

By Email

24 May 2019

Mr David Wells
Future Services Transition Manager
Airservices Australia
GPO Box 367
CANBERRA ACT 2601

Email: stakeholder@airservicesaustralia.com

Dear David,

AUSALPA SUBMISSION TO AIRSERVICES:
AIRSPACE MODERNISATION PROJECT – TRANCHE THREE PROPOSALS

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 7,500 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.

AusALPA welcomes the opportunity to contribute feedback to the Tranche Three consultation for Airservices' proposed Airspace Modernisation Project (AMP).

Consultation for an Airspace Change Proposal (ACP)

AusALPA notes that under the consultation requirements for an ACP, a proponent is expected to provide and detail, with the submission of the ACP, a record of consultation completed with other airspace users in the area(s) to be impacted by the proposal and, following consultation, an assessment of the impact on the access to the airspace by other airspace users or to the efficient operations of aerodrome operations, air routes, VFR routes or Instrument Flight Procedures (IFP).

While AusALPA provides this submission to Airservices, we also expect to be able to assist CASA Office of Airspace Regulation (OAR) consultations directly. Furthermore, since only one set of options have been presented by Airservices for consideration, for any further proposal alterations or new proposals we expect that a new consultation opportunity would be available prior to final decisions or ACP.

Recent Consultations and Ignored Outcomes

AusALPA is both disappointed and frustrated with Airservices' repeated pursuit of some proposals despite contrary outcomes from previous industry consultations. This is especially so given the recency of these consultations, such as:

- The erroneous proposals related to the establishment of Class E steps above Ayers Rock aerodrome were only consulted upon four months ago and Airservices are now putting an alternative proposal forward to industry, which ignores the previous consultation outcome.
- The proposal for Class E above Class D towers, which was only consulted upon twelve months ago. Communication following that consultation was that Airservices was not going ahead with the proposal.

It is neither fair nor acceptable for Airservices to repeatedly consume the time and resources of aviation industry stakeholders with repeated attempts to implement its preferred model(s) simply because their preferred proposals were not accepted previously.

Such behaviour is only reasonable if the proponent provides an explanation as to why the previous negative feedback is misinformed, ill-advised or wrong. The industry is broadly capable of distinguishing when safety and operational efficiency are used as a cloak for internal cost-savings and it is abundantly clear that Airservices needs to be far more transparent about the reasons behind re-tabling of previously rejected concepts.

Given that there exists overwhelming responses of an adverse nature to previous consultations on Airservices' proposed and preferred options, AusALPA expects Airservices to adopt a consultation model that better aligns with industry expectations and needs, particularly one that includes rational discussion of industry feedback.

Current and Recent Airspace Reviews

The CASA Office of Airspace Regulation (OAR) has recently completed airspace reviews for locations relevant to the Tranche Three proposals, such as Alice Springs, Ayers Rock, Launceston, and a combined Rockhampton and Mackay review. Furthermore, AusALPA understands that new airspace reviews are underway for Hobart and Tamworth. In many of these completed reviews, OAR has determined that the current airspace arrangements are fit for purpose.

Generally speaking, none of the airspace reviews call for or recommend significant change proposals akin to those currently being proposed by Airservices. Whilst AusALPA does not always agree with every aspect of an airspace review, we generally consider the OAR recommendations to be uncontroversial.

In contrast, we are unable to agree with any of the current proposals contained within Tranche Three and further disagree with many of the assertions provided for the basis for the proposals. It is noteworthy that none of the Tranche Three proposals are found as recommendations in the relevant airspace review reports.

We believe that Airservices should more thoroughly and transparently consider the outcomes from airspace reviews to inform and guide their proposals and, if proposals are inconsistent with review outcomes and recommendations, that Airservices establish why the review findings aren't applicable. We also suggest that in contemplating the current Tranche Three proposals, Airservices refamiliarises itself with the underlying principles upon which the OAR base their decisions.

There is an expectation that, as far as is reasonably practicable, agencies of government should endeavour to work together harmoniously. AusALPA believes that the AMP Tranche Three proposals are so inconsistent with OAR requirements, positions and best-practice models that they constitute an example of the work of government agencies becoming increasingly divergent.

