

Senator Barry O'Sullivan
Chair, Senate Standing Committee on
Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
CANBERRA ACT 2600

Dear Senator O'Sullivan

Performance of Airservices Australia

Thank you for your correspondence of 28 November 2018 regarding Airservices' approach to Hobart's flight path redesign, Aviation Rescue Fire Fighting Services (ARFFS) at Brisbane and Adelaide, and digital air traffic control towers.

I have sought to address each of these issues below, and I look forward to answering any further queries of the Committee at the public hearing scheduled for 4 December 2018.

Hobart Flight Paths and the Aircraft Noise Ombudsman (ANO)

An update on progress in relation to the recommendations made by the ANO regarding flight path changes at Hobart is at **Attachment A**. This is also on our website and will be updated as progress is made against the recommendations.

As your correspondence notes, five of the 13 recommendations have been closed by the ANO. Airservices has provided evidence to the ANO for two further recommendations (9 and 12) and the ANO will continue to monitor Airservices progress before closing these recommendations. Work is ongoing for the remaining six recommendations.

Airservices is currently undertaking a comprehensive community consultation exercise as part of the Hobart Airspace Design Review. We engaged a community consultation specialist to advise us on best practice and lead the consultation. We have undertaken a social impact analysis to feed into the review, promoted our community consultation via newspapers, radio interviews, social media and website material, and recently completed a seven-day, 15 session consultation process in eight different locations to seek feedback from the community. The consultation period began on 1 November 2018 and is open until 21 December. We will carefully consider all feedback and hope to be in a position to make a decision on the final design in late January 2019.

We are putting the right foundations in place so that future community consultation on flight path changes is to the standard that the community expects. The ANO has commended Airservices for its efforts to address the concerns expressed by some in the Hobart community and has complimented Airservices on the positive actions taken to enhance its community engagement approach.

Aviation Rescue Fire Fighting Services (ARFFS) – Brisbane and Adelaide airports

Airservices supports the use of task resourcing analysis to determine ARFFS staffing levels, and has used this approach to underpin development of staffing levels for many years.

Internationally, Airservices supported the development of the International Civil Aviation Organisation (ICAO) current Task Resource Allocation (TRA) methodology, now formalised as a recommended practice by ICAO, and both Airservices and CASA support the introduction of ICAO TRA methodology into the Australian regulatory framework. This is being progressed as part of the Government's current review of Part 139H of the Civil Aviation Safety Regulations.

In early 2019 Airservices will implement a TRA framework based on the latest ICAO guidance material, and benchmarked against other international ARFFS providers. Location specific reviews at every ARFFS location nationally, including Adelaide and Brisbane, will commence in 2019.

Current approved ARFFS staffing levels at Brisbane and Adelaide (and all other locations across Australia) were developed by Airservices, and approved by CASA, using a risk assessment process that is based on task resourcing.

The current review of the Adelaide staffing roster, which is seeking to understand why rostered staffing numbers at Adelaide are considerably above the staffing levels approved by CASA, will be informed by the TRA methodology. No changes to current staffing numbers will be made until they are assessed against the TRA framework after it is introduced in early 2019.

In that context of the above information, the advice provided to the Committee that CASA uses ICAO TRA in determining operational staffing levels is incorrect – CASA does not determine staffing levels (this is the role of Airservices; CASA has an approval role), and Airservices is still developing an ICAO-based TRA framework.

Digital air traffic control towers

Airservices has established a program to examine the possible introduction of digital aerodrome services into Australia, also known as digital air traffic control towers. The intent of the program is to safely utilise technology to assist our air traffic controllers, enhance service delivery and provide improved safety outcomes for the aviation industry and the travelling public.

Digital air traffic control technology is recognised by ICAO's Global Air Navigation Plan and its use is expanding rapidly globally, being trialled and implemented at a number of aerodromes around the world including Heathrow (UK), Changi (Singapore), Saarbrücken (Germany), London City airport (UK), Bodø (Norway), Sundsvall (Sweden) and Leesburg (USA).

Airservices program is in its infancy and is being progressed in a very measured way, taking a staged approach. We have developed a concept of operations, and have now approached the market to seek information on the technology options available to meet Airservices stringent operational and safety performance standards in order to commence an operational trial.

This trial will enable Airservices to determine the suitability of the technology, carefully considering any risks that emerge, as well as validating the range of potential benefits this technology offers in terms of service continuity, safety and the efficient delivery of world-class air traffic control tower services. Of particular note, the trial will allow exploration of the opportunity provided by the technology to improve safety at regional aerodromes, particularly those that do not currently have an air traffic control tower.

Subject to the successful outcome of the trial, Airservices would commence a thorough program of work to progress to operational implementation, supported by the appropriate safety analysis, a business case, and necessary regulatory approvals.

