

Audit Report No. 29, 2006-2007,
Implementation of the *Sydney Airport
Demand Management Act 1997*

Introduction

Background

- 21.1 Sydney Airport is a major international gateway and cargo airport and a key element of Australia's economic and transport infrastructure. It is set amid densely populated urban areas, relatively close to the city centre.
- 21.2 The following figure outlines monthly aircraft movements at Sydney Airport since 1998. It highlights the volatile nature of aviation demand, with the effects of the September 2001 terrorist attacks in the United States exacerbated in Australia by the collapse of Ansett Airlines. While aircraft movement growth at Sydney Airport has resumed, it is at a slower rate than prior to the events of September 2001 such that monthly movements have only recently returned to the levels observed before the Sydney 2000 Olympic Games.
- 21.3 Within the civil aviation industry, approaches to managing airport demand have evolved to improve the use of tightly constrained airport facilities. In this context, the International Air Transport Association (IATA) has developed procedures (called the Worldwide Scheduling Guidelines) to provide guidance on the allocation of available capacity and coordination of airline schedules. However, IATA has acknowledged that, where sovereign nations have in place legislation to govern the

management of demand, this legislation takes precedence over the Worldwide Scheduling Guidelines.

- 21.4 The *Sydney Airport Demand Management Act 1997* (SADM Act) provides the framework for the long-term management of demand at Sydney Airport. The SADM Act is intended to meet the commitment made by the Government prior to the March 1996 Federal election that aircraft movements at Sydney Airport would be capped at 80 per hour. In this respect, the requirements of the SADM Act take precedence over voluntary coordination practices advocated by IATA, and in place at other major Australian airports.¹
- 21.5 In the second reading speech for the legislation, Parliament was advised that the demand management arrangements would:
- help alleviate delays caused by congestion at Sydney Airport;
 - spread aircraft movements more evenly within hours;
 - safeguard the levels of access that regional New South Wales has to Sydney Airport;
 - provide for any potential new entrants to have equal access with their established competitors to slots at Sydney Airport; and
 - ensure a workable and effective means of administering the movement limit.
- 21.6 The demand management scheme for Sydney Airport comprises the SADM Act and legislative instruments made under the Act. The SADM Act limits aircraft movements at Sydney Airport to a maximum of 80 per hour. Each arm of the operational requirements created by the SADM Act is put into effect by legislative instruments made under the Act. The two most important are:
- the Slot Management Scheme, under which aircraft operators are required to seek a slot (a permission to undertake an aircraft movement) from the Slot Manager;² and

1 The voluntary coordination of scheduled movements between Australian Airports is a long-standing practice. International terminal coordination commenced at Sydney and Melbourne in 1971. Brisbane, Perth and Darwin airports followed suit, as have Adelaide, Townsville and Cairns as their international arrivals have grown.

2 The Slot Manager, Airport Coordination Australia Pty Ltd (ACA), was appointed by the Minister and is a proprietary company registered in New South Wales. At June 2006, the holders of its 1 000 issued shares were the Sydney Airport Corporation Limited (10 percent), Qantas Airways Limited (41 percent), Virgin Blue Airlines Pty Ltd (35 percent) and the Regional Aviation Association of Australia (14 percent).

- the Compliance Scheme, which requires operators to carry out authorised aircraft movements within a prescribed tolerance period before or after the scheduled slot time. The Compliance Scheme also deals with certain matters concerning the application of penalties to aircraft operators who operate aircraft without a slot or outside of the prescribed tolerances.
- 21.7 The combined action of these two instruments is intended to implement the movement limit, by controlling the scheduling of aircraft movements under the Slot Management Scheme and requiring timely performance through the Compliance Scheme.
- 21.8 The SADM Act commenced on 17 November 1997, with the movement limit and penalties for unauthorised aircraft movements coming into effect on 17 May 1998. Both the Slot Management and Compliance Schemes were made by determination of the then Minister for Transport and Regional Services during 1998. The Slot Management Scheme commenced operation on 25 March 1998, and the Compliance Scheme on 25 October 1998. Since the commencement of the scheme, there have been over 190000 regulated hours and approximately two million aircraft movements.
- 21.9 The Department of Transport and Regional Services (DOTARS)³ is responsible for the implementation and administration of the SADM Act. Airservices Australia is responsible for monitoring and reporting on compliance with the aircraft movement limit.

