

By Email & online submission

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Deputy Secretary Transport (Acting)
Department of Infrastructure, Transport, Regional Development Communications and the Arts
GPO Box 594
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AUSALPA COMMENTS ON THE DRAFT 2025 AUSTRALIAN AIRSPACE POLICY STATEMENT

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 commends the drafters on adopting a more future-focused and risk-based approach to the draft Australian Airspace Policy Statement (AAPS) for 2025.

Transparency

AusALPA firmly advocates that all matters of aviation safety should be transparent and open to public scrutiny. The AAPS has properly adopted a risk-based approach, thus, the assessment of risks, their mitigation and frequent monitoring become more critical to the overall process. Safety must never remain confidential.

Therefore, we support and emphasize IFALPA's stance on: [Transparency in Safety Management Systems](#), which advocates for an open process with access to the analysis and reasoning behind decisions to address (or not address) existing and emerging risks.

Clause 42 of the draft AAPS briefly addresses the inclusion of transparency but its interpretation can vary considerably among individuals and organisations. We recommend incorporating more detailed provisions regarding transparency within the AAPS, with specific obligations placed on CASA and Airservices to ensure clarity and accountability.

Upper Airspace - Residual issue from our 2018 submission

In 2018, we identified a policy gap in the administration of Australia's sovereign airspace between the upper limit of Class A controlled airspace and (as we understood at the time) the

lower limit of the Australian Space Agency jurisdiction (of 100km above mean sea level). We posited that Australian airspace policy should be seamless from ground level to the boundary of space.

While civil aircraft operations are unlikely to exceed an altitude of Flight Level 600 in the immediate future, both defence and emerging civil technologies will utilise or transit this very high-altitude airspace. In these cases, collision risks exist both within and below that airspace.

AusALPA recommended that the AAPS reflect the administrative arrangements, including accident investigation protocols necessary to ensure safety. We continue to assert that such inclusions are essential.

International Consistency – Clause 14

AusALPA notes the removal of language from AAPS 2021 clause 11 regarding Airspace Reviews: “CASA is expected to continue to move towards closer alignment with the International Civil Aviation Organization (ICAO).” The revised clause for “International Consistency” in the 2025 draft now emphasizes that administration of Australian airspace, should not only be aligned with ICAO but also, “...continue to move closer to alignment...”. AusALPA supports this inclusion.

However, AusALPA notes that the expectation articulated in this draft clause is directed solely at CASA. For optimal progress and increased alignment to the ICAO SARPs, AusALPA believes that inclusion should specify that this expectation of alignment progression applies to both CASA and Airservices.

Airservices Australia – Clauses 7 & 33

AusALPA acknowledges that the language in clause 7 of the draft AAPS marks a significant improvement. Previous versions of the AAPS have not outlined expectations for Airservices, as they have for CASA.

Unfortunately, Airservices appears to lack transparency regarding many of its airspace and airspace-related activities, particularly concerning consultation feedback. This leaves us unable to verify whether these activities are conducted in favour of Airservices’ organisational needs over those of the industry and the traveling public. We emphasize the necessity for the AAPS to address transparency in risk determinations, particularly concerning Airservices operations.

In theory, CASA determines airspace requirements while Airservices as the service provider, implements those requirements. However, AusALPA has observed that in practice, Airservices seeks to control both policy and implementation narratives at all levels. When Airservices wields excessive influence in airspace policy decisions, it effectively undermines the OAR’s role. The unactioned or delayed recommendations from the most recent Avalon Airspace Review exemplifies this issue.

AusALPA appreciates the enhancement in clause 33 of the AAPS, which imposes an obligation on Airservices to collaborate with CASA in implementing changes to airspace classifications, services, or facilities.

Australian Future Airspace Framework (AFAF) – Clause 41

AusALPA recognises the importance of the AFAF and has no issue with most of the clauses drafted concerning the AFAF.

However, we note that the language at clause 41 is currently inconsistent with the clause 14 – international consistency. Clause 14 refers to both consistency with the ICAO SARPs and the progressive improved alignment where there are areas of inconsistency. In contrast, clause

41 denotes the ability to file a difference (which is provided through Article 38 of the Convention). However, clause 41 is silent on considering differences as exceptions, the standardisation process and a need for alignment as the default.

AusALPA believes that selective reading of the AAPS related to draft clause 41 will perpetuate the existing Australian State safety culture issue of a “differences-appetite”. Therefore, we request the AAPS be amended to be more consistent with the provisions outlined at clause 14.

Government Policy Objectives – Clauses 11 & 12

AusALPA commends the Government Policy Objectives generally and particularly the emphasis on safety. However, we propose revising clauses 11 and 12 to explicitly state that while the Act includes equity of access as a consideration, it is not an inherent right and may be influenced to varying degrees by the overriding importance of passenger transport safety.

Concluding Comments

AusALPA acknowledges the draft AAPS’s general direction, with consideration given to a range of broader organisational matters. The increased focus on adherence to international standards is noted, though some areas in the draft AAPS require further attention before the statement is finalised.

We recognise the clauses related to Airservices influence and accountability and we suggest further revision of the AAPS is required to ensure that its purpose is clear and not obscured through ambiguity.

Accountability and transparency are essential to ensure the best decisions are made to reduce risk in our skies. We remain willing to engage in any processes that enhance the safety of Australian flight operations and protect the travelling public.

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