



SUBMISSION TO AVIATION WHITE PAPER March 2023

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1 BACKGROUND

The Department of Infrastructure, Transport, Regional Development, Communications and Arts has invited submissions to a White Paper under preparation.

The Scope and Themes covered by the White Paper are as follows:

The White Paper will examine the Government policy and economic reforms necessary to promote efficiency, safety, sustainability and competitiveness of the aviation sector out to 2050. Areas to be considered include:

- *aviation's role in economic development, trade and the visitor economy – general, domestic, regional and international aviation;*
- *how to maximise the aviation sector's contribution to achieving net zero carbon emissions including through sustainable aviation fuel and emerging technologies;*
- *changing aviation technologies and ways to position our policies, regulations and systems to encourage uptake and manufacturing of new, more efficient, transport technologies;*
- *airport development planning processes and consultation mechanisms that consider the impact and changing nature of aircraft noise and related expectations on the role of noise sharing and noise mitigation;*
- *how to support and regenerate Australia's general aviation sector;*
- *future industry workforce skills and training requirements;*
- *appropriate consumer protections and access to services;*
- *maintaining fit-for-purpose aviation safety, air navigation and aviation security systems and service delivery agencies;*
- *the role of airlines and airports in supporting regional economies; and*
- *other significant issues raised during the consultation process.*

The discussion points raised within this submission will address several points within the scope of the White Paper. This submission to the Aviation White Paper and has been derived from many decades of experience in delivering services to the airports and aerodromes of Australia.

2 CURRENT SITUATION

There are a large number of personnel travelling for a mix of business and necessity. Personnel travelling for work or personnel travelling to larger centres to access goods and services not available in their home location in aged (many nearing 50 years old), non-fuel efficient and less safe (based on their design capabilities) aircraft as these single engine, aged aircraft are cheaper to hire.

The increased risk to personnel travelling in these aircraft comes from the aircraft not being able to fly above the weather as they are not pressurised and are required to fly around and / or through weather. Flying in these conditions can be very uncomfortable leading to a reduced pool of personnel choosing to cope with these conditions to travel to and from work / home or simply avoid travelling to avoid these conditions leading to delayed care until issues become serious enough to overcome the risk/reward threshold.

The discussion points below will expand on these issues.

3 QUALIFICATIONS

Aerodrome Management Services Pty Ltd (AMS) is based in Perth providing a range of services to the Airport Industry. AMS has been operating for 26 years and predominantly services regional and remote aerodromes and communities.

Our services utilising some 200 staff cover:

- Operation of aerodromes
- Supply of personnel for aerodrome operations
- Baggage handling
- Aviation Security and Screening
- Training of airport staff
- Engineering and construction of airports
- Electrical and lighting
- Safety Audits and Annual Technical Inspections

AMS has provided unbroken services to the Department since 2004 by carrying out the required inspections and services under the Remote Aerodrome Inspection Program (RAI).

After personally flying to all 56 aerodromes each year for the past 19 years, I believe AMS is in a good position to provide a submission to this White Paper.

4 EXPERIENCES

4.1 The RAI Program

The RAI Program covers mainly Aboriginal and Torres Strait Island Communities. It covers some of the most remote locations in Australia. It was born out of a death in custody enquiry where the root cause was identified as a lack of annual aerodrome inspections being conducted to a set of safety and technical items as required by the regulator.

4.2 Under Funded

Most aerodromes under the RAI and others in remote areas are underfunded for both operation and maintenance.

4.3 High Cost to Access Maintenance

Due to the remote locations, it is cost prohibitive to access skilled personnel and equipment required to perform essential annual maintenance leading to it being completed to a sub-standard level or not being completed at all.

4.4 Transient Staff

Staff at all levels at aboriginal communities are very transient. Airport staff are regularly trained in their duties and responsibilities but rarely last longer than 12 months before moving on leading to a constant drain on corporate memory and local learnings.

4.5 Small Aerodromes

The small size of the aerodromes at aboriginal communities generally means that only small size aircraft can be used and the cost to upgrade facilities to accommodate larger, more modern aircraft being outside of the capacity of any local community to procure or project manage effectively should they be successful in securing Government funding.

4.6 Small Aircraft

Small aircraft (6 seats or less) are operated on a very competitive supply base, meaning the lower acquisition cost the more competitive rate can be offered. These aircraft with lower acquisition costs are old, generally more than 50 years old with outdated technologies and are inefficient.

4.7 Government Services FIFO

Due to an escalation in violence in the communities and greater expectations for living conditions, many government agencies have reverted to fly in/fly out arrangements for their staff. There is a very high rate of government workers travelling regularly to aboriginal communities rather than past practices of living in the communities. As much of the North of Australia has a distinctive wet and dry season weather pattern. Flying during the wet season can be very uncomfortable and is not acceptable for many people leading to a further shallowing of the Government worker pool willing to take up these postings and/or remain for any length of time.

