



THE SENATE
**SENATE SELECT COMMITTEE ON COMMONWEALTH BILATERAL AIR
SERVICE AGREEMENTS**

Public Hearing – 22 September 2023

Question on notice

Civil Air

1 PROOF HANSARD, p. 36

Senator TONY SHELDON: Request for copies on Civil Air correspondence to external authorities re staffing.

Response from Civil Air: Please see attached letter of 28/06/22.

2 PROOF HANSARD, p. 35

Senator BRIDGET MCKENZIE: Request for info re Sydney Tower Movement Monitor (Aircraft movements)

Response from Civil Air: I am advised that the Movement Monitors use a running sheet. Depending on the preference of the MM that is on duty they can use either a digital version or a paper version of the running sheet.

They monitor the frequencies of both runways and then record the callsign each time a landing clearance or a takeoff clearance is issued - then use that to track the maximum 80 per hour.

They work on 76 as a maximum just in case there was any human error - and the " hour " resets every 15 mins, so they need to ensure it's below 80 regardless of if you count the hour from 0700 to 0800 or 0715 to 0815 or 0745 to 0845 , etc.



28 June 2022

Ms. P. Spence PSM
Chief Executive Officer and Director of Aviation Safety
Civil Aviation Safety Authority
GPO Box 2005
CANBERRA ACT 2601

Email:

Dear Ms Spence,

Re: Air Traffic Services Staffing Issues

Civil Air is the Association that represents civilian Air Traffic Service employees. We write to highlight issues of concern about the parlous state of staffing in Airservices.

The COVID-19 pandemic shut down international and intranational borders and significantly altered the aviation landscape from March 2020. Airservices moved quickly to protect its air traffic service staff and organised them into teams' rosters and effectively managed the continuation of safe air navigation whilst maintaining safe and healthy workplaces. There was no significant outbreak of infection and air traffic was managed admirably. This was a tremendous effort.

In February 2021, Airservices advised that they wanted to offer a Retirement Incentive Scheme (RIS) for Air Traffic Control and Aviation Rescue Firefighting employees between the ages of 55 to 65. Civil Air formally raised concerns about the impact of losing such a large and experienced group of controllers, particularly given the constant issues regarding adequate staff numbers. However, the early retirement scheme was approved, and 138 experienced Air Traffic Controllers have progressively left Airservices between October 2021 and 17 June 2022.

The rate of departure of trained ATCs has coincided with the rise in air traffic movements. Since 1 October 2021, there have been at least 213 separate occasions in which airspace and/or tower services were unable to be provided in accordance with ERSA-published hours. Whilst a handful of these instances were unavoidable (due to circumstances such as flooding, tower evacuations and facility failures), it is our opinion that the vast majority are directly attributable to Airservices not having a suitable number of qualified ATS personnel.

A closer examination of these closures reveals that nine unique enroute units have had to implement TIBA/TRA due staffing unavailability. Nineteen of Airservices twenty-seven towers have experienced closures as a result of staffing unavailability during this period. Port Hedland AFIS, and the now discontinued overnight SAFRA services into Rockhampton, Mackay, Launceston and Hobart, also experienced a significant number of closures. It is important to note that these closures are on top of the amended (reduced) hours that several Airservices towers are still operating – despite traffic levels approaching pre- COVID levels. One notable example being the Gold Coast; the tower continues to close early every day at 21.30L (vice 2300L) and we are aware that multiple RPT flights are arriving during this period every night without any ATC aerodrome services being provided.

Airservices also have a myriad of other projects occurring that require a significant staff resource over the coming months and years:

- New daytime surveillance approach services into Rockhampton, Mackay, Launceston & Hobart airports that commenced on 16 June 2022.

- Relocation of Sydney Terminal Control Unit from Sydney to Melbourne Centre, necessitating intensive training to enable staff replacement for the majority of SY-based controllers who do not wish to transfer.
- Introduction of the new Civil & Military Air Traffic Management System (CMATS).
- Probable Sunshine Coast surveillance approach service.
- Melbourne airport's new parallel runway.
- Brisbane basin airspace review and re-design.
- Introduction of Western Sydney airport and
- Continued reference to mooted 'airspace modernisation' changes, including introduction of increased Class E airspace across the east coast of Australia.

The pressure being brought to bear upon licence holders due to this situation of reduced qualified staff and 'must have' projects significantly increases risk for licence holders whenever they exercise the privileges of their licence. Civil Air has serious concerns about this situation. In nearly all operational units, there is an ever-increasing reliance on staff performing overtime to ensure the services can be provided. This is unsustainable as fatigue increases amongst the workforce.

By way of illustrating the issue, below is a sample of currently vacant shifts on various roster groups across the country between 1 July and 31 July 2022. Given this is outside the 7-day covid isolation and recovery window, we are confident that these vacancies can only be representative of widespread staffing shortfalls that are not solely related to short term illness as per Airservices' repeated public claims. It is expected that the majority of these shifts will need to be covered by use of overtime.

- Sydney TCU - >120 shifts
- Brisbane TCU - > 80 shifts
- Cairns TCU (including Rocky/Mackay approach service) – 73 shifts
- TAS approach – 33 shifts
- Melbourne Tower – 43 shifts
- Gold Coast Tower – 39 shifts
- Archerfield Tower – 24 shifts
- Monaro enroute unit – 50 shifts
- Gwydir enroute uni – 36 shifts
- Byron enroute unit – 31 shifts and
- Central enroute unit – 26 shifts

It is a requirement under the *Civil Aviation Safety Regulations 1998* for an Air Traffic Service provider to have a sufficient number of **suitably qualified** Air Traffic Control staff. Relevant sections are set out below:

172.110 Personnel

An ATS provider must have, at all times, enough suitably qualified and trained personnel to enable it to provide, in accordance with the standards set out in the Manual of Standards and the standards set out or referred to in Annex 11, the air traffic services covered by its approval.

172.115 Supervisory personnel

An ATS provider must have, at all times, enough suitably qualified and trained personnel who are able to supervise the provision of any air traffic service that it provides.

In 2013, CASA only granted Airservices an operating certificate for three years due to several issues related to personnel issues, airspace closures and management.¹

Our concerns about the current situation have been raised repeatedly with Airservices in consultative forums. We have

¹ 2013 Review of Airservices – CASR Part 172

been advised that Workforce Deployment 'has a plan' and indeed, Airservices is on the public record denying that there is a staffing problem.²

As recently as last week, Airservices claimed that they have the appropriate number of staff however, staff are located in the wrong locations. Civil Air is unable to determine which, if any, operational units have an excess of staff. Moreover, if Airservices claim is to be accepted then we believe that is a clear admission that they have contravened the regulations with respect to maintaining enough "*suitably qualified and trained personnel to enable it to provide the air traffic services covered by its approval.*" This is clearly evidenced by the number of airspace closure events already experienced and the challenging state of advance rosters. The decision made by Airservices' high-level management to remove 138 highly experienced and trained staff via the RIS program has no doubt resulted in the current state.

Civil Air continues to work closely with Airservices middle management to try and limit the impacts on both air safety and staff welfare and we intend to continue to work collaboratively and constructively with those managers directly responsible for day-to-day operations. However, we believe that we have no choice but to contact CASA as the Regulator with our concerns as this situation represents an alarming safety issue with consequent unfair pressure upon those operating in the system.

Yours faithfully,

James Walsh
Vice President Professional

² "ATC crisis to delay new, less noisy Brisbane Flight paths" B. O'Malley, South East Advertiser, 12 May 2022