



13 January 2025

The AIP Flight Priorities Working Group

Department of Infrastructure, Transport, Regional Development, Communications, and the Arts

Via email: [AirspacePolicy@infrastructure.gov.au](mailto:AirspacePolicy@infrastructure.gov.au).

To whom it may concern

The Regional Aviation Association of Australia (RAAA) welcomes the opportunity to provide feedback to the public consultation for the AIP Flight Priorities Review.

The RAAA represents over 120-member organisations including most of the regional airlines that operate across the country that fly into and out of the aerodromes that are the subject of the AIP Flight Priorities Review.

RAAA members have a long history of providing vital aviation services to regional and remote communities across Australia.

It is well understood and acknowledged that aircraft in Australia are typically prioritised on a 'first come, first served' basis by Air Traffic Control (ATC). However, from time-to-time other safety or operational needs require that the prioritisation of aircraft taking off and landing may need to be varied. This is well understood by all operators, Airservices Australia (Airservices) and the Civil Aviation Safety Authority (CASA). Examples include in emergency situations or where a medical flight may require immediate access.

The 'first come, first served' policy is also an International Civil Aviation Organisation (ICAO) recognised and endorsed approach to aircraft operations around the world. It is well understood and accepted and yet the rationale for recommending the change to the 'first come, first served' policy is unclear.

Historically the current system has worked and continues to work well. To ensure air traffic control can direct traffic safely and efficiently, AIP ENR 1.4 Section 6 Regulation of Flights – Assessment of Priorities (AIP ENR 1.4 – 6) already afford certain aircraft priority status in specific circumstances.

The RAAA acknowledges that the AIP Flight Priorities Working Group, made up of Airservices, CASA and the Department of Defence, has conducted a review of these procedures and wants to ensure these priorities remain fit for purpose.

The Working Group has identified four proposed changes they believe are required to ensure the safe and efficient flow of traffic in Australian airspace.

The RAAA provides the following feedback to the four Working Group proposed changes 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.*

**RAAA response:** Agree.

**RAAA Comment:** The RAAA understands that this already generally occurs. Airservices manages and oversees the annual program that conducts Navigational and Instrument Flight Procedure Checks. Due to

the nature of that program most Navigational and Instrument Flight Procedure Checks are scheduled, and the need is well understood. Any maintenance and subsequent testing are identified and scheduled to occur on specific dates and times due to the availability of specialised aircraft and crew. Airservices nav aids are scheduled for maintenance and subsequent flight testing follows when required. The RAAA believes that the current arrangements work well and is supportive of a reasonable and pragmatic approach to the timing of these important checks.

- *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.*

**RAAA response:** Conditionally agree.

**RAAA Comment:** The RAAA does not entirely agree with the proposed wording. As written, there is not sufficient detail or technical definition around what is meant by 'unable to make a successful approach'. It is assumed that an aircraft that is Category 2 (Cat 2) Instrument Landing System (ILS) equipped, or Cat 3 ILS equipped, and is being flown by appropriately certified pilots, will be prioritised over a Cat 1 ILS equipped and certified aircraft. Using Sydney airport as an example, of the five RAAA member airlines that fly into Sydney regularly there are three that are only Cat 1 ILS equipped and certified. Depending on the operational circumstances there is every chance a Cat 1 ILS aircraft may also be able to land as safely as a Cat 2 or Cat 3 ILS aircraft. In this case who will decide whether a Cat 1 ILS aircraft is not capable of a safe landing and is therefore prioritised behind a Cat 2 ILS or Cat 3 ILS aircraft? More information needs to be provided around the decision-making process, the decision criteria and who will be making the decision as to what aircraft can land and when.

- *Prioritisation of Very Long-Haul International Flights: In certain circumstances, these flights will be prioritised to mitigate avoidable diversions and emergency landings.*

**RAAA response:** Agree.

**RAAA comment:** As a matter of aviation safety the RAAA agrees that long-haul flights from the Americas or Europe should be offered priority where practical when holding exceeds ten (10) minutes. Noting the extended flight times these routes currently entail, and the planned future ultra-long-haul flights planned by some airlines and aircraft operators it is appropriate that these aircraft can land safely, and the airlines and aircraft operators can, when possible, avoid the cost and inconvenience of being forced to divert to an alternate aerodrome. It is important to note that all long-haul aircraft operators should be able to have access to this provision.

- *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.*

**RAAA response:** Disagree.

**RAAA comment:** The RAAA disagrees with the proposed change as it is currently proposed. It states: *for flights in other Class-C terminal control areas (excluding Archerfield, Bankstown, Jandakot, Moorabbin, and Parafield Control Zones), ATC will apply priorities in the following order: (i) with equal priority flights with a Calculated Off Blocks Time (COBT), scheduled air transport operations, State aircraft (other than training flights) and Medical Aircraft (HOSP) operations; and (ii) all other aircraft.*



This change is extremely broad and lacks definition, particularly the reference to 'most towered airports'. This revision will fundamentally change the 'first come, first served' policy. There is insufficient detail as to why the change is needed and any explanation or detail around that reason. It is also unclear as to what '*enhance the stability of the Air Traffic Management network*' means. Is there a known safety requirement that has been identified, and if so, is there a safety case to support the proposed changes?

Acknowledging that Archerfield, Bankstown, Jandakot, Moorabbin, and Parafield are not included there are a considerable number of towered aerodromes, where this change will potentially negatively impact the operations of RAAA member airlines, charter, and air work operators because they fall into the definition of (ii) all other aircraft.

These include impacts on business jets, air transport (charter), flight training and aerial work activities. There are numerous examples where our members are already experiencing airborne holding, extended tracking with subsequent fuel burn and/or ground delay penalties due to the operation of scheduled flights with priority.

Additionally, this change would not be aligned to other existing procedures already prescribed in the AIP.

In summary, the current system of 'first come, first served' is well understood and works well most of the time. The operational need, safety or otherwise, is not articulated in a way to allow for proper consideration of the proposed change. Therefore, additional industry consultation is required so that industry can be appropriately informed and understand why a change to the existing policy needs to be made.

Thank you once again for the opportunity to provide feedback into the proposed changes. I am happy to provide further detail or discuss further as required.

Kind regards

A handwritten signature in black ink, appearing to read "Rob Walker", is positioned below the text "Kind regards".

Rob Walker

Chief Executive Officer

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