



Stakeholder feedback and responses—SSP-NASP—October 2024

Stakeholder	Comments	Responses
Anonymous	The submission calls for airlines to seat parents and children together to promote passenger safety.	Noted. No change required.
Aviation Maintenance Repair and Overhaul Business Association (AMROBA)	<p>State safety Programme <i>SSP Chapter 4. State Safety Promotion</i></p> <p>Recommends aligning documents with global aviation terminology and definitions. Change references to ‘just culture’ to ‘positive safety culture’ (which includes just culture) to give greater prominence to the promotion of positive safety cultures and the recognition of the aviation sector’s responsibilities for the safety of the public (per the GASP).</p>	<p>Amendments made.</p> <p>State Safety Programme terminology was amended to reflect positive safety culture, consistent with the NASP.</p> <p>Within the NASP the terminology refers to positive safety culture and where necessary for clarification used “positive safety culture/ ‘just culture’” instead of using the just culture term.</p>
Maintenance Repair and Overhaul Business Association (AMROBA)	Table 2. Correct the relationship line of AMSA.	<p>Noted. Amendment made.</p> <p>Table 2 has been amended to reflect AMSA reporting into the Minister of Infrastructure, Transport and Regional Development and Local Government.</p>
Maintenance Repair and Overhaul Business Association (AMROBA)	<p>Figure 3, page 17:</p> <ul style="list-style-type: none"> amend figure to reflect CASA having direct contact with industry; amend figure to reflect ICAO having direct connection with Civil Aviation Safety Authority, not Civil Aviation Safety Board 	<p>Amendments made.</p> <p>Figure 3 structure now reflects that both Industry and ICAO can and do have the capacity to interact directly with CASA.</p> <ul style="list-style-type: none"> Industry-to-agency contact is reflected for CASA as well as other civil aviation agencies, such as Airservices and ATSB. The CASA boxes have been corrected to reflect both the Civil Aviation Safety Board and Civil Aviation Safety Authority.

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Airports Plus Pty Ltd	Concerned that airports have been forgotten and all airport-related issues are tasked to Airservices Australia, and that no airport operators were consulted or tasked in reducing airport risks.	<p>Noted. No change required.</p> <p>Under Annex 19 of the Chicago Convention, Australia is required to establish an SSP, and is recommended to have a NASP, for the management of aviation safety in the State. Accordingly, these documents set out the framework of Australia’s State aviation safety oversight, systems and frameworks to enable safe civil aviation operations.</p> <p>The NASP sets out the role that State Aviation Safety Agencies take and their interactions with Industry, including with airport operators to achieve continued improvements to aviation safety across all industry sectors.</p>
Airports Plus Pty Ltd	Concerned the process should have involved the Australian Airports Association and the Local Government Association as airport operator representative bodies.	<p>Noted. No change required.</p> <p>The SSP working groups (as identified in SSP Annex 1) identify several working groups with airport associations/industry associations as participants. Each working group respectively contributes to the control of identified safety risks described in the NASP.</p>
Airports Plus Pty Ltd	Believes overuse of abbreviations makes document hard to read.	<p>Noted. No change required.</p> <p>A full glossary is provided at the front of the SSP and a full glossary and table of definitions are provided at the front of the NASP.</p>
Skyportz	Encouraged the safety requirements for airports and eVTOL and eSTOL aircraft operators have guidance on how to best provide infrastructure and operational safety.	<p>Noted. No change required.</p> <p>Feedback and support appreciated.</p>

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The Honourable Company of Air Pilots (HCAPA)	<p>Endorses comments of member airports and broadly supports approach in SSP and NASP.</p> <ul style="list-style-type: none"> HCAPA has not been included in the membership of various SSP or NASP committees and working groups, aside from the Medical Technical Working Group. HCAPA feels it has limited opportunities to provide input beyond meetings with high level SSP-agency representatives. HCAPA seeks active and ongoing participation in the Aviation Safety Advisory Panel, the National Runway Safety Group, the ASTRA Council, the Australian Aviation Wildlife Hazards Group, as well as CASA’s TWGs 	<p>Noted. No changes required.</p> <p>Feedback and support appreciated.</p> <p>The agency leads for each SSP Working Groups (including those with industry associations as members) periodically review their current membership profile and where appropriate consider changes to ensure it captures diversity of views.</p>
General Aviation Advisory Network (GAAN)	<p>State Safety Programme</p> <ul style="list-style-type: none"> GAAN advises the SSP makes mention of ASTRA, which we note is no longer actively functioning as a cross-sector engagement forum, with the exception of its SBAS Sub-Group. GAAN has previously recommended the establishment of a new industry engagement forum for airspace matter. 	<p>Amendments made.</p> <p>The AIG is currently considering whether to re-convene ASTRA or establish a different group.</p> <p>The SSP/Annex 1 SSP Working Groups table has been amended to reflect this.</p>
General Aviation Advisory Network (GAAN)	<p>National Aviation Safety Plan</p> <ul style="list-style-type: none"> GAAN advises the NASP makes mention of the opportunity and value of sharing safety data between industry and SSP agencies; however, it does not commit to a specific safety enhancement initiative (SEI) to enable this. In this respect, GAAN members note the safety-data sharing programs that operate in the United States (Aviation Safety Information Analysis and Sharing program, ASIAS) and in Europe (Data4Safety). 	<p>Noted. No changes required.</p> <ul style="list-style-type: none"> SEI actions 5.2.4 and 5.3.1 are designed to enable the enhanced proactive safety data sharing between industry and SSP agencies. The FAA and EASA platforms have been reviewed in relation to opportunities for enhancing safety intelligence. While not specifically mentioned under SEI Action 3.2.1 (to design an SSP safety intelligence framework) these styles of safety data sharing programs may be reconsidered if there is support from industry service providers to partake in such a voluntary program.

