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Newsletter from The Commercial Aviation Association of Southern Africa NPC

## From our CEO

### **Flight-data-recorder retrofit: a pragmatic, phased policy for South Africa – cost, safety benefit and the economics CEOs need to demand**

These issues have come a long way through numerous meetings, work groups, and discussions, and the net result, as in many other matters, is that the regulator just takes their merry old time, and industry pays the price.

“Mandates without economic analysis impose risk on operators and may undermine safety goals. Smart regulation pairs clear standards with realistic, phased implementation and targeted investment.”

The technical argument for richer flight data and longer-duration cockpit-voice recording is straightforward: better data shortens investigations, improves causal learning and feeds proactive safety management. The more complex questions are economic and programmatic – who pays, how quickly do we get the benefit, and how do we avoid creating perverse incentives or operational harm while we raise the bar.

Below, I set out the cost and safety benefits, identify a critical gap in the South African approach (the missing economic assessment), and recommend a balanced, phased implementation focused on new and newer aircraft entering the South African register, rather than a blunt, fleet-wide retrofit mandate.

### **Cost: Realistic ranges and where the money goes**

Retrofit costs vary widely by aircraft type, existing wiring and systems, and the certification path (STC vs. manufacturer support).

Cont.

## IN THIS ISSUE

**AAD2026  
UPDATE**

**2025 CAASA AWARDS**

**CAAI UPDATE**

**THOUGHT LEADERSHIP**

**OFFICIAL NOTICE**



Here are **realistic ballpark numbers** for the aircraft that make up a large percentage of South Africa's / sub-Saharan Africa's charter operations:

**Turboprops (King Air 90/200/350, PC-12, Caravan, Cheyenne, etc.)**

- **FDR or combined FDR/CVR installation:**  
**USD 35,000–90,000** per aircraft
- **Extended-duration CVR (2–25 hours):**  
**USD 10,000–30,000**
- **Installation labour (major driver):**  
**USD 10,000–25,000**
- **Downtime cost** (lost charter hours, positioning, AMO availability):  
5–14 days, depending on STC and complexity.

**Total realistic retrofit envelope: USD 55,000–140,000 per aircraft**

For operators running thin margins on air ambulance, mining shuttle, and charter work, this is a material shock.

**Older piston twins (Baron, Cessna 402/404, Seneca, Aerostars, etc.)**

These aircraft may be worth only USD 150,000–400,000. Installing a modern mandated recorder suite can cost **20–40% of hull value**, meaning:

- **Typical installation: USD 20,000–45,000**
- **Complex installations: USD 50,000–70,000**

For many of these airframes, retrofit cost exceeds economic sense and may trigger early, forced retirement.

**The bottom line**

A mandated retrofit across the entire GA/charter fleet would impose **tens of millions of rand in sector-wide capital costs**, much of it on older aircraft nearing retirement.

These are order-of-magnitude figures to budget against; operators will need quotes from approved modification organisations for firm numbers. Significantly, staged retrofits performed during heavy maintenance visits reduce incremental downtime cost.

## Safety benefits – how to think about the return

- Safety delivers both **direct** benefits (better outcomes in accident and serious-incident investigations) and **indirect** benefits (improved safety management and reduced risk). However, these are long-term gains, and the benefits I outline below may never fully materialise in practice.
- **Investigation quality:** longer-duration CVR and higher-parameter FDRs reduce the chance that crucial evidence is overwritten or unavailable, shortening investigation times and improving root-cause attribution. Faster, more accurate determinations mitigate the risk of repeated events.
- **Proactive safety management:** richer data supports trend analysis, predictive maintenance, and more effective SMS interventions, reducing the expected frequency and severity of incidents over time.
- **Financial upside:** fewer and less-severe incidents lower insurance premiums, decrease unscheduled maintenance costs and limit brand/reputational damage. The hard-dollar benefits will vary widely by operator exposure, but they are real and accrue over time.

A reasonable way for finance teams to model benefits is to estimate the expected avoided loss from a prevented catastrophic or major incident (high-impact, low-probability) and the expected annual reduction in minor incidents – then compare the discounted avoided losses to retrofit and operational costs. This is the core of a cost-benefit analysis (CBA) that regulators should undertake before imposing national retrofit mandates, and we have seen no indication that our regulator is working in these realms, as would be expected of any regulator aspiring to a top-10 place in the world.