Ministerial Direction No 4 of 2004

AusALPA would like to comment on the Ministerial Direction No 4 of 2004 (apparently known as the Radar direction) as it relates to the proposals within the Airspace Modernisation Project and more broadly for the provision of services to the aviation and rural communities. From the Ministerial Direction we note:

“If:

- (a) on the date on which this direction commences, a volume of airspace above Class D airspace above an airport was classified as Class E airspace; and
- (b) after the commencement of this direction, AA reclassifies that volume of airspace to Class C airspace,

AA must, in performing its function under s.8 of the Air Services Act 1995 of providing facilities and services, provide an operating ATC control tower at the airport and an approach radar control service at the earliest time one can be supplied and installed.”

We acknowledge that the Tranche Three proposals do not of themselves trigger the terms of the Direction but given that Airservices refers to the Direction whilst communicating about Tranche Three, we seek greater clarification from Airservices on a number of questions.

- Question 1: Has there been airspace classification change of a nature that has triggered the Direction (i.e. since 31 August 2004)?
- Question 2: If so, what was the specific change and when did it occur?
- Question 3: If a trigger event did occur, how and when did Airservices comply with the Direction?
- Question 4: If the Direction has not been complied with, on what basis has Airservices declined to act?

AusALPA is particularly interested in Airservices’ detailed response to these questions in order to avoid the inevitable conclusion that the Tranche Three reclassification of airspace from Class C to Class E, which involves a reduction in service level and safety, has been proposed merely to avoid the need to comply with Ministerial Direction No 4 of 2004.

Standardisation on A045 – the Benefits and Challenges

Standardisation can create safety benefits through reduced confusion and ease of expectation and AusALPA recognises that these benefits underpin safety initiatives such as the adoption of Standard Operating Procedures (SOPs). AusALPA understands that Airservices are supporting many of their proposals within the AMP on the basis of the benefits of standardisation.

AusALPA supports standardisation initiatives in principle. However, we are also quite cognisant that a blanket rule to standardise can obviate the genuine reasons why some non-standardisation exists. Standardisation is a worthy goal, but only when it can be shown to maintain risk to ALARP. Standardisation should be fit for purpose and not the cause of any deterioration in the net level of system safety.

AusALPA does not support the current proposed set of standardisations presented for consultation within Tranche Three of the AMP and believes that overall, they cause a net deterioration in safety levels. Furthermore, in attempting to ascertain why 4500 feet (A045) has been chosen as the standardised base altitude for enroute CTA, repeated

attempts to garner a clear and useful response from Airservices representatives have only resulted in either no response or no discernibly useful response.

On the 03 May 2019, AusALPA attended an Airservices meeting in which questions were raised about the A045 level. An extract from that meeting's outcomes reads:

"Why was 4,500ft chosen?"

- *4,500ft is the altitude that is below the starting level of instrument and approaches and is within the first set of Minimum Safe Altitudes (MSAs).*

This response explains nothing in terms of decision criteria or the alternatives. The next opportunity for Airservices to provide a clear explanation on this question was at the 08 May 2019 meeting, which we also attended. Airservices offered no further insight about their choice of A045. We have since asked for clarification as to what the above statement actually means.

Airservices responded to clarify their concept of MSA "sets":

"The first set of MSA's refers to the 25nm MSA being the first of the MSA's on descent and joining onto the approach. The other set being the 10nm MSA."

Whilst this answers one specific question, it still doesn't address their choice of A045. It is incomprehensible to us that such a key facet of the AMP Tranche Three proposals is unexplained and presented to industry as a *fait accompli*.

AusALPA does not believe that the chosen level of A045 is an acceptable level for use in standardisation, due to issues related to IFP and airspace containment, MSA and missed approach climb requirements, as well as flight crew workload management.

Airspace Containment

The CASA Airspace Risk and Safety Management Manual sets out airspace containment of IFP as best practice - they should either be contained in or remain outside of the lateral and vertical dimensions of controlled airspace or designated airspace, wherever possible. Containing approaches wholly within or wholly outside of controlled airspace creates direct safety benefits, particularly through reduction in pilot workload during the critical phases of flight.

We acknowledge that there are some IFPs which cannot physically meet this best practice model due to the proximity of other controlled or restricted airspace. An existing example is the RNAV approach to Toowoomba runway 11, which can initially transition through Oakey controlled airspace before proceeding into Class G airspace. However, AusALPA is firmly of the view that individual deviations from IFP containment best practice must be thoroughly justified on the specific issues at a particular location and not on some esoteric notion of airspace design standardisation at any cost. The resultant outcomes from most of the Tranche Three proposals clearly do not draw upon this same perspective.

