



Aviation State Safety Programme (SSP) and National Aviation Safety Plan (NASP) consultation – Stakeholder issues and responses

Stakeholder	Comments	Response
Qantas Group	Okay with plan/ no changes requested.	No change required.
Regional Aviation Association of Australia (RAAA)	Okay with plan/ no changes requested.	No change required.
Virgin Australia	Okay with plan/ no changes requested.	No change required.
Australian Airports Association	<ul style="list-style-type: none"> Endorse comments of member airports and broadly supports approach in SSP and NASP. 	Noted.
	<ul style="list-style-type: none"> Regarding Principle 10 of the draft SSP, Government should support Airservices, BoM and CASA towards a more certain and sustainable long-term funding position, not reliant on cost-recovery through user charges or fuel excise revenue. 	<p>Noted. Government decisions on agency funding, including funding models and cost recovery, have been announced.</p> <p>No change to the NASP and SSP required.</p>
	<ul style="list-style-type: none"> (NASP) a key airport-related issue is mitigation of risk to air safety through inappropriate development around airports. Government should strengthen linkages between National Airports Safeguarding Advisory Group (NASAG) and aviation safety bodies, and improve links from NASAG and National Airports Safeguarding Framework (NASF) into state and territory planning systems to control inappropriate development around airports. 	<p>Noted, no change to NASP required. Government aviation agencies will continue to use NASAG and NASF to promote safety risk mitigations in land use planning around airports. While the Australian Government can continue to encourage uptake, State and Territory Governments decide the extent to which and how specific elements of NASF are adopted in their respective planning controls and legislation.</p> <p>There are also individual airport committees that can be used to address local safety issues including airport, Government agency and industry representatives. Any serious safety issues can also be raised with the Civil Aviation Safety Authority in terms of compliance with the relevant airport regulations.</p>
	<ul style="list-style-type: none"> (NASP) AAA supports, as an additional action in the SSP Operational roadmap Goal 1.4, the Government funding acquisition and installation of a Low-Level Windshear Alerting System (LLWAS) at major, high traffic airports. 	Noted. LLWAS is not CASA-mandated aviation safety equipment at or in the vicinity of an airport, and its installation is a decision for individual airport operators, in consultation with relevant stakeholders. No change to NASP proposed.

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Aviation Maintenance Repair and Overhaul Business Association (AMROBA)	<ul style="list-style-type: none"> Concerned with lack of adherence to the Chicago Convention. 	<p>Not agreed. Australia ratified the Chicago Convention in 1947 and continues to adhere to our obligations under the Convention. Section 11 of the Civil Aviation Act also requires CASA to perform its functions in a manner consistent with Australia's obligations under the Convention. The primary legislation in Australia that gives effect to the Convention is the <i>Air Navigation Act 1920</i> (AN Act). The AN Act provides approval for the ratification of the Convention, with the text of the Convention, protocols and amendments to it included as schedules. Australia's State Safety Policy Statement in the SSP (page 3) reiterates Australia's commitment to continue to seek closer alignment with ICAO Standards and Recommended Practices (SARPs). No change to SSP and NASP required.</p>
	<ul style="list-style-type: none"> Australian SSP looks like a marketing document and the NZ SSP sounds positive and definitive. Australia's SSP endorses "principles" whereas NZ "promotes and regulates to manage risks, deliver economic benefits to NZ and supports a safe, efficient transportations system." 	<p>Not agreed. The SSP and NASP are necessarily safety-focussed documents providing a summary of all Australian safety-related activities and detail on relevant legislation, systems and processes that support Australia's aviation safety system. The SSP aligns with ICAO Annex 19 – Safety Management (Annex 19), Doc 9859 – Safety Management Manual (SMM) and Doc 9734 – Safety Oversight Manual (SOM). Identifying safety principles is appropriate in a high level document.</p>