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Charbel Frangie	Raises concerns that Flight Dispatchers should be licensed, regulated with an in-depth training framework.	<p>Noted. No changes required.</p> <p>There are various safety critical roles across the aviation industry that are not licensed and regulated beyond Flight Dispatchers.</p> <p>The organisational challenge of workforce capabilities and capacity identifies that ensuring the industry has an appropriately skilled workforce is one way we are looking to address several roles within aviation beyond those that are licensed.</p>
Board of Airline Representatives of Australia (BARA)	<ul style="list-style-type: none"> • BARA has no additional comments to make, nor has received any specific feedback from member airlines. • As such, BARA considers the review undertaken and updating of key safety principles, structures and processes has clearly been thorough and well received. 	<p>Noted. No changes required.</p> <p>Feedback and support appreciated.</p>
Australian Airline Pilots' Association (AusALPA)	<p>State Safety Programme</p> <p>Standardisation</p> <ul style="list-style-type: none"> • AusALPA has concerns that the SSP does not include sufficient emphasis on standardisation regarding ICAO Standards and Recommend Practices (SARPs). • AusALPA feels this should be given greater prominence among the SSP safety principles including the promotion of standardisation as a priority for implementing SARPs. 	<p>Noted. No changes required.</p> <p>It is Australian Government policy to adopt ICAO standards and recommended practices (SARPs).</p> <p>This was recognised by ICAO in its recent audit of Australian aviation safety and a high compliance rate. However, there will be instances where it is deemed necessary for Australia to adopt a different approach to achieve the intended safety outcome of SARPs, particularly when our aviation environment does not align with the ICAO's international model, or when our safety outcomes exceed those proposed by ICAO. Under these instances, while the method may differ, the safety outcome is the same or better.</p>

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<p>Australian Airline Pilots' Association (AusALPA)</p>	<p>SSP Working Groups</p> <ul style="list-style-type: none"> • AusALPA wishes to clarify catch-all “industry” descriptors used for stakeholders such as itself, through the introduction of clearer terminology. • AusALPA wishes to clarify its participation among other SSP Working Groups. • AusALPA seeks the reestablishment of ASTRA and a re-evaluation of its role for supporting the SSP. 	<p>Amendments made.</p> <ul style="list-style-type: none"> • The SSP has been amended under section 1.2.6 Establishment of service providers to clarify the meaning of “industry service provider” consistent with that used in the NASP. Both documents have also been amended to use the terms Industry service provider and Industry Association as two separate groups where needed for clarity. • The agency leads for each SSP Working Groups (including those with industry associations as members) periodically review their membership profile and where appropriate consider changes to ensure it captures diversity of views. • The AIG is currently considering whether to re-convene ASTRA or establish a different group. The SSP/Annex 1 SSP Working Groups table has been amended to reflect this examination.

Stakeholder	Comments	Responses
<p>Australian Airline Pilots' Association (AusALPA)</p>	<p><i>Australian Aviation Legislation Framework</i></p> <ul style="list-style-type: none"> • AusALPA holds concerns about the lack of legislative and regulatory power under the Airports Act 1996 and Airports (Protection of Airspace) Regulations 1996. • AusALPA seeks the SSP review include specific mention of these under Section 1.1.2 to provide a “head of power” for new Obstacle Free Surfaces and an aeronautical study framework. 	<p>Noted. No changes required.</p> <p>The purpose of the Airports (Protection of Airspace) Regulations 1996 (Airspace Regulations) is to establish a system for the protection of airspace at, and around, Federally Leased Airports (FLAs) in the interests of the safety, efficiency or regularity.</p> <p>While the Airspace Regulations have consideration for safety at FLAs, the Civil Aviation Safety Authority (CASA) establishes the standards for prescribed airspace and provides safety advice under its legislation including, the Civil Aviation Safety Regulations 1998 – Part 139 (Aerodromes) Manual of Standards.</p> <p>CASA is leading Australia’s work on the International Civil Aviation Organization’s (ICAO’s) proposed reforms to Annex 14 of the Chicago Convention and the Standards and Recommended Practices (SARPs) for the establishment of an Obstacle Limitation Surfaces (OLS). CASA’s analysis of the proposed reforms will inform the implementation into the Australian legislative environment as it will apply to all Australian aerodromes, not just FLAs.</p>