## What's missing from the South African approach: the economic assessment gap

South Africa's steadfast yet unwavering regulatory alignment with ICAO, even if it damages our country's aviation industry, gives clear technical direction – but in several implementations I've reviewed, the economic and programmatic analysis is weak or absent. Specifically:

1. **No published, transparent cost-benefit analysis (CBA)** that quantifies retrofit costs across operator size bands and compares them with monetised safety benefits and system-wide risk reduction. Without this, policy choices lack defensible trade-offs.
2. **Limited modelling of industrial capacity and bottlenecks.** The local pool of AMOs and STC holders is finite (and possibly shrinking due to other poor decisions by the regulator); The retrofit mandate most probably creates severe backlogs, forcing aircraft out of service for longer than expected and concentrating downtime costs.

**Cont.**

3. **Absence of differentiated impact assessment.** Small commuter operators and domestic charters are disproportionately affected by up-front capital requirements; a one-size-fits-all regulatory schedule risks unintended market exits or unsafe cost-cutting.

4. **No phased adoption modelling** that ties compliance windows to economic indicators (e.g., age, flight hours, route criticality), thereby better balancing safety gains with financial viability.

Regulators should publish these analyses and engage stakeholders — not only for fairness, but because effective safety policy needs credible, data-driven foundations.

### **Why a targeted, phased implementation is a better policy**

A phased, targeted approach reduces cost shock, preserves operator liquidity, and maximises safety benefit per rand spent.

South Africa's regulatory implementation timing is poor, as there is no bankable timeline between when CARCom recommends a regulation to the Minister for promulgation and when the Minister promulgates, along the lines that, as of the date of enactment, industry must comply immediately. This does not allow effective budgeting and planning.

### **The key design principles that should be considered:**

1. **Target new aircraft and recent arrivals to the South African register first.** Require that all new type certificates and aircraft newly entering the South African register meet the modern FDR/CVR standard immediately. This gets the regulator to the desired state on future fleet composition without forcing immediate retrofit on legacy assets.

2. **Prioritise younger airframes in retrofit windows.** Set compliance tiers by aircraft age (e.g., <10 years, 10–20 years, >20 years) and utilisation: younger, high-utilisation aircraft are more critical to protect and yield the best long-term benefit from retrofit investment.

3. **Use heavy-maintenance windows to implement work.** Mandate that retrofits be completed at the operator's next scheduled C-check (or equivalent), reducing incremental downtime cost.

4. **Provide proportionate support measures.** Offer technical assistance, shared STC development funding or temporary exemptions tied to demonstrable SMS measures for small operators. This keeps small operators viable while ensuring safety progress.

5. **Time-box the policy horizon.** Build a 7–12-year transition plan to ensure older aircraft naturally exit the fleet before retrofit requirements, aligning economic reality with safety goals.



## Change management – balancing speed with sustainability

People and organisations deliver policy. A balanced change-management plan should include clear, phased timelines; predictable certification and approval pathways; publishing of capacity forecasts for AMOs; financial-planning guidance templates for operators; and a formal stakeholder dispute/appeal process. Regulators should coordinate with insurers and leasing companies – often the owners/lessors will drive compliance decisions and can help finance retrofits.

## Final recommendation

Industry must demand disclosure and require the use of CBAs when engaging with SACAA and industry bodies. Advocate for a rule that:

- Makes modern FDR/CVR mandatory for **new type certificates and aircraft newly registered in South Africa, based on a mutually agreed future date.**
- Imposes **phased retrofit requirements** prioritised by age and utilisation, tied to scheduled heavy maintenance, and
- It includes a published economic impact assessment and a capacity plan for STC/AMO bottlenecks.

**This path protects safety, limits unintended economic harm, and places South Africa on a sustainable trajectory to modern, data-rich aviation oversight, without forcing small operators into economically destructive short-term choices.**



**Kev Storie - CAASA CEO**



C A A S A

Commercial Aviation Association  
of Southern Africa NPC



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# CAASA ANNUAL AWARDS AND YEAR-END FUNCTION 2025:

## Celebrating Excellence And Future Leadership

By World Airnews

**The 2025 CAASA Annual Awards and Year-End Function took place on Friday, 31 October, at the Indaba Hotel in Fourways, Johannesburg — an evening that brought together South Africa's aviation leaders, professionals, and enthusiasts for a night of recognition, reflection, and inspiration.**

The event was not just a celebration of achievement but also a moment to honour aviation's enduring spirit — one that connects, uplifts, and unites.

