

ARCHERFIELD AIRPORT CHAMBER OF COMMERCE INC.

Registered Office: 2nd Floor 380 Queen Street Brisbane
Postal: GPO Box 2511 BRISBANE QLD 4001
www.aacci.org.au
President: Mr Lindsay Snell Ph 07 32741477

30th June 2008

Committee Secretary
Senate Rural and Regional Affairs and Transport Committee
Department of the Senate
PO Box 6100
Parliament House
Canberra ACT 2600
Australia

Dear Sir Madam,

RE: INQUIRY INTO THE ADMINISTRATION OF THE CIVIL AVIATION SAFETY AUTHORITY
AND RELATED MATTERS

This letter is submitted with the authority of the Committee of Management of Archerfield Airport Chamber of Commerce Inc.

This submission includes the following attachments:

1. AACC Inc.'s Letter of 23rd June to Minister Anthony Albanese re section 21 (1) b direction
2. Attachments listed in letter 1 above
3. Confidential REPCON Report re Archerfield Airport
4. DVD of Channel Ten related to Safety issues at Archerfield Airport and CASA's dealing with those issues.
5. Archerfield Airport Plan View of Penetrating Structures
6. Archerfield Airport Cross Section of Penetrating Structures

Government, CASA and ATSB

CASA's adoption of and application of safety rules, modifies depending upon who is breaching the safety rules.

The attachments show the extent to which CASA is prepared to ignore safety where Airport Lessee Company profits are prioritised to safety.

As a CASA senior flight operations safety inspector put it to a member of our Chamber, "the worst offender for safety is the government itself".

He was at the time, referring to the sunken road cutting permitted constructed across the western end of runway 28R/10L on Archerfield Aerodrome, a Commonwealth owned but leased airport where three near fatal incidents have already occurred involving the cutting. (Refer DVD report).

It is clearly unsafe. CASA knows it to be unsafe as they have to rely on “grandfathering” clauses in Runway End Safety End (“RESA”) provisions in the “CASA Manual of Standards”, to be able to “exempt” the government and Archerfield Airport Corporation from their safety responsibilities to have a causeway built over it. The cutting was built to create access to a new non-aviation industrial estate on the airport, serves only non-aviation interests and aviators now have to suffer potentially fatal risks every take off and landing as a result.

CASA, is prepared to act against private developers in relating to structures many kilometres away from the airport (refer Courier Mail 27th June attached), however, CASA has not been prepared to act against Archerfield Airport Corporation who wilfully constructed buildings within the airport grounds on operational areas of the airport and dangerously too close to the runways. These actions breach a plethora of regulations designed to protect airspace at the critical stages of landing and take off.

Modification and or demolition are required by the regulations to mitigate risk, yet CASA won't act.

Also the ATSB cannot be independent because the Secretary of the Department appoints the Executive Director, and the ATSB does not report directly to parliament as is the case in many other countries.

Inquiries and Parliament

Unfortunately the attention span of the public and politicians is short, while the time required to accomplish lasting change usually requires years. Without constant pressure and the attention from the media, political attention turns to other matters and progress in critical safety issues begins to slow until public attention is raised by the next major incident. This “tombstone mentality”, that is, taking action to prevent accidents that have already taken lives, often involves mitigating risks that were already well known.

The “Fly, Crash, Fix Fly” sequence of safety is both wrong and tragic.

The House of Representatives Standing Committee on Transport and Regional Services presented a report in November 2003 entitled *Regional Aviation and Island Transport Services: Making Ends Meet*. Section 7 of that report concerned CASA administration issues with recommendations (Recommendations 23 to 28). Three and a half years later very little has changed:

- No Aviation Ombudsman yet for complaints
- No annual confidential client satisfaction survey with public reported results
- Attitudes of CASA Officers
- Endemic distrust of CASA
- Lack of service delivery and unnecessary costs to operators, destroying their businesses
- No ANAO report to parliament

The “Code of Silence”

There exists a “code of silence” within the general aviation industry because operators, approved test officers (“ATO”) and professional pilots know that those who speak out risk retributions from CASA as many CASA officers still consider CASA the “manager of aviation”, not just the safety regulator.