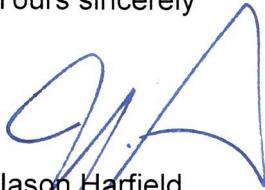
Airservices appreciates the Committee's concerns relating to data security and I can reassure you that Airservices is investing heavily in measures to ensure our systems and data remain secure as technology develops. Our critical aviation infrastructure role, as well as our partnership with the Department of Defence for the OneSKY Australia Program, requires us to have the robust security arrangements. A digital tower system would be certified against the latest version of the Australian Signals Directorate (ASD) Information Security Manual as part of any implementation program.

I would be more than happy to arrange a demonstration for the Committee of the selected supplier(s) digital tower technology after the trial has commenced.

Also, I would like to reiterate an open invitation to the Committee to visit any of our air traffic control and/or ARFFS operations around Australia at the Committee's convenience.

I trust this information has been of assistance, and my colleagues and I look forward to addressing these matters in more detail at the 4 December 2018 hearing.

Yours sincerely



Jason Harfield
Chief Executive Officer
30 November 2018

Airservices' status and progress of Aircraft Noise Ombudsman (ANO) Hobart report recommendations

As at 30 November 2018

No.	ANO Hobart Recommendation	Status
1	Airservices should incorporate consideration of potential noise impacts from the commencement of flight path design and integrate that consideration throughout the design process.	Completed and closed by the ANO.
2	Airservices should review its environmental assessment criteria to ensure they are appropriate as a quantitative measure for analysis against the EPBC Act requirements and for assessment of social impact.	
	<p>ANO July-September 2018 Board Report:</p> <p>Ongoing - Airservices has advised that its actions to address this recommendation are 'in progress', including:</p> <ul style="list-style-type: none"> - it is reviewing its environmental assessment referral criteria to ensure it is appropriate and aligned to the EPBC Act requirements and when complete will seek the advice of the Department of Environment. This review will be completed by June 2019; - it is also developing social impact criteria for aircraft noise management, to be completed December 2018. 	<p>In progress and on track for completion by June 2019.</p> <p>There are two components to this recommendation. The first is the review and revision of the environmental impact assessment (EIA) EPBC Act criteria which is on track to be completed by June 2019. The second is the development of social impact criteria which was originally estimated to be completed by December 2018. Work undertaken has found these two bodies of work are inter-related and leverage off each other i.e. the social impact criteria is informed by the EIA assessment criteria and vice versa.</p> <p>These two components are being progressed as a package and both bodies of work are on track for completion by June 2019.</p>

No.	ANO Hobart Recommendation	Status
3	<p>Airservices should ensure that its additional analysis of social impact to form part of the Environmental Assessment:</p> <p>(a) includes a clearly defined purpose;</p> <p>(b) includes explicit commentary on social impact taking into account particular community history, context and sensitivities; and</p> <p>(c) incorporates a critically analytical assessment of the potential impact on the community of proposed change referring to both qualitative and quantitative values.</p>	
	<p>ANO July-September 2018 Board Report:</p> <p>Ongoing – Airservices has advised that its actions to address this recommendation are ‘in progress’, including:</p> <ul style="list-style-type: none"> - it has amended its Environmental Assessment template to document the more detailed social impact information required; - its subsequent stakeholder engagement plans will incorporate the appropriate social impact analysis and context; - it has contracted a social impact specialist firm to strengthen its community engagement planning; - this focus is already included in the re-engagement with Hobart stakeholders and the community. <p>Airservices’ work to address this recommendation is expected to be completed in Q4-2018.</p>	<p>In progress.</p> <p>Since Airservices began this work, we have identified dependencies with <i>recommendation 2</i> and the development of social impact criteria.</p> <p>Airservices is developing new templates and a new evaluation procedure which will include the outcomes of work identified at <i>recommendation 2</i>. As such, the timeline for completion has been adjusted to June 2019.</p>
4	<p>In undertaking its Environmental Assessments and preparing reports on those assessments, Airservices should:</p> <p>(a) ensure that all assessment criteria, for both EPBC Act purposes and for assessment of social impact, are clearly explained in its documentation in a way that makes clear their purpose, whether they are primary or secondary, the assessment methodology, and the consequences that follow if a threshold is exceeded.</p> <p>(b) explicitly document any assumptions made and explain the basis for each assumption.</p> <p>(c) explicitly document its consideration of change proposals against each of its stated criteria.</p> <p>(d) undertake a more nuanced assessment of whether a change is ‘significant’ in social impact or under the EPBC Act requirements, taking into account both quantitative and qualitative values so that a non-binary and more informative approach is taken to assessment against criteria; and</p> <p>(e) refer to or document all relevant information that forms the basis of its environmental assessment and conclusions in a single explanatory Environmental Assessment report.</p>	
	<p>ANO July-September 2018 Board Report:</p> <p>Ongoing – Airservices has advised that its actions to address this recommendation are ‘in progress’, and that its response is the same as for Recommendation 3.</p> <p>Airservices’ work to address this recommendation is expected to be completed in Q4-2018.</p>	<p>In progress.</p> <p>This recommendation has dependencies with <i>recommendation 2</i> (environmental and social impact criteria) and will therefore be completed by June 2019.</p>

