



28 March 2013

Mr Tim Hailes
National Manager Regional Aviation Weather Services
Bureau of Meteorology
GPO Box 1289
MELBOURNE VIC 3001

Dear Mr Hailes,

**RAAA Submission
Review of Aerodrome Forecast Services for the Aviation Industry
Draft Report.**

INTRODUCTION

The Regional Aviation Association of Australia (RAAA) is a not-for-profit organisation formed in 1980 as the Regional Airlines Association of Australia to protect, represent and promote the combined interests of its regional airline members and regional aviation throughout Australia.

The Association changed its name in July 2001 to the Regional Aviation Association of Australia (RAAA) and widened its charter to include a range of membership, including regional airlines, charter and aerial work operators, and the businesses that support them.

The RAAA has 30 Ordinary Members (AOC holders) and 71 Associate/Affiliate Members. The RAAA's AOC members directly employ over 2,500 Australians, many in regional areas. On an annual basis, the RAAA's AOC members jointly turnover more than \$1b, carry well in excess of 2 million passengers and move over 23 million kilograms of freight.

RAAA members operate in all States and Territories and include airlines, airports, engineering and flight training companies, finance and insurance companies and government entities. Many of RAAA's members operate successful and growing businesses providing employment and economic sustainability within regional and remote areas of Australia.

BACKGROUND

This review clearly notes among the critical stakeholders regional communities and regional airlines. The central thrust of the review's recommendations, however, is to substantially reduce services to those stakeholders with what the review itself says "comes at an economic and environmental cost". We say it also reduces regional infrastructure with consequent detrimental social impacts and potential reductions in safety.

Serving regional aviation, and through it, the people and businesses of regional Australia

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The core of the problem is underlying Government policy, which requires a user pays cost recovery model on the Bureau where that model is just not appropriate or reasonable.

That meteorological services to regional aviation should be funded on a cost recovery basis through the MSC ignores the public interest in these services beyond the simple provision of aviation services. It ignores the dependence on adequate aviation services of regional and remote communities. That dependence is real despite the lack of an effective market when the size of the user base is taken into account. The REX and Skytrans routes subsidised by the Queensland Government are a good example of a genuine need that could not be satisfied by a market based solution.

At the very time when great emphasis is being placed on improving national infrastructure and attempting to induce a population shift to regional and remote Australia, a draft review is published which proposes to reduce by some 50% one part of the infrastructure which makes such a shift possible.

What has happened in this review is that interests of the mainline carriers (Qantas, Virgin) have been pitted against regional aviation and general aviation. Although the review says it is “an aviation industry initiated review” (Executive Summary, page v), the truth of the matter is “the major MSC contributing airlines have requested that the Bureau contain the cost of its aviation service” (paragraph 2, page 5). This is perfectly rational response from the major carriers, but its impacts on regional aviation, and as a consequence on regional Australia, are highly detrimental.

The RAAA agrees that some services need to be rationalised and we make specific comment on particular closures, but a wholesale reduction of service is not a rational way to deal with part of the national infrastructure.

The RAAA does acknowledge that additional monies from the MSC are proposed to be spent on limited physical infrastructure being retained. However, the RAAA believes more physical infrastructure should be retained and appropriately upgraded to ensure services to regional and remote communities are not compromised. If the MSC is not appropriate or adequate to do this, an alternate funding mechanism must be found.

BASIC ISSUE

The Review proposes the closure of 78 TAF services, that is, 78 regional or remote aerodromes will not be provided with a forecasting service. It also proposes a reduction of services at a number of other aerodromes. This means that, in anticipated poor weather conditions, operators to those aerodromes will have to carry additional fuel to be able to return to their point of departure or to go to another aerodrome where a forecast is available. In the case of IFR flights proceeding to an airport with an instrument approach procedure which does not have a TAF available, additional alternate fuel will have to carry whether or not poor weather conditions are anticipated (AIP ENR 1.1 para 58.2.12.b. For obvious safety reasons most passenger carrying services are conducted under the IFR rules.

Additional fuel means a reduction in payload – passengers or freight. This is a potentially large economic cost to the operator because carrying additional fuel that displaces revenue generating passengers and/or freight increases the operating overheads and reduces the revenue.

Another problem is the 60 minute EDTO limit which applies the types of aircraft commonly used for regional and remote RPT services. Without TAFs at certain airports, no RPT service will be possible.

COMMENTS ON INDIVIDUAL AERODROMES

BOULIA (T)

Should be a strategic retention. Otherwise, IFR RPT would require alternate fuel.

CESSNOCK (T)

Given the traffic and micro-climate in the Hunter Valley should be retained.

COWRA (T)

Should be a Strategic retention, see comments under Young

GOULBURN (T)

It would appear that YGLB meets the threshold of 4000 movements. Avdata data for the period February 2012 to January 2013 shows 5351 landings. Those figures also show a strong growth over the 12 months. YGLB is the maintenance base for a large GA operator of turbine aircraft. It has two active GA flying schools, two active RAAus flying schools and a parachute school. In addition, the airport and its NDB are used by Sydney and Canberra operators for training.

JULIA CREEK (T)

Should be a strategic retention. Otherwise, IFR RPT would require alternate fuel.

LEIGH CREEK (T)

Should be a strategic retention. The SA Govt regards it as sufficiently important to subsidise the retention of AGAS and AVTUR at the aerodrome. It has a bi-weekly closed charter and the RFDS uses it frequently. In addition, it is used as an east-west staging point by private and commercial operators.

RICHMOND (QLD) (T)

Should be a strategic retention. Otherwise, IFR RPT would require alternate fuel.

THARGOMINDAH (T)

Should be a strategic retention. Otherwise, IFR RPT would require alternate fuel.

WINDORAH (T)

Should be a strategic retention. Otherwise, IFR RPT would require alternate fuel.

YOUNG (retain strategic)

Given closeness to Cowra, 31 nm, (with Cowra having an active flying school, busy air ag operator, 2 maintenance organisations, an aircraft factory and both an NDB and a VOR), Cowra would be a better strategic retention.

The RAAA appreciates the opportunity to respond to the Bureau of Meteorology's Review of Aerodrome Forecast Services For The Aviation Industry - Draft Report. If you require any further information, or clarification of any of the above points, please feel free to contact me on 02 6162 0305 or email ceo@raaa.com.au.

Yours sincerely,


Paul Tyrrell
Chief Executive Officer