Is CASA dysfunctional?

Many within the aviation industry and CASA itself consider this to be the case. Areas of immediate concern are as follows:-

- Inconsistent application of the Regulations
- Lack of and waste of scarce resources
- Lack of qualified staff
- CASA staff have no clear direction or professional development path from management
- FOIs not able to maintain flying currency
- Inability of the regulator to attract appropriately qualified staff
- Lack of surveillance of ATOs to maintain standards

Yours faithfully

Archerfield Airport Chamber of Commerce Inc.



Lindsay Snell

President

Encl.

Plane fears over skyscraper

Des Houghton
June 27, 2008

From: The Courier-Mail

A 79-STOREY skyscraper now under construction in the centre of Brisbane has been branded a serious aircraft hazard by the Civil Aviation Safety Authority.

CASA has called on the Federal Government to veto approval of the Vision building in Mary St, saying it would intrude into the air corridor and cause a radar shadow at Brisbane Airport.

The Brisbane Airport Corporation also condemned the project, saying a 79-storey, 287m building posed a risk in the event of an "engine-out scenario" requiring a plane to have a longer climbing distance.

[Click here to read the full article on the website](#)

Alternatively, you can copy and paste this link into your browser:

<http://www.news.com.au/couriermail/story/0,23739,23928036-952,00.html>

Dear Sir / Madam

Please find attached the following documents forming this Chamber's submission.

1. AACC Inc.'s letter of submission to the enquiry dated 30 June
2. AACC Inc's Letter of 23rd June to Minister Anthony Albanese re section 21 (1) b direction
3. Attachments Listed in letter 2 above
4. Confidential REPCON Report re Archerfield Airport
5. Archerfield Airport Plan View of Penetrating Structures
6. Archerfield Airport Cross Section of Penetrating Structures

There is a DVD of Channel Ten related to Safety issues at Archerfield Airport and CASA's dealing with those issues. The DVD has been dispatched by express mail.

We advise the the REPCON Report is a confidential protected report and may not be released.

This submission is with the authority of the Committee of AACC Inc.

Yours faithfully
Archerfield Airport Chamber of Commerce Inc.
Ross Steele
Executive Officer
Ph 07 32200422

ARCHERFIELD AIRPORT CHAMBER OF COMMERCE INC.

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18th March 2008

Mr Kym Bills
Executive Director
Australian Transport Safety Bureau
PO Box 967
CIVIC SQUARE ACT 2608

Dear Mr Bills

RE: SAFETY - ARCHERFIELD AIRPORT AND REPORTED SYSTEMIC SAFETY ISSUES

We are aware that the ATSB has released Alert Bulletins on Archerfield Airport

As you are aware:

Section 23 of the *Transport Safety Investigation Act 2003* includes as a **transport safety matter** “(1) where a transport vehicle (a transport vehicle includes an aircraft) is involved in a near-accident; the transport vehicle is involved in an occurrence that affected, or could have affected, the safety of the operation of the transport vehicle and (2) also includes something that occurred that affected, is affecting, or might affect, transport safety”.

Section 21 of the *Transport Safety Investigation Act 2003* provides that the Executive Director may investigate any **transport safety matter** and must investigate any transport safety matter if directed by the Minister in writing.

Repon reports of incidents on Archerfield Airport, expert aerodrome engineering reports providing irrefutable proof of non-compliance with the *obstacle limitation surface* and *Manual of Aerodrome Standards*, unsafe RESA areas, systemic, and negligent non-compliance by the airport leasing company in connection with its responsibilities under regulation 4.11(3) of the *Airservices regulations* and other acts, regulations and the Commonwealth Lease, as listed in the reports already provided, should be more than enough information for yourself as Executive Director to form the view that you should commence an investigation pursuant to section 22 (1) of the *Transport Safety Investigation Act 2003*. We hereby request that you commence such an investigation forthwith.

