



AIRSERVICES AUSTRALIA

Mr Andrew Snedden
Committee Secretary
Rural and Regional Affairs and Transport Legislation Committee
Parliament House
CANBERRA ACT 2600

Dear Mr Snedden,

I refer to your letter of 7 April 2003 in which you seek written comments or observations from Airservices Australia on the following Bills:

- Civil Aviation Amendment Bill 2003; and
- Aviation Transport Security Bill 2003 and related Bill.

I have no additional comments on the *Civil Aviation Amendment Bill 2003*.

My comments on the *Aviation Transport Security Bill 2003* and related *Bill* are attached.

Yours sincerely

B R Smith
Chief Executive

27 April 2003

Attachment: Airservices Australia Comments on the Aviation Transport Security Bill 2003 and Related Bill

AIRSERVICES AUSTRALIA
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**AIRSERVICES AUSTRALIA COMMENTS ON THE
AVIATION TRANSPORT SECURITY BILL 2003 AND RELATED BILL**

Accountability

Airservices Australia must be made accountable directly to the appropriate regulatory authority for security outcomes at its air traffic control and fire fighting facilities. We must not be held accountable by airports or other aviation industry participants for the physical or personnel security outcomes within our facilities on airside or landside security zones. Accordingly, Airservices Australia should have been designated as an *aviation industry participant*, along with airport operators, aircraft operators, cargo agents and the like. Clause 9 – Definitions should have explicitly included air traffic control and fire fighting service providers as 'aviation industry participants'.

Furthermore, Airservices Australia should be authorised to issue, like airports and airlines, its own Aviation Security Identification Cards so that it can effectively control access to its own facilities on airside and landside security zones, and arrange for the access to manned facilities and unmanned communications, navigation and surveillance aids in these zones.

Airservices Australia Facilities on Airside and Landside Security Zones

Airservices Australia provides both air traffic control and fire fighting services. Air traffic control services are provided using a range of tower and terminal services air traffic control facilities, such as towers, terminal services, navigation, aeronautical and aeronautical information centres. While these air traffic control and fire fighting services are adequately described under the general headings of *towers, navigation aids, critical facilities and critical structures* in both Clause 31 (Airside Security Zones) and Clause 32 (Landside Security Zones), the Bill could have more accurately described them as air traffic control facilities and fire stations.