Consequently, AusALPA recommends that Airservices review and amend their approach to airspace change proposals, to include greater consideration for airspace containment of IFPs.

Currently when the tower controlled airspace transitions to a Class G classification (when outside of tower hours) the Lower Level (LL) of the controlled airspace occurs at A085. Thus, for out of tower hour operations the IFPs are wholly outside of controlled airspace, whilst the opposite is true during tower hours, where the IFPs are contained within controlled airspace. In contrast, Tranche Three proposals would adversely alter

this current best practice arrangement, significantly increasing operational complexity and risk. The Tranche Three proposals (2 to 5) create a CTA/OCTA vertical change through some commencement portions and missed approach portions of IFPs because the proposed A045 base level of controlled airspace provides insufficient terrain and obstacle clearance.

Therefore, there are many initiatives within Tranche Three that AusALPA cannot support because we believe that there will be a net increase in workload for pilots and controllers, with a concomitant reduction in monitoring and safety margins. Our firm position is that the A045 standardisation proposal is an adverse airspace design.

Continuous Descent Operations (CDO)

Any discussion of airspace containment must necessarily include consideration of operational techniques, most relevantly, continuous descent approaches (CDA) in Australian terminology or, more broadly, CDO. ICAO Doc 9931 *Continuous Descent Operations* provides extensive guidance on CDO, particularly in regard to stakeholder issues and the interface with ATS. While it is written primarily in the context of operations within controlled airspace, the principles apply equally to operations that transition to operations OCTA.

One of the important aspects underpinning safe CDO is the concept of providing flight crew with the time and mental space to manage the aircraft flight path and energy state. Avoiding disruptions is a high priority, as is the need for unambiguous ATC communications. AusALPA members are particularly concerned about the operational and safety consequences of exiting controlled airspace at very low levels while executing CDO, simply due to the need to identify traffic OCTA and to self-separate coincident with the aircraft positioning and energy management requirements to commence an IFP.

It appears to us that Airservices is either ignoring or unaware of the operational consequences of designing airspace that results in low level exits coincident with high flight crew workloads and potentially high collision risks. Clearly, those consequences are unacceptable.

Missed Approach Procedures

The ability to climb to the designated missed approach altitude without increased workload is critical to safety. A missed approach is not an emergency procedure but it is a critical phase of flight where the configuration and intentions of the aircraft transition notably. AusALPA believes that if the Tranche Three A045 standard were to actually be implemented, there are three (possibly four) locations where the ability to climb unimpeded during a missed approach is impeded by the proximity of the base of controlled airspace. This would be different during tower hours, but given that it is intended for the airspace above A045 to be controlled by enroute controllers and not the tower controllers (Tranche One*), operations during tower hours may also experience some extra communications requirements during this phase of flight.

(*We note that AIC H25/19 has reversed some of this and diminished standardisation and increased confusion).

Questionable Logic behind Altering a Minimum Sector Altitude (MSA)

At the 08 May meeting, our representatives noted the problematic nature of a A045 standard upon IFP at some of the aerodromes which have higher terrain and subsequently, asked if alternatives to A045 were or could be considered. No

alternatives are considered. Given the safety criticality of MSAs in relation to IFP missed approach procedures, along with the potential for undue interference with this critical aspect arising from poorly designed airspace architecture, AusALPA sought further clarification. Airservices confirmed that there has been work done on the assessment of the MSAs.

In the first instance, this information should have been provided openly in the consultation information fact sheets. Subsequently, it is likely that many consultation respondents are unaware of these MSA alteration plans.

AusALPA notes Ayers Rock and Mackay are locations where Airservices propose to amend MSAs to support Tranche Three and that there are no changes for the other locations proposed. Specific reasons provided to AusALPA by Airservices (via email) include:

- For Ayers Rock the proposed MSA amendment is to allow all the instrument approaches to commence from 4,500ft.
- For Mackay the amendment allows the RNAV GNSS RWY 14/32 procedures to commence from 4,500ft.

