



PO Box 394
Port Melbourne VIC 3207
PH: 03 9647 9100
Freecall 1800 359 007
Fax 03 9647 9199
Email: civilair@civilair.asn.au
Website: www.civilair.asn.au

23 December 2024

Department of Infrastructure, Transport, Regional Development, Communications and the Arts
Via online submission

RE: Aeronautical Information Publication Flight Priorities review

To whom it may concern,

The Civil Air Operations Officers Association of Australia (Civil Air) is a registered organisation under the *Fair Work (Registered Organisations) Act 2009*. Civil Air was established in 1948 and the Association has eligibility to represent members employed in civilian air traffic control and air traffic services in Airservices Australia. Civil Air directly represents around 80% of Air Traffic Controllers eligible to be members of the Union.

Civil Air has received the four draft amendments for AIP ENR 1.4 – 6 proposed as part of the *Aeronautical Information Publication Flight Priorities review*. As it is Air Traffic Controllers who will be responsible for implementing these new priorities if they are accepted, we wish to provide feedback on each.

It must be remembered that safety must be the first consideration with regard to the service that Airservices Australia provides, as regulated by the Civil Aviation Safety Authority. Whilst regularity and efficiency are important considerations, they are necessarily couched as secondary to the absolute requirement of safety. This principle is codified in legislation.

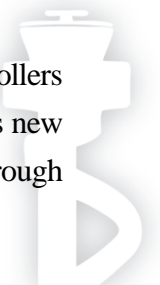
Prioritisation of Very Long-Haul International Flights

Civil Air does not support this amendment and strongly believes it should be declined.

We appreciate the economic and efficiency factors associated with the proposed amendment, such as reduced diversions; as well as improved economic and environmental outcomes should Long Haul flights be able to expect lesser holding and by extension carry lesser fuel. However, these factors do not outweigh the safety impost of this amendment in our view.

In practical terms, and when considering the extensive system limitations that Air Traffic Controllers experience in the existing air traffic management system TAAATS (which is nearly 30 years old), this new priority would require Controllers to control individual (or perhaps multiple individual aircraft) through

Civil Air – The Australian Air Traffic Control Association



holding patterns of aircraft not captured by this new priority, and insert them into the arrival sequence premature to their natural position. Whilst perhaps sounding simple, this is incredibly difficult for Enroute controllers who setup arrivals sequences for major airports.

In metaphorical terms, this proposal would require controllers to “thread the needle” – the “thread” being a fully laden Boeing 787 or Airbus A350 jet aircraft, and the “needle” being a stack of eight heavy and medium jet aircraft operating short or medium haul flights into a major port. We are certain that anyone understanding this situation could not assess this situation as safe.

Based on existing market conditions for Long Haul flights from the Americas and Europe, we expect that this change would impact Perth and Sydney airports primarily. Both of these airports are already experiencing significant complexity, Perth due to mining traffic, and Sydney due to being the busiest international airport in Australia. The current discussion and recent legislative changes surrounding slot management at Sydney Airport are exemplar of the complexities and demand already placed on that airport, and we fear that this change will result in negative safety outcomes in already complex airspace.

These outcomes are likely to include Loss of Separation, or Inadequate Separation Assurance events. For example, aircraft arriving into Sydney from the north, are often flanked by RAAF controlled restricted airspace on both the east and west of the arrival flight path. Attempting to guide a long haul jet through the existing stack of holding traffic has a serious and credible increased risk of Loss of Separation, or even incursion, into an active restricted area where Flying and at times Live Firing activities are occurring.

We accept that situations do exist where controllers are at times already guiding aircraft with no (or reduced) delay through aircraft holding extensively. This includes HEAD or MEDEVAC status aircraft, or those subject to MAYDAY or PAN PAN emergencies. However, these situations are abnormal, do not happen regularly, and in the case of an emergency, are dealt with by multiple controllers and supervisors working behind the applicable controller to support them with decision making. To normalise this situation by inserting a new priority into AIP which enables such a complexity to occur dozens of times per day, is unacceptable in our view.

These comments are by no way a reflection on the complete professionalism and expertise of our members, but are a realistic assessment of the human factors issues associated with this immature proposal.

In the context of fostering the aviation industry and supporting operators to achieve the objectives that are driving this proposed amendment, Civil Air recommends revisiting this change in 2028, which will be following the implementation of OneSKY. The new OneSKY system, which will replace TAAATS, includes numerous new tools available to Air Traffic Controllers to facilitate enhanced and more efficient operations. Civil Air believes that such a change could potentially be implemented better after the implementation of OneSKY, when these tools become available. An introduction of this new priority whilst using the existing TAAATS system would be unsafe and inappropriate in our view.

If this proposal is accepted, whether now or in future, Air Traffic Controllers will be unable to implement it without prior discussion and development of new procedures and training. We caution against

implementing this change without exploring this suite of work first, as not doing so will likely lead to a need to revisit the issue with Long Haul operators when they are inevitably not afforded the priority they expect due to air traffic control complexity. This may cause the proposal to become counter-productive, as efficiency outcomes may actually be worse if more aircraft require diversion due to carrying less holding fuel on Long Haul flights.

Prioritisation for Navigational and Instrument Flight Procedure Checks

Civil Air has no objection to this amendment. We note that in practice, appropriate priority is already afforded to these aircraft.

Prioritisation Based on Weather Conditions

Civil Air has no objection to this amendment. We note that in practice, appropriate priority is already afforded to these aircraft.

Expansion of Additional Priorities to Most Towered Airports

Civil Air has no objection to this amendment.

This particular priority is complicated by the unique traffic mix referred to by the Department, including the fact that many of the aircraft operating from these airports do indeed have a COBT for a flight to a major airport. However, Civil Air is comfortable that Air Traffic Controllers are in practice, already controlling and prioritising aircraft in an appropriate manner commensurate with both the aircraft status, as well as with regard to overall safety and efficiency in terminal areas.

We reiterate in strong terms that we do not support a new priority for Very Long Haul flights and this proposal should be declined. This is an unsafe and immature proposal that will have negative outcomes.

Civil Air is very happy to partake in further discussion should the Government require any further understanding. With most Civil Air representatives continuing to control air traffic on a regular basis, we would welcome the opportunity to provide any representatives from the Government a briefing on how airborne sequencing operates into major Australian airports in practical terms.

We look forward to the outcome of the review.

Yours sincerely,

SCOTT NUGENT
PRESIDENT