Stakeholder	Comments	Responses
Australian Airline Pilots' Association (AusALPA)	<p><i>Establishment of Service Providers</i></p> <ul style="list-style-type: none"> AusALPA advocates the separation of roles of the MET Service Provider and the MET Authority. AusALPA believes the role of Airservices Australia should focus on delivering services requested by the aviation industry. AusALPA feels the shift of aviation security from Infrastructure to Home Affairs should be reconsidered in the interests of transparency and consultation. 	<p>Noted. No changes required.</p> <ul style="list-style-type: none"> The roles of the MET service provider and the MET authority although performed by the Bureau of Meteorology, are functionally separate. Agencies are currently reviewing safety oversight arrangements for aviation meteorological services in the context of Annex 19. Airservices consults with industry in the design phase and prior to the delivery of new service initiatives. Home Affairs will continue to be the appropriate authority for matters concerning aviation security.
Australian Airline Pilots' Association (AusALPA)	<p><i>Qualified Technical Personnel</i></p> <ul style="list-style-type: none"> AusALPA holds concerns CASA is challenged to retain and recruit sufficient technical personnel tasked with safety oversight responsibilities, particularly those trained and experienced in safety risk management. Further that addressing this is a priority for maintaining the SSP. 	<p>Noted. No changes required.</p> <p>This is a specific organisational challenge identified in the NASP (workforce capabilities and capacity) and is a challenge not only faced by CASA but all SSP agencies alike.</p> <p>The NASP SEIs 2.4 and 3.2 specifically relate to enhancing safety intelligence and identifying resources (including people and systems) to support risk management and to enhancing and maintaining qualified technical personnel.</p>

Stakeholder	Comments	Responses
<p>Australian Airline Pilots' Association (AusALPA)</p>	<p><i>State Safety Risk Management</i></p> <ul style="list-style-type: none"> • AusALPA is concerned with the lack of quality regarding the conduct of safety risk assessments and subsequent management. AusALPA considers there is a lack of risk management technical guidance standardisation to facilitate the development and assessment of safety cases. • Further, as a consequence undetected and/or dismissed risks are being ignored and untreated in favour of alternative positions. • AusALPA believes all agencies must embrace the inclusion of other industry participants in hazard identification and risk management activities to ensure adequate operational experience. • AusALPA seeks greater transparency for the public over State hazard identification and safety risk assessments, including access to SSP-CAT risk assessments, registers and SSP-CAT minutes. 	<p>Noted. No changes required.</p> <ul style="list-style-type: none"> • Industry and other stakeholders are included in the State hazard identification and safety risk assessment process through SSP Working Groups (e.g. National Runway Safety Group) and activities such as Sector Safety Risk Profiles. • Outcomes of Sector Safety Risk Profiles as well as bow tie risk analysis for each sector is published through the CASA website for public access. • Existing SEIs (e.g. SEI 3.3) seek to improve the State risk management capabilities while other SEIs (e.g. SEI 2.3) seek to improve industry's SMS capabilities. • The Department is of the view sufficient public transparency already exists in understanding the safety risks that are contextualised at the State level in the NASP. • The SSP-CAT is a strategic aviation safety forum and does not itself identify safety risks. The SSP-CAT collates the advice from SSP Working Groups and other inputs already publicly available for inclusion in the NASP. Accordingly, the SSP-CAT does not conduct its own risk assessments or maintain its own hazard identification or risk registers.

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<p>Australian Airline Pilots' Association (AusALPA)</p>	<p>National Aviation Safety Plan</p> <p>Addressing 'safety level equal to, or better than' SARPs</p> <ul style="list-style-type: none"> • AusALPA is concerned about (in its view) the need for Australia to adopt ICAO SARPs rather than file differences, claiming Australia does not have a prodigious record or State safety culture of aligning, adopting or adhering to ICAO SARPs. • AusALPA seeks the inclusion of a Safety Enhancement Initiative (SEI) which addresses instances where Australia does not meet a safety level at least equivalent to SARPs. Specifically, <ul style="list-style-type: none"> ○ Improve upon Goal 2 with regards to enhancing State safety intelligence. There needs to be a Safety Objective (SO) that better aligns with the aims of Goal 5 regarding collaboration. ○ SO2.7 "Maintain or improve the effectiveness of Australia's aviation safety regime in accordance with ICAO SARPs". AusALPA suggests that this SO be utilised through a policy to enable a structured mechanism for industry stakeholders to provide input to a single source for all the agencies for when our alignment to the SARPs is considered to be of a "less than equal nature". ○ An extra SPI "c)" should be added that monitors and tracks such a process, focused on engaging stakeholder collaboration in identifying when Australia's aviation safety regime is not in accordance with ICAO SARPs. ○ AusALPA suggests including an SEI Action to 3.3 with "Infrastructure" as the most probable responsible agency nominated for this role. 	<p>Noted. No changes required.</p> <ul style="list-style-type: none"> • This was recognised by ICAO in its recent audit of Australian aviation safety and a high compliance rate. However, there will be instances where it is deemed necessary for Australia to adopt a different approach to achieve the intended safety outcome of SARPs, particularly when our aviation environment does not align with the ICAO's international model, or when our safety outcomes exceed those proposed by ICAO. Under these instances, while the method may differ, the safety outcome is the same or better. • Led by the Department, Australia has existing mechanisms to monitor its ongoing compliance with ICAO's SARPs through the multi-agency USOAP-CMA Working Group. Where the Working Group feels Australia has deviated away from a standard the Working Group can propose the responsible lead agency review current arrangements with a view to more closely aligning itself with the SARP. This may involve consultation by the lead agency with stakeholders as appropriate.