	<ul style="list-style-type: none"> No mention of Articles 37/38 of the Convention in SSP or NASP; government must amend documents to include a commitment to Articles 37/38. 	<p>Agreed. The SSP (page 10) has been amended to specifically identify text relevant to Australia's obligations under Articles 37 and 38 of the Chicago Convention.</p>
	<ul style="list-style-type: none"> Program is about the bureaucratic system rather than the civil aviation industry. 	<p>Noted. However under Annex 19 of the Chicago Convention, each State is required to establish an SSP for the management of safety in the State, in order to achieve an acceptable level of safety performance in civil aviation.</p> <p>The documents are about the framework of State aviation safety oversight, systems and frameworks and how these enable safe civil aviation operations.</p>
	<ul style="list-style-type: none"> Instead of listing principles, change to positive and practical objectives that will provide clarity for those involved in regulatory development. 	<p>Not Agreed. The SSP and NASP considered together provide both safety principles and objectives (goals) for aviation safety in Australia. No change to SSP and NASP is proposed.</p>

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Individual Feedback	<ul style="list-style-type: none"> • Shortfall in the measurement of the effectiveness of present and emerging safety initiatives which is caused by the failure of agencies in reporting safety occurrences at uncontrolled aerodromes; • No structured compulsion for aircrew, ground crew and aerodrome owners/operators to formally report to CASA or the ATSB on incidents which occur daily in the vicinity of uncontrolled aerodromes; • Suggest a mandatory independent reporting regime for all aviation entities with repercussions for failing to report air safety occurrences. 	<p>Not Agreed. In addition to mandatory reporting of occurrences of accidents, serious incidents and incidents, the existing Aviation Confidential Reporting (REPCON) scheme allows any person who has an aviation safety concern to report it to the ATSB confidentially. Under the Aviation Self Reporting Scheme (ASRS), the holder of a Civil Aviation Authorisation may report a reportable contravention committed by the holder. ATSB is not permitted to disclose information that identifies the reporter. The Transport Safety Investigation Act and Regulations identify a number of occurrences which aircrew, operators and ground personnel are required to report to the ATSB.</p>
Sydney Airport	<ul style="list-style-type: none"> • In relation to Goal 6 of the NASP, about ensuring aviation infrastructure to support safe operations, one deficiency in infrastructure currently is the lack of (real-time) Low Level Windshear Alerting Systems (LLWAS), to mitigate the risk of windshear and low level turbulence at major airports; • Major international airports overseas provide these systems either via the Air Traffic Service Provider or the appropriate meteorological authority; • Suggest inclusion in NASP Appendix A Safety Enhancement Initiative 1.4 (page 23) of text about the promotion of the implementation of LLWAS systems at major capital city airports to mitigate contributing factors to runway safety accidents. 	<p>Noted. LLWAS is not CASA-mandated aviation safety equipment at or in the vicinity of an airport, and its installation would be a decision for individual airport operators, in consultation with relevant stakeholders. No change to NASP proposed.</p>
Brisbane Airport Corporation	<ul style="list-style-type: none"> • Support inclusion under Goal 6 of the NASP BAC of a national plan to provide low level windshear alerting and airborne wind information at major aerodromes. • See this as an existing gap in essential safety information for pilots at airports, given the availability of LIDAR or similar technology. 	<p>Noted. LLWAS is not CASA-mandated aviation safety equipment at or in the vicinity of an airport, and its installation would be a decision for individual airport operators, in consultation with relevant stakeholders. No change to NASP proposed.</p>

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Board of Airline Representatives of Australia (BARA)	<ul style="list-style-type: none"> NASP should make more reference to the issues of airfield safety outside of runway incursions, and how airfield safety issues such as FOD and airside operating practices will be safely managed with return to high traffic volume. 	Noted. Specific elements can be considered under existing National Runway Safety Group or through local runway safety teams, depending on whether a national or airport specific issue has been raised.
