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Department of Infrastructure, Transport, Cities and Regional Development  
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Janet,

## **Proposal – Industry Advisory Board Australian Airspace (IABAA)**

### Overview

This unsolicited submission proposes that the Department initiates and manages a new advisory board – the Industry Advisory Board for Australian Airspace (IABAA).

With a national, strategic focus, the IABAA would fill a significant gap in the current planning of Australian airspace.

This proposal substantiates the need, the logic of the Department as convenor, and a brief path to accomplish its establishment.

### Author

The proponent, Brian Hannan has two decades of aviation negotiations and airspace involvement with the Department, CASA, Airservices, ASTRA, RAPAC and associations. An author credibility check can be made with Rob Walker, EM Stakeholder Engagement, CASA, or Andrew Andersen, Chair of the General Aviation Advisory Network (GAAN).

Acronyms and abbreviations have been used in the knowledge of readers' comprehension.

### Need

Among its several directions, the Minister's AAPS expects that the management of Australian airspace:

"...

- *shall consider adopting proven international best practice airspace systems adapted to benefit Australia's aviation environment; and*
- *shall take advantage of advances in technology wherever practicable..."*

Fulfilment in these respects, at best, is lagging.

The latter point deserves consideration in light of our progress with technology. It may be that "international best practice airspace systems", in reality, lag behind Australia's potential to lead in airspace, rather than follow.

This view is:

- Reinforced by the GAAN in their letter of 11 Nov 2020 to the Department noting a forthcoming *Policy Note* document dealing with airspace classification and management;

and

- Articulated in the “Session Report: Future of Australia’s Aviation Sector”, initiated by the Department in December 2020:  
*“Participants called for a national forum for industry-wide consultation to help develop a national airspace plan, taking a holistic view that accounts for both existing and emerging users. Participants proposed that the national airspace plan would assist in determining what future infrastructure is needed to support new technologies like drones as well as general air traffic management, and should be viewed as a long-term infrastructure investment.”*
- Demonstrated currently, as an example, by the gap disclosed in the recent Airservices proposal to change airspace by lowering the floor of Class E on the East Coast, which has attracted over 1,000 mostly critical responses from industry. The proposal contained no RIS, BCC or demonstrated safety case. Certainly CASA OAR would be required to assess such a proposal at submission stage, but industry can ill afford time to educate Airservices, particularly because no “airspace master plan” exists as a benchmark or baseline.
- Finally, critical in the need for consideration of the emerging RPAS impact on airspace and safety.

### Airspace

Australia generally follows the ICAO system, however suffers the tyranny of distance and economies of scale in the provision of airspace surveillance and communications with much “dirt road” hybrid Class G (lowest level) airspace basing separation on “see and be seen”. For these reasons and policies for cost recovery, overseas practices cannot be “plug and play” as some propose, because we cannot embrace the operational totality of the overseas systems. Few people have a holistic overview of the complexity of overseas systems.

Airspace cannot be examined in isolation from technology; therefore, any airspace future planning group must involve industry experts to examine the interaction between the two in airspace design.

Airspace is also a national resource, acknowledged by the existence of the AAPS, and any airspace planning process must democratically involve whole of affected industry. General aviation deserves equitable access.

### Airservices

As the Australian ANSP, there are conflicts of interest in Airservices entering the province of airspace design. The “user pays” philosophy specified by government has the consequence that 99% of Airservices revenue occurs from the passenger carrying sector, almost exclusively airlines. This biases the actions of Airservices and results in situations like the recent East Coast Class E proposal that would reduce the safety of air navigation and fail the AAPS direction “*shall consider cost implications for all airspace users*”. On 17 February 2021, Airservices acknowledged the gaps in their proposal.

A second conflict is that airspace proposals undertaken by Airservices will usually involve compromised financial interest in the resulting air navigation charges.

