

Date: 16 July 2021

**National Strategic Airspace – National Aviation Policy Issues Paper  
RAAus organisational consultation response**

Please accept this document as the Recreational Aviation Australia (RAAus) organisational consultation response to the 'National Strategic Airspace – National Aviation Policy Issues Paper' (the Issues Paper).

**1. Executive Summary**

RAAus welcomes the opportunity to contribute to this initiative and looks forward to continued engagement with Government, the Department of Infrastructure, Transport, Regional Development and Communications (the Department) and relevant Agencies to ensure future airspace policy meet the needs of our members, the Australia aviation industry, and Australians more broadly.

Although the engagement noted above is currently the case, we contend that due to the size and complexity of the task to develop policy and strategies associated with national airspace, that an effective means of engagement for Government agencies and industry such as ASTRA<sup>1</sup> or a modernised version thereof, be established with targeted working groups to consider the concepts contained within the Issues Paper in more detail. This will enable the effective leveraging of industry participant expertise. The strategies utilised in the already established CASA Aviation Safety Advisory Panel (ASAP), would assist the Department in the formulation of policy.

**Recommendation 1**

ASTRA or a similar modernised body is established with targeted working groups to consider the concepts contained within the Issues Paper in more detail, leveraging off participant expertise.

One key area identified as missing from the Issues Paper is the context for *what* our airspace intends to achieve for airspace participants. Whilst there is material contained within the Issues Paper relating to technical design and concepts, we believe the Department has overlooked an opportunity to commence the development of policy using a first principles approach. That is, *why* is it in the national interest to establish policy and associated strategies. We maintain the view that airspace – a national commodity – is there to serve the interest of Australians within an international context. There are many participants within the eco-system, sometimes with incompatible objectives, however there is a need to formulate a needs-based approach for all participants.

Without attempting to be controversial, at times it is viewed by industry that the Government and its agencies are self-serving and therefore rather than meeting the needs of Australians and the industry they serve, consultation and engagement is conducted, but in the end, they meet their own pre-

<sup>1</sup> (The) Australian Strategic Air Traffic Management Group

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determined needs. An assessment is needed by Government and its agencies to recalibrate *why* they perform their function and *what* it is that Australians and industry require. Only then can industry prosper within an environment that has aligned objectives and a clearly articulated strategy.

## **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. Current operations and airspace users**

The Australian regulatory framework has progressed over the past 25 years towards an environment that seeks to manage risk based upon the type of operation being conducted. For example, the Civil Aviation Safety Regulations (CASR) will soon clearly articulate types of operation. That is, Air Transport Operations will be captured under Part 121, 135 & 133, Flight Training is captured within Part 141 & 142, and so on. We believe this is an appropriate manner in how airspace use can also be described and therefore assist in enabling a level playing field from a commercial aspect and allowing a true risk-based approach to be adopted.

### **Recommendation 2**

That when developing Australia Aviation Policy, including Airspace Policy, Government and its agencies describe industry segments by *type of operation* instead of who is performing the operation.

## **4. Technical Background**

RAAus notes the next generation ATM system currently under development and is encouraged that for this system to function as designed, there is a need to standardise airspace to the 'maximum extent possible'.

In relation to the Airservices Airspace Modernisation Program (AMP), we would ask for more transparency around what the AMP is attempting to achieve (other than the suggested standardised airspace) and what this program currently planning.

## **5. Technical Considerations**

RAAus is supportive of the Technical Considerations as outlined in this section. We would also like to emphasise the importance of ensuring Airservices *and* CASA work collaboratively in the development of AFAF, noting this is yet to occur.

We also support the concept around equitable access of airspace in the ongoing development of future airspace classifications.

## **6. Proposals for airspace classification**

RAAus has considered only those airspace proposals that affect our current and envisaged future operations.

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### Class of airspace – Enroute continental airspace

Preferred – AC10

Our rationale behind supporting AC10 is that the status quo is already considered to provide an ALoSP. Given the cost and/or impact to our members we do not believe a sufficient safety or operational case exists to deviate from the established structure at this time. Should arrival and departure paths for Air Transport operations require protection, we believe this can be achieved through other means.

### Class of airspace – Terminal airspace

Preferred – undecided

The complexities as outlined within the Proposal for AC12 serve as an example of where risk modelling, along with considerable consultation with industry is necessary to arrive at the most appropriate model. Clearly, Western Sydney airport commencing mid-2020's will introduce complexities in the Sydney basin along with the potential for Class B airspace. These changes have the potential to severely curtail recreational flight in the Sydney basin, in addition to creating additional challenges for transit. Furthermore, with new industry entrants participating in aviation activities we would contend that further investigation needs to occur rather than simply selecting a pre-determined and possibly incomplete model in the form of AC11 or 12.

### Class of airspace – Control Zones

Preferred – undecided

As with terminal airspace, we maintain the view that considerable engagement and consultation needs to occur across industry to decide on what the future model should be.

### Low level airspace

Preferred – LL2

Although we prefer LL2, it should be noted that RAAus supports the work of the NEAT CC and that a harmonised approach across current and future entrants should be adopted to ensure the needs of all (or most) can be achieved.

## **7. Proposals for airspace design**

### Control Zones

Preferred – AD1

### Terminal control area

Preferred – AD4 or 5

The rationale for our preferences in both Control zones and Terminal control area design is that we wish to see a more standardised approach to airspace design across the country. Furthermore, we believe compliance with Part 173 and Annex 11 will assist in driving this consistency.

### Enroute control area

Preferred – AD8 (provisionally)

Whilst supporting the environmental benefits that AD7 provides, we do not support the complexities associated with 1000 ft vertical increments (steps) below 8500 ft as this will introduce complexity, chart clutter and potentially result in additional airspace infringements. Therefore, we believe further work needs to be done relating to AD8 to address known issues whilst remaining practical for airspace users – particularly those operating in Class G airspace.

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## **8. Consequential discussion points**

We specifically call out *“where a surveillance service is provided in a control zone, fitment and use of a transponder is required unless alternate solutions are in place...”* And that the rationale is to align with the UK requirement for the use of Class D for control zones.

Question: Is this implying that there would be future transponder requirements in Class D control zones?

If this were the case, RAAus would seek that Government consult widely on this issue. The resultant outcome from this would be continued reliance upon old radar-based technology (transponders) when ADS-B could provide a more suitable outcome. Either way, we have concerns that this will result in increased costs for industry without a demonstrated safety benefit. In other words, we see this as only introducing a requirement for transponders in Class D because surveillance exists, rather than it being operationally necessary.

## **9. Conclusion**

We believe this document is a good starting point to discuss the complexities associated with airspace. We support a process that seeks to improve safety, efficiency and equity through data rather than emotion – as has typically been experienced in Australia.

Whilst this is the case, RAAus believes that the items being addressed through this paper should be worked through with full transparency for industry and we therefore re-iterate Recommendation 1, that ASTRA or similar should be stood-up to work through this.

There are many vested interests’ variables relating to airspace policy in Australia at present including OneSky, Airspace Modernisation Program, AFAF, new entrants and technology, as well as significant changes in operational regulation. For this reason, it will be a challenge for all stakeholders to bring this together as a coherent plan for Australia’s airspace future without an overarching consultative process. RAAus welcomes the opportunity for continued involvement and makes the commitment to work collaboratively across industry to progress this work.

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