

MELBOURNE AIRPORT

6 January 2025

Director, Flight and Airspace Policy
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594
Canberra ACT 2601

Submission on the Draft Australian Airspace Policy Statement 2025

Thank you for the opportunity to provide feedback on the Draft Australian Airspace Policy Statement (AAPS) 2025. Melbourne Airport welcomes the proposed updates and appreciates the efforts of the Department of Infrastructure, Transport, Regional Development, Communications and the Arts to shape a forward-looking airspace policy framework.

Australian Future Airspace Framework

Melbourne Airport supports the development of an Australian Future Airspace Framework (AFAF) however, we note that no reports or outcomes have been made available from the AFAF Technical Working Group. Greater transparency, particularly through industry engagement and consultation, would enhance the framework's ability to address the needs of stakeholders effectively.

Airspace Reviews

We support the inclusion of “regular reviews of Australia’s airspace architecture” to ensure alignment with operational developments and industry needs. In Victoria, recent airspace reviews have included the *Mangalore Aeronautical Study (2022)*, *Avalon Airspace Review (2020)*, and *Mildura Airspace Review (2018)*. Melbourne Airport is also aware of the *Aeronautical Study of Melbourne* completed in 2011.

Given the approval of Melbourne Airport’s Third Runway on 10 September 2024, a CASA-led Airspace Review in 2025 would be both timely and beneficial. Such a review could inform subsequent processes, including the development of the Noise Sharing and Airspace Concept Plan (Condition of Approval #3), Airservices’ detailed airspace design process, and future Airspace Change Proposals (ACPs).

Melbourne Airport requests clarification regarding the removal of the policy objective to “move towards closer alignment with the International Civil Aviation Organisation (ICAO),” which was previously included in paragraph 11 of the AAPS 2021.

International Consistency

Melbourne Airport supports the inclusion of “International Consistency” as a policy objective and recommends that this objective reference the potential changes to ICAO Obstacle Limitation Surfaces (OLS) arising from the OLS Taskforce. We are particularly conscious of the

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timing of these changes given the significant change planned for Melbourne Airport's airspace due to the opening of Melbourne Airport's Third Runway. Misalignment or inconsistent implementation of OLS controls risks reputational damage and unnecessary resource expenditure. Ensuring the outcomes of the OLS Taskforce are prioritised over the timeframe of the AAPS 2025 would mitigate such risks.

Roles and Responsibilities

Melbourne Airport supports the reference to Airservices' role in the draft AAPS. However, we recommend the inclusion of clear roles and responsibilities between Airservices and CASA regarding airspace policy to ensure accountability and effective implementation.

Environmental Protection

We would also appreciate further explanation regarding changes to the wording on environmental protection under airspace administration. Specifically, the draft AAPS 2025 states that CASA will "as far as practicable, ensure the environment is protected," whereas the 2021 version stated CASA "shall consider the protection of the environment." Additionally, Melbourne Airport notes that the definition of "Environment Protection" in the draft 2025 AAPS no longer references the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

In our experience, Airservices places significant emphasis on the EPBC Act in its environmental considerations. To ensure consistency, Melbourne Airport supports a harmonised approach to environmental protection across CASA and Airservices.

Melbourne Airport remains committed to supporting a safe, efficient, and sustainable airspace framework that benefits the aviation industry and the broader community. We look forward to further engagement as the AAPS 2025 progresses.