

Evans Head Memorial Aerodrome Committee Incorporated



State Heritage Listed Evans Head Memorial Aerodrome World War II

30 June 2014

Comments on the Aviation Safety Regulation Review

1. My Committee appreciates the complex nature of the matters covered in the review.
2. While some attention was given to the problem of aviation safety and planning around aerodromes we do not believe that this important topic received the attention it deserves. The now out-of-date Australian Noise Exposure Forecast (ANEF) tool is being used as a **surrogate for safety zones** around many Australian airfields for planning purposes by both State and Local authorities. There is no evidence that a noise nuisance measure determined through political decision-making in the early 1980's is an appropriate metric or tool for determining the safety zones around airfields. It is inappropriate for planners to be using this measure to determine where structures will or will not be built relative to active runways, etc. Should there be a loss of a large hull on take-off or landing in a built-up area this question will undoubtedly be raised in any investigation particularly given that the current risk model being used in the industry is one of "affordable risk". This problem must be dealt with as a matter of urgency notwithstanding improvements in aircraft technology, etc. Safety zones need to be determined using appropriate empirical data such as those found in California Aircraft Accident Data sets. Boundary determinations need to be made by a Federal agency not State or Local governments who do not have the expertise. As it presently stands delegation of planning responsibility to State and Local authorities looks very much like rail gauge determinations of the 19th Century. There must be Australia-wide uniformity to ensure safety across Australia.

We note in passing interference by the 'big developer lobby' is Australian Standard 2021 with regard to the ANEF. This matter should be the subject of independent investigation given the use of this standard for planning purposes and determination of safety zones around airfields. Whose interests are being looked after here?

3. My Committee has dealt with the Department of Transport and Infrastructure under various names now for many years. In our view this Department has been very unhelpful and indeed obstructive, legalistic and heavily politicised. In our view aviation safety should be dealt with independently by an expert body arms length from government control. With regard to appointments to such a body there must be at least one person who is expert in human decision-making and human factors. It appears to us that such expertise seems to be wanting in many of the processes under review. There should be an *Amicus Curiae* developed by appropriate expertise in this area to inform decision-making.
4. We are very concerned about the affordable risk model being used for many decisions. There are better models which have not been canvassed. Safety should not be the subject of the political process of the day but a reflection of the best empirical information available.
5. Appointments to senior positions must not be on a short term contract basis. Those on contract are more likely to be responsive to political masters if they are seeking contract renewal. This is not good from a safety perspective. Contracts inhibit arms-length and fearless advice.



Dr Richard Gates, President