

06 October 2020

Mr Brett Anderson  
General Manager, Aviation, Land and Maritime Transport  
Bureau of Meteorology  
GPO Box 1289 Melbourne Vic 3001

Email: [TAFreview@bom.gov.au](mailto:TAFreview@bom.gov.au)

Dear Mr Anderson,

### **AusALPA Submission on the 2020 TAF Review**

The Australian Airline Pilots' Association (AusALPA) represents more than 7,000 professional pilots within Australia on safety and technical matters. We are also the Australian Member Association of the International Federation of Airline Pilot Associations (IFALPA) which represents over 100,000 pilots in 100 countries. 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 Australia's safety-related agencies as essential to ensuring that our policy makers get the best of independent safety and technical advice.

AusALPA welcomes the opportunity to comment on the latest TAF Review.

#### **Recommendation 1:**

***For International (A) aerodromes, the validity of each TAF issue to be 18, 24 or 30 hours. The TAF validity for an aerodrome will be determined based on demonstrated operational requirements.***

AusALPA has no objection to this recommendation; however, we would like to make the following comments:

#### ***Changes in TAF Services***

We note that the inclusion of two aerodromes, Brisbane Wellcamp (YBWW) and Busselton (YBLN), will improve the reliability of the system for Brisbane and Perth operations. This presumes that "Single Use Aerodromes", predominantly private airfields associated with mining in WA, will continue to have TAFs provided for a fee. Obviously,

that may have a very slight increase in cost to that part of the industry, but conversely, will reduce cost to most of the industry.

Reduction in service to other fields is almost exclusively affecting general and regional aviation. We welcome the mechanism whereby the service may be reviewed based on the aerodrome operator's "revised aerodrome data". We are cautious, however, that with the unknown future impact of COVID-19 that movement and passenger numbers alone may not be the most appropriate criteria for determining the level of service.

### **Observational Infrastructure**

AusALPA notes that additional observation equipment will be provided at some airports and we welcome this initiative. We are concerned, however, that *"where the Bureau, in consultation with aerodrome operators, is unable to negotiate access to a suitable location meeting AWS siting requirements at an acceptable cost (based on standard off-aerodrome costs for an automatic weather station), it may need to remove its equipment from the aerodrome and allow the aerodrome to organise its own meteorological observations."*<sup>1</sup> AusALPA, as a member of the Part 139 Technical Working Group, strongly supported the proposed changes to the MOS 139 that designated meteorological observation instrumentation in the same category as navigation equipment. The action described appears to be a potentially retrograde step in providing accurate meteorological information to our members and other users.

### **Replacement of the TTF with TAF3**

*"A review of the trend forecast (TTF) was conducted and has recommended that the TTF be replaced with a TAF issued every three hours (TAF3). TAF issue times will be revised for those locations receiving a TAF3 as part of the Trend Review – TAF3 implementation."*<sup>2</sup>

The Association was part of the Trend Review Working Group, along with various major industry stakeholders. As we have previously stated, we consider the review to have been comprehensive and that the review process has provided broad consultation within the industry. The findings and recommendations have been adequately covered in the previous report released by the Bureau of Meteorology.

### **Fuel Buffers**

We note the changes to the CASA ruleset enabling the TAF3 to be treated as per the TTF, such that, during the period of validity, any PROB30 or PROB40 for TS or associated severe turbulence do not need to be considered and fuel buffers are not required.<sup>3</sup>

AusALPA anticipates that these forecasts will be more accurate and timely, given the emphasis on actively monitoring weather changes and updating the forecast frequently

---

<sup>1</sup> TAF Review Consultative Draft Report Page 38

<sup>2</sup> TAF Review Consultative Draft Report Page 18

<sup>3</sup> Aeronautical Information Publication (AIP) Effective 05NOV2020 – AIP ENR 1.1 Para 11.7.2.9

and as required, in combination with the monitoring of individual forecasters with the Aviation Verification System (AVS 2) and new technologies such as the Himawari Satellite. In time, if the new TAF3 provides greater accuracy, it is likely that operators will consider and act on PROBs, as the first 3 hours of the TAF should provide the best forecast.

### **Consultation**

AusALPA acknowledges the good working relationship with the Bureau of Meteorology that has existed for the last decade. In considering any future changes, we would emphasise the importance of early consultation with the industry stakeholders.

Yours sincerely,



**First Officer Mark Sedgwick**  
**President AusALPA**  
**President AIPA**

**Tel:** 61 – 2 – 8307 7777

**Fax:** 61 – 2 – 8307 7799

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



**Captain Louise Pole**  
**President AFAP**