

By Email

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Dear Anthony,

## **AUSALPA COMMENTS ON THE AIRSPACE REVIEW OF BALLINA**

The Australian Airline Pilots' Association (AusALPA) is the Member Association for Australia and a key member of the International Federation of Airline Pilot Associations (IFALPA) which represents over 100,000 pilots in 100 countries. We represent more than 7,100 professional pilots within Australia on safety and technical matters. Our membership places a very strong expectation of rational, risk and evidence-based safety behaviour on our government agencies and processes and we regard our participation in the work of the Australia's safety-related agencies as essential to ensuring that our policy makers get the best of independent safety and technical advice.

It is in light of this that AusALPA responds to the Recommendations made in the Airspace Review of Ballina.

### **AusALPA Responses to the Recommendations of the Airspace Review**

[Recommendation 1: CASA should prepare a Request For Change \(RFC\) to separate the Lismore and Casino Common Traffic Advisory Frequency \(CTAF\) from the Ballina CTAF by 16 June 2022.](#)

AusALPA notes that these actions were enacted on 16 June 2022. We have continuing concerns re Recommendation 1. Our concerns centre on the possibility of unintended consequences resulting from the frequency separations due to the Lismore RWY 33 approach encroaching on the Ballina Mandatory Broadcast Area (MBA) boundary and airspace. This is an issue of the original driving reasons for the frequencies to be aligned in the first place. Since then, traffic volume has only increased.

Traffic separation risks being compromised by the need for this Lismore traffic to monitor the area frequency, the Ballina CTAF and the Lismore CTAF. There is potential for missed communications and an inappropriate increase in the workload level at critical phases of flight. Additionally, it remains unclear how the Surveillance Flight Information Service (SFIS) will interact cohesively with the area controller and not contribute to the increase in communications workload for flight crew.

Recommendation 1 rightfully seeks to declutter Ballina airspace frequency congestion. However, the concern remains that without a coincident airspace and separation solution, isolated solutions to communications issues create more risk issues than they can possibly solve.

[Recommendation 2: Evans Head Airport should be allocated the common CTAF \(126.7 MHz\) by 16 June 2022.](#)

AusALPA notes that these actions were enacted on 16 June 2022. We strongly support Recommendation 2.

[Recommendation 3: CASA should direct AA to install an Automatic Dependent Surveillance - Broadcast \(ADS-B\) ground station in the vicinity of Ballina to improve surveillance as soon as practicable but no later than December 2022. The ground station should, as far as is practical, provide ADS-B surveillance capability to the runway surface.](#)

AusALPA supports Recommendation 3. We strongly agree that surveillance is critical infrastructure that should be established as soon as possible and ideally by December 2022.

Additionally, the ADS-B station should also be a communications station, such as at Ayers Rock Aerodrome, to ensure both elements of the required risk mitigator are in place as soon as practicable. This infrastructure is essential to facilitate the end state of a towered control zone and approach area. We are strongly opposed to any delay to the establishment of this infrastructure.

AusALPA is concerned that the Air Navigation Service provider (ANSP) will cause delays to the introduction of this infrastructure by citing logistical and budget based reasons to delay, revise, or hinder Recommendation 3 from proceeding on the expeditious timeline that it needs to. The quoted costs associated to the provision of an appropriate solution should be closely scrutinised and, if necessary, tendered to ANSP competitors experienced in the specification and delivery of ADS-B surveillance (and comms) infrastructure.

[Recommendation 4: CASA should explore a suitable regulatory framework that can safely authorise sport and recreational aircraft and pilot certificate holders to operate in the controlled airspace associated with Ballina where pilot certificate holders meet CASA specified competency standards and the aircraft are appropriately equipped.](#)

AusALPA supports Recommendation 4.

However, we believe that this solution should not be geographically limited to the Ballina airspace. Regulatory reform of this nature should be a natural evolution in the provision of appropriate access to all parts of the industry that meet sensible competency standards and equipment.

[Recommendation 5: CASA's Stakeholder Engagement Division \(SED\) should conduct additional safety promotion programs in relation to Ballina operations as soon as practicable. The programs should include, but are not limited to the following key elements:](#)

- a. reinforce the mandatory radio calls required when operating within the Ballina MBA in the interim, pending the establishment of controlled airspace, and

- b. later, provide guidance as to how a Sport Aviation Body might develop a suitable scheme and make application to CASA for approval, under the regulatory framework identified in recommendation 4.

AusALPA strongly supports Recommendation 5.

Recommendation 6: Uncertified aerodromes and flight training areas around Ballina should be promulgated in aeronautical publications to increase pilot situational awareness.

