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Dear Ms Ryan

Feedback on the Aeronautical Information Publication Flight Priorities review – Australian Business Aviation Association Inc.

The Australian Business Aviation Association Inc. (ABAA) welcomes the opportunity to provide feedback on proposed changes to the Aeronautical Information Publication Australia (AIP) and appreciates the engagement opportunities provided during the current consultation process.

We would also like to acknowledge the considerable work the Department and the Working Group have committed to this review.

The ABAA notes and supports the Working Group's guiding principle of ensuring the continued safe and efficient flow of air traffic within the Australian airspace. We note the four proposed changes outlined in the *Draft AIP* and summarised as follows:

- **Prioritisation for Navigational and Instrument Flight Procedure Checks:** Aircraft conducting these checks, where prior arrangement has been made, will be prioritised to prevent any delays in required testing.
- **Prioritisation Based on Weather Conditions:** Aircraft that are able to make a successful landing based on weather conditions broadcast at the time will be prioritised over those that cannot. This will formalise an existing regulatory provision.
- **Prioritisation of Very Long-Haul International Flights:** In certain circumstances, these flights will be prioritised to mitigate avoidable diversions and emergency landings.
- **Expansion of Additional Priorities to Most Towered Airports:** This will further enhance the stability of the Air Traffic Management network. However, these priorities will not apply to the secondary metropolitan airports due to their unique traffic mix.

Source:
https://www.infrastructure.gov.au/have-your-say/aeronautical-information-publication-flight-priorities-review

The ABAA supports the first three proposed amendments. These proposed changes are logical, appropriate, and ostensibly aligned with international practice.

However, the association retains significant concerns regarding item 4, **Expansion of Additional Priorities to Most Towered Airports,** and does not support this proposal. Adopting this proposed change—outlined in item 6.2e of the *Draft AIP* document—would significantly impact Australia's business and general aviation operators, now and into the future.

If implemented, this would expand an already inconsistent set of priorities and extend the de-prioritisation of non-scheduled operators to many regional and significant city aerodromes, many of which are well-utilised by general aviation (GA) operators. If adopted, the change will increase operating costs, reduce efficiency, and increase fuel burn for a range of operators; small GA businesses are no more able to accept these cost implications than those in the airline sector.

This further de-prioritisation of non-scheduled operators seems anomalous to the *"first come, first served"* approach whereby *"aircraft first able to use the manoeuvring area or desired airspace in the normal course of its operations will be given priority".* It is at odds with the 2024 Aviation White Paper's recognition of GA and its contribution to Australian air transport and the Minister's commitment to growing the sector's future.

Consideration could also be given to whether the varied system of priorities is consistent with ICAO guidelines. Noting the overarching principles of safety and efficiency, the ABAA—whose members operate worldwide—supports an approach that reduces complexity and increases harmonisation with accepted international airspace management practices.

We therefore request that item 4, **Expansion of Additional Priorities to Most Towered Airports,** be subject to further and broader consultation so that the consequences for non-scheduled operators may be fully considered. In addition, it would be helpful to receive feedback on the background of this proposal so that we may better understand the Department/Working Group's intent. What are the drivers for change? What is the safety case, and, if adopted, where are the efficiencies expected to be achieved, and for whom?

In the interim, we provide the following comments for the attention of the Department and the Working Group as they continue the review process.

Our primary concern relates to 6.2e of the *Draft AIP* regarding other terminal areas and the priority given to scheduled air transport operations. Further to discussions with the Department, it is correct to note that scheduled air transport is prioritised within the corresponding aspect of the current AIP. However, this pertains to a limited number of airports. The proposed expansion of this priority is concerning, particularly when inconsistencies already exist within the current system.

As background, there are currently two different sets of priorities that vary depending on the airport in use.

At capital city airports where continuous Air Traffic Flow Management (ATFM) requirements are in place, this hierarchy of priorities (scheduled vs non-scheduled) does not currently apply if operators comply with their ATFM requirements. So, scheduled and non-scheduled flights have equal priority if they adhere to their COBT requirements at:

- Sydney
- Melbourne
- Brisbane
- Perth

In this example, no reference is currently made to scheduled or non-scheduled operations. The system is broadly accepted to be safe and efficient, and the principle of "first come, first served" is met.

However, at the following airports that fall into the category of "other Class C terminal control areas", scheduled operations have priority over non-scheduled operations. These are airports with radar facilities, and most of them have a considerable amount of GA and business traffic, including international operations.

- Darwin
- Adelaide
- Canberra
- Newcastle (Williamtown)
- Essendon
- Gold Coast
- Townsville
- Cairns

The issue is complicated further by the fact that many airports have Class C (radar) airspace overhead a Class D (procedural) terminal control zone or a non-towered CTAF airport. The transition between these two areas is normally at 4500ft, quite close to the airport. With the current AIP wording, scheduled operations are therefore prioritised in the airspace near the airport, even if the priority doesn't apply at the airport itself. These airports also rely on procedural separation standards between aircraft which are significantly more restrictive than those in Class C (radar) environments. This does not help the airports to process aircraft efficiently. These airports include:

- Hobart
- Launceston
- Tamworth
- Coffs Harbour
- Albury
- Sunshine Coast
- Rockhampton
- Mackay
- Alice Springs
- Broome
- Hamilton Island
- Avalon
- Karratha

If the wording of *Draft AIP* is applied, this priority for scheduled aircraft will apply for all operations, including on the ground, at the 21 airports listed in the above two paragraphs. There would be added implications if the number of towered aerodromes is extended in the future, via the further rollout of remote towers, for example.

The inconsistent application of priorities across Australian airports already causes delays for non-scheduled operators. Expanding this across a larger area would further constrain GA operators, including, but not limited to, those in business aviation.

We propose that the terms "scheduled and non-scheduled" should not appear within this section of the AIP. As mentioned, the priorities in play at major city airports of Melbourne, Perth, Sydney and Brisbane do not make this distinction and are accepted to work well.

One alternative to the current proposal would be to accommodate the first three proposed changes and, at the same time, extend the application of these major city priorities to cover all terminal control areas. Paragraph 6.2e could be removed and 6.2d amended to cover all terminal control areas, not just the Class C ones associated with the four major cities. For example, the paragraph could read:

6.2d. for flights in Class C and D terminal control areas, ATC will apply priorities in the following order;
(i) Long Haul flights from the Americas or Europe will be offered priority where practical when holding exceeds 10 minutes;
(ii) with equal priority, flights compliant with their ATFM requirements, flights exempt from ATFM measures and Medical Aircraft (HOSP) operations; and
(iii) flights not compliant with their ATFM requirements;
(iv) all other aircraft.
Note: Further information about ATFM procedures at Australian airports is available at ENR 1.9.,

or similar wording to the effect that the proposed first three amendments are accommodated and scheduled and non-scheduled operators are afforded equal footing on a *"first come, first served basis."*

Thank you again for the opportunity to provide feedback on this process. The ABAA remains available to engage with your office on any aspect of this submission or the AIP Review in general.

Yours sincerely

Jessica Graham

Jessica Graham
Chief Executive Officer
Australian Business Aviation Association Inc.