

By Email

04 May 2018

Mr Terry Fulton
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Dear Terry,

AUSALPA SUBMISSION TO THE AIRSERVICES PROPOSAL:
THE TRIAL OF CLASS E AIRSPACE SERVICES AT HOBART AND LAUNCESTON AIRPORTS

The Australian Airline Pilots' Association (AusALPA) represents more than 6,500 professional pilots within Australia on safety and technical matters. We are 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. 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 the Australia's safety-related agencies as essential to ensuring that our policy makers get the best of independent safety and technical advice.

AusALPA recently learnt of the proposal by Airservices Australia (AsA) to trial Class E airspace in Tasmania through our participation at an AsA chaired meeting held after the TAS RAPAC meeting (April 11th). We were previously unaware of any industry-based initiatives to amend the airspace classification and configuration.

Since that meeting, we have reviewed the proposal through the content provided in the projects' section of the Airservices web page. Both AsA sources of information speak positively for the proposal and refer to it as an airspace enhancement and a design solution. Thank you for the opportunity to provide our feedback on this matter.

AusALPA does not share this perspective and views the proposal as a degradation of the airspace rather than an enhancement.

We also question what problem this redesign of the airspace is aimed at solving, since we are unable to identify any safety or operational benefits for our members. Consequently, AusALPA considers that there is no justification for the airspace reclassification for trial purposes or otherwise.

We understand that the Tasmanian VFR community may have a differing view and regard this proposal as an enhancement, though we are not aware of any request by them for the proposed change. AusALPA sought during the Hobart meeting to clarify if any such request had been made by the Tasmanian VFR community, but the AsA

representatives were not able to provide any information that that was the case. Furthermore, one representative from a local VFR based training school confirmed that he was also unaware of any grass roots call for a relaxing of access restrictions to this airspace by local VFR stakeholders. We therefore, conclude that this proposal is not a solution to a request from the VFR community, but rather one that has been made by AsA without proper consultation with the stakeholders.

This contrasts with a recent consultative effort by Civil Aviation Safety Authority's Office of Airspace Regulation (OAR) to consider the utilisation of most of the Tasmanian airspace and the needs of its users.

The OAR conducted a review of the Hobart airspace and provided a report (Aeronautical Study of Hobart, February 2017). The purpose of the study was to evaluate the airspace arrangements and classification for Hobart aerodrome and much of the associated airspace. Many stakeholders were canvassed for feedback so that a considered and informed outcome could be reached. Section 6.2 of that report outlines the consultation that the OAR took with AsA. The report provided three key recommendations and the recommendation which is most relevant to the AsA proposal is Recommendation 1. This recommendation states:

"The existing airspace classification and architecture (apart from the one CTA step lower limit change, which is already the subject of an airspace change proposal) is appropriate and should remain unchanged."

Given that the key recommendation from this well consulted OAR report clearly states that there should not be any change to the airspace classification, AusALPA is perplexed as to why AsA now proposes to do the exact opposite.

We note that the OAR report outlines how AsA was consulted and was a key stakeholder and participant during the airspace review. We consider it to be most unlikely that a call for airspace reclassification by AsA at the time of the review would not be included in the report. AusALPA would therefore like to provide AsA with the opportunity to share these considerations, so we can establish a more informed perspective on the proposal. In the absence of such information and based on the clear recommendation of the OAR's review in consultation with all the stakeholders, including AsA, AusALPA strongly objects to the proposal to reclassify part of the airspace.

AusALPA has consulted member pilots and there is a common view that this proposed airspace reclassification will reduce safety margins; make the airspace even more complicated; and pose a higher risk to aircraft operating within it. This applies to both IFR operations and VFR traffic.

The approach and departure phases of flight are relatively high workload phases of flight. Class E airspace increases the need to utilise 'see and avoid' measures when compared to that of Class C or D airspace. This is particularly problematic on descent where small aircraft can be almost impossible to visually detect due an array of ground clutter masking the ability to sight an aircraft. Our membership firmly supports AusALPA's assertion that climb and descent conducted with known traffic in Class C airspace in the often adverse Tasmanian weather means operations are safer. The existing airspace classification is far preferable to that proposed.

AusALPA considers that the risk modelling, if any, for this proposal is woefully inadequate. At the Hobart meeting, we asked about the data AsA used in risk-assessing the merits of this proposal, in order to gain an understanding of why there appears to be a different perspective of safety risk between our organisations. Merely

offering the opinion that “E over D in other parts of the country presents no problems” is not a compelling case for the proposed change.

Furthermore, it was asserted at the meeting that the proposed changes would create ‘efficiencies’. AusALPA asked AsA what those efficiencies might be, but no meaningful explanation was provided. We believe that the proposal’s efficiencies (if any) are only gained by AsA itself and perhaps a very limited number of airspace users, but only at the expense of the safety of the many.

CONCLUDING REMARKS

AusALPA remains unconvinced that this proposal is necessary, that it has been sufficiently risk modelled, and that it will provide efficiencies in any meaningful manner.

AusALPA strongly believes that the proposed reclassification of the airspace would result in a reduction of safety protections and an increase in pilot workload, whilst providing no real net savings in efficiencies.

Given that IFR traffic must be provided with a controlled airspace service in either airspace classification, that VFR traffic has the option of accessing the current airspace through a clearance request and that there is no demonstrated need to free up the airspace for greater VFR traffic use without clearances, it is unclear to AusALPA why there is any requirement to change the airspace classification in Tasmania. This is supported by the OAR review.

AusALPA believes that this proposal will result in a degradation of safety rather than an enhancement without any significant operational efficiencies.

AusALPA, therefore, strongly opposes this proposal.

Yours sincerely,

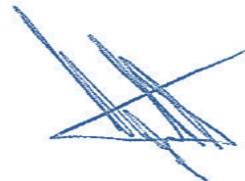


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