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<p>Australian Airline Pilots' Association (AusALPA)</p>	<p><i>Human Performance Data to Enable the Voice of Humans into the System</i></p> <ul style="list-style-type: none"> • AusALPS is concerned the draft NASP insufficiently recognises human performance data challenges and there is an absence of SEIs to guide agencies, despite assertions under Section 3.3.2. • AusALPA asserts a greater need to hear from frontline humans on the performance of systems to better understand overall performance and aid hazard identification. • AusALPA agrees with section 3.3.1. • AusALPA considers Australia to be deficient in complying with ICAO Annex 19 (Safety Management) as they relate to safety data and information protection principles and SARPs. AusALPA seek the inclusion of a “Protection of Safety Information” section within the SSP and SEIs within the NASP to: <ul style="list-style-type: none"> ○ Address how HP challenges involve safety culture impediments to data provision. ○ Create an SEI Action for improving Australia’s alignment with Annex 19 of the Convention. ○ Consider Australian State advocacy for amendment to the Annex 13 of the Convention to address the definitions of "cockpit voice recordings" and "airborne image recordings". ○ Require service providers to proactively hazard identify HP challenges and safety culture impediments, including through confidential surveys of frontline workers. ○ Establish and improve consultation with the representatives of frontline aviation workers, through their member associations. 	<p>Noted. No changes required.</p> <ul style="list-style-type: none"> • Safety Enhancement Initiatives 1.1-1.4 and SEI 3.3 directly relate to better understanding contributing factors to accidents, serious incidents and incidents, including specific human factors performance influencers. • SEIs 5.1 to 5.3 have been designed to assist with enhancing overall collaboration and knowledge sharing between those within the system and state agencies. • Feedback and support of section 3.3.1 appreciated. • SEI action 3.1.3 and SEIs relating to Goal 5 have been designed to assist with some of these concerns raised in relation to HP and positive safety culture. However, recognising these are only a starting point, it is envisioned future NASP revisions will build on the lessons learned and SEIs achieved from these identified SEIs, as this revision has done.
<p>Australian Airline Pilots' Association (AusALPA)</p>	<p><i>Greater Emphasis on a move from Reactive to Proactive Risk management</i></p> <ul style="list-style-type: none"> • AusALPA supports the move away from predominantly reactive risk data (Section 4) and seeks greater inclusion of a proactive approach through the adoption of “Safety II” principles through greater emphasis on these principles and terminology in the NASP. 	<p>Noted. No changes required.</p> <p>SEI 3.2 is designed to assist to a move to a more proactive safety risk analysis and management approach through a SSP safety intelligence framework and this is supported by SEI 3.3. The full adoption of “Safety II” principles would be difficult before the SSP safety intelligence framework has been implemented and had time to mature.</p>

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<p>Australian Airline Pilots' Association (AusALPA)</p>	<p><i>Appropriate Infrastructure to support Safe Operations</i></p> <ul style="list-style-type: none"> AusALPA suggests the inclusion of an SEI for a strategy for the development of a surveillance and VHF communications infrastructure framework roadmap in support of Goal 6. 	<p>Noted. No change required.</p> <p>Airservices Australia is currently developing a surveillance and communications capability roadmap. Given Australia's infrastructure is currently limited to ground-based, the approach will continue to be a risk-based expansion of ground infrastructure where the need is identified through CASA airspace reviews and aeronautical studies.</p> <p>Longer term, Airservices will look at a transition to space-based infrastructure that could significantly improve the speed of response to service requirement changes. An SEI describing the above has not been included in the NASP based on the existing SEIs related to Airspace Reviews and Aeronautical Studies already being the basis for changes to surveillance and communications capability.</p>
<p>Virgin Australia</p>	<p>State Safety Program</p> <ul style="list-style-type: none"> Virgin Australia considers the State Safety Program captures how aviation safety is managed in Australia, reflecting current roles and responsibilities of respective Government agencies. However, there is scope for greater regulation and oversight of meteorological services in aviation sector, particularly the outputs of the Bureau of Meteorology. 	<p>Noted. No change required.</p> <p>Agencies are currently reviewing safety oversight arrangements for aviation meteorological services in the context of Annex 19.</p>
<p>Virgin Australia</p>	<p>National Aviation Safety Plan 2024</p> <p><i>Aviation Safety Goals</i></p> <ul style="list-style-type: none"> Virgin Australia suggests the inclusion of Meteorology: "All sectors" to ensure comprehensive safety oversight. Accountability mechanisms should be introduced for Government service providers to maintain safety performance (e.g. Airservices Australia and Bureau of Meteorology). 	<p>Noted. No changes required.</p> <ul style="list-style-type: none"> Agencies are currently reviewing safety oversight arrangements for aviation meteorological services in the context of Annex 19. Accountability mechanisms already exist for Airservices Australia via the Air Services Act 1995, service KPIs listed in the Airservices Australia corporate plans and corresponding annual reports with regulatory oversight by CASA.

