

14 January 2025

To whom it may concern

The General Aviation Advisory Network (GAAN) welcomes the opportunity to provide a submission to the consultation on the *Aeronautical Information Package (AIP) Flight Priorities Review*.

The GAAN was formed in October 2016 to provide advice to the Minister for Infrastructure and Transport on matters affecting the General Aviation (GA) sector. The GAAN membership covers all general aviation sectors potentially affected by the proposed changes that are the subject of this consultation. Specifically, operators and operations that are conducted into Sydney International Airport as well as other terminal control areas where scheduled air transport operations occur.

The GAAN acknowledges that the current system works well with aircraft typically prioritised on a 'first come, first served' basis by Air Traffic Control (ATC). However, the review undertaken by the AIP Flight Priorities Working Group, made up of Airservices, CASA and the Department of Defence, has recommended four proposed changes to the AIP which are the subject of this consultation.

The GAAN would like to provide the following feedback on these proposed changes.

- *Prioritisation for Navigational and Instrument Flight Procedure Checks: Aircraft conducting these checks, where prior arrangement has been made, will be prioritised to prevent any delays in required testing.*

The GAAN **supports** this change. Navigational and Instrument Flight checks are safety critical activities that should be prioritised to ensure continued safe operations across the country.

- ***Prioritisation Based on Weather Conditions:** Aircraft that are able to make a successful landing based on weather conditions broadcast at the time will be prioritised over those that cannot. This will formalise an existing regulatory provision.*

The GAAN **supports** this change. However, air traffic control decisions should continue to be informed by all operational factors that are relevant on the day of operations and decisions are not applied in a way that may be discriminatory to smaller or older aircraft based on avionics equipment alone. For example, other operators like business jets and some aircraft conducting aeromedical services are highly capable of landing in all weather conditions.

GAAN IN CONFIDENCE

- ***Prioritisation of Very Long-Haul International Flights:*** *In certain circumstances, these flights will be prioritised to mitigate avoidable diversions and emergency landings.*

The GAAN **supports** this change. As a matter of aviation safety, the GAAN agrees that long-haul flights from the Americas or Europe should be offered priority where practical when holding exceeds ten (10) minutes. Noting the extended flight times these routes currently entail, and the planned future ultra-long-haul flights planned by some airline operators and business jet operators as there are many new aircraft types including those capable of ultra-long-haul operations that may also require priority after completing extended long-haul flight sectors.

- ***Expansion of Additional Priorities to Most Towered Airports:*** *This will further enhance the stability of the Air Traffic Management network. However, these priorities will not apply to the secondary metropolitan airports due to their unique traffic mix.*

The GAAN **does not support** this change based on the limited information provided. The wording of the proposed change is extremely broad and lacks definition... particularly the reference to 'most towered airports'. It is also unclear as to what 'enhance the stability of the Air Traffic Management network' actually means. Is there a known safety requirement that has been identified, and if so, is there a safety case to support the proposed changes?

The 'first come, first served' policy is an International Civil Aviation Organisation (ICAO) recognised and endorsed approach to aircraft operations around the world. It is well understood and accepted.

This proposal will fundamentally change the existing policy of 'first come, first served' at many aerodromes where scheduled flights occur or may occur in the future. The proposed change will negatively impact the operations of many smaller airlines, charter, and air work operators because they fall into the definition of *(ii) all other aircraft*.

Specific examples include the operational impacts on business jets, flight training and aerial work activities. Other examples include tourism operations in both fixed wing and rotary aircraft. Similarly aerial survey work or aerial application operations may also be adversely affected.

These would be time and cost sensitive for an operator and their clients. Numerous examples can be provided where operators have already experienced airborne holding, extended track miles with subsequent fuel burn and ground delay penalties due to the operation of scheduled flights with priority. The GAAN recommends that this proposal be consulted further.

GAAN IN CONFIDENCE

Additionally, this change would not be aligned to other existing procedures already prescribed in the AIP.

In summary, the current system of first come first served is well understood and works well most of the time. The operational need, safety or otherwise, is not articulated in a way to allow for proper consideration of the proposed change. Therefore, additional industry consultation is required so that industry can be appropriately informed and understand why a change the existing policy needs to be made.

Thank you once again for the opportunity to provide feedback into the proposed changes. The GAAN is happy to provide additional detail or discuss further as required.

Kind regards

Rob Walker
GAAN Chair

Chair