We also enclose:

1. DVD copy of Channel 10 New's item report on Archerfield Airport aired 6th Nov. 2007
2. Copy of letter of the Parliamentary Secretary to the Premier of Queensland 11th March 2008
3. NOTAM C269/07 REVIEW 268/07
4. Table 7.1-2 from the Manual of Standards Part 139
5. Extract of 13th March 2008 ERSA Runway Distance Supplement for Archerfield
6. Extract of 13th March 2008 ERSA – Archerfield

CASA has advised the media in the news item enclosed that any claims of safety issues at Archerfield Airport were “baseless” and that there was a soon to be released report being prepared, yet Airservices at the direction of CASA had issued NOTAM C269/07 REVIEW C268/07, truncating the main runway and no such report has ever been provided to our Chamber, or to our knowledge prepared. The person from CASA who we believe made the statements to Network Ten was a Ms Michelle Harris.

Our members and the public would like to know, if, according to CASA their were no safety issues at Archerfield, (i) why did CASA direct Airservices to issue the NOTAM truncating the main runway, and (ii) how has CASA been able to form a view contrary to such expert opinion, (iii) where is the “soon to be released” report, and to explain why CASA has failed to exercise its powers to enforce the law.

Former DOTARS Minister Mr Mark Vaile and the Department of Transport and Regional Services, were advised of safety issues as early as 18th July 2007 and failed to take action against reasonably foreseeable circumstances that could give rise to harm to users of the airport and of immediate and grave operational safety concern.

Information being provided to Airservices by Archerfield Airport Corporation Pty Ltd continues to be produced in a careless manner and is a danger to air operations. We refer to the most current AIP items 5 and 6 above as attached which continues to have either missing, erroneous or misleading data.

- (i) Supplementary take off distance data (RDS) for Runway 28R is entirely missing
- (ii) RDS Runway 28 R should be shown as RWS Width 180, not 150
- (iii) RDS Runway 04L 22R should be shown as a code 3 runway not a code 2
- (iv) ERSA – Page FACB -2, has the Corporate Jet Hangars and QES obstacle completely missing from the list of Obstacles.

Further, runway 28R/10L, the main runway and the only runway with runway lighting, being a code 3 runway, cannot be legally used for night operations under current standards. (Refer MOS 139 table 7.1-2). Additionally no NOTAM has been issued covering this fact, resulting in operations currently being conducted at night contrary to standards.

Yours faithfully
Archerfield Airport
Chamber of Commerce Inc.



Lindsay Snell (President)

cc. Mr Anthony Albanese MP Federal Minister
Mr G Perrett MP Federal Member for Moreton
Parliamentary Secretary to the Premier of Queensland Mr Phil Reeves MP
Mr Tim Collits – Network Ten Senior Journalist



Australian Government
Australian Transport Safety Bureau

Reference: AI-2008-038

Mr Lindsay Snell
President
Archerfield Chamber of Commerce Inc.
GPO Box 2511
BRISBANE QLD 4001

Subject: SAFETY – ARCHERFIELD AIRPORT AND ALLEGED SYSTEMIC SAFETY ISSUES

Dear Mr Snell

I acknowledge receipt of your letters dated 18 March 2008 and 2 June 2008 to the Australian Transport Safety Bureau (ATSB).

The ATSB receives thousands of occurrence reports each year, with over 14,000 reports having been received and assessed last year. Of those, the ATSB assessed around 8,000 to be an accident or incident. However, the ATSB is only resourced to conduct up to 80 investigations each year. Clearly, hard decisions have to be made as to which transport safety matters are investigated and how ATSB resources can be best directed. Any decision to investigate is guided by assessment of a range of issues, including international obligations, the potential safety value that may be gained by conducting an investigation, on-board fatalities and/or serious passenger injuries, provision of support to state coroners, and the extent of resources available and projected to be available. The *Transport Safety Investigation Act 2003* provides clear discretionary powers for the Executive Director to make such decisions and emphasises independence in doing so.

