

Response to the Aviation Green Paper

27th February 2009

Background

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 25 airports in Australia and around the world and to other industry players including CASA, ATSB and Qantas. Our Director, Phil Shaw, is Australia's first and only member of the International Birdstrike Committee steering group.

We have for some time believed that the bird and animal strike risk has been undervalued by Australia's regulators, airlines and many airport operators. As an example, the nation's peak body for this issue, the Australian Aviation Wildlife Working Group has not met for over 18 months, despite a charter suggesting quarterly meetings. Further, your Green Paper fails to mention the issue.

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 this aspect of aviation safety needs to be addressed. In Australia we are not immune from similar possibilities.

Response

1. We acknowledge and appreciate that "Safety is the number one priority for the Australian aviation industry and the Government." (p23). This sentiment should extend to the bird and wildlife strike risk.
2. We note that the government has "launched the new Aviation Training Package which delivers for the first time Australia-wide standards and qualifications for pilots and other aviation workers" (p29) and "CASA has taken steps to develop and enhance the skills of its staff by introducing a Diploma and Certificate IV qualification in Aviation Safety Regulation in conjunction with the Swinburne University of Technology". Appropriate certificate level training to prospective CASA auditors and other aviation workers should include a detailed understanding of the strike risk and mitigation.
3. We note "for the first time the two regulators of Australia's aviation industry – the CASA and Defence - have agreed on standards and requirements for pilot qualifications" and "ensure the closer alignment of national civil and military air traffic controller standards and qualifications" (p64) and there is a section on the use of defence ports for civil aviation (p176). This should be extended to include Aerodrome Standards to meet MOS 139.
4. The strike risk needs to be one of the considerations when determining possible locations for Sydney's alternative airport.

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5. We appreciate that “The Government is committed to working with the state and territory governments to develop the following initiatives:

- developing a national risk-based framework to guide all levels of government in taking responsibility for safeguarding airports from off-airport development that is inconsistent with future operations and the development of the airports;
- developing a clear policy on the definition of public safety zones around airports which can be taken into account in local planning with a view to ensuring that the community is not exposed to any undue level of risk from aircraft operations” (p33)

“The Government will initiate this approach through the public release of a more detailed discussion paper on a national airport safeguarding framework.” (p169).

This is long overdue. We have reviewed similar safeguarding policies around the world and would be willing to assist in the formulation of the discussion paper.

6. We agree that “There was broad agreement that the regulatory framework should mesh with international best practice”. (p47) From a bird and wildlife risk perspective, there are several areas where we fall down on best practice. Training for one, but also the quality of the database held by ATSB on bird and wildlife strikes is nowhere near that of the USA. I have heard an ATSB officer response to that is we couldn’t possibly afford that as we are only a very small industry when compared with the USA. If we are truly dedicated to best practice, that can never be an excuse.

Conclusion

Avisure welcomes the general sentiment of the Aviation Green Paper. We request that the bird and wildlife strike issue be given greater consideration in the White Paper. We are willing to assist in any way we can, in the name of aviation safety.

Phil Shaw



Director