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DRAFT Australian Airspace Policy Statement 2021 RAAus organisational consultation response

Please accept this document as the Recreational Aviation Australia (RAAus) organisational response to the consultation on the DRAFT Australian Airspace Policy Statement 2021.

1. Executive Summary

RAAus has undertaken a review of the Draft Australian Airspace Policy Statement (AAPS) 2021 and whilst overall we believe it to be suitable, we would welcome the consideration of our recommendations relating to the involvement of industry.

2. Recreational Aviation Australia (RAAus)

RAAus is Australia's largest Civil Aviation Safety Authority (CASA) Approved Self-administering Aviation Organisation (ASAO) and is responsible for administering a large portion of what was traditionally known as general aviation including ultralight, recreational and Light Sport Aircraft (LSA) operations. With more than 10,000 members, we train and certify pilots, flying instructors and maintainers, register a fleet of over 3,200 aircraft, oversee the operations of 194 Flight Training Schools around the country and support almost 50 Aero Clubs.

3. Review of AAPS 2021

Government Policy Objectives - Clauses 8 – 13

RAAus is of the view that a Government Policy Objective should relate to Industry involvement to enable the leveraging of expertise within industry and to ensure Australian airspace meets industry needs rather than just the needs of Government and its agencies. We would contend that the omission of industry consultation within each of these clauses, or as a stand-alone item, introduces risk that these objectives will be delivered regardless of industry needs.

Recommendation 1: An additional Clause be inserted under Government Policy Objectives per the following:

Industry Consultation

Government recognises the significant subject matter expertise contained within the Australian Aviation industry along with the variability of industries' needs. The Government therefore expects its relevant Departments, CASA and Airservices Australia to proactively engage with industry, to consult and incorporate relevant consultative material on matters relating to airspace.

Australia's Future Airspace Framework – Clauses 31 – 40

RAAus seeks involvement of Industry representatives in the development and maintenance of the AFAP within Clause 32. Whilst it is recognised that Clause 33 directs CASA to *consult* with industry stakeholders, this provides no assurance that involvement of industry in the infancy of the AFAP development would take place. Our experience tells us that sometimes it's simply too late or complicated for industry consultation feedback to be incorporated in the final design of these initiatives. We envisage industry involvement to be undertaken through ASTRA or a modernised body that has working groups, similar to the design of CASA's Aviation Safety Advisory Panel (ASAP).

Recommendation 2: Inclusion of 'industry representatives' in Clause 32 per the following:

CASA shall work collaboratively with Airservices, Defence and the Department of Infrastructure, Transport, Regional Development and Communications **and industry representatives** to develop/maintain the AFAP and the implementation plan. Airspace is seen as a critical element in the development of a seamless harmonised national and civil military ATM system.

4. Conclusion

RAAus recognises the challenge of Government to meet the needs of all airspace users and therefore we respect the importance of assuring the safety of passenger transport services as the first priority. It is, however, incumbent upon Government policy to also assure the economic viability of the Australian aviation industry and to continue to enable the participation of existing industry participants whilst preparing for the influx of new participants such as RPAS.

The variability of operations utilising airspace is such that it is unrealistic to expect Government or its agencies to maintain subject matter expertise on all such operations. For this reason, it is essential that industry participation in the development, implementation and maintenance of airspace policy is intrinsic to the manner in which Government and its agency's function. Conflicting requirements of either Government or industry may result in outcomes which may only be resolved through the use of expertise, negotiation and compromise. RAAus remains aware that this approach necessitates all participants to approach collaboration of this nature with a mature mindset and we therefore welcome our continued involvement in setting a pathway for Australia's aviation future.

RAAus thanks the Minister for Infrastructure, Transport and Regional Development for the opportunity to make comment on this important statement.

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