### Opening the Skies

In his welcoming remarks, CAASA CEO Kev Storie set the tone for the evening with an impassioned reflection on what aviation means for South Africa and the continent.

*"Aviation has always been more than an industry — it is a connector of people, a driver of progress, and a source of inspiration,"* Storie said.

He spoke of aviation's reach and relevance across Sub-Saharan Africa — from small airstrips and helipads to bustling hubs — describing it as *"the heartbeat of development."* Aviation, he reminded the audience, brings medical care where roads cannot reach, carries goods to markets, and connects families, businesses, and nations. *"For so many, aviation is not a luxury — it's a lifeline,"* he said.

Storie highlighted aviation's power to inspire the next generation: *"When a young person looks up and sees a plane cutting across the sky — maybe leaving a contrail or a smoke signature at an airshow like AAD — something stirs. It says, 'One day, that could be me.'"* But, he cautioned, to keep that dream alive, aviation must remain accessible. Entry into the sector — whether as a pilot, engineer, or operator — should not feel like navigating a maze of red tape. *"Safety must always come first,"* he said, *"but safety should enable, not prevent, participation. When the rules become heavier than the wings, we lose the very spirit of aviation."*

Storie's call for balance — between regulation and reason, safety and sustainability, compliance and common sense — struck a chord with the audience.

His message was clear: aviation thrives not in constraint, but in collaboration.

### A Vision for the Future

Building on that spirit, Mike Clark, CEO of Solenta Aviation and President of CAASA, delivered an

address that combined reflection with a forward-focused vision.

Clark praised the dedication, resilience, and professionalism that define South Africa's aviation community, acknowledging the CAASA leadership, Board, and Council for their role in maintaining the organisation's strong and unified voice.

Reflecting on the country's proud legacy — from training world-class pilots and engineers to setting industry standards across the continent — Clark emphasised that South Africa's expertise and infrastructure position it as a leader in African aviation. Yet, he cautioned that inefficiencies in regulatory processes risk constraining growth, deterring investment, and creating operational uncertainty.

*"Our goal isn't to remove regulation — it's to modernise it,"* Clark said. *"Safety and efficiency must work hand in hand."*

He underscored that progress depends on modernisation, not deregulation. Oversight must evolve to become digital, transparent, and service-oriented — supporting growth while maintaining the highest safety standards.

Clark also turned attention to the future workforce. Nurturing new talent and ensuring accessible pathways for young professionals are essential to sustaining South Africa's leadership in aviation. By investing in training, mentorship, and inclusivity, he said, the nation can build a modern, competitive industry that meets global standards and embraces innovation.

### Celebrating Excellence

The highlight of the evening was the presentation of the CAASA Annual Awards, honouring individuals and organisations whose contributions continue to strengthen and inspire the industry. Each recipient reflected the very qualities celebrated throughout the evening — dedication, innovation, and an unwavering commitment to safety and excellence.

Both Storie and Clark concluded with gratitude to CAASA members, industry partners, families, and colleagues for their continued support and passion. *"Tonight, we celebrate what we do right,"* Storie said. *"We celebrate excellence, innovation, and dedication within CAASA and the broader aviation family. Each person here represents a commitment to keeping our skies safe, our economy growing, and our youth inspired."*

The evening ended with a collective toast to progress — a fitting close to a night that captured the essence of South African aviation: proud of its legacy, united in purpose, and ready to embrace the future.



# CAASA Awards





# CAASA Celebration











25 November 2025

## Press release

### CAASA Aviation Activity Index (CAAI) for South Africa: 3<sup>rd</sup> quarter of 2025

The CAAI index retreated somewhat during the third quarter of 2025 as it recorded a reading of **179.0** index points, from 186.5 during 2025Q2 (that is a decrease of 4.0% q:q but still a strong rise of 18.2% compared to the same quarter of last year, i.e. 2024Q3).