Stakeholder	Comments	Responses
Virgin Australia	<p>Collaboration</p> <ul style="list-style-type: none"> Virgin Australia has concerns that several government entities that manage safety-related functions (including Aircraft Noise Ombudsman, Noise Complaints and Information Services and the Meteorological Authority Office) are not subject to the same oversight as other government entities. Virgin Australia suggests the NASP better define their roles and responsibilities, requirements for consultation and performance expectations. Virgin Australia recommends that the design and purpose of ASTRA is reviewed following industry consultation to inform a future approach for a similar type-forum. 	<p>Noted. No changes required.</p> <ul style="list-style-type: none"> The Meteorological Authority Office does not have any safety-functions. Agencies are currently reviewing safety oversight arrangements for aviation meteorological services in the context of Annex 19. The AIG is currently considering whether to re-convene ASTRA or establish a different group. The SSP/Annex 1 SSP Working Groups table has been amended to reflect this examination.
Virgin Australia	<p>Australia's Operational Safety Risks</p> <ul style="list-style-type: none"> Virgin Australia considers the risks described in the draft NASP to be largely accurate, particularly regarding uncontrolled airspace. However, Virgin Australia feels a risk that remains unmanaged at the State level is the volume of airspace left uncontrolled by Airservices Australia resulting in a high number of Traffic Information Broadcast by Aircraft (TIBA) activations and subsequent lack of oversight/intervention by CASA. Virgin Australia considers opportunities exist for earlier industry intervention to improve the classification of airspace and supporting communications infrastructure available. Virgin Australia considers the safety risks do not capture any meteorological-related risks stemming from perceived substandard forecasting outputs from the Bureau of Meteorology. Virgin Australia suggests changes be made in the NASP to the Bureau of Meteorology's aviation products. 	<p>Noted. No change required.</p> <ul style="list-style-type: none"> Every individual Service Variation that Airservices implements is subject to operational safety risk management and requires CASA notification. The current rate of Service Variations is subject to additional oversight by CASA through ongoing engagement. As part of the SSP Working Groups, the Aviation Industry Services Working group is tasked with reviewing the aviation meteorological service. (Also refer to NASP Goal 5, SO5.3). Agencies are reviewing safety oversight arrangements for aviation meteorological services in the context of Annex 19.

Stakeholder	Comments	Responses
Virgin Australia	<p><i>Meteorological Safety Enhancements</i></p> <ul style="list-style-type: none"> • Virgin Australia considers the NASP contains a lack of initiatives aimed at enhancing meteorological products/outputs for aviation safety. • Virgin Australia suggests separating the meteorological service provider and the meteorological authority office. Virgin Australia suggests this would ensure greater accountability and quality oversight of BoM products while also supporting the NASP’s objective of improved safety outcomes. 	<p>Noted. No changes required.</p> <ul style="list-style-type: none"> • As part of the SSP Working Groups, the Aviation Industry Services Working group is tasked with reviewing the aviation meteorological service. (Also refer to NASP Goal 5, SO5.3). • The roles of the MET service provider and the MET authority although performed by the Bureau of Meteorology, are functionally separate. • Agencies are currently reviewing safety oversight arrangements for aviation meteorological services in the context of Annex 19.
Virgin Australia	<p><i>Opportunities to further enhance aviation safety</i></p> <ul style="list-style-type: none"> • Virgin Australia suggests introducing surveillance and communication mandates across all airspace types that are affordable and accessible. • Greater uptake of space-based surveillance and communications technologies to introduce efficiencies quicker and be more fit-for-purpose as the industry demand requires (e.g. Pilbara airspace operations and lack of surveillance and communications in this area). 	<p>Noted. No changes required.</p> <ul style="list-style-type: none"> • Specific mandates for new initiatives are appreciated at the agency level. The comment has been forwarded to Airservices Australia for further consultation. • Airservices Australia is already committed to the increased uptake of space-based surveillance and communication technologies. This technology is expected to mature towards the end of this decade and be ready for service introduction. The key reasons for the delay include the need for proven technical solutions to become available and having a certified product aligned to ICAO SARPS (which are still in development).

Stakeholder	Comments	Responses
Qantas	<p>National Aviation Safety Plan</p> <p>The Qantas Group welcomes the addition of various risks to the “Australian Safety Risks, Challenges and Priorities” section of the NASP. In particular,</p> <ul style="list-style-type: none"> • <i>Suitability of current ATM mechanism for increasingly complex and remote airspace;</i> • <i>Emerging concerns regarding mid-air collision involving non-CAT aircraft;</i> • <i>Human performance operational safety impacts.</i> Qantas supports a focus on how to retain and attract experience within the industry, and also improvements to the management of fatigue. • <i>Workforce capabilities and capacity.</i> Limited availability of skilled labour is appropriately recognised in the NASP. • <i>Enhancing and enabling infrastructure for current and future needs.</i> Qantas acknowledges the complexity of balancing infrastructure requirements with forecast air traffic growth. 	<p>Noted. No changes required.</p> <p>Feedback and support appreciated.</p>
Qantas	<p>Safety goals, objectives, indicators, targets and actions</p> <ul style="list-style-type: none"> • The Qantas Group supports Safety Enhancement Action 1.3.7 requiring CASA to conduct a risk analysis regarding CAT operations near non-controlled aerodromes in class G airspace. • The Qantas Group supports Safety Enhancement Action 6.1.3 relating to the Enterprise Network Modernisation Program (ENMP) as it would facilitate significant safety benefits with increasing traffic density and mix at some regional non-controlled aerodromes. • The Qantas Group welcomes Safety Enhancement Initiatives 6.2.1 and 6.4.3 relating to the introduction of Digital Aerodrome Services (DAS) and remote Airservices towers. Qantas believes these initiatives will bring significant benefits to aerodromes with increasing traffic density and mix that would otherwise go unrealised. 	<p>Noted. No changes required.</p> <p>Feedback and support appreciated.</p>
Australian Association for Uncrewed Systems (AAUS)	<p>State Safety Programme</p> <p>AAUS understands ASTRA has not functioned since 2020 but is a strong advocate for the re-establishment of ASTRA or a similar body.</p>	<p>Noted. No changes required.</p> <p>The AIG is currently considering whether to re-convene ASTRA or establish a different group. The SSP/Annex 1 SSP Working Groups table has been amended to reflect this.</p>

National Aviation Safety Plan

AAUS is encouraged that the safe integration of RPAS and AAM into the Australian aviation operations is reflected within the SEIs.