Audit Objective

- 21.10 The objective of the audit was to assess the implementation and administration of the movement limit and the Slot Management Scheme at Sydney Airport.
- 21.11 The scope of the audit included the development and administration of the Act. The scope also included the development and administration of the relevant legislative instruments and determinations, particularly those which put in place the monitoring and compliance frameworks that support the legislation.

3 The Transport and Regional Services Portfolio was formerly the Transport and Regional Development Portfolio. The name change occurred as part of revised administrative arrangements in 1998. For consistency, all references in this report are to the Minister for Transport and Regional Services (the Minister) and the Department of Transport and Regional Services (DOTARS).

Audit Conclusions

- 21.12 The primary purpose of the SADM Act was to give effect to the Government's commitment to limit aircraft movements at Sydney Airport to 80 per hour. DOTARS had primary responsibility for the development of the delegated legislation that gives effect to the SADM Act. In doing so, the Department consulted with a range of parties, including airlines and representative groups. This approach was necessary to meet the underlying policy goals that the slot management arrangements be workable in the industry's interests and be developed and implemented by the industry in a cooperative manner. In this respect, DOTARS has advised ANAO that the scheme is held in high regard by industry and that there is a high degree of voluntary cooperation. However, ANAO's analysis is that elements of the legislative scheme are unclear, do not operate in the way intended or are ineffective.
- 21.13 Slot allocation is a complex process that, for international airports, has to fit within a world-wide structure. Slots at Sydney Airport are currently allocated and managed in a manner that aligns closely with the Worldwide Scheduling Guidelines issued by IATA. The Worldwide Scheduling Guidelines acknowledge that, where sovereign nations have in place legislation to govern the management of demand, this legislation takes precedence over the Worldwide Scheduling Guidelines. However, the allocation and management of slots at Sydney Airport does not accord with the SADM Act and its subordinate legislative instruments.
- 21.14 Under the SADM Act, almost all aircraft operators who wish to land at, or take off from, Sydney Airport must apply for and be granted a slot under the Slot Management Scheme. Slot allocation has the capacity to ensure that movement limit breaches do not occur, depending on the number of slots allocated in any given period, and the timeliness of the subsequent aircraft operations. However, the Slot Management Scheme does not include an express limit on the number of slots that can be allocated, and there has been at least one occasion on which more than 80 slots were allocated in a regulated hour. In an environment of increasing aircraft movements, there is also a risk to future compliance with the movement limit in circumstances where slot allocations are made at or near 80 movements per regulated hour.
- 21.15 The intent of the Sydney Airport Compliance Scheme is that aircraft operators comply with the requirement to obtain a slot for a proposed aircraft movement and, having done so, take reasonable measures to ensure the proposed movement occurs as planned. The SADM Act established a system of penalties for unauthorised aircraft movements so

as to protect the integrity of the movement limit, and establish clear guides for airport users as to the range of sanctions that may be levied in the form of an infringement notice or civil prosecution.⁴

- 21.16 There is evidence of a high number of unauthorised aircraft movements (movements without a slot and movements outside the slot tolerances) having occurred at Sydney Airport. However, since the scheme commenced in 1998, no infringement notices have been issued to operators or other penalties applied.
- 21.17 In addition, there are other factors which indicate that the demand management scheme is not being administered as intended. These include:
- the Compliance Committee chaired by DOTARS has not effectively applied the Compliance Scheme's provisions for identifying unauthorised aircraft movements; and
 - some operators that have not been exempted by the legislation are, nevertheless, not required to submit data on their aircraft movements thereby enabling them to operate outside the jurisdiction of the scheme.
- 21.18 Further, the SADM Act requires Airservices Australia to monitor and report breaches of the movement limit to the Parliament through its Minister. However, reliable and accurate records do not exist to evidence past monitoring of compliance with the movement limit, and support the reports made to the Parliament. The available data indicates that some of the 61 reported breaches may not, in fact, have occurred. This data also indicates that there may have been many other, unreported, breaches of the movement limit. This position should be considered in the context of approximately two million aircraft movements since the commencement of the scheme. The available data shows that breaches occurred prior to September 2001 when there were higher overall numbers of aircraft movements at Sydney Airport. The risk of future breaches will increase when the scheduled numbers of aircraft movements at Sydney Airport return to pre-September 2001 levels.
- 21.19 Against this background, the management of aircraft demand at Sydney Airport needs to give more emphasis to the legislative requirements put in place specifically to manage aircraft movements. In this respect, Airservices Australia and DOTARS have already taken steps in a number