We are at a loss to understand why MSA calculations would be amended to give effect to what should be an entirely independent airspace design proposal. We have sought further clarification from Airservices, but have yet to receive a response. This issue raises some serious concerns for us about how the AMP is being managed within the broader aviation safety framework.

Airservices appear to have no proposed solutions to address the issues at locations where missed approaches must climb above A045 due to MSA requirement, such as at Alice Springs, Tamworth and possibly Albury. That is also unacceptable to us.

Class E Efficiencies for IFR Operations are Limited and Disappearing

When the original case for the introduction of Class E airspace was made, efficiencies for IFR operations were later touted as positive outcomes. This has not borne out in practice and any hope that this will eventuate are diminishing or deceased.

Some of these “efficiencies”, including VFR climb/descent and VFR on top, are procedures prohibited to flight crew by most organisations operating aircraft under the IFR. Furthermore, Airservices should be aware of the impending implications of CASR Part 121. The introduction of Part 121 will mean that operations must be conducted under the IFR. The current provisions in CAO 82.3/5 that permit VFR operations in Class E will cease when CASR Part 121 regulations become active in March 2021.

It is true that not all IFR operations will be conducted under Part 121 but it is true that the vast majority will. In any event, the types of Class E operations mentioned above should not be considered in the mix of possible flight efficiency options.

Proposals for Class E over D (Removal of C over D)

Australian and international pilot associations have for many years opposed the introduction or expansion of Class E over Class D aerodromes. The most recent submission, prior to this one, was an AusALPA submission: “*AusALPA Submission to the Airservices proposal: The trial of Class E airspace services at Hobart and Launceston airports*” (4 May 2018), which we have attached.

AusALPA wishes to reiterate our firm view that this airspace model constitutes a real deterioration in safety. We note that Airservices are promising to uphold “current levels of safety” when Class C is replaced by Class E:

“It is proposed to replace the Class C airspace with Class E over these regional aerodromes while ensuring the current levels of efficiency and safety to all airspace users in those areas remain.”

However, AusALPA strongly believes that these assurances to retain current levels of safety by downgrading airspace classification are a very disturbing development, are false and are more akin to promotional statements than to statements of a genuine commitment to safety. Without labouring on the obvious, within Class C airspace IFR aircraft are separated from all other aircraft and VFR aircraft are a known entity. In Class E airspace, that is not the case. Worse still, some VFR aircraft may not be visible due to a lack of Primary radar or ADS-B fitment to these aircraft.

Airservices has stated that the airspace suits a lower risk model than what is currently associated with it. Notwithstanding our complete disagreement on this point, this still does not alter the fact that reduced separation services will be supplied to airspace users and that this will result in a lower level of safety service than what is currently provided. Thus, AusALPA considers statements about maintaining current levels of safety by changing the airspace classification from C to E to be a complete and utter nonsense.

There exists a great variety of examples that demonstrate that E over D is an unsatisfactory airspace solution and how it enhances rather than mitigates unsafe circumstances. Some of these are provided in our previous submission (see Attachment A). It is fair to say that the majority of Australia’s professional pilots are tired of Airservices’ persistence in continuing to put “lipstick on this particular pig”.

Despite self-serving suggestions of improved efficiency for airspace users of the E over D proposal, AusALPA firmly believes the opposite to be true. One such example would be delays to take-off and departure, or extra tracking requirements, due to uncontrolled VFR aircraft operating through the intended departure tracks from RWYs or SIDs. A reliance upon VFR airmanship and listening-out cannot obviate this scenario from occurring. Whilst it may not become the norm, Airservices certainly cannot assure airspace users that it won’t occur and therefore, they also cannot legitimately state that current levels of efficiency will be maintained. They simply have no means of assuring that.

From a safety perspective, relying on “see and avoid” can never reduce collision risk to ALARP.

AusALPA notes that benefits to the VFR community are being touted as reasons for the first proposal of Tranche Three, just as they were for the original introduction of Class E airspace. For example:

“This will provide VFR aircraft with greater unrestricted access to airspace at these locations, fostering and promoting civil aviation.”

AusALPA considers statements by Airservices that they will help foster and promote civil aviation for the VFR community to be disingenuous pandering to one industry sector at the expense of another. Allowing VFR aircraft to put themselves into situations of closer proximity to IFR aircraft during higher workload phases of IFR flight is a measure of Airservices’ disregard towards this aviation sector, nothing more. Of course, there is no justification for increasing the collision risk to IFR traffic.