- However, AAUS is concerned SEI 1.6 regarding the integration of AAM is not aligned with industry expectations or CASA AAM/RPAS regulatory roadmap. AAUS recommends greater detail regarding AAM training, licensing, operations and airspace integration.
- AAUS agrees that emerging technology and other larger crewed aircraft could significantly increase the volume of traffic in Class G airspace. AAUS recommends a mandate for electronic conspicuity devices for all aircraft operating in Class G airspace, including AAM and RPAS. AAUS believes this could be addressed through more work on airspace design – considering AAM and RPAS - under SEI 6.4.
- AAUS is concerned the safety performance indicators (Table 1) are based on traditional aircraft and may need further refinement to enhance definition for emerging aviation technology (particularly RPAS)

Amendments made.

- While the CASA RPAS/AAM Roadmap contains specific activities regarding AAM integration, the NASP has taken an approach of a singular AAM SEI action. This does not detract from activities already committed to in the Roadmap.
 - However, SEI action 1.6.1 is designed to not only incorporate the Roadmap activities but also ensure Australia reviews and monitors global progress relating to AAM.
 - The timeline of the SEI action 1.6.1 (2030) has been chosen to fall within the medium-term of the Roadmap and to extend beyond the lifespan of this NASP. Accordingly, it has not been updated.
 - Progress made against this action - along with Roadmap activities - will assist with future NASP revisions.
- With respect to mandates for electronic conspicuity devices for all aircraft operating in Class G airspace, including AAM and RPAS, this has been referred to the relevant CASA Working Group for consideration.
- The inclusion of RPAS specific SPIs has been adopted within Safety Objective 1.4. It is envisioned that through the SEI 1.5 these will be further developed in future NASP revisions as the capability to trend, rate, and analyse on specific RPAS related performance indicators relating to G-HRCs.
 - At this time, an update to an SPI to be this encompassing would be difficult to monitor and report on as there is no defined elements to be measured and reported against. Future NASP revisions will consider SEI actions and other safety data improvements to report on operational safety performance regarding RPAS/AAM operations.

Stakeholder	Comments	Responses
Australian Association for Uncrewed Systems (AAUS)	<p>1.3.2 Encourage and promote the wider use of aircraft situational awareness tools beyond regulatory requirements (i.e., ADS-B in/out).</p> <ul style="list-style-type: none"> AAUS believes this action needs to be strengthened with a risk-based mandate to facilitate the growing number of crewed and uncrewed aircraft forecast for Class G airspace in coming years. AAUS suggests a mandate will also improve the safety and utility of any UTM developed (SEI 6.3.2). 	<p>Noted. No changes required.</p> <p>Referred to appropriate SSP WG for further consultation.</p>
Australian Association for Uncrewed Systems (AAUS)	<p>1.5.1 Work with industry associations to promote key safety lessons, from investigations and occurrences, from RPAS sector available data.</p> <ul style="list-style-type: none"> AAUS believes work will be needed around reporting requirements to ensure that data is of a sufficient quality and quantity to draw meaningful conclusions. 	<p>Amendments made.</p> <p>SEI Action 1.5.1 has been expanded to the following:</p> <p><i>Work with industry associations to promote key safety lessons, from investigations and occurrences, from RPAS sector available data, and to enhance RPAS industry understanding of safety reporting requirements and purposes.</i></p>
Australian Association for Uncrewed Systems (AAUS)	<p>1.5.2 Consider new separation standards, which use new technologies, for RPAS-to-RPAS.</p> <ul style="list-style-type: none"> AAUS believes this action needs to be on a timeline to meet UTM development schedule (SEI 6.3.2). 	<p>Amendment made.</p> <p>SEI action 1.5.2 timeline has been updated to 2027 to align with SEI action 6.3.2. This is also in line with the CASA RPAS/AAM Roadmap near-term timeline for this activity.</p>
Australian Association for Uncrewed Systems (AAUS)	<p>1.5.5 Develop the framework and standards to support the implementation of Uncrewed Aircraft System Traffic Management (UTM).</p> <ul style="list-style-type: none"> AAUS believes this action needs to be on a timeline to meet UTM development schedule (SEI 6.3.2). 	<p>Amendment made.</p> <p>SEI action 1.5.5 timeline has been updated to 2027 to align with SEI action 6.3.2. This is also in line with the CASA RPAS/AAM Roadmap near-term timeline for this activity.</p>