AusALPA supports Recommendation 6.

However, there is a possibility of “chart clutter” associated with the increase of included information. This consultation makes no specific mention of the possible promulgation of a VTC for the associated control zone but AusALPA suggests that promulgation of a VTC will be the appropriate chart choice and will resolve our concerns re chart clutter.

Additionally, given that there is likely a reasonable timeline associated with the development and promulgation of a new VTC, we suggest that it would be prudent to commence the survey and design work for such a chart soon after the close of this consultation.

Recommendation 7: As an interim action pending the completion of Recommendation 8, CASA should make a determination to establish a control area around Ballina Byron Gateway Airport with a base which is as low as possible, and direct AA to provide services within the control area. The services should be provided during all periods of scheduled Air Transport Operations and include an Approach Control Service to aircraft operating under the Instrument Flight Rules (IFR), separation between IFR aircraft, VFR traffic information to all aircraft, and sequencing of all aircraft to and from the runway. CASA and AA should jointly explore opportunities to detect non-cooperative aircraft or vehicles in the immediate vicinity of the runway. The services should be established as soon as practicable but no later than 15 June 2023.

AusALPA does not support Recommendation 7.

Although the implementation of an Approach Control Service for Ballina is necessary, we believe that this must not occur prior to the establishment of an Aerodrome Control Service (Recommendation 8). The two must be introduced concurrently.

A scenario where the two are not implemented simultaneously will lead to an unacceptable increase in workload at the later/critical phase of flight for aircraft arriving from CTA into the CTAF.

The draft report provides no specificity to the base level of such control zone steps. None the less, a significant problem arises when an approach control arrangement delivers traffic into the lower level Class G, where pilots then need to fend for themselves with insufficient time and airspace to initiate Class G ops safely (in this case, liaise with the SFIS and provide self-separation with other traffic in the CTAF).

Another significant problem arising from recommendation 7 is that it will encourage a concentration of VFR aircraft into the remaining Class G airspace below the controlled approach steps. This will exacerbate the separation issues already discussed above. We are yet to be convinced by the arguments raised in the Lowering Class E consultation by Airservices that this risk is very small.

Additionally, we do not support Class E as the airspace classification for the Approach Control Service. The use of Class E airspace will not resolve the ongoing separation issues in the approach phases in the Ballina airspace. Uncontrolled VFR aircraft operating through the Class E airspace would continue to need to be negotiated as a separation hazard.

[Recommendation 8:](#) CASA should make a determination that Ballina Byron Gateway Airport will become a controlled aerodrome with an associated control zone and control area, and direct Airservices Australia (AA) to provide an Aerodrome Control Service to the aerodrome. That service should be established as soon as practicable but no later than 30 November 2023.

AusALPA strongly supports Recommendation 8 and believes urgent action is required to establish an Aerodrome Control Service ASAP.

The original risk remains insufficiently mitigated without a control zone established and we believe that the evidence shows that SFIS has not mitigated the separation risks to the extent expected and nor did the CAGRS either.

We again warn of the consequences to the safety of air navigation if “project slippage” were allowed to arise due to delays caused by stated or real competing uses of resources of Airservices or due to any timing and associated cost issues. If Airservices is unable to prioritise its resources and provide reasonable project cost estimates to achieve an Aerodrome Control Service for Ballina as soon as practicable, then the project should be tendered out to appropriately competent ANSPs.

[Recommendation 9:](#) CASA should prepare and finalise an Airspace Change Proposal (ACP) for a control zone and control area steps in preparation for the implementation of Recommendations 7 and 8.

AusALPA supports Recommendation 9, however our concerns with Recommendation 7 remain. The control zone and control area steps should be components of the same ACP because the implementation timeline for both should be simultaneous.

This finalisation of the ACP should be made without delay.

## **Concluding Comments**

AusALPA strongly support the end-state proposal of a combined control zone and approach service for the Ballina airspace.

AusALPA is concerned that the proposed piecemeal and stepped-solution timeline for the implementation of the draft recommendations demonstrate that the issues are not being adequately addressed holistically. The interim mitigations proposed each come with potential unintended consequences and completion risks. We do not believe that there is sufficient emphasis on the required end state as the highest priority, with the interim steps existing only as implementation milestones rather than standalone solutions.

Without a holistic approach to reform of the Ballina airspace, there is a real risk of further loss of separation events and unintended consequences.

AusALPA urges all agencies to work cohesively together and with urgent intent for achieving a control zone service with an associated approach control service as soon as possible.

The combined approach and control zone services must also be sufficiently serviced with adequate surveillance and communications infrastructure.

Yours sincerely,



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