



# Stakeholder feedback and responses—NANP—October 2024

Stakeholder	Comments	Response
<b>Anonymous submissions</b>	<p>Anonymous submissions called for the NANP to address concerns relating to:</p> <ul style="list-style-type: none"><li>• international harmonisation of special use airspace (e.g. rules relating to operating in certain portions of international airspace)</li><li>• implementation of A-CDM</li><li>• regional integration of ATFM</li><li>• contingencies if access to satellite-based navigation services (e.g. GPS) is denied or jammed</li><li>• whether the Bureau of Meteorology provides windshear detection facilities, such as LIDAR and X Band Radar, at locations where such risks exist.</li></ul>	<ul style="list-style-type: none"><li>• Recent changes to special use airspace bring Australia into compliance with our international commitments. SUA is captured in the NANP as an ASBU identified as a regional ANS priority within the OneSKY initiative.</li><li>• The NANP covers the establishment of National Airspace Management Office for more flexibility in flight planning options.</li><li>• The other matters, such as A-CDM and Long-range ATFM, are addressed in the NANP.</li><li>• The Backup Navigation Network is maintained and monitored by Airservices Australia to support a GNSS contingency mode of operation, in the unexpected case where a pilot is unable to access GNSS service.</li><li>• The AIG is currently considering whether to reconvene ASTRA or establish a different group.</li><li>• The Bureau of Meteorology provides services in accordance with ICAO Annex 3 and filed differences. ICAO Annex 3 does not prescribe the requirements on who owns and operates supporting equipment.</li></ul>

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<b>Australian Airline Pilots' Association (AusALPA)</b>	<p>AusALPA called for the NANP to include:</p> <ul style="list-style-type: none"> <li>• processes for the development of the rules for SBAS approaches and obstacle limitation surfaces</li> <li>• workforce planning in the ANS</li> <li>• protection of airspace issues</li> <li>• A-CDM – additional Bureau of Meteorology services requested (LIDAR and X-band radar)</li> <li>• detailed implementation plans for OneSKY, RPAS/AAM, expanded use of digital aerodromes, etc.</li> </ul> <p>AusALPA also referred to the filing of differences process and greater alignment with ICAO SARPs, and the reactivation of ASTRA and the AFAF TWG.</p>	<ul style="list-style-type: none"> <li>• The NANP is a high-level strategic document and does not detail implementation plans.</li> <li>• More detailed information on specific initiatives such as OneSKY can be obtained through Airservices Australia.</li> <li>• Australia files all differences with ICAO, including where we exceed ICAO SARPs. This was recognised by ICAO in its recent audit of Australia's aviation safety oversight system and noted a high compliance rate. There will be instances where Australia adopts a different approach to achieve the intended safety outcome of SARPs, particularly when our aviation environment does not align with ICAO's international model, or when our safety outcomes exceed those parameters. Under these instances, while the method may differ, the safety outcome is the same or better.</li> <li>• Workforce capabilities and capacity issues are addressed in the National Aviation Safety Plan.</li> <li>• The Bureau of Meteorology provides services in accordance with ICAO Annex 3 and filed differences. ICAO Annex 3 does not prescribe the requirements on who owns and operates supporting equipment.</li> <li>• The Australian Future Airspace Framework (AFAF) Technical Working Group will address some of the implementation matters.</li> <li>• The AIG is currently considering whether to reconvene ASTRA or establish a different group.</li> </ul>

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<b>Boeing Australia</b>	<p>Boeing Australia submitted:</p> <ul style="list-style-type: none"> <li>• Communication and engagement with industry on the AFAF has been minimal.</li> <li>• The Australian Communications and Media Authority should be included as a stakeholder on spectrum allocation.</li> <li>• ‘Safe, effective, and efficient integration of emerging aviation technologies’ should be included in the list of requirements for evolving the Australian ANS.</li> <li>• Stronger measures for encouraging the use of ADS-OUT, electronic conspicuity transmitters, and ADS-B IN.</li> <li>• Acceleration of FIMS and UTM activities to support progress made in the introduction of AAM activities.</li> <li>• FIMS should support emerging technologies rather than have an altitude focus.</li> </ul>	<ul style="list-style-type: none"> <li>• CASA is aware that communication and engagement on AFAF has been limited, the Technical Working Group will re-convene in 2024.</li> <li>• The Minister’s Statement of Expectations to CASA covers issues related to emerging technologies such as RPAS, AAM, FIMS and UTM.</li> <li>• As relevant, agencies engage with the Department of Infrastructure, Transport, Regional Communications and the Arts and the ACMA on spectrum allocation matters.</li> </ul>
<b>Gliding Australia</b>	<ul style="list-style-type: none"> <li>• Gliding Australia supports the NANP’s intent to enhance innovation and growth through new technologies.</li> <li>• Australia’s NANP also needs to consider the consequential effects of changes in controlled airspace, and low-level airspace use by unmanned or autonomous aviation systems, on all other VFR aviation traffic.</li> <li>• Gliding Australia advocates for closer ASAO engagement in exploring other technological innovation options and airspace management policies and practices.</li> </ul>	<p>Consultation with industry stakeholders will continue on future airspace management policies and practices.</p>
<b>The Honourable Company of Air Pilots</b>	<p>The HCPA raised issues related to:</p> <ul style="list-style-type: none"> <li>• Workforce planning in the ANS.</li> <li>• Protection of airspace.</li> <li>• General aviation.</li> <li>• Expanded use of digital aerodromes at regional airports.</li> <li>• Aviation weather services.</li> <li>• GPS jamming.</li> <li>• AFAF TWGs and ASTRA.</li> <li>• OneSKY.</li> </ul>	<p>These comments are broadly similar to those raised by other submissions and are addressed above.</p> <p>Consultation with industry stakeholders will continue on future airspace management policies and practices.</p>
<b>QANTAS</b>	<p>QANTAS supported a number of specific priorities in the NANP.</p>	<p>Noted.</p>