

By Email & online submission

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Mr Richard Wood  
Deputy Secretary Transport (Acting)  
Department of Infrastructure, Transport, Regional Development Communications and the Arts  
GPO Box 594  
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Dear Mr Wood,

## **AUSALPA COMMENTS ON THE AERONAUTICAL INFORMATION PUBLICATION FLIGHT PRIORITIES REVIEW**

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 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 Aeronautical Information Publication (AIP) flight priorities review.

### **Comments**

AusALPA welcomes the broad thrust of the proposed changes to the published: *regulation of flight - assessment of priorities*.

Our feedback to this consultation relates to the proposed changes at clause 6.2 (d) (i): "*Long Haul flights from the Americas or Europe will be offered priority where practical when holding exceeds 10 minutes*".

AusALPA supports the intended outcomes of this prioritisation. Direct long-haul air transport flights from the Americas and Europe to Australia have limited fuel and flight duty period buffers, which are a further impediment. We believe that diversions (as a contingency mitigation tool) due to airborne holding and traffic issues are a poor solution to traffic management constraints.

However, we understand that there may be tactical air traffic control challenges that still need to be resolved. We would encourage the Department to consult with the representatives of air

traffic controllers and Airservices' management to resolve any practical difficulties and avoid any unintended consequences prior to the changes being implemented.

As always, we are happy to participate in any processes that enhances the safety of Australian flight operations and protect the travelling public.

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