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

RE: Draft Australian Airspace Policy Statement 2025

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 wishes to provide input on the *Draft Australian Airspace Policy Statement 2025* (Draft AAPS) as it has a direct impact on the work our members undertake daily, as the individuals responsible for the safe operation and oversight of Australian airspace.

Civil Air supports the Draft AAPS in principle. We particularly welcome positive changes with respect to the airspace change processes outlined in paragraphs 25 through 34.

For many years, including over the life of the previous AAPS, our members have voiced extensive concerns relating to implementation of airspace change or the introduction of new air traffic services. These concerns relate extensively to safety change processes, but also extended to industrial issues that have on some occasions resulted in significant legal penalties being imposed upon Airservices Australia after haphazard and unstructured change management. We believe that Air Traffic Controllers and the Australian Government have a mutual interest in avoiding these issues moving forward and welcome a more structured approach to the governance around airspace change.

Whilst supporting the Draft AAPS in its current form, we provide the following points as feedback for the consideration of the Government:

- Paragraph 14 – We support closer alignment to ICAO SARPs and would welcome further engagement from the Government about any published differences. Civil Air has a significant



international presence in the International Federation of Air Traffic Control Associations (IFATCA) which includes the genesis and promotion of policy to ICAO for inclusion in their SARPs.

- Paragraph 26 – We suggest a specific inclusion of REPCON’s received by the Australian Transportation Safety Bureau (ATSB) with respect to data to be analysed. REPCON is an important tool made available to industry participants to report safety concerns in a confidential and personally safe manner, and we believe that the Government specifically identifying REPCON as a data source to be considered would be a tremendous display of good faith on behalf of the Government, which would continue to foster a healthy reporting culture.
- Paragraph 27 – We believe that CASA must engage with industry bodies such as Civil Air and other associations (such as the Australian Airline Pilots Association, AusALPA) to ensure that risk is appropriately understood and assessed with regard to input from the individuals actually operating and controlling the airspace every single day.
- Paragraph 33 – We are strongly supportive of CASA setting the reasonable timeframe for implementation of airspace change by Airservices, however we would encourage engagement with Civil Air throughout this process to ensure “buy in” by Air Traffic Controllers.
- Paragraphs 35 through 44 – Civil Air is a participant in the Australian Future Airspace Framework Technical Working Group and welcomes continued, and where possible expanded, engagement in this important body. We recognise the professional importance of developing such a framework and the shared interests of Government and industry participants in strengthening this policy area.
- Paragraphs 47 and 48 – We would encourage that CASA make these documents available publicly, or at a minimum, available to industry participants with an interest in the airspace risk, such as Civil Air. We firmly believe that transparency with respect to these matters will only foster better safety outcomes.

Civil Air would welcome any further discussion should the Government require further input or assistance with respect to the Draft AAPS, or any other matter relating to airspace or air traffic services in Australia. We look forward to the release of the AAPS in 2025 and to consequential engagement during the airspace change process.