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Director Flight and Airspace Policy
Department of Infrastructure, Transport, Regional Development, and the Arts
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Submission to the Aeronautical Information Publication (AIP) Flight Priorities Review

The Australian Airports Association (AAA) welcomes the Federal Government's initiative to review and update the Aeronautical Information Publication (AIP). The AAA represents over 340 airports across Australia, including major international hubs and smaller regional airports. As vital infrastructure supporting both economic growth and community connectivity, airports play a key role in Australia's economy and in promoting Australia as an attractive visitor destination.

As the government acknowledges, flights in Australia are typically prioritised on a 'first come, first served' basis by Air Traffic Control (ATC), although at particularly busy airports, and in emergency situations, this is not always possible or safe. Consequently, the AAA and its membership strongly supports the 4 recommended proposed changes to AIP ENR 1.4 – 6 by the Flight Priorities Working Group to help ensure Air Traffic Control can continue to manage air traffic safely and efficiently.

In particular, the recommendation that resonates most strongly with our members is the *Prioritisation of Very Long-Haul International Flights*. The current “first come, first served” approach by ATCs has had the potential of damaging the reputation of Australia as an attractive destination for tourists and airlines alike. Very long-haul flights are unable to carry the fuel required for extensive holding patterns as they are often at the end of their range by the time they reach their destination airport. In many instances, they can absorb the impact of being placed in a 10-minute holding pattern beyond which, issuing a “mayday” to be prioritised is currently their only option — something which airlines, airports and the travelling public would much rather avoid. As a result, international flights are being redirected to alternative ports for landing which has a raft of negative flow on effects, including:

1. **Crew Duty Hours:** At the point of diversion, the flight crew may have exhausted their duty hours and cannot operate the aircraft to its original destination, e.g. A 15-16hr LAX-SYD flight being forced to divert to Canberra (see case study below).
2. **Crew Sourcing:** Another crew needs to be sourced to recover the aircraft. If sourced from the original destination, they may recover the aircraft, but cannot fly the next sector.
3. **Operational Costs:** The aircraft can be out of the network for several days while waiting to be recovered, incurring significant costs to the airline.
4. **Logistical Arrangements:** Suitable arrangements for Australian Border Force (ABF) passenger screening, fuelling, and ground servicing equipment may not be readily available.

5. **ABF Costs:** ABF may impose additional costs to process passengers at a port not usually facilitating international traffic.
6. **Passenger Stranding:** Passengers may be stranded at an unfamiliar port, possibly overnight, without available accommodation or pre-arranged onward transport.
7. **Passenger Perception:** Passengers will form a negative view of the airline and the country.

A recent incident involving a flight from North America to Sydney illustrates these challenges:

- A flight from North America bound for Sydney was required to enter a holding pattern due to thunderstorm activity causing congestion and delays at Sydney Airport.
- The aircraft was diverted to Canberra as it could not carry the fuel required to undertake extensive holding on arrival in Sydney, despite planning with all necessary fuel prior to departure.
- Due to the unplanned arrival into Canberra, the aircraft had to wait for refuelling services to become available. Meanwhile, the crew were unable to continue operating the aircraft as their allowable duty hours were nearing their limit.
- Arrangements had to be made for the ABF to screen arriving passengers. While this would typically attract a fee per passenger, the ABF agreed to waive the fee in this circumstance.
- Airlines were unable to place passengers on domestic flights from Canberra to Sydney, and so charter buses had to be arranged.
- Passenger luggage was required to be transported the following day, which missed some passengers who were required to embark on a cruise ship.
- Ultimately, the North American aircraft was out of the network for three sectors and was recovered to its home base empty at significant cost to the airline.

Domestic flights will have considerably more fuel reserves for holding patterns and while issues with security screening will be moot, should a domestic service be required to be redirected to another port. Further, where domestic diversions occur:

1. **Crew:** Airlines have flexibility to find replacement crews or extend existing crews.
2. **Logistical Arrangements:** Aircraft can be more easily relocated, and flights and schedules can be collapsed, allowing the airline to recover more quickly.

This is why the AAA and its members support the proposed change to the AIP, as highlighted below for emphasis:

...for flights in Class C terminal control areas associated with Brisbane, Melbourne, Perth and Sydney, ATC will apply priorities in the following order;

(i) Long Haul flights from the Americas or Europe will be offered priority where practical when holding exceeds 10 minutes;

(ii) with equal priority, flights compliant with their ATFM requirements, flights exempt from ATFM measures and Medical Aircraft (HOSP) operations; and

(iii) flights not compliant with their ATFM requirements;

(iv) all other aircraft

The proposed changes directly address the challenges faced by long-haul international flights by ensuring they can plan with 10 minutes of traffic holding on arrival, after which they will be granted priority to land.

From a general aviation safety and efficiency perspective, the AAA and its members also strongly support additional 3 proposed changes to the AIP:

- Prioritisation for Navigational and Instrument Flight Procedure Checks
- Prioritisation Based on Weather Conditions
- Expansion of Additional Priorities to Most Towered Airports

The AAA applauds the government's efforts to update the AIP to better accommodate the unique needs of long-haul international flights. These changes will not only improve operational efficiency but also bolster Australia's standing as a premier destination for global aviation. They also represent a commonsense approach to managing air traffic that is responsive to the needs of aircraft, their crew and passengers and should result in a positive change in the management of inbound aircraft. We look forward to working with the government to support their implementation which will help to ensure that our airports remain competitive and reliable hubs for travel.

Should you require further information or clarification, please do not hesitate to contact Sanjiv Sathiah, Senior Manager Regulatory Affairs, via email ssathiah@airports.asn.au or phone 0407 471 812.

Yours sincerely,

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