Upon receiving your first letter, a Senior Transport Safety Investigator was directed to inquire into your safety allegations and provide any necessary recommendation for formal investigation. During April and May of 2008 that investigator made initial introductory contact with you and also with the Executive Officer of the Archerfield Chamber of Commerce Inc (AACCI). During this and further conversations, the process to be used for the inquiry into your allegations was explained, further information was received, updates provided and arrangements for future meetings agreed upon, accepted and then, disappointingly, declined by you.

Nonetheless, the ATSB inquiries continue in relation to the allegations involving aviation safety at Archerfield Airport that are contained within your letter dated 18 March 2008. At this time we have not found any non-compliance or lease issues associated with any of the safety allegations in your letter.

Specifically, your allegation of the “*NOTAM truncating the main runway*” was a safety response by Airservices Australia until further consideration was made in determining the status of a hangar that may infringe the ICAO Pans-Ops surfaces. This matter continues to be the subject of our inquiries.

Yours sincerely

A handwritten signature in blue ink, consisting of a large, stylized loop followed by a horizontal line extending to the right.

Kym Bills
Executive Director

6 June 2008

ARCHERFIELD AIRPORT CHAMBER OF COMMERCE INC.

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President: Mr Lindsay Snell Ph 07 32741477

2nd June 2008

COPY

Mr Kym Bills
Executive Director
Australian Transport Safety Bureau
PO Box 967
CIVIC SQUARE ACT 2608

BY REGISTERED MAIL

Dear Mr Bills

RE: OUR REQUEST FOR SAFETY INVESTIGATION ARCHERFIELD

On 18th March 2008 we wrote to you requesting you commence an investigation pursuant to Section 21 of the *Transport Safety Investigation Act 2003* in relation to safety issues and material provided to you.

A copy of that letter is enclosed.

Despite the passing of ten weeks we have not had the courtesy of your formal response acknowledging the letter nor have you provided to us your decision.

Should you fail to provide to us your formal response within fourteen days of the date of this letter or determine that you will not proceed with an investigation we will refer your actions to the Commonwealth Ombudsman.

Archerfield Airport
Chamber of Commerce Inc.

Lindsay Snell
President

Encl.

- ^c No actual ground survey required unless specifically required by procedure designer. Procedure designer will use topographical maps and tall structure databank to determine minimum altitudes.
- ^d Approach area up to this distance needs to be monitored for new obstacles. Refer to procedure designer's advice on significant high ground or tall structure that needs monitoring.
- ^e Distance to end of runway strip.
- ^f Or to the end of the runway strip, whichever is less.

7.1.3.5 The physical dimensions of the OLS surfaces, for take-off runways, must be determined using Table 7.1-2.

Table 7.1-2: Take-off runways

Take-off climb surface – Dimensions (in metres and percentages)	Take-off Runways Code number		
	1 [*]	2 ^a	3 or 4
Length of inner edge	60	80	180 ^c
Minimum distance of inner edge from runway end ^c	30	60	60
Rate of divergence (each side)	10%	10%	12.5%
Final width	380	580	1800 ^d
Overall length	1600	2500	15000
Slope	5%	4%	2% ^e

All dimensions are measured horizontally unless otherwise specified.

- ^{*} Runways used for RPT operations at night by aircraft with maximum take-off mass not exceeding 5,700 kg are required to meet code 2 standards.
- ^a For aircraft above 5,700 kg the survey area does not cover full extent of obstacle clearance required as specified in CAO 20.7.1B.
- ^b The length of the inner edge may be reduced to 90 m if the runway is intended to be used by aeroplanes having an mass less than 22,700 kg and operating in VMC by day. In this case the final width may be 600 m, unless the flight path may involve a change of heading in excess of 15°.
- ^c The take-off climb starts from the end of clearway if a clearway is provided.
- ^d The final width may be reduced to 1200 m if the runway is used only by aircraft with take-off procedure which does not include changes of heading greater than 15° for operations conducted in IMC or at night.
- ^e The operational characteristics of aircraft for which the runway is intended should be examined to see if it is desirable to reduce the slope to cater for critical operating conditions as specified in CAO 20.7.1B. If the specified slope is reduced, corresponding adjustment in length for take-off climb is to be made so as to provide protection to a height of 300 m. If no object reaches the 2% take-off climb surface, new objects should be limited to preserve the existing obstacle free surface or a surface down to a slope of 1.6%.