Despite this, the trend (4-quarter moving average) recorded a new record as it increased from 177.5 in the second quarter, to **184.3** during the third quarter of 2025 (3.9% q:q and 11.0% compared to 2024Q3).

Items that supported the CAAI notably during this quarter included imports of spares as well as imports and exports of helicopters and drones, and air traffic movements (ATMs) at the larger ACSA airports.

Imports of spares (notably undercarriages and other general spares) have been performing very strongly recently and are on new record levels, also in real (inflation adjusted) terms. Activity related to import and export of helicopters have generally been performing well throughout 2025, with imports of larger helis (more than 2 ton) doing very well against its longer-term average performance.

Air traffic movements (ATMs) of aircraft at the larger ACSA airports performed strong with Cape Town International Airport and OR Tambo at or close to pre-Covid levels. King Shaka (Durban) also continued its upwards momentum but seems to be lagging somewhat compared to CPT and ORT.

Amongst the smaller ACSA airports, Chief Dawid Stuurman (PE) dipped slightly during the last quarter, after a strong performance during most of 2024 and the first half of 2025. In contrast to this, George Airport recorded a post-Covid high during 2024Q2 but has been trending downwards since then. King Phalo (East London) and Bram Fischer International Airport (Bloemfontein) also recorded below-average movements compared to their long-term averages.

Drones is a relatively new item that has only been officially included in the CAAI since the first quarter of this year. Reasons for adding it include the strong rise in popularity and use of so-called 'unmanned aircraft'. Data for drones are made available by SARS in different weight categories (e.g. take-off mass between 7 to 25kg, etc) and is available from 2022. The CAAI was updated (retrospectively) from 2022 with a weight of 5%, allocated to the combined effects of imports and exports of drones. Both imports and exports of drones have been performing strongly since 2022. However, imports far outweigh exports in terms of both value and volume. The bulk (90%+) of this is related to the smaller (take-off weight less than 7kg) category of drones.

Global economic and trade sentiment started 2025 on an uncertain footing, especially after US President Trump's 'Liberation Day tariffs' (April 2025) and questions over how these would filter through to trade volumes and the larger economy. Despite a lot of trade negotiations, the US imposed a 30% tariff on all South African imports from 1 August. Uncertainty remains over this, including clarity over the African Growth and Opportunity Act (AGOA) arrangements.

South Africa recorded meagre growth averaging around 0.5% during the first half of 2025. An important development has been the adjustment of the official inflation target to 3 percent (with a 1 percentage point tolerance band) during the recent 2025 Medium Term Budget (MTBPS). With inflation continuing to trend downwards during the first half of 2025, the SA Reserve Bank were able to cut the Repo interest rate further from 7.5% in January to 6.75% during its November MPC meeting. This will provide support to the household sector and spending in the economy in general and is likely part of the positive performance of the CAAI observed during the year to date.