Furthermore, AusALPA disputes that Class E is a solution to an issue for equity of access for proposals associated with replacing Class C with E. We note that this has repeatedly been a reason provided by Airservices for the E over D proposals yet, it is without question that VFR aircraft are able to simply obtain a clearance to enter and operate in Class C as equally as an IFR aircraft can. Ironically, replacement of Class C airspace with Class E airspace actually increases inequity of access to this airspace, in that IFR aircraft will still have clearance restrictions/requirements and the VFR aircraft will not.

Airservices have not provided any data or evidence that their “trickle down” efficiencies model will actually result in any cost savings to airspace users. From Airservices Tranche Three information:

“In removing the requirement to separate VFR aircraft from IFR aircraft in relatively low density regional areas, resources can be allocated to manage traffic at higher density and higher risk areas.”

If there are any actual efficiency gains from this “trickle down” model for airspace users, it is extremely difficult to believe that these would be anything other than miniscule. Disguising the proposal as a customer service initiative rather than a self-service initiative for Airservices fools no one.

In any event, AusALPA reminds Airservices that the cost of unsafe practices is far greater than that of safe practices.

The Priority of Safety and the Airservices Act (1995)

AusALPA firmly believes that the Tranche Three proposals are focused on cost savings for Airservices and maintaining profit margins rather than on maintaining or improving services for airspace users. We also believe that all of the proposals actually constitute a deterioration of safety levels, despite the requirements of section 9 of the *Airservices Act 1995*:

9 - Manner in which AA must perform its functions

- (1) In exercising its powers and performing its functions, AA must regard the safety of air navigation as the most important consideration.

Risk Assessments and a Systems-Approach

AusALPA has found some difficulty in addressing Airservices proposals as there is often a lack of detail to them, including after requesting further information and clarification. It is also difficult to believe that this continuing lack of transparency is merely inept rather than deliberate.

We understand that one of the intentions of this consultation is to better inform the risk assessments of the Tranche Three proposals prior to submitting them to the OAR. Nonetheless, AusALPA has ongoing concerns with how the level of risk is being, or is to be, assessed. We have not seen specific work on how the risk has been, or will be, assessed for the AMP Tranche Three proposals, but given recent examples of poorly thought-out proposals from Airservices related to airspace change, to navigation aids and regarding Stop Bars (to name a few), we are not confident that a thorough and coordinated risk assessment will necessarily occur. These proposals did proceed to proposal and initial internal acceptance and, therefore, through the internal Airservices risk assessment process as well.

With this in mind, AusALPA believes that it is important to stress to Airservices that the use of a risk-based assessment methodology is not the same as a systems-approach.

Whilst it is true that these two can coexist harmoniously and in a complementary manner, assumptions that they perform the same function and reach the same outcome are invalid. Risk assessments in complex systems cannot be conducted in a series of isolated and independent assessments without regard to the interdependencies of each system component.

In proposing changes to a safety critical system, AusALPA believes that it is imperative to consider all the underpinning risks against a defences-in-depth model of risk mitigation of the total system in which they actually occur.

It appears that Airservices is likely to consider that the Tranche Three proposals are each of a reasonably low risk change to safety. Whilst we dispute that possible perspective, there should be no disagreement that the combination of the proposed set of changes do not build defences-in-depth, in fact, they combine to result in an overall relaxation of defences-in-depth. AusALPA asserts that the proposed changes under Tranche Three compromise rather than enhance the system of safety, creating a greater range of potential latent failure points and an overall deterioration to the system of safety below acceptable levels.

It is imperative that Airservices demonstrates to stakeholders a system-based risk management approach to this and all such proposals. While AusALPA recognises that equity in access to airspace is an issue, current Australian aviation safety policy gives primacy to the protection of fare-paying passengers over other airspace users. The Tranche Three proposals are not consistent with either of those requirements.

Conclusions

AusALPA does not support the Tranche Three proposals of the Airspace Modernisation Project and believes that a significant rethink is required.

Class E is an inherently less safe model of airspace classification to that of Class C. Any suggestion that the same levels of safety can be maintained when airspace is changed from C to E are simply false. Furthermore, Class E airspace at lower altitudes results in more of a challenge to maintain acceptable levels of safety because of the increased prevalence of VFR traffic at lower altitudes when compared with higher altitudes.