Archerfield
Runway 10I/28R

Archerfield
Runway
22L / 04R

7.1.3.6 Where two OLS surfaces overlap, the lower surface must be used as the controlling OLS.

Table 7.1-1: Approach Runways

Archerfield –
Runway 10L/28R
VFR

Archerfield
Runway 10I/28R
Instrument

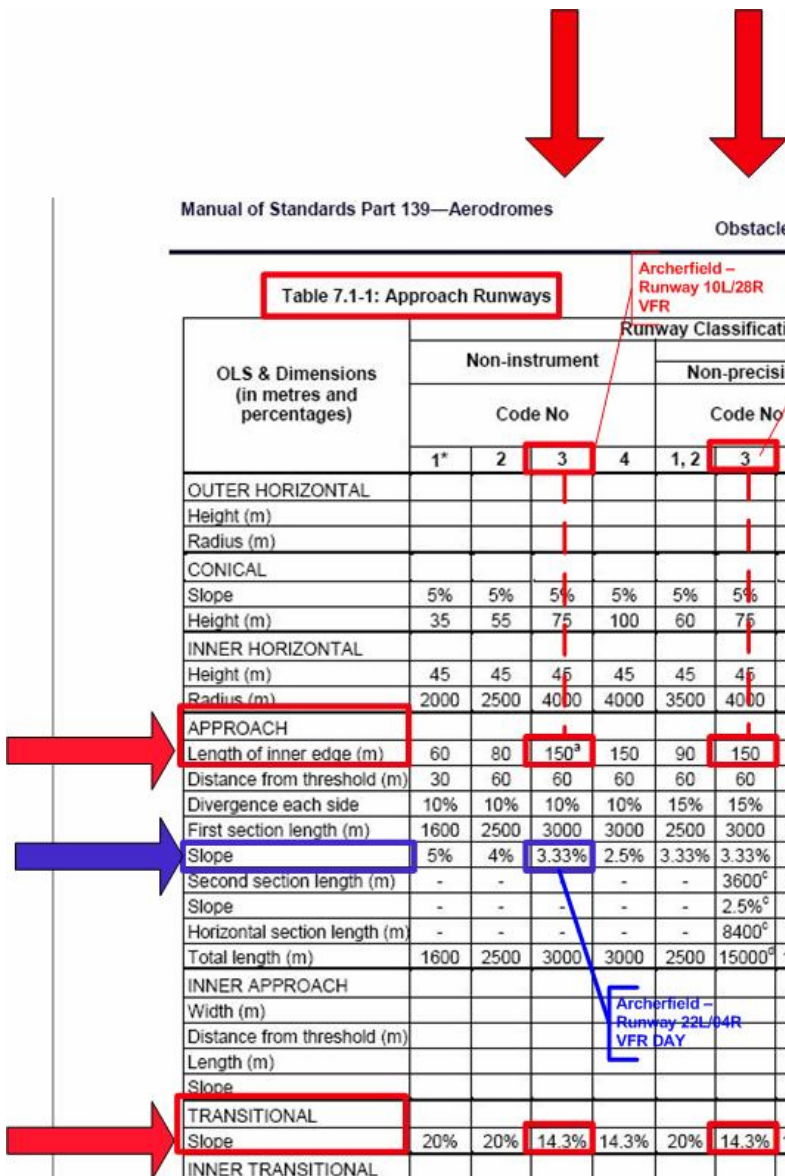
OLS & Dimensions (in metres and percentages)	Runway Classification									
	Non-instrument				Instrument					
	Code No				Non-precision		Precision			
	1*	2	3	4	1, 2	3	4	I Code No		II & III Code No
							1, 2	3, 4	3, 4	
OUTER HORIZONTAL										
Height (m)									150	150
Radius (m)									15000	15000
CONICAL										
Slope	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%
Height (m)	35	55	75	100	60	75	100	60	100	100
INNER HORIZONTAL										
Height (m)	45	45	45	45	45	45	45	45	45	45
Radius (m)	2000	2500	4000	4000	3500	4000	4000	3500	4000	4000
APPROACH										
Length of inner edge (m)	60	80	150 ^a	150	90	150	300 ^b	150	300	300
Distance from threshold (m)	30	60	60	60	60	60	60	60	60	60
Divergence each side	10%	10%	10%	10%	15%	15%	15%	15%	15%	15%
First section length (m)	1600	2500	3000	3000	2500	3000	3000	3000	3000	3000
Slope	5%	4%	3.33%	2.5%	3.33%	3.33%	2%	2.5%	2%	2%
Second section length (m)	-	-	-	-	-	3600 ^c	3600	12000	3600	3600
Slope	-	-	-	-	-	2.5% ^c	2.5%	3%	2.5%	2.5%
Horizontal section length (m)	-	-	-	-	-	8400 ^c	8400	-	8400	8400
Total length (m)	1600	2500	3000	3000	2500	15000 ^d	15000	15000	15000	15000
INNER APPROACH										
Width (m)								90	120	120
Distance from threshold (m)								60	60	60
Length (m)								900	900	900
Slope								2.5%	2%	2%
TRANSITIONAL										
Slope	20%	20%	14.3%	14.3%	20%	14.3%	14.3%	14.3%	14.3%	14.3%
INNER TRANSITIONAL										
Slope								40%	33.3%	33.3%
BAULKED LANDING										
Length of inner edge (m)								90	120	120
Distance from threshold (m)								* 1800 ^f	1800	1800
Divergence each side								10%	10%	10%
Slope								4%	3.3%	3.3%