Figure 1

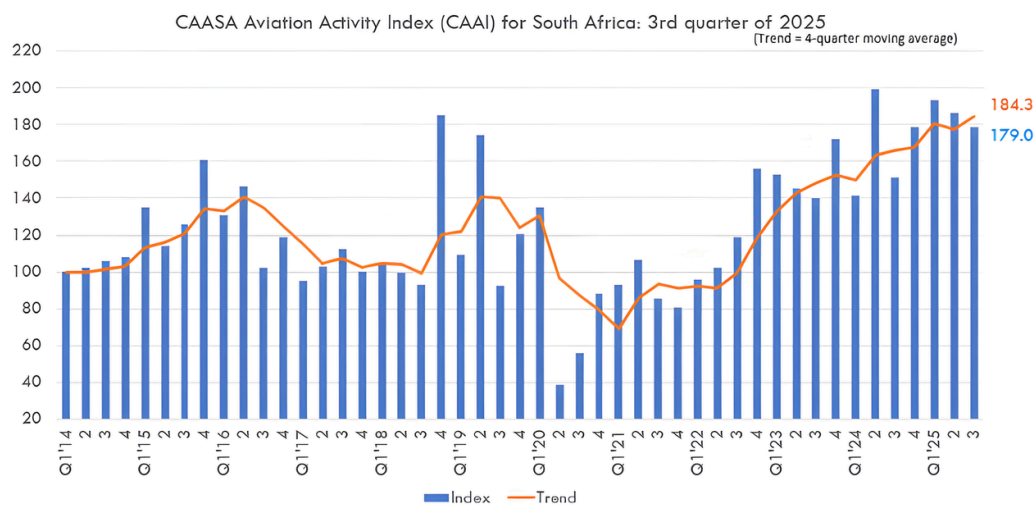


Table 1

| CAASA AVIATION ACTIVITY INDEX (CAAI) FOR SOUTH AFRICA: 3 <sup>RD</sup> QUARTER OF 2025 |         |       |                           |       |                                        |       |
|----------------------------------------------------------------------------------------|---------|-------|---------------------------|-------|----------------------------------------|-------|
|                                                                                        |         |       | Q/Q<br>(previous quarter) |       | Q/Q<br>(same quarter of previous year) |       |
|                                                                                        |         |       | Index                     | Trend | Index                                  | Trend |
| Q1'24                                                                                  | Index   | Trend |                           |       |                                        |       |
|                                                                                        | 141.6   | 149.8 | -17.8%                    | -1.8% | -7.3%                                  | 13.1% |
|                                                                                        | 2 199.4 | 163.3 | 40.8%                     | 9.0%  | 37.2%                                  | 14.1% |
|                                                                                        | 3 151.4 | 166.1 | -24.0%                    | 1.7%  | 8.1%                                   | 11.9% |
| Q1'25                                                                                  | 4 178.7 | 167.8 | 18.0%                     | 1.0%  | 3.8%                                   | 10.0% |
|                                                                                        | 193.2   | 180.7 | 8.2%                      | 7.7%  | 36.5%                                  | 20.6% |
|                                                                                        | 2 186.5 | 177.5 | -3.5%                     | -1.8% | -6.5%                                  | 8.7%  |
|                                                                                        | 3 179.0 | 184.3 | -4.0%                     | 3.9%  | 18.2%                                  | 11.0% |

Background: the CAAI is based on a composite indexation technique, whereby a group of indicators representing different units is forged into a single value. Changes over time in the different indicators are measured and then also expressed as changes to the weighted index. A total of 25 different indicators comprises the CAAI, emanating from six broad categories including import and export values of aircraft, helicopters, spares and drones: air traffic movements (ATMs) of aircraft at all major ACSA airports as well as aviation fuel sales volumes. Combined in an appropriately weighted index, these indicators provide an objective & balanced measure of economic activity in various spheres of the commercial aviation industry.

The CAAI is prepared on behalf of CAASA for general and commercial aviation industry by Dr Fanie Joubert.

Click here to download the complete Q3 report



# DANGEROUS GOODS : –

## DG-HOPSON'S CHOICE

*By Rob Garbett*

### **Either you comply and sleep well or you don't and suffer insomnia.**

It really is as simple as that EVERYBODY must comply whether they consciously handle dangerous goods or not—to do or not to do is not the question !!

My aim is to make this article as informative and practical as is possible in the limited space I have available. I will quote certain Regulations so that you may look them up for yourselves on the SACAA website. This is a complex subject, DG high level training courses take up to five days. I welcome any email requests for information to [rob@professional.za.com](mailto:rob@professional.za.com).

Dangerous Goods( DG) do kill and destroy, the object of the SACAA Regulations (Part 92) is to prevent such a catastrophe. The Regulations are based on international best practice published by ICAO ( The International Civil Aviation Authority) and IATA ( The International Air Transport Association), the former membership are Countries and the latter Air Carriers.

Let me first dispel a well-worn assumption that Forwarding/Courier agents, or Air Charter Operators, who choose not to accept dangerous goods, need not comply with Part 92 at all. Regulation 92.01.47 (7) states that any entity handling cargo must appoint a trained designated person, employees ( based on their duties) must undergo training, and they must develop a procedures manual. This training applies not only to warehouse personnel and drivers but also cargo sales agents (term from the Regulations) and cargo reservations staff (I think they mean Cargo Acceptance staff), this is confirmed in 92.02.2(1).

Airlines (Air Service Operators) including Foreign Operators and Air Charter Operators who intend, or wish to, carry DG, have many Regulations with which they must comply. For example, under 92.01.17 whether these entities carry DG or not they must develop a DG operations manual, training program and submit these to the SACAA for approval.

