

Suite 6.01, Level 6  
243-249 Coward Street  
Mascot NSW 2010

T. +61 2 8307 7777  
F. +61 2 8307 7799  
E. [ausalpa@aipa.org.au](mailto:ausalpa@aipa.org.au)

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**By Electronic Transmission**

Mr Tim Hailes  
National Manager, Regional Aviation Weather Services  
Weather and Ocean Services Branch  
Bureau of Meteorology  
GPO Box 1289 Melbourne VIC 3001  
Level 6, 700 Collins Street, Docklands VIC 3008

**Email:** [t.hailes@bom.gov.au](mailto:t.hailes@bom.gov.au)

Our Ref: G40-0039

Dear Mr Hailes,

**Re: AusALPA Comments on the Review of Aerodrome (TAF) Services for Aviation**

On behalf of the Australian Airline Pilots' Association (AusALPA), thank you for providing us with the opportunity to review the Draft TAF Review.

AusALPA consists of the Australian and International Pilots' Association (AIPA) and the Australian Federation of Air Pilots (AFAP) and represents more than 5000 professional pilots within Australia on safety and technical matters.

AusALPA takes an active stake in the Australian aviation industry, participating in inquiries in the Australian Aviation sector and contributing members to various industry forums. AusALPA is also an active member of the global pilot body, the International Federation of Airline Pilots' Association (IFALPA), which represents over 100 000 airline pilots internationally.

AusALPA has recently reviewed the draft document and would like to put forward the following comments for your consideration.

In general, the proposals seem reasonable and align Australia with the ICAO Annex 3 SARPS, as modified by the ICAO Basic Air Navigation Plan (ICAO Doc 9673). There are, however, some areas of discussion and/or concern.

### **Future of the TTF**

Although the Q&A document to the Draft TAF Review states that “Other forecast and warning services provided to the aviation community and the general public will not change as a result of this review”; AusALPA believes that the future of the TTF (which is already under discussion) needs to be considered in conjunction with the TAF review and not separately.

Although one major RPT carrier has stated at various industry meetings that the TTF is of minor value to it, another major RPT has stated the opposite. In addition, the Regional airlines and, other air operators and GA find it very useful, because of its shorter validity period.

The TTF is generally more accurate than the TAF, as it is adjusted by the current METAR rather than a forecast made several hours ahead.

AusALPA’s understanding, during the initial consultation process, was that one option would be to introduce a 3 hour TAF for some of the airports that presently received a TTF (see BoM Discussion Paper – TTF Review dated 15 Aug 2012). The main reason for not doing so appears to be the additional cost and non-standardisation with ICAO Annex 3.

The Review states that “In November 2008, the Bureau of Meteorology implemented changes to the TAF format to comply with the format specified by ICAO. Most of those changes were due to the world-wide introduction of a TAF with a 30 hour validity period to assist in flight planning for those aerodromes required by long-haul operators.”

It should be noted, however, that the issue and validity times introduced in 2008 for the Australian “international airports”, “comply” with the requirements specified in the draft amendment to ICAO Doc 9673 (Air Navigation Plan - Asia and Pacific Regions, Part VI-Meteorology) and not with Version 1 issued in 2006, which is still current. Whilst, AusALPA does not have a problem with using the periods, specified in the draft Doc 9673, ICAO Annex 3 6.2.6 Recommendation states that “Routine TAF valid for less than 12 hours should be issued every 3 hours...” It follows that the period of validity could be less than the Regional Plan requirement (i.e. less than 12 hours) allowing a TAF to be issued every 3 hours for Small (D) Airports, as well as some within the other categories.

The Review goes on to state that “other TAF validity times have previously been determined by the category of aerodrome and the needs of industry. It is not proposed to make any significant changes to those validity times with respect to the proposed new categorisation.”

What the Review does not state is whether the TTF will be removed and, if so, what will replace it.

### **Requirement for a Destination/Alternate TAF**

The Review states that a TAF is not required to operate to an airport. (It should be noted that other regulators do require a TAF in order to nominate an airport as an en-route airport, a destination or an alternate). The economic impact of not providing a TAF (additional fuel etc.) for an operator may outweigh the savings to an airport in not providing this service.

### **Availability of a TAF Service for Aerodromes outside an Australian Flight Information Region**

Recommendation 6 states:

“All TAF services currently provided for aerodromes outside an Australian Flight Information Region, except Australian External Territory International Airports, shall be reviewed in consultation with stakeholders, and a determination made as to the continued provision of the service for each such aerodrome. All retained services shall be supported by an ICAO approved agreement between the Bureau and the designated meteorological authority for the FIR within which the aerodrome is located.”

This may be a crucial issue as it could mean that no TAF or an inferior TAF is provided for some destinations and en-route airports, including those used for EDTO (ETOPS) operations.

The criteria for “determining” the “continued provision of the service for each such aerodrome” needs to be carefully considered. Safety and operational efficiency considerations need to be weighed against any cost reduction provided by the curtailment of this service.

### **Provisional Forecast**

The Bureau, has decided to discontinue “Provisional TAFs” in line with ICAO, although this decision may not be final.

At the moment, according to the Bureau, there are only a few airports that would be affected e.g. Dili (Timor-Leste) and Norfolk Island. Dili has an agreement with Australia to provide this service, but this bilateral agreement would need to be converted into an “ICAO approved agreement; whilst Norfolk Island is a self-governing territory of Australia and is, therefore, covered.

It is essential that whatever agreement is made, this or a similar service continues. The PELAIR accident amply illustrates why the “best possible forecast” is required.

### **Continued Consultation**

The Review states that:

“Following feedback, the Bureau will finalise recommendations and then develop an implementation plan with phased implementation of agreed recommendations commencing in late 2013. The Bureau commits to a comprehensive consultation process prior to the submission of the final TAF Review report to industry/Bureau consultative bodies and implementation of any significant changes to existing products or services.”

It is imperative that this is a proper consultation process with the views of the user being carefully considered before any changes are implemented.

Should you wish to discuss this further or would like more information, please do not hesitate to contact our office.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. MacDonald', written in a cursive style.

**Captain John MacDonald**  
**President**

**Tel:** 61 – 2 – 8307 7777

**Fax:** 61 – 2 – 8307 7799

**Email:** [ausalpa@aipa.org.au](mailto:ausalpa@aipa.org.au)

**References:**

Doc 9673 — Asia and Pacific Regions.

Volume I, Basic ANP. ISBN 92-9194-678-8

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1st edition, 2006. 498 pp.

English only