Airspace hubs (i.e. aerodromes) further heighten the likelihood of inappropriate separation encounters between VFR and IFR aircraft, further reducing safety margins. AusALPA rejects Airservices' claims that they can maintain current levels of safety when Class C over D is replaced by E over D. We believe that Airservices is not responsibly fulfilling its primary commitment to aviation safety with the AMP.

It is unclear to AusALPA how or if the Tranche Three proposals have been developed with consideration to airspace containment for IFP, or for missed approach climb workload issues related to MSA and CTA. The Tranche Three proposals are not consistent with best practice airspace models.

AusALPA seeks greater clarification from Airservices as to matters related to the Ministerial Directive No 4 of 2004. We have asked a number of questions that we consider relevant to this consultation and we request a timely response from Airservices.

AusALPA finds that Airservices current proposed model of airspace design standardisation actually complicates matters for airspace users and possibly controllers as well. Standardisation should be both fit for purpose and not the cause of a

deterioration to the nett level of safety. The choice of A045 fails that test and must be reconsidered.

Attempts to change MSAs in order to allow the chosen model of standardisation to work are a glaring “red flag” that the choice of A045 as a standardisation altitude for airspace architecture is obviously a mistake. This is a conflation of mutually exclusive concepts that raises serious concerns about the management and direction of Airservices airspace projects.

AusALPA believes that the efficiencies for users touted in the promotion for Tranche Three are misleading at best but are more akin to a self-serving attempt by Airservices for internal corporate efficiencies. Whilst we openly acknowledge that it is important to consider costs and to pursue genuine means of creating efficiencies, these considerations should not usurp the first priority towards the safety of the air navigation, consistent with the *Airservices Act 1995*.

AusALPA believes that the Tranche Three proposals have wrongly reordered so-called efficiencies to the top of the list of priorities and that only a significant rethink of these proposals can possibly rectify this. Any future proposal must reflect system-based risk management and the creation of safety defences-in-depth.

Yours sincerely,



Captain Louise Pole
President AusALPA
President AFAP



Mark Sedgwick
Vice-President AusALPA
President AIPA

Tel: 61 – 2 – 8307 7777

Fax: 61 – 2 – 8307 7799

Email: office@ausalpa.org.au
government.regulatory@aipa.org.au

Attachments: 1. AusALPA submission on the Trial of Class E Airspace Services at Hobart and Launceston airports - 04 May 2018



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

T: +61 2 8307 7777
F: +61 2 8307 7789
E: office@ausalpa.org.au

By Email

04 May 2018

Mr Terry Fulton
OneSKY Integration Manager
Airservices Australia
GPO Box 367
CANBERRA ACT 2601

Email: stakeholder@airservicesaustralia.com

Dear Terry,

**AUSALPA SUBMISSION TO THE AIRSERVICES PROPOSAL:
THE TRIAL OF CLASS E AIRSPACE SERVICES AT HOBART AND LAUNCESTON
AIRPORTS**

The Australian Airline Pilots' Association (AusALPA) represents more than 6,500 professional pilots within Australia on safety and technical matters. We are 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. 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.

AusALPA recently learnt of the proposal by Airservices Australia (AsA) to trial Class E airspace in Tasmania through our participation at an AsA chaired meeting held after the TAS RAPAC meeting (April 11th). We were previously unaware of any industry-based initiatives to amend the airspace classification and configuration.

Since that meeting, we have reviewed the proposal through the content provided in the projects' section of the Airservices web page. Both AsA sources of information speak positively for the proposal and refer to it as an airspace enhancement and a design solution. Thank you for the opportunity to provide our feedback on this matter.

AusALPA does not share this perspective and views the proposal as a degradation of the airspace rather than an enhancement.

We also question what problem this redesign of the airspace is aimed at solving, since we are unable to identify any safety or operational benefits for our members. Consequently, AusALPA considers that there is no justification for the airspace reclassification for trial purposes or otherwise.

We understand that the Tasmanian VFR community may have a differing view and regard this proposal as an enhancement, though we are not aware of any request by them for the proposed change. AusALPA sought during the Hobart meeting to clarify if any such request had been made by the Tasmanian VFR community, but the AsA

representatives were not able to provide any information that that was the case. Furthermore, one representative from a local VFR based training school confirmed that he was also unaware of any grass roots call for a relaxing of access restrictions to this airspace by local VFR stakeholders. We therefore, conclude that this proposal is not a solution to a request from the VFR community, but rather one that has been made by AsA without proper consultation with the stakeholders.

