

COMMENT on the AUSTRALIAN ATM STRATEGIC PLAN
MAKING ROOM FOR SPORT AND RECREATIONAL AVIATION
A STRATEGIC VIEW

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17/05/07

BACKGROUND and SUMMARY

Australia has the lowest overall air traffic density of any developed country. International analysis shows that Australia is unique in that most of our airspace will not encounter any air traffic management capacity limitations – even with no change to the ATM system – by 2025. Current ATM approaches and systems deliver excellent safety outcomes. Future development of the Australian Air Traffic Management system towards 2025 must concentrate on those higher traffic density parts of the system which these studies show will require upgrading to the next generation ATM system.

Australia is also unique in having substantial amounts of airspace which can safely and economically accommodate Sport and Recreational Aviation with freedom to develop in a manner not possible elsewhere in the world.

Some Overall Comments on Airspace Policy

Sport and Recreational Aviation welcomes and strongly endorses the thrust of the recent changes to airspace regulation introduced by successive Ministers over the past two or so years.

Specifically and particularly, Sport and Recreational Aviation supports the universal dependence on a risk management and cost benefit justification starting with Class G – no services – as the default airspace classification and any additional requirements justified on a risk management and cost benefit basis. This justification is seen by Sport and Recreational Aviation as central and fundamental to the way forward.

Strict adherence to this approach is essential not only to the delivery of good safety outcomes and lowest cost, efficient air traffic management – but documentation of this approach is the only means of demonstrating that this has been achieved.

The Significance of Sport and Recreational Aviation

Sport and Recreational Aviation is 15% of the total Australian aviation operation and 40% of the ‘not for hire and reward’ GA aviation. Almost all of this operation takes place in low density airspace – currently classified Classes E and G.

This rural industry attracts a substantial number of Australian participants as well as significant numbers of international pilots. Some 100,000 individuals participate in Sport and Recreational Aviation every year. Sport and Recreational Aviation is a significant contributor to the rural economy and – in the words of the locals – Sport and Recreational Aviation ‘drought proofs’ a number of important rural centres.

The Air Transport sector faces a serious lack of experienced trainee Air Transport pilots. Sport and Recreational aviation is a growing component of the industry able to provide pilots with considerable and very significant aviation experience. Any action which unnecessarily inhibits this sector is not in the interests of the Air Transport sector.

The airspace needs and desires of Sport and Recreational Aviation are different, and often diametrically opposed, to that of the rest of the industry and, particularly, the Air Transport sector.

Sport and Recreational Aviation understands and supports the Government's priority for both the safety of the travelling public and the efficiency of the Air Transport sector. However, Australia is fortunate indeed to have room to foster and develop both sectors.

THE IMPORTANCE OF A RISK MANAGEMENT APPROACH

If the ATM system is to meet the needs of all users then the implementation of ATM technology must be on a strict risk management and cost benefit basis – with equity of access and cost as essential outcomes.

All implementation decisions must meet the Minister's policy that Class G – no services – will be the default airspace and the implementation of a higher class of airspace or provision of services must be strictly justified on a risk management and cost benefit basis.

This requirement is fundamental to the way forward and is non-negotiable so far as Sport and Recreational Aviation is concerned.

Specifically the roll out of controlled airspace and such innovations as SWIM (System-Wide Information Management) and ADS-B – other than on a voluntary basis – must be strictly limited to locations and operations where these developments can be justified on a risk management and cost benefit basis

International analysis of the capacity of ATM systems shows that Australia has only very limited parts of the so called 'J' curve which will suffer capacity limitations requiring the implementation of next generation ATM systems by 2025. Roll-out of new technology or ATM approaches must be targeted to these already identified areas.

In implementing efficiency gains, the outcomes must be decided on a strict cost benefit basis with the needs of other airspace users – specifically Sport and Recreational Aviation – considered equally, particularly in low density airspace now classified as classes E and G.

ICAO REQUIREMENTS

ICAO is, perhaps necessarily, focused on the safety and efficiency of air transport in the complex and high traffic density airspace found in Europe and similar locations. If Australia is to reap the advantages of our large amounts of low density airspace, implementation of ICAO requirements or recommendations must also be subject to a risk management and cost benefit justification. Where these cannot be justified – Australia must file a difference.

CONCLUSION

The ASTRA ATM Strategic Plan is a long term policy document indicating ATM future trends and possible technology designed to provide certainty for future planning for those dependant on ATM services.

Implementation decisions must all be strictly subject to a risk management and cost benefit justification. This risk management and cost benefit approach is seen by Sport and Recreational Aviation as central and fundamental to the way forward.

These implementation decisions must meet the policy statement by the Minister, particularly that the default airspace classification is Class G – no services – and the implementation of any higher

classification of airspace or the provision of services must be justified on a risk management and cost benefit basis.

Australia has the lowest air traffic density of all developed nations and international analysis shows that, with the exception of a small area in part (only) of what is known as the 'J' curve, Australian airspace will not encounter any ATM capacity limitations with no changes to the system by 2025. Current ATM systems deliver good safety outcomes.

Implementation of changes to the ATM system must target those higher traffic density areas where analysis shows that next generation ATM systems are necessary.

Specifically and by way of example, the implementation of such initiatives as SWIM (System-Wide-Information Management) and ADS-B will be limited to those operations and locations where these initiatives can be justified on a risk management and cost benefit basis.

Except where required for international interoperability, ICAO requirements, particularly in airspace currently classified Classes E and G, must also be implemented subject to a risk management and cost benefit justification and, where not found justified, Australia must file a difference on that basis.

Finally, any efficiency or cost saving initiative must take account of the effect of those initiatives on other airspace users especially in Classes E and G and the right of free access to this airspace respected.

Specifically, implementation of initiatives designed to improve the efficiency and reduce costs to the Air Transport sector, such as user preferred trajectories and tracking, will take full account of the right of access and any increased cost to other airspace users – especially in low density airspace now classified Classes E and G.

RECOMMENDATIONS

1. That ASTRA and the Australian Airspace Policy Statement recognise the importance of Sport and Recreational Aviation and supports the strategy that airspace regulation must foster the development of this sector where and whenever this is possible, consistent with the Government priority for protection of the travelling public and the efficiency of the Air transport sector.
2. That ASTRA and the Australian Airspace Policy Statement recognise that Airspace policy in Australia must retain and build on the strict application of a documented risk management and cost benefit approach to all implementation decisions above the default of no services – Class G airspace.

The ATM Strategic Plan must make clear that the implementation of this plan will be strictly limited to the operations and locations which meet this requirement for a risk management and cost benefit justification.

3. Any ICAO requirement or recommendation not capable of a risk management and cost benefit justification, and which is not necessary to ensure international interoperability, must not be implemented and this risk and cost benefit analysis used as the basis for filing a difference.
4. Australia must not implement requirements which are over and above those implemented by ICAO unless these can be justified on a risk management and cost benefit basis.

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