4.8 Vital Access

All aboriginal and Torres Strait islander aerodromes are vital to their communities. Most remote aboriginal communities do not have road access during the wet season therefore, to access services that most of the Australian population take for granted requires travel in light aircraft to access incurring additional costs.

4.9 Mini Hubs

Some aboriginal community aerodromes form an access to other communities within their land areas. These aerodromes form a mini hub for either road access to other even smaller airstrips this benefits all as the mini hubs tend to be all weather accessible and generally maintained to a higher standard.

4.10 CASA Rule Changes

Recent CASA rule set changes have made management of the aerodromes very problematic. In summary, aerodromes with instrument approaches are now mandated to be certified. Many remote aerodromes which had instrument approaches were previously classified as Registered. Registration had fit for purpose inspections and management requirements.

As there is no scaling in the Certified requirements, most of the requirements for a remote aerodrome extend in the same as capital city airports. A community airport such as Milingimbi, is now required to have Accountable Managers, operations manuals, risk management systems, more extensive training and onerous deliverables to CASA.

This combined with the transient workforce at the communities means that difficulty in implementation and full compliance on an ongoing basis is difficult. This situation leads to some rules being overlooked due to the practicability of meeting compliance in these environments.



5 DISCUSSION

It is argued that aerodromes at remote Aboriginal and Torres Strait Island communities are vital to the success of the wider Australian community. Australia pays recognition to aboriginal heritage and the land they occupy. Access to these communities is crucial to:

- Provide travel for the people living in the communities.
- Allow travel for cultural reasons.
- Allow travel for Government staff to provide a range of services to the communities from power, water, communications, health and education.
- Failure to provide travel will mean there will be a drain of people from communities to the cities. This has already happened and is clearly visible in the NT.
- Only efficient, safe and comfortable transport can provide the best outcomes for aboriginal people.
- Currently, the aerodromes place limits on aircraft types and sizes. This leads to inefficiency and greater fuel usage.
- Greater efficiency, reduced commute times and comfort can be achieved by using larger, faster and newer aircraft types by moving to an airline class aircraft rather than small single engine aircraft that are slower, unpressurised, and forced to fly lower in the weather rather than above it.
- To allow for larger aircraft, larger aerodromes are required in most cases. It would follow that an airline service much like what is offered to other regional towns in Australia could operate to a timetable (known as Regular Passenger Transport RPT).

- One or two RPT services per day using airline class aircraft could replace up to 12 smaller light aircraft.
- Larger airline type aircraft requiring the construction of larger aerodromes would provide:
 - better efficiency of fuel use on a passenger kilometre basis.
 - Allow for safer aircraft being pressurized with ability to fly above the weather.
 - Be more acceptable to the traveller, especially government thus providing better retention levels.
 - Greater efficiencies will mean reduced airfares meaning easier and cheaper 'return to country' by people, thus invigorating the communities.
 - Provide greater resilience to wet weather and flooding.
 - Ability to accept larger aircraft in times of emergencies.
 - Through the construction of larger aerodromes to suit the larger aircraft, the result will be to provide emergency landing places for other aircraft thus having efficiencies of even larger airline traffic to track more efficiently to their destination. As an explanation, aircraft have to remain within mandated distances to suitable emergency landing locations even if they are traveling Darwin to Sydney for example. By having more suitable landing locations, they do not have to deviate off course to maintain these mandated distances.
 - Provide landing locations suitable for the new wave of RFDS or Careflight type jet aircraft thus allowing more efficient and timely evacuations.



6 SOLUTIONS

A study is needed to consider the Aboriginal and Torres Strait Island aerodromes in a larger sense to the full community of Australia.

The study should consider not only the use of the aerodrome to the community it serves, but to the greater benefit to the community in terms of access impingements and the results through the community having inefficient, outdated and uncomfortable aircraft. The cost to the Government through over reliance on charter aircraft and the effect on the performance and outcomes for the Government worker needs to be considered.

A full understanding of the need for good aviation access to all communities needs a shift in priorities. The past which looks at the cheapest option on the day should be weighed up against the social costs, ancillary costs such as longer travel times, mental costs (I know of at least two Government Workers who have suffered real stress from having to travel in light aircraft) and the best for the nation's aviation infrastructure into the future.

Additionally, these larger hubs would better lend themselves to proposed "green powered" aircraft as the investment in infrastructure would be more cost effective than it would be by trying to do this at smaller, single community service aerodromes.

With this understanding and assuming the study finds accordingly, there should be a shift to larger aerodromes, with suitable navigation aids and equipment to facilitate larger airline class aircraft.

The maintenance of the aerodromes whether existing or future developed, needs to be considered. Professional maintenance management plans should be drafted and implemented. In this way Government can plan the maintenance of the aerodromes in a more efficient manner. For example, term contracts to aboriginal companies to maintain a group of airports on country.

Management of the aerodromes should be centralised to contracted companies with clearly guided outcomes and principles.