In 2007 the Department resolved some obvious conflict, by transferring airspace regulation from Airservices (AERU) to CASA (OAR). Now is the time to remove the remaining inhibitors.

### ASTRA

ASTRA, the Australian Strategic Air Traffic Management Group, was established in 1999 by industry and government stakeholders to plan and coordinate the implementation of the future ATM system.

The ASTRA Charter is worthwhile reading in developing a model for the proposed IABAA.

Airservices has historically provided the ASTRA Secretariat and web presence; and over time assumed de facto ownership of ASTRA. Actually, however, the membership of Airservices on ASTRA Council, according to its charter, is only as an equal member - aviation "Service Provider".

ASTRA achievements are commendable including the implementation of PBN and ADS-B and the creation of the Australian ATM Strategic Plan (ATMSP), which it (ASTRA) produced in the absence of any other published national plan.

However, the focus on airborne equipment technology impact on airspace, rather than the ASTRA ATMSP, leaves the nation still referencing the last edition of the Australian ATM Strategic Plan, published in 2007. In the age of technology change, this is a gap that needs action. But ASTRA has lost impetus and leadership and has been refocused as an Airservices consultative group.

### CASA OAR

OAR sets the benchmark for transparent industry consultation, versus the Airservices "Engage Airservices", which is essentially a one-way consultation model. However, OAR exists for airspace administration and regulation, rather than identifying policy and promulgating a strategy for an efficient airspace future state.

OAR also provides a "safety net" through its responsibility under the *Airspace Act 2007* to:

- (a) foster efficient use of Australian-administered airspace; and
- (b) foster equitable access to that airspace for all users of that airspace.

OAR coordinates AvSEF State groups (formerly RAPAC) which do have an airspace portfolio, but are focused more on current issues, than any future airspace state. AvSEF do not meet in national forum.

### The Department of Infrastructure, Regional Development and Communications

The Department has self-identified as the coordinating body for the IABAA by this commitment in the Future of Australia's Aviation Sector Issues Paper-2020:

*"The Australian Government will consult with industry in 2020 on a range of options to develop a National Strategic Airspace Policy to ensure Australia's airspace administration and management arrangements remain appropriate into the future."*

By establishing the IABAA, the Department would establish a consultative group "in committee" rather than non-simultaneous two-way consultation processes. This would support sharing of

industry expertise together and democratic participation across industry, as well as fulfilling key Departmental ideals:

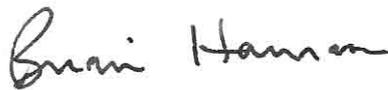
- Development of a strategic vision and “flight plan” for Australia’s national airspace system;
- Maintaining the vision and flight plan in line with the Minister’s Policy Statements, changing stakeholder needs, and emergence of new opportunities for innovation;
- Providing a forum for ensuring a national and strategic industry input to airspace; change proposals and so provide holistic, not piecemeal input to airspace system decisions; and
- Align the wide array of airspace stakeholders, assisting also cross-industry comprehension.

### Pathway

This proposal recommends that the Department:

1. Considers, queries as required, and accepts its role as lead agency in the formulation of policy for the Australian airspace national asset;
2. Establishes the IABAA identity, adopting a charter possibly based on a scaled down ASTRA charter;
3. Invites industry (initially based on the ASTRA membership) to participate in IABAA specifically for the purpose of establishing a living 5–year Airspace Plan (this would be a carrot for industry);
4. Identifies to industry that, subject to majority concurrence, IABAA would subsume ASTRA’s role as the primary airspace consultative body informing the APG, CASA and Airservices,
5. Proceeds to a first meeting of the IABAA by mid-2021.

Kind regards, I am happy to clarify or support on request (preferably email due my deafness).



18 February 2021

CC Rob Walker (CASA), Andrew Andersen (GAAN), Andy Sparrow (CASA), Adrienne Fleming (ASAP), Matt Bouttell (CEO RA Aus), Doug Stott (HCAPA).