial operations and suggested that these differences should be reflected in the levy structure.

However, many respondents also questioned whether aircraft weight alone, was an appropriate measure for determining a levy. Respondents noted that aircraft weight does not necessarily reflect the value of the aircraft, the nature of its operation, revenue generated, utilisation levels or the actual effort involved in completing the renewal task or for CASA's administration of the scheme. Several respondents also raised concerns about weight thresholds and the potential for significant differences in charges where aircraft sit close to category boundaries.

Weight and category levy

Respondents that were in favour of a weight and category model reasoned that it was the most equitable option because it allows for greater differentiation between aircraft types and operational activities.

Respondents noted that the model could better reflect the diversity of aircraft operations across the Australian aviation sector. Some stakeholders considered that differences between commercial operations, private operations, training activities and specialised aircraft could be recognised more effectively under this approach.

Conversely, a weight and category model was also identified as the most complex of the options. Respondents noted that additional categories may increase administrative complexity, require more detailed definitions and create implementation challenges, and increased costs for CASA to build, administer and maintain.

Several respondents suggested that consideration should be given to additional categories, concessions or exemptions for aircraft that operate in special circumstances, including historic aircraft, aircraft undergoing restoration, club aircraft and community-operated aircraft.

Annual registration responsibilities

The consultation sought feedback on whether annual registration obligations should sit with the registered operator rather than the owner.

Many respondents did not raise concerns with the proposal and noted that the operator is often best placed to provide current operational information about the aircraft. Respondents observed that ownership and operation can be separated through leasing arrangements, financing arrangements and other operational structures.

Other respondents raised concerns that separating ownership from registration obligations may create uncertainty regarding accountability and responsibility for compliance. Some respondents suggested that flexibility may be required to accommodate different ownership and operational arrangements across the sector.

Collection of additional information

The consultation sought feedback on collecting additional information during registration and renewal, including aircraft utilisation information and the installation of specified equipment.

Many respondents questioned whether some information may already exist within existing regulatory, maintenance or government systems and suggested that duplication of information collection should be minimised wherever possible.

Many respondents indicated that much of the proposed information was already available through maintenance records, technical documentation and operational records. Respondents generally considered that accurate information could be provided where it was already recorded as part of normal aircraft operation and maintenance activities. Many respondents also emphasised the importance of avoiding duplication by making use of information already available through existing systems where possible.

However, respondents also identified practical challenges associated with collecting and maintaining information across different aircraft types, ages and operational environments. Feedback suggested that the effort required to provide and maintain information may vary significantly depending on the circumstances of individual aircraft and operators.

Respondents also sought greater clarity regarding how information would be used, how it would contribute to safety outcomes and how privacy and security considerations would be managed.

64% of respondents stated that it would be very easy, easy or moderate to provide accurate information about aircraft hours, operational status and equipment installed. Refer to **Chart 2** below.

68% of respondents stated that it would be very easy, easy or moderate to provide accurate information about aircraft time in service, measured in hours, at annual renewal. Refer to **Chart 3** below.

Chart 2: showing respondents' assessment of the difficulty of providing accurate aircraft hours information. Most respondents reported that the task was easy or moderately easy. The chart displays the percentage of respondents in each response category.

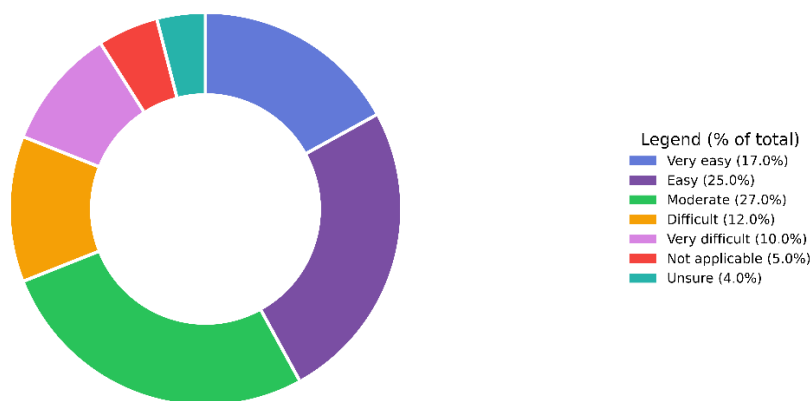
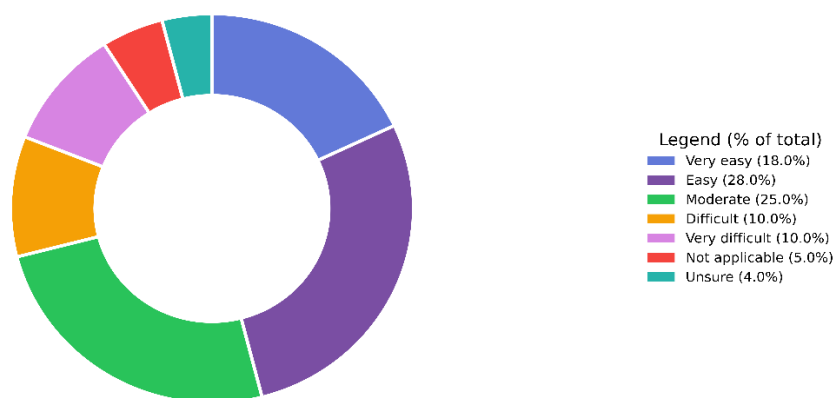


Chart 3: showing respondents' assessment of the difficulty of providing aircraft time-in-service information at annual renewal. Most respondents reported that the task was easy or moderately easy. The chart displays the percentage of respondents in each response category.



Digital registration renewals

Many respondents supported the use of digital processes for aircraft registration and renewal. Respondents generally acknowledged the potential benefits of online services, including reduced paperwork, streamlined transactions and simpler updating of aircraft information.

A consistent theme across submissions was the need for the renewal process to be simple and user-friendly. Respondents frequently suggested the use of pre-populated information, clear guidance and streamlined processes to minimise administrative burden. An additional theme raised by respondents managing multiple aircraft was the ability of fleet management functionality to improve the efficiency of annual renewal processes.

While not a dominant theme, some respondents also noted that some members of the aviation community may experience barriers to digital participation due to location, connectivity or familiarity with digital systems. Respondents generally supported the continued availability of alternative pathways for those unable to access online services.

Many respondents emphasised the importance of system reliability, secure information management and appropriate notification processes to support compliance with annual renewal requirements.

Other feedback

A number of respondents raised concerns regarding the relationship between aircraft registration renewal and continuous airworthiness approvals. It was suggested that CASA should ensure that a suspension or cancellation of registration arising from an administrative delay should not invalidate continuing airworthiness approvals.

In support of this, a number of respondents suggested a defined grace period, and highlighted the importance of advance and multiple reminders, with clear rectification pathways to restore a registration that has been missed for annual renewal.