	<ul style="list-style-type: none"> NASP should recognise potential opportunities in making the best use of on-board technologies on new generation aircraft to support increasingly efficient and safe operations. 	Noted. This issue to be considered under Action 1.1.3 of SEI 1.1 in the NASP.
	<ul style="list-style-type: none"> NASP could well include a statement that Australian safety design and systems will draw on world's best practice where appropriate for Australian conditions; 	Noted. No change proposed as a statement to this effect is already included in the first paragraph of the State Safety Policy Statement of the SSP.
	<ul style="list-style-type: none"> The SPIs in Goal 1 (NASP, Table 1) do not differentiate between individual and multiple airframe events, so it is assumed that air traffic management (ATM) incidents and accidents form part of Goal 1 assessments. An option to address this issue is to have different SPIs and targets established for ATM--based incidents. 	Noted. This is the first use of State SPIs. Future versions of the NASP will seek to mature SPIs and Safety Performance Targets (SPTs) and will consider separate SPIs/SPTs for ATM based events. No change to NASP proposed at this time.
	<ul style="list-style-type: none"> (NASP, SEI 6.3) not clear how airport collaborative decision making (A-CDM) will contribute to the identified SPI targets, and understand that A-CDM is unlikely to be delivered during the life of the NASP. 	Noted. While A-CDM is aimed at better efficiency and predictability, for aircraft arrivals and departures, these elements also bring safety gains (e.g. implementing a ground delay for an aircraft at the departure airport is safer than a delay at the destination airport, if airborne holding is required).
	<ul style="list-style-type: none"> (NASP, SEI 6.3) long range air traffic flow management (LRATFM) is about operational efficiency and reduced fuel burn, rather than achieving the SPI targets. 	Not Agreed. Shifting airborne delays for international flights from arrival to enroute phase is inherently safer than unplanned holding in higher density airspace in the vicinity of the airport.
	<ul style="list-style-type: none"> A more appropriate deliverable under NASP SEI 6.3 might be the implementation of flexible use airspace (FUA)/Advanced FUA supported by OneSky technology – or simply the deployment of OneSky. 	Noted. Propose the issue of implementing FUA be considered in the context of the National Strategic Airspace: National Aviation Policy Issues Paper released in June 2021 by the Department of Infrastructure for stakeholder consultation.
	<ul style="list-style-type: none"> NASP could note the changing basis of international airline operations and how it incorporates these changes (i.e. many services and functions are now subcontracted and outsourced to other specialist organisations rather than provided directly by airlines) into safety management. 	Agreed. NASP (Section 3.3.2) has been amended to acknowledge the changing corporate model of international airline operations where services and functions may be outsourced to specialist organisations rather than provided directly by airlines.
<ul style="list-style-type: none"> Consider development and deployment of smart technology and artificial intelligence and the concepts of 'machine learning' and 'deep learning' in support of navigation performance, separation assurance airspace conformance and system integration. 	Agreed. NASP (Section 3.3.5) has been amended to acknowledge the need to monitor and research emerging technologies including AI and ML to be in a position to implement an appropriate and timely safety regulatory response when needed.	

