



16 January 2025

QANTAS GROUP RESPONSE AUSTRALIAN AIRSPACE POLICY STATEMENT 2025

The Qantas Group (**Qantas**) welcomes the opportunity to provide feedback on the draft Australian Airspace Policy Statement 2025 (**AAPS**).

The Civil Aviation Safety Authority (**CASA**) and Office of Airspace Regulation (**OAR**) play an integral role in regulating Australian aviation safety and administering airspace.

Qantas supports the draft AAPS and its policy objectives, including the prioritisation of safety, the development of an Australian Future Airspace Framework (**AFAF**) and continued alignment with international standards and recommended practices.

Our comments on each of the policy objectives and priorities are provided below. Qantas is also open to the opportunity to review the outcomes delivered under the Airspace Policy Statement 2021 to inform the updated AAPS.

Safety

Qantas wholly supports the primary policy objective of safety under the policy statement and the Government's position on CASA's role in identifying, monitoring airspace risk and responding appropriately and in a timely manner. Qantas encourages CASA to adopt resourcing models that enable efficient and timely reviews to deliver safety outcomes for all aviation participants.

Australian Future Airspace Framework (AFAF)

Qantas has long supported the development of an AFAF by CASA. While there has been recent engagement with industry through the AFAF Technical Working Group (**TWG**), Qantas would welcome a more detailed timeframe in the establishment and implementation of the AFAF. Given its significance, the AFAF should be a central force in shaping airspace design in Australia at a time of increasing activity and a changing technology landscape in the Australian aviation sector. Qantas urges the Department to prioritise funding and support for the AFAF's establishment and development.

Regulatory Certainty for New Aviation Technologies

Qantas supports this policy objective. Qantas recognises the importance of ensuring the aviation regulatory framework remains responsive to the evolution of the Australian air navigation services and the changing infrastructure and capability landscape.

Enabling Flight Testing

Qantas acknowledges the need for strategic military testing. However, restricting airspace for civilian use can, at times, lead to inefficient flight paths, higher fuel consumption and increased emissions, hampering industry's efforts to achieve the Government's net zero targets. Qantas recommends that the objective consider the efficient use of airspace for all airspace users during testing.

Airspace Review

Qantas supports regular review of Australia's airspace architecture, services, facilities, and user obligations. Qantas would welcome the opportunity for industry input into CASA's OAR Strategic Workplan and greater rigor in the oversight and management of CASA's airspace reviews to ensure practical, timely and effective outcomes for all airspace users.



International Consistency

Qantas supports continued alignment with the International Civil Aviation Organisation's (ICAO) standards and recommended practices (SARPs) and airspace classification. Continued alignment with SARPs and international guidance will ensure Australia remains connected with international counterparts and the technology being used to administer airspace.

Regional Aerodromes

The evolving nature of airspace use in Australia continues to add complexity to the administration of regional airspace. For example, in Class G airspace there is an increasing overlap of commercial and non-commercial air transport operations. Qantas supports the AAPS's focus on this important topic given the unique challenges within specific regional aerodromes.

Qantas operates to approximately 50 uncontrolled aerodromes across regional Australia. Operators must manage the risk of airborne conflict at uncontrolled aerodromes using a comprehensive suite of controls. Qantas welcomes the focus of the OAR through the process of dedicated Airspace Reviews in assessing the suitability of current air traffic management mechanisms for increasingly complex regional and remote airspace.

Future Focused Collaboration to Support National Security

Qantas supports this policy objective.

Airspace Administration

Qantas supports this priority as drafted in the AAPS. Qantas also supports continued oversight of Airservices to ensure air traffic management in Australia continues to achieve the highest safety standards while also supporting industry efficiency and sustainability targets. This oversight will ensure Australian-administered airspace continues to evolve in alignment with international airspace systems as outlined within the ICAO Global Aviation Safety Plan and ICAO Global Air Navigation Plan.

Qantas would be happy to provide additional information if it would assist the Department.