The Regulations covering Shippers ( Consignors) who do not actively handle DG are not specific. There is a danger area under this category which in that all Shippers should be able to identify DG, an onerous task, my recommendation is to pass all their outgoing cargo to a forwarding or courier agent, they should not submit cargo directly to an air carrier.

Shippers who do actively handle DG (for this reason must be able to identify DG) must also comply with many Regulations, my recommendation



is, as above, they should simply pass any cargo that, even remotely could be DG, to their forwarding agent. BUT ALSO, they must inform their insurance underwriters of their procedures covering DG.

Regulation 92.01.16 dictates that foreign Operators, when applying for a Foreign Operating Permit(FOP) and who wish to handle DG must submit a foreign DG operating certificate, foreign certificates of DG training, and a Dangerous Goods manual approved by the foreign country all for approval by the SACAA. Alternatively comply with the local regulations .

The Commercial Aviation Association of Southern Africa ( CAASA) exchanged correspondence with the SACAA over many months to seek clarification as to whether the Regulations apply to all aircraft and eventually received the instruction that that is indeed the case. This means private flights are also pulled into the net but the regulations are somewhat vague covering this category. Regulation 92.01.1 under Applicability states that DG procedures apply to ALL aircraft the Regulations, however other Regulations are not precise or practical as to the requirements covering private flights. There are many examples some are, private flights may typically sometimes carry DG items such as firearms, compressed gas cylinders and certain types of paint that are forbidden, extra fuel etc. The Regulations are silent as to which



Regulations private aircraft owners must adhere to, for example do private pilots need to undergo some sort of DG training. The law, as it stands now, means that should an incident occur, and the aircraft was carrying DG without adhering to the Regulations, the insurance underwriter may well repudiate the claim.

CAASA have suggested to the SACAA that the Regulations incorporate specific Regulations covering private flights so as to throw light on the situation.

There is wide disregard for DG Regulations amongst online retailers (online shopping platforms), Regulation 92.01.48 covers this category specifically. It requires that the online retailer must develop and provide information to their clients, and partners, covering DG. This is somewhat loose as what exactly is to be provided to clients/partners is not specified. There is no further guidance information in the SACAA Technical Standards. In addition, there are many other Regulations with which they must comply. I recommend that this category take direction from their forwarding or courier agent. BUT ALSO, they must inform their insurance underwriters of their procedures covering DG.

Competency Based Training and Assessment (CBTA) was introduced by ICAO and IATA in 2003 and essentially means that DG training must be based on the job function of employees such as

for example, Group A DG acceptance personnel, instructors moderators and so on, Group B personnel Group C pilots and flight dispatchers and operating personnel accepting non DG plus other categories up to Group J.

The Commercial Aviation Association of Southern Africa (CAASA) have also been corresponding with the SACAA for many months regarding an anomaly that exists and that is that there is substantial information, which has been provided to the SACAA, to illustrate that DG training should be conducted under the Technical Instructions- TI published by ICAO of which organization South Africa is a member. The Regulations suggest that the IATA DG publication (known as the Dangerous Goods Regulations-DGR) may be substituted for the TI which is, in my view, misleading. CAASA have provided more than sufficient information, and suggestions, to the SACAA which will minimally inconvenience the industry to utilize the TI for training at minimal cost. CAASA have produced a report in this connection which has been submitted to a high level at the SACAA and, hopefully, CAASA will soon receive direction from the SACAA.

The space allowed by this article does not permit me to provide information applicable to other participants in the DG supply chain, these include Ground Handling Agents, Aerodrome Operators, DG Training Organizations, DG Instructors, Postal Services Providers and DG Packers.







## **Come Fly with Us in 2026**

### **At CAASA we remain invested in *your* success.**

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4. All your contact details, including your website and social media links.

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**With 80-plus years of legacy and reputation, your contribution can only help us foster growth in your business and across our critically important aviation sector.**



## OFFICIAL NOTICE

Please Note

The **CAASA** office will be closed from the **12th of December**, and re-open on the **12th of January 2026**.

For any urgent matters during the break, please email:

**[melissa@caasa.co.za](mailto:melissa@caasa.co.za)**