Stakeholder	Comments	Responses
<p>Australian Association for Uncrewed Systems (AAUS)</p>	<p><i>1.6.1 Review and monitor global progress of introduction of AAM for relevant policy consideration and its impact of safe integration within Australia.</i></p> <ul style="list-style-type: none"> AAUS believes the 2030 timeline does not match industry expectations on when AAM will commence operations in Australia and also timelines indicated by CASA RPAS and AAM regulatory roadmap. AAUS recommends additional details related to the CASA RPAS and AAM Roadmap including training, licensing, operations and airspace integration be added to provide clarity on timelines for key events 	<p>Noted. No changes required.</p> <ul style="list-style-type: none"> While the CASA RPAS/AAM Roadmap contains specific activities regarding AAM integration, the NASP has taken an approach of a singular AAM SEI action. This does not detract from activities already committed to in the Roadmap. However, SEI action 1.6.1 is designed to not only incorporate the Roadmap activities but also ensure Australia remains in a state of constant review/monitoring of global progress relating to AAM. The timeline of the SEI action 1.6.1 (2030) has been chosen to fall within the medium-term timeline of the Roadmap and to extend beyond the lifespan of this NASP version. Accordingly, it has not been updated. It is further envisioned that progress made against this action - along with the Roadmap activities - will assist with future NASP revisions.
<p>Australian Association for Uncrewed Systems (AAUS)</p>	<p><i>2.1.3 Develop policy and standards, recognising international alignment, to support the ongoing safe introduction and use of emerging technologies in aircraft energy sources.</i></p> <ul style="list-style-type: none"> AAUS believes the 2030 timeline does not match industry expectations on when AAM will commence operations in Australia (Industry is forecasting 2027). 	<p>Noted. No changes required.</p> <p>While AAM may commence operations before 2030 the action is in relation to all emerging technology relating to aircraft energy sources. This means there may be aspects of this action relating to aircraft energy sources that are developed before others. It is expected that CASA will manage this on a basis of what is being developed and commenced in a sequential manner when recognising and aligning with international progress as well.</p>

Stakeholder	Comments	Responses
Australian Association for Uncrewed Systems (AAUS)	<p>5.2.3 Enhance work with RPAS Industry associations to promote key safety lessons from available data.</p> <ul style="list-style-type: none"> AAUS is committed to actively support the NASP and engagement activities. 	<p>Noted. No changes required. Feedback and support appreciated.</p>
Australian Association for Uncrewed Systems (AAUS)	<p>6.4 Strategic review and reform of Australia's airspace</p> <ul style="list-style-type: none"> AAUS suggests the absence of RPAS / AAM / UTM airspace requirements review is concerning and would appear to be required for successful outcomes relating to the safe integration of RPAS and AAM (SEI 1.5 and 1.6). 	<p>Noted. No changes required. SEI action 6.3.2 addresses the integration of UTM into the existing ATM system and this is not being expected for completion until 2027. It is further envisioned that that future NASP revisions would then be able to build on this SEI action in relation to airspace reform and enhancements.</p>
National Emergency Management Agency (NEMA)	<p>State Safety Programme</p> <p>NEMA suggested revised wording for its role and its management of the Australian Government Aviation Disaster Response Plan (AUSAVPLAN).</p>	<p>Amendments made.</p> <p>Relevant sections have been updated.</p>
Boeing Australia	<p>State Safety Programme</p> <ul style="list-style-type: none"> Boeing suggests removing reference to ASTRA as a functioning or effective industry engagement forum. Boeing further encourages the creation of a new Government-industry forum for strategic airspace and ATM matters 	<p>Noted. No changes required. The AIG is currently considering whether to re-convene ASTRA or establish a different group. The SSP/Annex 1 SSP Working Groups table has been amended to reflect this examination.</p>

Stakeholder	Comments	Responses
Boeing Australia	<p>National Aviation Safety Plan</p> <p>Goal 1 – Improve the safety of Australian aviation operations across all sectors.</p> <ul style="list-style-type: none"> Boeing supports SEI 1.3.2, particularly with respect the introduction of AAM operations. In addition to ADS-B OUT electronic conspicuity (EC) devices, Boeing encourages consideration for the adoption of ADS-B IN and necessary equipment for cockpit display of ADS-B and EC information. Boeing supports SEI 1.5. Boeing supports SEIs 1.5.5, 1.5.8 and suggests these are equally applicable to SEI 1.6. Boeing highlights the availability of the AAUS “AAM Industry Vision and Roadmap” and CASA’s RPAS and AAM Strategic Regulatory Roadmap in support of SEI 1.6. Boeing suggests additional SEIs will be required to support the initial and continuing airworthiness, operations and airspace integration of AAM. Boeing also encourages consideration of accelerated FIMS and ITM activities in this vein. 	<p>Noted. No changes required.</p> <ul style="list-style-type: none"> SEI action 1.3.2 - Feedback and support appreciated. SEI 1.5 - Feedback and support appreciated. SEIs 1.5.5 and 1.5.8 - Feedback and support appreciated. While the CASA RPAS/AAM Roadmap contains specific activities regarding AAM integration, the NASP has taken an approach of a singular AAM SEI action. This does not detract from activities already committed to in the Roadmap. However, SEI action 1.6.1 is designed to not only incorporate the Roadmap activities but also ensure Australia remains in a state of constant review/monitoring of global progress relating to AAM. The timeline of the SEI action 1.6.1 (2030) has been chosen to fall within the medium-term timeline of the Roadmap and to extend beyond the lifespan of this NASP version. Accordingly, it has not been updated. It is further envisioned that progress made against this action - along with the Roadmap activities - will assist with future NASP revisions.