4 *Sydney Airport Demand Management Bill 1997*, second reading speech, House Hansard, 25 September 1997, p. 8536.

of areas to improve administration of the demand management scheme. These steps include:

- Airservices Australia is planning to introduce new technology to enhance its ability to meet its obligations to monitor aircraft movements at Sydney Airport. This is at least three years away and, in the meantime, other steps are underway to improve data collection, processing and reporting; and
- DOTARS has written to the Slot Manager and Airservices Australia reinforcing the primacy of the legislation over industry guidelines, emphasising the importance of delays being managed through the Compliance Scheme and stressing the need for operators to obtain a new slot where they are unable to use a slot on the day for which it was allocated.

21.20 Having regard to the improvement initiatives already underway, ANAO has made six recommendations relating to:

- The development and implementation of performance information and performance reporting that addresses the demand management scheme's objectives;
- addressing deficiencies in the legislative framework, including the fundamental issue of clear and effective aircraft movement definitions;
- implementation of slot allocation and management processes that comply with legislative requirements (rather than industry-preferred procedures) and promote adherence to the movement limit; and
- effective and equitable compliance arrangements that address all unauthorised aircraft movements.

ANAO Recommendations

Table 21.1 ANAO recommendations, Audit Report no. 29, 2006-2007

1.	<p>ANAO recommends that the Department of Transport and Regional Services promote the efficient and effective implementation of the demand management scheme for Sydney Airport by:</p> <p>(a) establishing performance measures for each of the scheme's objectives; and</p> <p>(b) reporting to the Parliament on the administration of the demand management scheme, including the extent to which the scheme's objectives have been achieved.</p> <p><i>DOTARS response: Agreed</i></p>
2.	<p>ANAO recommends that, in view of the importance of valid and effective aircraft movement definitions to the demand management scheme, the Department of Transport and Regional Services take steps to ensure consistency between the Compliance Scheme and the <i>Sydney Airport</i></p>

	<i>Demand Management Act 1997.</i> <i>DOTARS response: Agreed</i>
3.	<p>ANAO recommends that the Department of Transport and Regional Services seek to improve its ability to oversight the allocation and management of aircraft movement slots at Sydney Airport by working with the Slot Manager to:</p> <ul style="list-style-type: none">(a) implement arrangements that provide the Commonwealth with appropriate access to, and protection of, the records of the Slot Manager;(b) clarify the process for prioritising slot applications;(c) clarify the operation of the historical precedence provisions in the Slot Management Scheme so as to provide a sound basis for the allocation of movement slots to existing operators at Sydney Airport; and(d) oversight the slot allocation process in order that all the statutory rules governing historical precedence are applied. <p><i>DOTARS response: Agreed</i></p>
4.	<p>ANAO recommends that the Department of Transport and Regional Services work with the Slot Manager to enhance the rigour and effectiveness of the demand management scheme by:</p> <ul style="list-style-type: none">(a) identifying and evaluating options for obtaining movement data from all operators that use Sydney Airport, except those that are exempted from the scheme;(b) establishing and applying the necessary authority for varying, suspending or cancelling the Slot Management and Compliance Schemes in the event of major disruptions to the operations of Sydney Airport;(c) developing operational procedures for the Compliance Committee that apply the legislative requirements for identifying and assessing unauthorised aircraft movements; and(d) assessing options for obtaining greater assurance, on a risk management basis, as to the veracity of reasons given by operators for movements operating outside of their slot tolerances. <p><i>DOTARS response: Agreed</i></p>

The Committee's Review

21.21 The Committee held a public hearing on Wednesday 12 September 2007 with witnesses representing DOTARS, Airservices Australia, as well as representatives from the ANAO.

21.22 The Committee took evidence on the following issues:

- Legislative framework
- Movement cap breaches
- Definitions
- Data management and reporting mechanisms
 - ⇒ Data management
 - ⇒ Reporting mechanisms

- Improving agency compliance with legislation

Legislative framework

21.23 The Sydney Airport Demand Management Act (SADM Act) was assented to on 17 November 2007. The purpose of the act is to limit aircraft movements at Sydney Airport to a maximum of 80 per hour. Each arm of the operational requirements created by the SADM Act is put into effect by legislative instruments made under the Act. The two most important are:

- the Slot Management Scheme, under which aircraft operators are required to seek a slot (a permission to undertake an aircraft movement) from the Slot Manager;⁵ and
- the Compliance Scheme, which requires operators to carry out authorised aircraft movements within a prescribed tolerance period before or after the scheduled slot time. The Compliance Scheme also deals with certain matters concerning the application of penalties to aircraft operators who operate aircraft without a slot or outside of the prescribed tolerances.

