

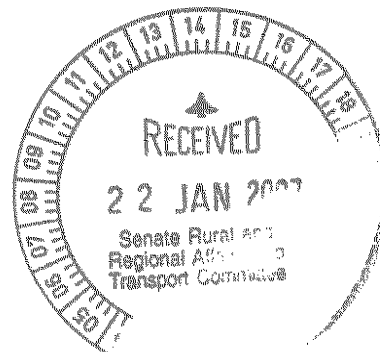


**NATIONAL SECRETARIAT**

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18 January, 2007

The Secretary,  
Senate Rural and Regional Affairs and Transport Committee  
PO Box 6100  
Parliament House  
CANBERRA ACT 2600



Dear Ms. Radcliffe,

**AIRSPACE BILL 2006**  
**Airspace (Consequential and Other Measures) Bill 2006**

I write in response to your letter dated 22 December 2006 inviting the Association to make a written submission addressing issues of our interest arising from the Bills. In the first instance I thank you and the 'Committee' for the invitation and opportunity to participate in the current Inquiry relative to the above subject Bills.

The Australian Airports Association (AAA) is a non-profit organisation founded in 1982 and represents the interests of over 255 airports Australia-wide from the local country community landing strips to the major international gateway airports. The Charter of the Association is to facilitate co-operation among all member airports and their many and varied partners in Australian aviation, whilst maintaining an air transport system that is safe, secure, environmentally responsible and efficient for the benefit of all Australians.

The AAA has considered the 'Airspace Bill 2006', particularly 'Part 2 – Australian Airspace Policy Statement'. We unreservedly endorse and support the assumptions and expectations highlighted in the summary. We should also mention that we wholeheartedly concur with comments made in the 'Explanatory Memorandum' to the Bill.

The establishment of an independent 'Office of Airspace Regulation' (or whatever the final title is determined to be) operating under the oversight of the Chief Executive Officer (CEO) of the Civil Aviation Safety Authority (CASA) should strengthen Australia's planning and administration of airspace. It will also negate any perceptions of a conflict of interest between Airservices Australia in its historic roles as both a commercial air navigation service provider and the regulator of that level of service.

Accordingly, it is the view of the AAA that CASA should administer and regulate Australian-administered airspace. We also believe the 'Office of Airspace Regulation' should operate independently under the oversight of, and report to, the CEO of CASA.

*It is incumbent upon the Government that the necessary additional funding be made available to CASA to efficiently administer the 'Office of Airspace Regulation' over and above its approved operating Budget.*

*On the issue of financial arrangements, the AAA wishes to raise one query relative to the 'Financial Impact Statement' presented in conjunction with the Bills. According to the 'Statement' the Department of Transport and Regional Services (DoTaRS) has sought funding of \$4.2M to establish an "administrative unit" to "include provision of advice on airspace policy and development and maintenance of the Australian Airspace Policy Statement". On what basis has DoTaRS determined the necessity for such expenditure and exactly what role will this "administrative unit" fulfil? Furthermore, how does the amount sought by DoTaRS compare with the funding to be made available to CASA to actually undertake the provision of airspace regulation and management?*

*Once the Bill is promulgated and the 'Office of Airspace Regulation' established within CASA we would be seeking clarification from CASA on how they intend to interpret Clauses 11 and 12 of the Bill. We would be placing particular emphasis on Clause 11 (2)(K) and Clause 11 (5).*

*The AAA encourages the Minister to make his 'Australian Airspace Statement' on the administration and regulation of, and policy objectives for, Australian-administered airspace, at the earliest opportunity.*

*In summary, the AAA supports the Minister with his 'policy statement' and endorses the establishment of an independent 'Office of Airspace Regulation' within CASA and for it to be directly responsible and accountable to the CEO of CASA.*

*Should it suit the purpose of the Committee, the AAA would welcome an invitation to discuss any of the foregoing in more detail at the forthcoming series of public hearings. Once again, we thank the 'Committee' for the opportunity to make a submission on behalf of Australian airports. In the interim, please be advised that the principal contact for any further immediate advice or comment on the content of this submission is the undersigned.*

*Yours sincerely,*



*Ken Keech  
Chief Executive*