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	<ul style="list-style-type: none"> Consider incorporating low level wind shear and wake turbulence and the candidate technological solutions such as ground based LIDAR (Low level Windshear) and On-board Predictive Wind Shear System (PWS). 	<p>Noted. LLWAS is not CASA-mandated aviation safety equipment at or in the vicinity of an airport, and its installation would be a decision for individual airport operators, in consultation with relevant stakeholders. No change to NASP proposed.</p>
<p>Australian International Aviation College and School of Aviation, UNSW Sydney</p>	<ul style="list-style-type: none"> Lack of legal framework that underpins, supports and promotes a 'just culture' in Australia, noting that the concept of a just culture is possibly not well understood in the Australian aviation context; Recommends CASA take a leadership approach in relation to developing a greater understanding of potential barriers to leadership reporting and the limitations of just culture, implements standards and directions and engages in industry wide promotion of these. An absence of consideration of future risk and change management with rapidly emerging technologies in aviation such as Artificial Intelligence (AI), Machine Learning (ML), Single-pilot air transport operations, and Remote Pilot Aerial Systems (RPAS); Recommends CASA commence a consultation and research process to facilitate regulator and industry readiness for adoption of emerging technologies, and the next SSP/ NASP include provision for these technologies. 	<p>Noted. The NASP (Section 2.4) has been amended to acknowledge the need for relevant agencies, particularly CASA, to focus ongoing education and communication efforts to continue growing industry trust in and understanding of a just culture approach and to increase the level of voluntary reporting by the aviation industry. Consistent with provisions of Annex 19 to the Chicago Convention (Safety Management), CASA has incorporated 'just culture' principles into relevant provisions of the civil aviation legislation.</p> <p>Agreed. The NASP (Section 3.3.5) has been amended to acknowledge the need to monitor and research emerging technologies including AI and ML to be in a position to implement an appropriate and timely safety regulatory response when needed.</p>
<p>The Australian Airline Pilots' Association (AusALPA)</p>	<ul style="list-style-type: none"> (SSP, State Safety Policy Statement) concerned Principles 4 and 7 yet to gain any real traction within the agencies. <ul style="list-style-type: none"> Risk assessments that are often perfunctory, self-serving and, deliberately or otherwise, lacking the vision or rigour to adequately identify all relevant risks, yet are apparently accepted without question by agencies in ignorance or avoidance of best practice; Fairness and consistency under Principle 7 cannot be achieved by agencies that avoid the critical element of transparency at all costs. It is a hollow aspiration whilst ever agencies lack the courage or commitment to have their decision-making openly reviewed by the Australian public they serve. 	<p>Noted. Comment is not seeking a change to the Principles but rather their application with regard to the quality of risk assessments and availability for public scrutiny as a basis for regulatory decisions. Concerns have been provided to safety agencies to address in terms of their risk assessment and transparent decision making processes.</p> <p>No change to SSP proposed.</p>

Stakeholder	Comments	Response
	<ul style="list-style-type: none"> (SSP, Section 1.1) unclear why the <i>Airports Act 1996</i> and the <i>Airports (Protection of Airspace) Regulations 1996</i> are not included in Critical Elements 1 and 2. inappropriate to exclude the <i>Airports Act 1996</i> and the <i>Airports (Protection of Airspace) Regulations 1996</i> from the legislative framework. 	<p>Noted. However, the legislation in Critical Elements 1 and 2 is that which gives direct effect Australia's contracting State Obligations in relation to the Chicago Convention and standards and recommended practices in the Annexes to the Convention. This does not include the economic and on-airport environmental and planning legislation and regulation suite concerning the operation of Australia's federal leased airports. Airports are subject to Australia's domestic aviation safety legislation and regulations. No change proposed to SSP.</p>
	<ul style="list-style-type: none"> (SSP, Section 1.1.4) a link to Australian registered differences to ICAO SARPs should be provided on DITRDC's Aviation Policy & Regulation page for greater public transparency. 	<p>Agreed. A link to the Airservices AIP/ Differences portal has been included in section 1.1.4 of the SSP and is also available through the Department's website.</p>
