



# ROYAL AUSTRALIAN AIR FORCE

Director General Air Capability Enablers – Air Force

BP31612003

## Assistant Secretary, Aviation White Paper and Reform Branch

Department of Infrastructure, Transport, Regional Development, Communication and the Arts  
GPO Box 594  
CANBERRA ACT 2601

Dear Mr Dymowski

### AVIATION WHITE PAPER TERMS OF REFERENCE

1. Thank you for the opportunity to contribute to the Aviation White Paper Terms of Reference and the Green Paper. Defence, as a major stakeholder in the aviation sector, has a keen interest in the outcomes of the White Paper and ensuring that Defence's needs are part of the discussion around future aviation policy.
2. The Terms of Reference cover many of the aspects that are relevant to Defence aviation and will form a good basis for deeper discussion. I would like to offer the following feedback for consideration in the green paper development:
  - a. **Recognition of Defence as an Air Navigation Service Provider (ANSP).** Defence continues to strive for harmonisation of technology and procedures with Airservices Australia (Airservices); however, it should be recognised that Defence is an ANSP in its own right with unique requirements. As a result, there will be necessary differences between Defence and Airservices in technology and service delivery and this should not be viewed as counter to the objective of harmonisation.
  - b. **Airspace as a national resource.** Increasing traffic volumes and emerging technologies, including un-crewed aerial systems (UAS) and rockets, are placing increased civil demand on access to suitable airspace. Similarly new Defence platforms and capabilities increasingly require access to protective airspace to achieve operational and force generation outcomes. Airspace is a constrained, limited resource and policy discussions should examine the prioritisation and flexible use of airspace.
  - c. **Emerging technology and UAS.** The proliferation of new aviation technologies is fundamentally changing the landscape of the sector. While encouraging investment in the development and expansion of this aspect, consideration should be given to the impact these technologies will have on the security of Defence operations and installations, particularly at locations that do not have protective airspace.
  - d. **Defence airport planning.** Defence is investing significant money into the development and refurbishment of many of its air bases and considerations similar to those of civilian airports, including airspace and noise, are equally applicable. Defence is under increasing pressure from competing agencies at many locations,

particularly in capital cities, which may adversely affect operations and force generation.

3. I look forward to further opportunities to contribute to the development of Australia's aviation policy. My contact officer for enquiries is Group Captain Nick Dyce-McGowan, Director Strategic Airspace Management and Airbase Operations, who can be contacted by telephone on (02) 5131 3989 or at [nicholas.dyce-mcgowan@defence.gov.au](mailto:nicholas.dyce-mcgowan@defence.gov.au).

Sincerely

**Paul Long**

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15 March 2023