21.24 The combined action of these two instruments is intended to implement the movement limit, by controlling the scheduling of aircraft movements under the Slot Management Scheme and requiring timely performance through the Compliance Scheme.

Movement cap breaches

21.25 The Committee was concerned that there had been inadequate reporting of breaches of the movement cap to Parliament, however, the Audit Report indicates there were severe deficiencies in data collection and data management that have led to confusion over whether or not cap breaches have actually occurred.

21.26 In the public hearing, the ANAO indicated that due to these data deficiencies, it was not possible to determine if there had been over 80

5 The Slot Manager, Airport Coordination Australia Pty Ltd (ACA), was appointed by the Minister and is a proprietary company registered in New South Wales. At June 2006, the holders of its 1 000 issued shares were the Sydney Airport Corporation Limited (10 percent), Qantas Airways Limited (41 percent), Virgin Blue Airlines Pty Ltd (35 percent) and the Regional Aviation Association of Australia (14 percent).

movements in an hour, or which movements were exempt movements and therefore should not be counted towards the cap.⁶

- 21.27 Airservices Australia acknowledged their system made it impossible to verify the true number of movements made per hour. As a result, they acknowledged there was a need to improve their data and records management procedures to not only monitor the total number of movements per hour, but also which movements were exempt from the cap.

They key learning from Airservices' perspective was the need to improve our data and records management. It was not that it was freely available; it was freely available but it was about our systems which are now designed to keep them for longer than the 30 days. That was key to the point: because we were not keeping them for longer than the operational requirement, that made it difficult to verify. We have now put processes into place to be able to do that and we have new technologies which are converting the paper strip technology to electronics, which will make this problem not apparent any more.⁷

- 21.28 The Committee inquired whether other agencies had found it difficult to access data, and sought an assurance that records would be available for Commonwealth officers in the future. DOTARS advised the Committee that they had had no difficulty in accessing the records to date, but that there were regulations being put into place for the making and keeping of records by the compliance committee and the slot coordinator.⁸

Definitions

- 21.29 The SADM Act defines aircraft movement as the landing of an aircraft on a runway, or the taking off of an aircraft from a runway.⁹

6 Mr Bond, ANAO. Committee Hansard, Joint Committee of Public Accounts and Audit, Review of Auditor-General's reports Nos 21 (2006-2007) to 3 (2007-2008), Wednesday 12 September 2007, p. PA21

7 Mr Dudley, Airservices Australia. Committee Hansard, Joint Committee of Public Accounts and Audit, Review of Auditor-General's reports Nos 21 (2006-2007) to 3 (2007-2008), Wednesday 12 September 2007, p. PA21

8 Mr Mrdak, DOTARS. Committee Hansard, Joint Committee of Public Accounts and Audit, Review of Auditor-General's reports Nos 21 (2006-2007) to 3 (2007-2008), Wednesday 12 September 2007, p. PA21

9 S33, *Sydney Airport Demand Management Act 1997*

- 21.30 To monitor aircraft movement, Airservices Australia recovers radar data which approximates the time at which an aircraft's wheels leave (for take-off) or first touch the runway (for landing).
- 21.31 The SADM Act does not explicitly define the terms *land* and *take off*, instead, they are defined in Schedule 1 as having the meaning given by the Compliance Scheme. The Compliance Scheme defines the terms as follows:
- An aircraft 'takes off' when it first moves after all external doors have been closed in preparation for flight; and
- An aircraft 'lands' when, after a flight, it comes to a standstill and the engines are turned off.
- 21.32 This has led to the situation of Airservices Australia, the organisation in charge of monitoring movement using a different definition of an aircraft movement to that defined in the Compliance Scheme established by the Act.
- 21.33 The usual rule of statutory interpretation is that the provisions of an Act cannot be undone by regulations or other instruments made under that Act. The purpose of this is to recognise the primacy of the Parliament and is intended to guide officials drafting and administering instruments made under the authority of an Act. A definition that is used in delegated legislation must comply with the requirements of the empowering Act unless the Act provides otherwise. In this case, the definitions of 'take off' and 'land' in the Compliance Scheme are inconsistent with the requirements of the SADM Act.
- 21.34 The Committee asked why there had been problems establishing standard definitions of aircraft movement, as standard definitions would improve the consistency of data available to assess the performance of the demand management scheme. The Committee was informed that the movement cap refers to movement on the runway,¹⁰ while the slot management scheme refers to movement from gates.
- 21.35 The Committee was advised that the slot management scheme's use of movement from gates was consistent with international practice, and that work to align definitions was in progress.¹¹
-