	<ul style="list-style-type: none"> (SSP, Sections 1.1 and 1.2, including Tables 1, 2 and 3) There appears to be something of a logical disconnect in how aviation security fits into the SSP. Concerned no mention is made of the <i>Crimes (Aviation) Act 1991</i>. Concerned about the porous nature of airside access arrangements in particular and the attendant risk to aircraft and their occupants, and about the risks to crew from disruptive passengers. Therefore think that it is appropriate to more fulsomely include the aviation security framework within the overall context of the SSP. 	<p>Noted. However, ICAO has deliberately separated aviation security and safety, with security SARPs presented in Annex 17 – Security, reflecting measures taken by ICAO to prevent and suppress all acts of unlawful interference against civil aviation.</p> <p>The Department of Home Affairs has responsibility for Australia's engagement on Annex 17 (SSP Table 3 – Allocation of ICAO Annexes refers) as well as responsibility for engagement with ICAO's Universal Security Audit Programme Continuous Monitoring Approach (USAP-CMA) to Member States' aviation security performance, in order to enhance their aviation security compliance and oversight capabilities.</p> <p>The <i>Crimes (Aviation) Act 1991</i> establishes offences and penalties, including in relation to unlawful interference with civil aviation but is not primary aviation safety legislation</p>
	<ul style="list-style-type: none"> (SSP, Section 1.2.2) no mention of any arrangements regarding the coordination arrangements between the Commonwealth and the states and territories. The most obvious of these arrangements is the management of the National Airports Safeguarding Framework (NASF) by the National Airports Safeguarding Advisory Group (NASAG). It is a key part of Australia's safety management governance and therefore should be in the SSP. 	<p>Noted. It is the responsibility of each jurisdiction to implement the Framework into their respective planning systems, as appropriate, which are not oversights by the Australian Government or its agencies, and does not fit within the framework illustrated in Figure 4 of the SSP.</p>

Stakeholder	Comments	Response
	<ul style="list-style-type: none"> (SSP Section 1.2.6) BoM is both the aviation meteorology regulator and the service provider. AusALPA believes that the roles should be separated and that CASA should be the ICAO Met Authority. The aviation meteorological arrangements should be explicitly clarified. 	<p>Noted. No change to the SSP is required as this matter is reflected in Action 3.2.3 in SEI 3.2 of the NASP. The issue of appropriate separation of services provision and independent regulatory oversight and auditing is being considered by the Department in consultation with relevant agencies.</p>
	<ul style="list-style-type: none"> (SSP, Section 1.3) If necessary, CASA must make structural changes to ensure that there is clear technical leadership and accountability to ensure consistent application of standards across all disciplines. 	<p>Noted. This matter is outside of the scope of the SSP, however the suggestion has been passed to CASA for consideration.</p>
	<ul style="list-style-type: none"> (SSP, Section 1.4) CASA needs to establish a robust standard for aviation safety cases that embraces best practice for risk management and that fosters dedicated, focused, objective and transparent risk identification, assessment and mitigation. 	<p>Noted. Risk Management requirements, including those for safety cases are embedded within the SMS requirements for the relevant sector. SMS requirements, including risk management will continue to be matured through introduction of CASR Part 5. CASA's enterprise risk management framework aligns with global best practice, and is continually reviewed and updated to keep abreast of those developments, including those in NS/NZS ISO31000:2018. CASA's risk management approach informs policy, regulation and surveillance.</p>
	<ul style="list-style-type: none"> (SSP, Section 2) AusALPA strongly believes that agencies must embrace the inclusion of other industry participants in hazard identification and risk treatment activities, particularly those participants independent of the commercial outcomes, in order to ensure adequate operational experience is brought to bear. 	<p>Noted. Agencies engage stakeholders through direct participation on consultative and technical groups managed by individual aviation agencies, and processes that enable submissions directly in response to regulatory and policy change consultation processes and to respond to those submissions.</p>