No.	ANO Hobart Recommendation	Status
5	<p>Airservices should access, through recruitment or otherwise, skilled and experienced subject matter expertise in the practice of community consultation. Leadership should give prominent support to this expertise so as to promote its influence and effect on Airservices' better performance in community consultation.</p>	
	<p>ANO July-September 2018 Board Report:</p> <p><u>Ongoing</u> – Airservices has advised that its actions to address this recommendation are 'in progress', including:</p> <ul style="list-style-type: none"> - it has engaged a community engagement consultant; - it is conducting recruitment for a Group Community Engagement Manager who will be required to have community engagement experience and skills. Expected completion of this recruitment is Aug 2018; - external assistance may be sought on a case-by-case basis for other sensitive changes in the future. 	<p>In progress.</p> <p>Airservices has made significant progress with actions to address this recommendation, including:</p> <ul style="list-style-type: none"> - engaged expertise for the duration of the Hobart Airspace Design Review to provide social impact and consultation advice - finalising a comprehensive literature review of social impact assessment and community consultation methodologies across a range of industries to enhance internal processes and procedures - increased capability of the community engagement team through training and upskilling and access to community engagement specialists and expertise <p>A recruitment process was conducted in August 2018 for a Community Engagement Manager which did not find a suitable candidate. A second recruitment activity is underway and an outcome is expected in December 2018.</p>

No.	ANO Hobart Recommendation	Status
6	<p>Airservices should abandon its stated policy of making the Community Aviation Consultation Groups (CACGs) the primary site of its community consultation and instead, with the input and leadership of a skilled practitioner of community engagement, develop a community consultation strategy and guidelines to inform individual detailed strategies for individual changes.</p>	
	<p>ANO July-September 2018 Board Report: <u>Ongoing</u> – Airservices has advised that its actions to address this recommendation are ‘in progress’, and that its response is the same as for Recommendation 5.</p>	<p>In progress, see status update to <i>recommendation 5</i>.</p> <p>In addition, Airservices has demonstrated from its activities in Hobart that it is not using the CACG as its primary community consultation mechanism. Airservices has conducted face to face consultations across multiple locations in Hobart, utilised social media, websites, newspapers and radio networks and letters to community members registered with NCIS to promote its activities and is also seeking community feedback through submissions.</p>
7	<p>Airservices should develop a policy that, on those occasions when incorrect statements are made to the community or other stakeholders, it will acknowledge the error and remedy it.</p>	<p>Completed and closed by the ANO.</p>
8	<p>Airservices should ensure that, before deciding to propose a change and to commence to engage with a community about that change, it has acquainted itself with the context and recent history of that community and takes those matters into account in, as far as practicable, its decision making and in its engagement design.</p>	
	<p>ANO July-September 2018 Board Report: <u>Ongoing</u> – Airservices has advised that its actions to address this recommendation are ‘in progress’, and that its response is the same as for Recommendation 3. Airservices’ work to address this recommendation is expected to be completed in Q4-2018.</p>	<p>In progress.</p> <p>This recommendation has links to the development of social impact criteria which informs Airservices community engagement approach. As such, completion date has shifted to June 2019.</p>

No.	ANO Hobart Recommendation	Status
9	Airservices should, as part of its community consultation activity, approach the assessments and other material on which it bases its consultations from a critically analytical perspective so as to ensure that all relevant matters have been considered and the information provided to the community is timely, correct, relevant, transparent, comprehensive, consistent and logically sound.	Completed but not yet closed. ANO monitoring current activities prior to closing off recommendation.
10	In its Hobart SIDS and STARS Review, Airservices should consult with the community well in advance of settling its findings and recommendations. Airservices should take immediate steps to obtain the community's views on the most practical and effective ways to arrange this consultation.	Completed and closed by the ANO.
11	Where significant issues arise from complaints, Airservices should advise complainants and other stakeholders at the earliest possible stage of efforts being made, including investigation, to address concerns.	Completed and closed by the ANO.
12	Where Airservices identifies through complaints inconsistencies in information provided to residents and other stakeholders, Airservices should take early action to correct information given.	Completed but not yet closed. ANO monitoring current activities prior to closing off recommendation.
13	Airservices should not pre-empt the outcome of internal investigations in its responses to complaints by advising complainants that there is unlikely to be any change.	Completed and closed by the ANO.