Stakeholder	Comments	Responses
Boeing Australia	<p>Goal 2 – Strengthen Australia’s safety oversight and investigation capabilities.</p> <ul style="list-style-type: none"> • With respect SEI 2.2 and SEI 2.5, Boeing suggests consideration be given to an additional Safety Goal aimed at establishing a Regulatory Innovation environment to facilitate the safe introduction of operational innovations and emerging technologies into the regulatory ecosystem. • Boeing supports SEI 2.2.4 with particular note to new aircraft manufacturing techniques. • Boeing suggests a new SEI under Goal 2 for the safe integration of sustainability technologies and initiatives into Australian aviation. 	<p>Amendments made.</p> <ul style="list-style-type: none"> • With respect SEIs 2.2 and 2.5, an additional SEI action has been added to address this: SEI action 2.2.6 <i>Facilitating the safe introduction of operational innovations and emerging technologies through flexible applications of the regulatory framework.</i> • SEI action 2.2.4 - Feedback and support appreciated. • SEI action 4.1.2 already considers monitoring the international safety regulatory and standards needed to support the safe deployment of SAFs. Consequently, no new SEI is required, but greater reference to the future safe integration of “sustainability technologies” has been included in body text of NASP.
Boeing Australia	<p>Goal 3 – Enhance the effectiveness of Australia’s State Safety Programme through safety intelligence.</p> <p>Boeing supports SEI 3.2 and encourages this be undertaken in combination with Goal 5 aspirations to enhance greater safety collaboration with industry.</p>	<p>Noted. No changes required. Feedback and support appreciated.</p>
Boeing Australia	<p>Goal 4 – Increase collaboration at global and regional levels to enhance aviation safety.</p> <p>Boeing supports SEI 3.2 highlighting its own extensive collaboration with members of the National Aviation Authority network on matters relating to regulatory innovation.</p>	<p>Noted. No changes required. Feedback and support appreciated.</p>

Stakeholder	Comments	Responses
Boeing Australia	<p>Goal 5 – Enhance greater safety programme collaboration between Australian industry, industry associations and State agencies.</p> <ul style="list-style-type: none"> Boeing is concerned the NASP falls short of committing to a specific SEI to enable sharing of safety data between industry and SSP agencies. Boeing suggests a system akin to the Aviation Safety Information Analysis and Sharing (ASIAS) and Data4Safety Programs in the US and Europe may be needed. Accordingly, Boeing suggests a new SEI be considered under Goal 5 in this vein. 	<p>Noted. No changes required.</p> <ul style="list-style-type: none"> SEI actions 5.2.4 and 5.3.1 are designed to enable the enhanced proactive safety data sharing between industry and SSP agencies through the current safety data reporting mechanisms that already exist. The FAA and EASA platforms have been reviewed in relation to opportunities for enhancing safety intelligence. While not specifically mentioned there is SEI Action 3.2.1 to design an SSP safety intelligence framework and these style of safety data sharing programs may be an element that is reconsidered if there is support from industry service providers to partake in such a voluntary program.
Boeing Australia	<p>Goal 6 – Ensure Australia has the appropriate aviation infrastructure to support safe operations.</p> <ul style="list-style-type: none"> Boeing notes there is no discussion on access to radiofrequency spectrum and its link to aviation safety. Boeing suggests a new SEI under Goal 6 aimed to promote protection of existing internationally allocated and Australian specific aeronautical spectrum, and to champion allocation of dedicated and protected aeronautical spectrum to support safe operations of new and emerging technologies (e.g. UAS, RPAS, AAM, FIMS and UTM) 	<p>Amendments made.</p> <p>The NASP has been amended to address the protection of existing allocated radiofrequency spectrum and championing additional allocations where required to support new and emerging technologies is critical.</p> <p>A new SEI 6.5 has been added for Airservices Australia: <i>‘Manage allocated radiofrequency spectrum through the protection of current allocations to protect existing aviation operations and obtain additional allocations where required to support new and emerging technologies (including UAS, RPAS, AAM, FIMS and UTM)’.</i></p> <p>Further, two new SEI actions under the SEI 6.5 include:</p> <ul style="list-style-type: none"> <i>6.5.1: Representation at ICAO Frequency Spectrum Management Panel (FSMP)</i> <i>6.5.2: Participate in ITU-R meetings, in support of an Australian position at the WRC in 2027.</i>

Stakeholder	Comments			Responses
Department of Infrastructure, Transport, Regional Development, Communications and the Arts/National Emerging Aviation Technologies Policy	National Aviation Safety Plan			Amendments made.
	6.3.2	<ul style="list-style-type: none"> Change to SEI 6.3.2 <p>Uncrewed Aircraft Traffic Management development and integration into the existing Air Traffic Management system.</p> <p>Flight Information Management System (FIMS): Add additional features to FIMS after its initial roll out in 2025 to enable air traffic management to communicate electronically with drones and other uncrewed aircraft and support the safe integration of drones into controlled airspace.</p>	Airservices	SEI action 6.3.2 and its language has been updated: <i>Flight Information Management System (FIMS): Add additional features to FIMS after its initial roll out in 2025 to enable air traffic management to communicate electronically with RPAS and other uncrewed aircraft and support the safe integration of RPAS/uncrewed aircraft into controlled Australian airspace.</i>
Department of Infrastructure, Transport, Regional Development, Communications and the Arts/National Emerging Aviation Technologies Policy	<ul style="list-style-type: none"> Change to SEI 1.5.8 			Amendments made.
	1.5.8	<p>Develop and implement the Flight Information Management System (FIMS) to underpin the UTM support the safe integration of drones into controlled airspace.</p>	Airservices	SEI action 1.5.8 and its language has been updated: <i>Develop and implement the Flight Information Management System (FIMS) to support the safe integration of RPAS/UTM into controlled airspace.</i>