All distances are measured horizontally unless otherwise specified.

* Runways used for RPT operations at night by aircraft with maximum take-off mass not exceeding 5,700 kg are required to meet code 2 standards.

^a 90 m where width of runway is 30 m.

^b 150 m if only used by aeroplanes requiring 30 m wide runway.





Office of the Premier

For reply please quote: 153067/NL01/ECP

11 MAR 2008

Mr David McGrath
Vice-President
Archerfield Airport Chamber of Commerce Inc.
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BRISBANE Q 4001

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Dear Mr McGrath

Thank you for your letter of 23 January 2008 concerning Archerfield Airport. I also refer to the letter of 10 December 2007 from your former President, Mr Humphrey Maltman. I have been requested to reply to you on the Premier's behalf.

Both the letter from you and the letter from Mr Maltman raise a range of issues regarding the lease arrangements at the Airport and the hardship being experienced by existing tenants.

As noted in previous correspondence, the Queensland Government is aware of the range of concerns arising from the change of Federal Airports Corporation management to private control on a commercial basis. I also understand that the Chamber has had a number of meetings with State representatives in relation to these issues.

The Queensland Government will continue to monitor activities at the Airport. However, the Queensland Government does not believe it is appropriate to intervene in the commercial operations of the Airport. As you also realise, many of the issues that you raise relate to the responsibilities of the Federal Government. To this end I have written to the new Federal Minister, the Honourable Anthony Albanese MP, attaching a copy of your correspondence for his consideration.

As a final point, your letter also mentions the Queensland Government's Emergency Services facility at the Airport and potential safety issues. I am advised investigations by the Civil Aviation Safety Authority have confirmed the facility complies with relevant requirements.

Again, thank you for bringing these matters to the Premier's attention.

Yours sincerely

A handwritten signature in cursive script that reads "Phil Reeves".

Phil Reeves MP
Parliamentary Secretary to the Premier of Queensland
Member for Mansfield

ARCHERFIELD AIRPORT CHAMBER OF COMMERCE INC.