	<ul style="list-style-type: none"> (SSP, Section 2) the hazard identification and safety risk assessments conducted by each SSP agency, the aviation hazard register maintained by SSP-CAT and the minutes of SSP-CAT meetings should be publicly available and in sufficient detail to allow the public to form a view on how effective the process actually is in protecting them. 	<p>Noted. The role of the SSP-CAT is coordination between Australian Government agencies on high-level aviation safety policy development and reporting matters. Individual agencies (not the SSP-CAT) undertake individual detailed risk assessment processes on specific operational initiatives.</p>
	<ul style="list-style-type: none"> (SSP, Section 2.6) the omission of any discussion regarding the criticality of having a continued focus on protecting safety related data and information needs to be rectified. The SSP must provide a brief articulation for the reasons for such protection and how this is aimed to allow the flow of important safety critical information so that proactive safety management can occur. 	<p>Noted. CASA remains committed to implementing ICAO standards requiring the protection of safety information and data in accordance with the principles of Annex 19 of the Chicago Convention. These protections are currently mandated for Regular Public Transport operators and will continue to be so under Part 119 of the Civil Aviation Safety Regulations and otherwise. No amendment or addition to SSP required.</p>

Stakeholder	Comments	Response
	<ul style="list-style-type: none"> The opening statement in the SSP that “Australia takes a performance-based approach to its safety oversight system, underpinned by a philosophy of mutual responsibility and accountability” does not reflect the current approach to aviation safety in Australia. Currently, the approach is overwhelmingly compliance-based and not performance-based. So the statement should be “Australia intends to establish and develop a performance-based approach to its safety oversight system, underpinned by a philosophy of mutual responsibility and accountability”. 	<p>Not Agreed. Australia takes a performance-based approach to its safety oversight system, including through the development of outcome-based regulations and risk-based surveillance. Australia will continue to develop and mature its performance-based approach over the period of the NASP.</p> <p>No amendment or addition to SSP proposed.</p>
	<ul style="list-style-type: none"> (SSP, Section 3.3.2) The Aviation Safety Advisory Panel (ASAP) and the applicable Technical Working Group (TWG) should be recognised in the SSP as a successful regulatory change model. AusALPA should be reinstated to ASAP membership to restore ASAP’s objective balance. 	<p>Noted. Decisions on membership and representation of ASAP is a matter for CASA, which has established ASAP as a high level advisory body about current and future regulatory and associated policy approaches.</p>
	<ul style="list-style-type: none"> SSP Annex 1 – SSP Working Groups – believe that the SSP should identify the desirable range of stakeholder participants in listed groups to ensure appropriate participation. 	<p>Noted. The SSP and NASP are high level State documents and are aimed at providing a snap-shot or summary of the role and composition of significant SSP working groups. Hence the approach is to provide an indication of which are internal to Government and which have representation from both government and the aviation industry.</p>
	<ul style="list-style-type: none"> NASP Australia’s safety goals, indicators and targets, Goal 1 – it is not clear why or how these reduction targets have been established, not their values, nor why the 10% reduction target has been chosen. 	<p>Noted. The targets are agreed through the Joint Agency Aviation Safety Analysis Coordination Group (JAASACG) which will also monitor performance and revised targets in future NASP versions.</p> <p>The 2021 NASP is the first time State SPTs are being set. An initial 10% reduction is being set to drive continuous improvement while CASA monitors the safety performance. A percentage reduction as opposed to values was set for simplicity and JAASACG will monitor performance against the 2018 figures.</p>
	<ul style="list-style-type: none"> NASP Roadmap Summary Goal 1 – the rationale for combining runway incursions and excursions is not explained; no detail is provided on the factors to be mitigated under each SEI to address the ICAO GASP HRCs. AusALPA considers more specificity is required to connect the various parts of the NASP. 	<p>Noted. Runway safety includes both incursions and excursions. Many of the identified actions consider both incursion and excursion and as such a combined SEI was considered suitable. Future editions of the NASP will consider if separate SEIs would be appropriate in line with the separate consideration of these in the context of the ICAO GASP High Risk Category Occurrences. No amendment or addition to SSP proposed at this time.</p>

Stakeholder	Comments	Response