This contrasts with a recent consultative effort by Civil Aviation Safety Authority's Office of Airspace Regulation (OAR) to consider the utilisation of most of the Tasmanian airspace and the needs of its users.

The OAR conducted a review of the Hobart airspace and provided a report (Aeronautical Study of Hobart, February 2017). The purpose of the study was to evaluate the airspace arrangements and classification for Hobart aerodrome and much of the associated airspace. Many stakeholders were canvassed for feedback so that a considered and informed outcome could be reached. Section 6.2 of that report outlines the consultation that the OAR took with AsA. The report provided three key recommendations and the recommendation which is most relevant to the AsA proposal is Recommendation 1. This recommendation states:

"The existing airspace classification and architecture (apart from the one CTA step lower limit change, which is already the subject of an airspace change proposal) is appropriate and should remain unchanged."

Given that the key recommendation from this well consulted OAR report clearly states that there should not be any change to the airspace classification, AusALPA is perplexed as to why AsA now proposes to do the exact opposite.

We note that the OAR report outlines how AsA was consulted and was a key stakeholder and participant during the airspace review. We consider it to be most unlikely that a call for airspace reclassification by AsA at the time of the review would not be included in the report. AusALPA would therefore like to provide AsA with the opportunity to share these considerations, so we can establish a more informed perspective on the proposal. In the absence of such information and based on the clear recommendation of the OAR's review in consultation with all the stakeholders, including AsA, AusALPA strongly objects to the proposal to reclassify part of the airspace.

AusALPA has consulted member pilots and there is a common view that this proposed airspace reclassification will reduce safety margins; make the airspace even more complicated; and pose a higher risk to aircraft operating within it. This applies to both IFR operations and VFR traffic.

The approach and departure phases of flight are relatively high workload phases of flight. Class E airspace increases the need to utilise 'see and avoid' measures when compared to that of Class C or D airspace. This is particularly problematic on descent where small aircraft can be almost impossible to visually detect due an array of ground clutter masking the ability to sight an aircraft. Our membership firmly supports AusALPA's assertion that climb and descent conducted with known traffic in Class C airspace in the often adverse Tasmanian weather means operations are safer. The existing airspace classification is far preferable to that proposed.

AusALPA considers that the risk modelling, if any, for this proposal is woefully inadequate. At the Hobart meeting, we asked about the data AsA used in risk-assessing the merits of this proposal, in order to gain an understanding of why there appears to be a different perspective of safety risk between our organisations. Merely

offering the opinion that "E over D in other parts of the country presents no problems" is not a compelling case for the proposed change.

Furthermore, it was asserted at the meeting that the proposed changes would create 'efficiencies'. AusALPA asked AsA what those efficiencies might be, but no meaningful explanation was provided. We believe that the proposal's efficiencies (if any) are only gained by AsA itself and perhaps a very limited number of airspace users, but only at the expense of the safety of the many.

CONCLUDING REMARKS

AusALPA remains unconvinced that this proposal is necessary, that it has been sufficiently risk modelled, and that it will provide efficiencies in any meaningful manner.

AusALPA strongly believes that the proposed reclassification of the airspace would result in a reduction of safety protections and an increase in pilot workload, whilst providing no real net savings in efficiencies.

Given that IFR traffic must be provided with a controlled airspace service in either airspace classification, that VFR traffic has the option of accessing the current airspace through a clearance request and that there is no demonstrated need to free up the airspace for greater VFR traffic use without clearances, it is unclear to AusALPA why there is any requirement to change the airspace classification in Tasmania. This is supported by the OAR review.

AusALPA believes that this proposal will result in a degradation of safety rather than an enhancement without any significant operational efficiencies.

AusALPA, therefore, strongly opposes this proposal.

Yours sincerely,



Captain David Booth
President AusALPA
President AFAP

Tel: 61 – 2 – 8307 7777

Fax: 61 – 2 – 8307 7799

Email: office@ausalpa.org.au
government.regulatory@aipa.org.au



Captain Murray Butt
President AIPA