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President: Mr Lindsay Snell Ph 07 32741477

23 June 2008

The Honourable Anthony Albanese MP
Minister for Infrastructure, Transport
Regional Development and Local Government
Leader of the House
PO Box 6020
House of Representatives
Parliament House
CANBERRA ACT 2600

BY REGISTERED MAIL

Dear Minister

RE: TRANSPORT SAFETY INVESTIGATION ACT 2003
SECTION 21 (1) b EXERCISE OF MINISTERIAL DIRECTION

On 18th March this year, our Chamber wrote to Mr Kym Bills, the Executive Director of the Australian Transport Safety Bureau requesting that pursuant to Section 21 of the *Transport Safety Investigation Act 2003* he commence an investigation (copy attached).

It was not until after our further letter of 2nd June, prompting Mr Bills of his lack of written response and advising of our intention of referring the matter to the *Commonwealth Ombudsman* that he responded. Mr Bills' letter, received 11th June, and our subsequent response of 18th June are also attached.

The *Airports (Protection of Airspace) Regulations 1998*, *Civil Aviation Safety Regulations 1998*, *Air Services Act 1995*, *Air Services Regulations*, and the *Airports Act 1996* ("the regulations") are enacted to protect operational airspace and safety around Commonwealth Airports, including Archerfield Airport, a leased Commonwealth Airport, and still a *Commonwealth Place*. The Obstacle Limitation Surface ("OLS") is to be maintained pursuant to the Government's international obligations under the *Chicago Convention* and given effect to by the hereinbefore referred to legislation. The Civil Aviation Safety Authority is the regulator and has the responsibility for enforcement.

We allege that:

- (i) There was a systemic failure to protect the airspace
- (ii) CASA knew that Archerfield Airport Corporation constructed buildings on the airport that breached the regulations and penetrated the OLS. In particular regulation 9 of the *Airports (Protection of Airspace) Regulations 1998*.
- (iii) There was failure to prosecute Archerfield Airport Corporation despite the law requiring mandatory fines of 250 penalty units as per section 99(2) of the *Airports Act 1996* for such breaches
- (iv) CASA compromised its mandate by allowing itself to be directed by the National Party DOTARS Ministers imposed "light hands" policy to overlook any safety matter that could impact upon the profitability of Airport Lessee Companies.

- (v) CASA failed to ensure that section 187 of the Airports Act 1996 was applied through the Federal Court to have court orders issued that the buildings be demolished or reduced in height.
- (vi) CASA directed Airservices to make technical changes in NOTAMS to restrict operations at Archerfield so that this illegal activity could have the appearance of being legal.
- (vii) That CASA is considering altering the Manual of Standards to permanently accommodate the ALC's illegal construction activity.
- (viii) There has been inappropriate interference of the ATSB to suppress the matter from investigation.

Honouring of Pre-Election Promises

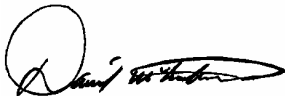
Former Shadow Transport Minister Mr Martin Ferguson, prior to the Federal Election and specifically on 23rd August 2007 made "on record" announcements to a special meeting of our membership, and to the aviation media that Labor would end the "light hands" approach of the National Party Ministers and would instead enforce the law, i.e. the regulations.

Mr Perrett, at the time, the Labor candidate and now the member for Moreton, made on camera undertakings just prior to the election repeating the policy announcements of Shadow Minister Ferguson.

Our members now expect to see delivery by Labor of those promises.

We request you inform Mr Bills in writing of your decision to require him pursuant to section 21 (1) b of the *Transport Safety Investigation Act 2003* to investigate the matter

Yours faithfully
Archerfield Airport
Chamber of Commerce Inc.



David McGrath
Vice-President
cc. Senate Inquiry into The Administration of CASA and related matters.

