

Response to the Discussion Paper:

“Safeguards for airports and the communities around them”

31 July 2009

Introduction

Avisure is Australia's leading service provider for managing the risks posed by birds and other wildlife. We consult to or have consulted to over 30 airports in Australia and around the world and to other industry players including Defence, CASA, ATSB and Qantas. Our Director, Phil Shaw, is Australia's first and only member of the International Birdstrike Committee steering group. We are the only Australian organisation that regularly attends and presents at international forums on the bird strike issue, where issues/policies such as land use in the vicinity of airports are discussed. We are proud to be co-hosting with Cairns International Airport the 2010 International Birdstrike Committee conference in Cairns, north Queensland.

The events in New York in January this year, where an A320 was forced to land on the Hudson River after striking several birds, highlights the urgency with which the bird and wildlife risk issue needs to be addressed. In Australia we are not immune from similar possibilities and Avisure welcomes the release of the Department of Infrastructure, Transport, Regional Development and Local Government's (DITRD LG) Safeguarding discussion paper and appreciates the opportunity to respond.

As a representative on the Australian Aviation Wildlife Hazard Group, we prepared the initial draft of their response, hence our comments on the discussion paper generally reflect the submission by that group.

HEAD OFFICE

Suite 10, 43 Tallebudgera Creek Rd,
PO Box 404,
West Burleigh, QLD 4219 Australia
P +61 7 5508 2046
F +61 7 5508 2544

SYDNEY OFFICE

PO Box 880
Surry Hills, NSW 2010 Australia
P +61 2 9690 1295
M +61 (0)408 002 373

CAIRNS OFFICE

PO Box 1130
North Cairns, Qld 4870 Australia
P +61 7 4031 9599
F +61 7 4031 9388

Background to bird and wildlife management at Airports

The Discussion Paper states:

“Such incidents as simultaneous bird strike causing double engine failure to an Airbus 320 and the landing of the US Airways Flight 1549 on New York’s Hudson River in January 2009 are extremely rare and the probability of a significant aircraft accident remains low. As modern aircraft and aircraft engines are designed to minimise the resultant consequences, the impacts are normally confined to structural damage and the efficiency and regularity of service.”

It is the case that the probability of a significant aircraft accident remains low, but this understates the cost to airline operators and airports that have to manage wildlife. The annual cost to the worldwide civil aviation industry has been conservatively estimated at US\$1.2 billion¹. These costs, typically absorbed by aircraft owners and airline operators, arise from direct damage cost and indirect downtime costs. Virgin Blue, for example, estimates a delay cost of \$100 per minute such that even non-damaging strikes requiring investigation can be of considerable cost to the airline’s operations.

Most major Australian airports take their responsibility for managing wildlife seriously, with mature Bird and Wildlife Management Plans and Safety Management Systems in place, but apart from in Queensland where State Planning Policy SPP01/02 operates, airports have no regulatory support to address serious wildlife risks originating beyond their property. It should also be noted that SPP01/02 only restricts planned developments in the vicinity of an aerodrome and their likely attraction for hazardous bird species. It is only binding for developments that require consent, hence some uses (e.g. playing fields) may escape scrutiny, yet could promote a bird hazard. The policy does not address the questions of hazards already existing in the airport environs. A risk-based, safeguarding policy is essential to minimise wildlife issues which arise as a result of inappropriate land use.

The discussion paper nominates landfill sites (presumably putrescible waste facilities), wetlands and nature reserves as land uses that can affect wildlife strike risk. In addition landscaping around airports is mentioned.

¹ Allan, J. R., and A. P. Orosz. 2001. The costs of birdstrikes to commercial aviation. Pages 218-226 in Bird Strike 2001, Proceedings of the Bird Strike Committee-USA/Canada meeting. Calgary, Alberta, Canada: Transport Canada, Ottawa, Ontario Canada.

Avisure considers that there are numerous other land uses that have the potential to attract birds and other wildlife and therefore require consideration. These include (but are not limited to):

- non-putrescible waste landfills and transfer stations
- sewer works
- cropping
- fruit production
- turf farming
- piggeries
- abattoirs
- aquaculture
- fisheries
- commercial fish processing
- food processing plants
- riding schools
- fair grounds
- outdoor restaurants
- racetracks
- playing fields
- commercial areas
- theme parks
- homing pigeon clubs
- golf courses
- outdoor theatres.

A suggested approach

Australia does not need to reinvent the wheel. There are many existing policies or policies under development around the world (e.g. Canada, UK and Europe) where the safeguarding issue has or is being addressed. A review of these approaches is bound to assist the strategy that Australia develops.

The Queensland policy is based predominantly on the Canadian policy and is sound in its basic intent: zones are created at set distances for where certain land use restrictions apply. For this approach to be improved it needs to be:

1. Inclusive of existing hazards.
2. Inclusive of uses which currently do not require consent through the current approvals processes, but may create a hazard if allowed to proceed.
3. Considerate of where a proponent includes suitable mitigation strategies.
4. Considerate of specific risks at each individual airport.
5. Inclusive of all major and regional airports with an opportunity for the intent of the policy to be applied at even small general aviation airports.

Conclusion

Avisure strongly endorses the DITRDLG safeguarding discussion paper. Avisure acknowledges the significant hazards wildlife present to air safety and believes that safeguarding is an extremely important step in mitigating the risks. Avisure advocates a risk-based approach that categorises land use types into hazard levels and then considering the distance from runway/s as to whether proposals should be accepted, referred to the airport operator, subject to risk assessment or refused.

We are willing to assist in any way we can, in the name of aviation safety.

Phil Shaw



Director