	<ul style="list-style-type: none"> NASP Appendix A – Australian OPS Roadmap – there are some significant departures from the advice provided by ICAO in the GASP; concerned that some of the proposed actions are not relevant to the SEIs and many of the stated mitigations do not appropriately address the identified risks (i.e. for SEI 1.1, 1.3, 1.4, 3.1, 3.4. 3.5 and 6.1). 	<p>(Responses to issues raised about specific SEIs are addressed below)</p>
	<ul style="list-style-type: none"> (NASP SEI 1.1) uncertain why continuous descent approaches (CDA) have an implied nexus with SBAS. CDA is affected more by airspace design and ATC intervention than by the presence or absence of SBAS and we expect Airservices’ focus to be on the former. Far from clear how NASAG cooperation is a mitigator for CFIT contributing factors. Similarly, notwithstanding our commitment to FDAP as a safety tool, it is not clear what CFIT precursors are thought to be or what level of FDAP deficiencies have been identified. 	<p>Noted. Continuous vertical guidance is one of the most important tools available to a pilot during the final stages of flight. It ensures the crew can maintain a safe height above terrain and obstacles when approaching a runway. In adverse weather, such as low cloud, they can also descend to a lower altitude before needing to make visual contact with the airport. This continuous vertical guidance decreases the chances of a pilot undertaking a go-around or having to divert, saving both fuel and time. A Satellite Based Augmentation System (SBAS) allows regional carriers who fly turboprop and smaller aircraft to reap the same benefits as larger aircraft without the need to install ILS infrastructure.</p>
	<ul style="list-style-type: none"> (NASP SEI 1.3) not clear how transitioning RAPAC into AvSEF mitigates collision risks or what MAC precursors are thought to be. Airspace design and management, as identified in the GASP, should be front and centre in this SEI. 	<p>Noted. Sound frameworks for communications and consultation are desirable and fundamental in underpinning stakeholder engagement, including to gain better data on issues such as MAC. Such consultation bodies also provide a structured way of conveying consistent messaging to industry from the regulator.</p>
	<ul style="list-style-type: none"> (NASP SEI 1.4) concerned that possible changes in the Runway in Use selection criteria (at Brisbane and Sydney) will result in operational risk. Reaffirming the current Runway in Use criteria is an important State risk control to mitigate contributing factors to runway excursions and landing accidents. 	<p>Noted. Concerns over possible operational changes at specific aerodromes can be taken up with CASA and the airport operators indicating how they would be less safe than existing standards and procedures.</p> <p>Noted. CASA will examine any suggestions where current runway operations are suggested to not be operating safely.</p>
	<ul style="list-style-type: none"> (NASP SEI 3.1) critical that action 3.1.4 is expanded to specifically deal with the issue of protection of safety information. Without trust-engendering protections in legislation, Australia’s safety reporting culture is placed under unnecessary risk. 	<p>Noted. CASA remains committed to implementing protection of safety information and data in accordance with the principles in Annex 19 of the Chicago Convention. These protections are currently mandated for Regular Public Transport operators and will continue to be so under Part 119 of the Civil Aviation Safety Regulations.</p>
	<ul style="list-style-type: none"> (NASP SEI 3.4) support the SEI, particularly action 3.4.1. Full consultation and collaborative policy development of this common SMS regulation is essential. 	<p>Noted. CASA has an established consultation process for all significant regulatory changes that it undertakes.</p>

Stakeholder	Comments	Response
	<ul style="list-style-type: none"> (NASP SEI 3.5) supports in principle, however, protection of the safety information is paramount, as is the involvement of the industry associations representing the sources of the data. 	<p>Noted. CASA remains committed to implementing protection of safety information and data in accordance with the principles in Annex 19 of the Chicago Convention. These protections are currently mandated for Regular Public Transport operators and will continue to be so under Part 119 of the Civil Aviation Safety Regulations.</p>
	<ul style="list-style-type: none"> (NASP SEI 6.1) Action 6.1.4 regarding the delivery of an airspace modernisation program, raises serious issues. Transparency is a key issue, particularly in regard to the safety basis of proposed airspace changes. 	<p>Noted. Only CASA has legislated responsibility for the regulation and administration of Australian-administered airspace, under the <i>Airspace Act 2007</i> to approve airspace architectural changes.</p>