Windsock 74 m to Corner
New Building

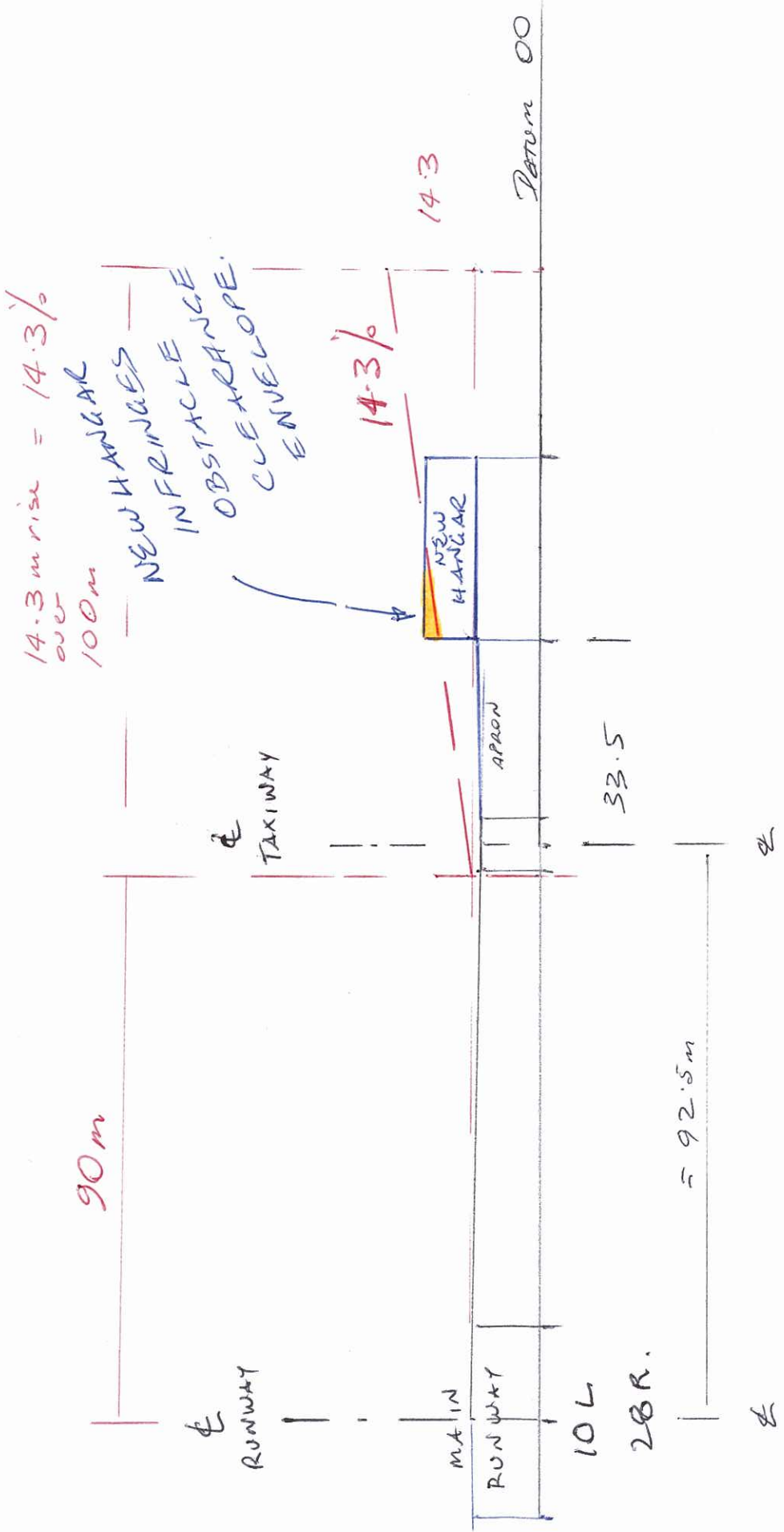
1:1000



10L

ARCHERFIELD AIRPORT 1:1000
 NEW "HANGAR" LOCATION

1:1000



YBAF - ARCHERFIELD AIRPORT

GAAF
BRISBANE

SECTION AT 1:1000 showing infringement of NEW HANGAR into obstacle clearance envelope.

Sketch by Clem Green
27.6.08