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Sent by email to: atmfuturepolicy@infrastructure.gov.au

ASAC Response to ATM Policy Directions Paper

This response is submitted by ASAC, the Australian Sport Aviation Confederation representing the Air Sports Aviation organisations, including the Australian Acrobatic Club, Australian Ballooning Federation, Australian Parachuting Federation, Gliding Federation of Australia, The Hang Gliding Federation of Australia and the Model Aeronautical Association of Australia.

The response was prepared by Dr. R. J. (Bob) Hall. The Department may release the content, source and author of this submission.

Specific Comments by ASAC

ASAC welcomes the opportunity provided by the Department of Infrastructure and Transport to comment on the *ATM Policy Directions* paper. ASAC has long supported the view that the Department, under the authority of the Minister, must take a strong hand in the development of ATM Strategic Policy, and accordingly is very pleased to see this paper and the basic structure which is proposed. ASAC is particularly pleased at the officially recognised place of the restructured ASTRA in this proposal, and is very encouraged at the early success of this White Paper Initiative.

Further, ASAC has contributed to the discussion of this Policy Directions Paper in ASTRA and fully supports the comments made in the ASTRA response to these proposals.

However, ASAC would like to make two comments relevant to the paper and the processes described within this document.

1. Responsibility for the Strategic Plan

ASAC very strongly believes that the Department, though the APG and AIG, must take final responsibility for the ATM Strategic Plan. The current proposal described in this document has the Department only responsible for overall policy decisions. In discussion with representatives from the Department it is clear that the Department and the Minister expects that CASA, Airservices and the Industry, through ASTRA, will each propose a version of, or contribution to, the ATM Strategic Plan – from their own standpoint. It is equally clear that this area has competing demands and, therefore, that it can be expected that there will be differing views on matters of substance.



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Clearly the objectives of this plan require that a single plan be prepared and accepted by the whole of the Industry. ASAC believes that, it is only the Department, under the authority of the Minister and through the APG and AIG, which can resolve any differences in matters of consequence, and take overall responsibility for the final version of the ATM Strategic Plan. However important and competent CASA is in these issues, it is therefore not appropriate that the Department limit its involvement to "Policy Directions", devolving final responsibility for the ATM Strategic Plan to just one of the instrumentalities involved in this complex issue, namely CASA.

The APG and the AIG may be the mechanism but, this responsibility needs to be placed with the Department, under the authority of the Minister, since the APG has no decision-making authority.

2. The Importance of Risk Management Implementation Policy

Precisely because of the expectation that the several competing policy outcomes expected of this overall plan will result in competing demands on matters of substance, ASAC is particularly disappointed that the policy statement includes no reference to a requirement for a risk management approach in resolving these differences. It is ASAC's clear view that it is only with a strict adherence to a risk management justification in implementing any and all initiatives, that these competing demands can be resolved equitably and, most importantly, while achieving the very best safety outcomes. ASAC understands that this is already required by the White Paper and the AAPS but, nevertheless, insists that this policy matter is of such importance that it must be explicitly stated in such a policy document.

The policy document must require firstly, an Industry wide agreement on an overall 'Concept of Operation' and, secondly, a strict reliance on a risk management justification for any implementation programme designed to meet the needs of the agreed Concept of Operation. ASTRA believes that this must be the basis of the development of an ATM policy and plan, and must be included as a specific policy in this document. It is only by application of this approach that the multiple aims of the White Paper can be addressed while maintaining the very best safety outcomes.

CONCLUSION.

ASAC supports the overall conclusion reached by ASTA, namely:

"While the Paper correctly identifies the components necessary for an effective national ATM strategy, ASTRA considers that greater attention is needed to the underlying strategic processes and relationships before it is accorded the primacy that this initiative deserves."

Specifically, ASAC believes that this proposal does not go far enough on two important issues.

Firstly, CASA, Airservices, and the Industry via ASTRA, will all prepare their separate contributions to the overall ATM Strategic Plan. These contributions must be welded into an overall single ATM Strategic Plan adopted by all. The only body which can coordinate this process, and provide the final decisions, is the Department under the authority of the Minister, and implemented by the APG and the AIG. This final responsibility must go beyond the overarching policy decisions down to the broad details of the ATM plan, including the resolution of any significant differences in matters of substance.

Secondly, this strategic plan must start with an agreed overall Concept of Operation. In preparing this overall plan there will be many instances where sections of the industry have competing demands. These demands can only be resolved while delivering the best safety outcomes, by strict application of a risk management approach to achieve an agreed Concept of Operation. This approach must be a central component of ATM policy.

ASAC would be happy to further develop these comments if that was considered helpful

Bob Hall

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