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16 July 2021

Mr Benedict Lyons
Director, Airspace and Future Technology
Department of Infrastructure, Transport, Regional Development and Communications
111 Alinga Street
CANBERRA ACT 2601

Via email: AirspacePolicy@infrastructure.gov.au

Dear Mr Lyons,

RE: NATIONAL STRATEGIC AIRSPACE | NATIONAL AVIATION POLICY ISSUES PAPER AND DRAFT AUSTRALIAN AIRSPACE POLICY STATEMENT

The Qantas Group (Qantas) welcomes the opportunity to provide feedback to the National Aviation Policy Issues Paper regarding National Strategic Airspace (the Issues Paper) and the draft Australian Airspace Policy Statement (AAPS). These comments complement those provided in October 2020 in response to the paper on Emerging Aviation Technology.

There are a range of different aircraft types and performance characteristics, incumbent and new commercial entrants, undertaking operations in Australian airspace. Qantas considers integrated airspace management essential in ensuring the safety of all participants and the Australian public.

We appreciate the consideration of potential challenges by the various proposals, however, note that tangible examples are not closely explored for many of the options. Qantas' comments on the proposals in the Issues Paper for future airspace classifications in Australia are provided at Attachment 1, based on the information available at this time. Our comments on the draft AAPS are provided at Attachment 2.

We would be pleased to provide any further information the Department may require.

Yours sincerely,

Mark Cameron
Head of Group Compliance
Qantas Group Compliance

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ATTACHMENT 1

NATIONAL AVIATION POLICY ISSUES PAPER

The Qantas response will follow the concepts identified in the Issues Paper as follows:

Proposals for airspace classification

Proposals for low level airspace

Proposals for airspace design

Consequential discussion points

Proposals for airspace classification

- Upper airspace: Qantas supports proposal AC1. This proposal provides a consistent base of class A and simplifies charting and pilot education.

- Enroute oceanic airspace: Qantas supports proposal AC4. This proposal provides alignment with continental airspace.

- Enroute continental airspace: Qantas proposal AC8. This option aligns with Airservices Australia's proposal to lower the level of class E on the East Coast of Australia. Qantas has previously supported this as it provides critical Air Traffic Control oversight and a consistent operating environment for high capacity Regular Public Transport (RPT) operations.

- Terminal airspace: Qantas supports proposal AC12. This proposal encourages standardisation to realise the benefits of the new Air Traffic Management (ATM) system but we note that further consideration may be required for a final decision for terminal airspace.

- Control zones: Qantas supports proposal AC14. Whilst it is acknowledged that AC13 will provide standardisation, which is in line with our position that consistent operational rules should be extended to high capacity RPT services in Australia, it is expected that this option may create some unworkable situations. We therefore prefer that the current control zones be retained. While this may impact new entrants, Qantas supports the management of this with streamlined regulatory processes as set out in the Issus Paper.

Proposals for low level airspace

Qantas supports proposal LL2. This proposal acknowledges the proliferation of users of low level airspace and provides freedom for the sector to develop with appropriate regulatory oversight.

Proposals for airspace design

- Control zones: Qantas supports proposal AD1. While standardisation may not be possible in all areas, the intent of option AD1 provides a clear definition and alignment with national and international standards where appropriate. Qantas supports an approach where consistent operational rules are applied to high capacity RPT services. For example, it creates unnecessary workload for pilots of RPT services to traverse Class D, Class E then Class C when departing or the opposite for arrivals.

- Terminal control area: Qantas supports proposal AD4. This approach provides for standardisation where appropriate with protection given to instrument approach procedures. The safety and efficiency benefits that results from these two concepts should be paramount.

- Enroute control area: Qantas supports proposal AD7. This approach provides for standardisation where appropriate with support given to continuous climb and descent gradients. The fuel efficiencies and greenhouse gas reduction benefits from this proposal are important to Qantas.

Consequential discussion points

Qantas appreciates the opportunity to identify the below policy and design points for further consideration.

Improved surveillance – Further to Qantas' comments to *The Future of Australia's Aviation Sector – Flying to Recovery Issues Paper*, we encourage all aircraft to be fitted with and use transponders. Given the cost of this requirement, an assistance package for industry may be appropriate. Increased use of Automatic Dependent Surveillance – Broadcast (ADS-B) will remove the need to replace costly and aging secondary surveillance radar at their end of life. This would also provide lasting safety improvements – particularly in non-controlled airspace and at aerodromes currently without a control tower.

Technology – While Qantas welcomes the commissioning of the new ATM system and the increasing use of digital technology, we encourage further discussion on the operational enhancements that these enable. Focus on airspace, processes, procedures and training that encourages the use of User Preferred Routes (UPR's), and RNP-AR departure and arrivals would be beneficial and contribute to considerable reductions in greenhouse gas emissions. Other enhancements, such as Digital Control Towers, provide benefits such as enhancing ATC flexibility to manage traffic as demand fluctuates.

Sydney Basin – Qantas believes this is a missed opportunity to review air traffic management in the Sydney basin based on the proposals outlined in the Issues Paper. Operations in the Sydney basin are hampered by overly complex and inefficient airspace structure and flight paths. A review of the Sydney basin flight paths would deliver significant operational benefits, improve fuel efficiency and reduce related emissions.

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ATTACHMENT 2

DRAFT AUSTRALIAN AIRSPACE POLICY STATEMENT

Qantas supports the draft AAPS and the policy objectives of safety, airspace review and international consistency where appropriate. Our comments on the key policy objectives are provided below.

- Safety: Qantas supports the safety of passenger transport services as receiving first priority under the policy statement.

- Future Airspace Framework: The development of an Australian Future Airspace Framework (AFAF), including a long-term strategic airspace implementation plan, by the Civil Aviation Safety Authority (CASA) is supported by Qantas. The development of the AFAF and implementation plan will need to be appropriately resourced to progress and allow CASA to continue its safety oversight role. We note the Department is aware of the resource challenge that CASA currently faces with the Issues Paper referencing items, such as the Australian Airspace Strategy, that have been on the CASA Office of Airspace Regulation (OAR) strategic works plan since 2017.

- International Consistency: Qantas supports the ongoing awareness and alignment with international standards (where appropriate) such as those contained in the GANP (Global Air Navigation Plan). Airspace review based on key policies such as Performance Based Navigation (PBN), Continuous Climb Operations (CCO) and Continuous Descent Operations (CDO) will ensure Australian airspace develops in accordance with global best practice.

- Airspace Review (Classifications, Services and Facilities): Qantas is increasingly concerned about high capacity, RPT aircraft operating in areas where they interact with General Aviation (GA) aircraft. RPT and GA operations differ in many aspects, including aircraft speeds, avionics equipment and awareness and familiarity with radio telephony procedures.

As such, we support the replacement of Airspace Review Criteria Thresholds with risk reviews based on 'quantitative and qualitative data'. Important risks can be reviewed in this manner regardless of aerodrome and airspace type. A review could include parameters such as, volume of traffic (both to an airport and transiting the area), mix of aircraft type, avionics equipment and pilot experience.

This process allows a targeted approach to airspace reform and we look forward to CASA implementing change based on this approach.