10 Mr Doherty, DOTARS. Committee Hansard, Joint Committee of Public Accounts and Audit, Review of Auditor-General's reports Nos 21 (2006-2007) to 3 (2007-2008), Wednesday 12 September 2007, p. PA24

11 Mr Mrdak, DOTARS. Committee Hansard, Joint Committee of Public Accounts and Audit, Review of Auditor-General's reports Nos 21 (2006-2007) to 3 (2007-2008), Wednesday 12 September 2007, p. PA25

Recommendation 39

The Committee recommends that a standard definition of aircraft movement be used for the purposes of administering and reporting on compliance with the SADM Act and that this definition directly relate to aircraft movement on runways.

Data management and reporting mechanisms

Data Management

- 21.36 The Committee notes one of the major points of the Audit Report was the lack of recorded information available to the ANAO to assess compliance with legislation. Further, the lack of recorded information made it difficult to assess the functioning of the slot management system and to prepare reports to Parliament on the slot management system.
- 21.37 As noted above, aircraft movement data is provided by both the slot coordinator, Airport Coordination Australia (ACA) and Airservices Australia. The data is then presented to DOTARS, with Airservices Australia analysing the data to report on compliance with the movement cap.
- 21.38 ACA commented in their response to the Audit Report that they had provided the Department with performance data since 1998, and pledged to cooperate to provide any further information required.
- 21.39 The Committee requested elaboration on data provision for performance measurement, and were informed by DOTARS that there were issues around the way the slot coordinator (ACA) dealt with data and records.¹²
- 21.40 The Committee inquired whether ACA was an outsourced organisation, and was informed that ACA was a limited liability company owned by the airport and airlines, a model consistent with overseas practice.¹³

12 Mr Mrdak, DOTARS. Committee Hansard, Joint Committee of Public Accounts and Audit, Review of Auditor-General's reports Nos 21 (2006-2007) to 3 (2007-2008), Wednesday 12 September 2007, p. PA19

13 Mr Mrdak, DOTARS. Committee Hansard, Joint Committee of Public Accounts and Audit, Review of Auditor-General's reports Nos 21 (2006-2007) to 3 (2007-2008), Wednesday 12 September 2007, p. PA19

- 21.41 The audit found that the slot compliance procedures were based on the International Air Transport Association (IATA) Worldwide Scheduling Guidelines, rather than the SADM Act. The Worldwide Scheduling Guidelines note that they are subordinate to any local legislation that applies, and, as such, the slot compliance procedures should have followed the requirements of the SADM Act, rather than any IATA guidelines.
- 21.42 The preference for IATA guidelines over legislation is of great concern to the Committee, and the Committee looks forward to seeing the ANAO recommendations implemented in full to ensure that Australian legislation rightfully takes precedence over IATA guidelines.

Recommendation 40

The Committee recommends that the SADM Act be used as the sole guide for slot compliance procedures.

Reporting mechanisms

- 21.43 The Committee each year approves the annual reporting requirements for Commonwealth Departments. One of these requires Annual Reports to include 'reporting of actual results against the specific standards for the outcomes and outputs set out in the PBS/PAES'.¹⁴
- 21.44 The Audit Report found DOTARS' reporting of its performance in administering the SADM Act has been minimal, and that there is no evidence that DOTARS has put in place mechanisms to measure the success of the Slot Management Scheme in meeting the remaining objectives outlined in the Minister's Second Reading speech. The ANAO found:
- no evidence of a performance information or evaluation strategy being developed as part of the policy development process;
 - no evidence of base-line data collection or systematic and ongoing reporting or relevant performance information; and

14 Department of the Prime Minister and Cabinet, *Requirements for Annual Reports for Departments, Executive Agencies and FMA Act Bodies* (Approved by the JCPAA under subsections 63(2) and 70(2) of the *Public Service Act 1999*), June 2005, p. 6.

- no evidence that the Department has formally evaluated the administration of the program or the outcomes that have been achieved.

21.45 Accordingly, the ANAO recommended that DOTARS establish performance measures for each of the scheme's objectives and report the administration of the scheme to Parliament.

21.46 DOTARS agreed to the recommendation and undertook to review its performance reporting regime and establish measures for the scheme's objectives as appropriate, and pledged to include performance information in the Department's Annual Reports.

Improving agency compliance with legislation

21.47 The Committee believes it is quite clear to see that there is very little compliance with the SADM Act, with the preference for use of the IATA Worldwide Scheduling Guidelines preferred. This situation is unacceptable, and it is vital to ensure agencies cooperate with the appropriate legislation for demand management at Sydney Airport – the SADM Act.

21.48 DOTARS indicated to the Committee that they believed the SADM Act actually performed two functions – controlling and capping runway movements at a maximum of 80 per hour, while providing an orderly planning regime for slot allocation.¹⁵

21.49 The Committee examined ways of improving the legislation, inquiring whether changes to legislation could be effected through regulation the primary legislation itself. The Committee was informed that the slot management scheme and compliance scheme were both statutory instruments, and that any changes in definitions would have to be effected through the primary legislation, requiring a package of amendments to the SADM Act.¹⁶ Further, the Committee was advised that legislative

15 Mr Mrdak, DOTARS. Committee Hansard, Joint Committee of Public Accounts and Audit, Review of Auditor-General's reports Nos 21 (2006-2007) to 3 (2007-2008), Wednesday 12 September 2007, p. PA25

16 Mr Doherty, DOTARS. Committee Hansard, Joint Committee of Public Accounts and Audit, Review of Auditor-General's reports Nos 21 (2006-2007) to 3 (2007-2008), Wednesday 12 September 2007, p. PA25

amendments had not yet been prepared, but that a bid for drafting had been placed at the time of the public hearing.¹⁷

- 21.50 It is of concern to the Committee that the SADM Act and its subordinate instruments did not completely align, resulting in the inconsistency of definitions. The Committee believes there are definite lessons to be learned from this experience, and that portfolio departments must ensure legislation is developed through the usual standard processes.
- 21.51 DOTARS conceded that the Audit Report had shown that the process could have more closely followed the procedure in the Act, and that the Department had established a working committee that included the compliance group and the slot manager. The objective of the working committee was to examine the operation of the arrangements with the goal of ensuring amendments to the scheme align with the requirements of both the compliance group and the slot manager.¹⁸
- 21.52 Further, DOTARS have indicated that while they are looking at amending the legislation to clarify definitions, they have also taken steps within the administration of the scheme through the slot manager to ensure that the administration of the scheme is consistent with the legislation.¹⁹
- 21.53 The audit revealed that the slot management scheme was focused on the gate movement time, rather than runway takeoff and landing times. Gate movement times are of little use in recording aircraft movements for the purposes of administering a movement cap, as there is often a considerable gap in time from an aircraft leaving the gate to actually taking off.

17 Mr Doherty, DOTARS. Committee Hansard, Joint Committee of Public Accounts and Audit, Review of Auditor-General's reports Nos 21 (2006-2007) to 3 (2007-2008), Wednesday 12 September 2007, p. PA26

18 Mr Doherty, DOTARS. Committee Hansard, Joint Committee of Public Accounts and Audit, Review of Auditor-General's reports Nos 21 (2006-2007) to 3 (2007-2008), Wednesday 12 September 2007, p. PA26

19 Mr Mrdak, DOTARS. Committee Hansard, Joint Committee of Public Accounts and Audit, Review of Auditor-General's reports Nos 21 (2006-2007) to 3 (2007-2008), Wednesday 12 September 2007, p. PA23

21.54 DOTARS indicated to the Committee that while both statistics are important, there was clearly a need to align and improve the data collection process to make sure both gate and take off/landing times are recorded.²⁰

Sharon Grierson MP
Committee Chair

August 2008

20 Mr Doherty, DOTARS. Committee Hansard, Joint Committee of Public Accounts and Audit, Review of Auditor-General's reports Nos 21 (2006-2007) to 3 (2007-2008), Wednesday 12 September 2007, p. PA25