



Annual Report 2017-2018

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ANO role

The ANO provides independent administrative reviews of Airservices Australia's and the Department of Defence's management of aircraft noise issues, specifically focussed on three areas:

- Complaint handling
- Consultation
- Information provision

In addition, the ANO may undertake targeted reviews on systemic issues.

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1 From the Ombudsman

- 1.1 2017-18 has been my first full year as Aircraft Noise Ombudsman and I am proud of our accomplishments. Highlights include:
- completion of a major review of Airservices' management of flight path changes in Hobart, including its community consultation, flight path design, environmental assessment, complaint handling and information provision, which led to 13 recommendations, all of which Airservices accepted;
 - Defence's closure of all but one recommendation from the 2016 *Review of Defence's Aircraft Noise Complaints Management Systems*, including the successful introduction of its online complaint lodgement system;
 - 115 complaints handled, including 65 reviewed in detail, of which 23 led to a change being adopted by the agency; and
 - delivering eight training sessions with Defence on complaint management and participation in two training sessions for Airservices on community consultation
- 1.2 I foreshadowed in my last Annual Report my intention to focus on community engagement as a key aspect of aircraft noise management. It is sometimes said that aviation operates and may only continue to grow on the platform of its social contract. The community needs what aviation gives it in the form of movement of people and goods, its facilitation of broad economic growth and the economic opportunities it provides around airports. Aviation wants to expand and continue to grow and predictions made 20 years ago of passenger and freight movements doubling in 20 years still ring true.
- 1.3 For aviation to continue on its path of development and expansion, the social contract, and the accommodation it affords, must be actively guarded and fostered. Changes in technology; international standards; infrastructure development; political imperatives; community awareness, sophistication and mobilisation; communication and social media; research into annoyance, health and even happiness and wellbeing make this a dynamic and constantly changing space that requires the social contract to be regularly negotiated, recalibrated and discussed as change continues. This is what makes community engagement so important – and can make it so challenging at times.
- 1.4 Just as broader engagement with the community about aviation is important, conversations with the community about particular impacts of aviation or about particular changes or increases in impact must also be had, fostered and encouraged. Failure to engage in this way and failure to consult with the community will compromise the social contract that allows aviation to grow and, in particular, allows Airservices and Defence to do their important work of ensuring safety in the air and national security. Effective community consultation is the necessary glue for this important ongoing relationship between the agencies and the community – and between the community and aviation generally.
- 1.5 Planned developments at a range of airports, the planned airport at Western Sydney and introduction of the Joint Strike Fighters (all within the next decade) are just some of the changes that will demand a high level of community engagement awareness, understanding and expertise.

- 1.6 We appreciate how challenging community engagement can be. It can be difficult to establish trust and effective communication with communities and individuals. We are seeing both Defence and Airservices working hard to meet this challenge, drawing on specialist expertise and advice, investing time and resources to align their community engagement with current best practice. We encourage and are encouraged by this important work.
- 1.7 I commented in our last annual report that I was impressed by the care and effort that people in the community put into raising issues of concern and putting forward ideas about aircraft noise management. I have no less reason this year to express my thanks to those in the community who invest their time in engaging on these issues. Effective community engagement is not possible without a community that is prepared to engage.
- 1.8 Finally, I acknowledge and celebrate the small and dynamic ANO team. Tim Abberton, Kate Burmester and Kristy Ryan remain the engine room of the ANO's office. Their dedication and commitment make it possible for a team of just four part time people to discharge the varied and often onerous responsibilities of a national ombudsman. They have my heartfelt thanks.
- 1.9 I look forward to continuing to strengthen the ANO role in 2018-19, looking to the future and the challenges ahead.

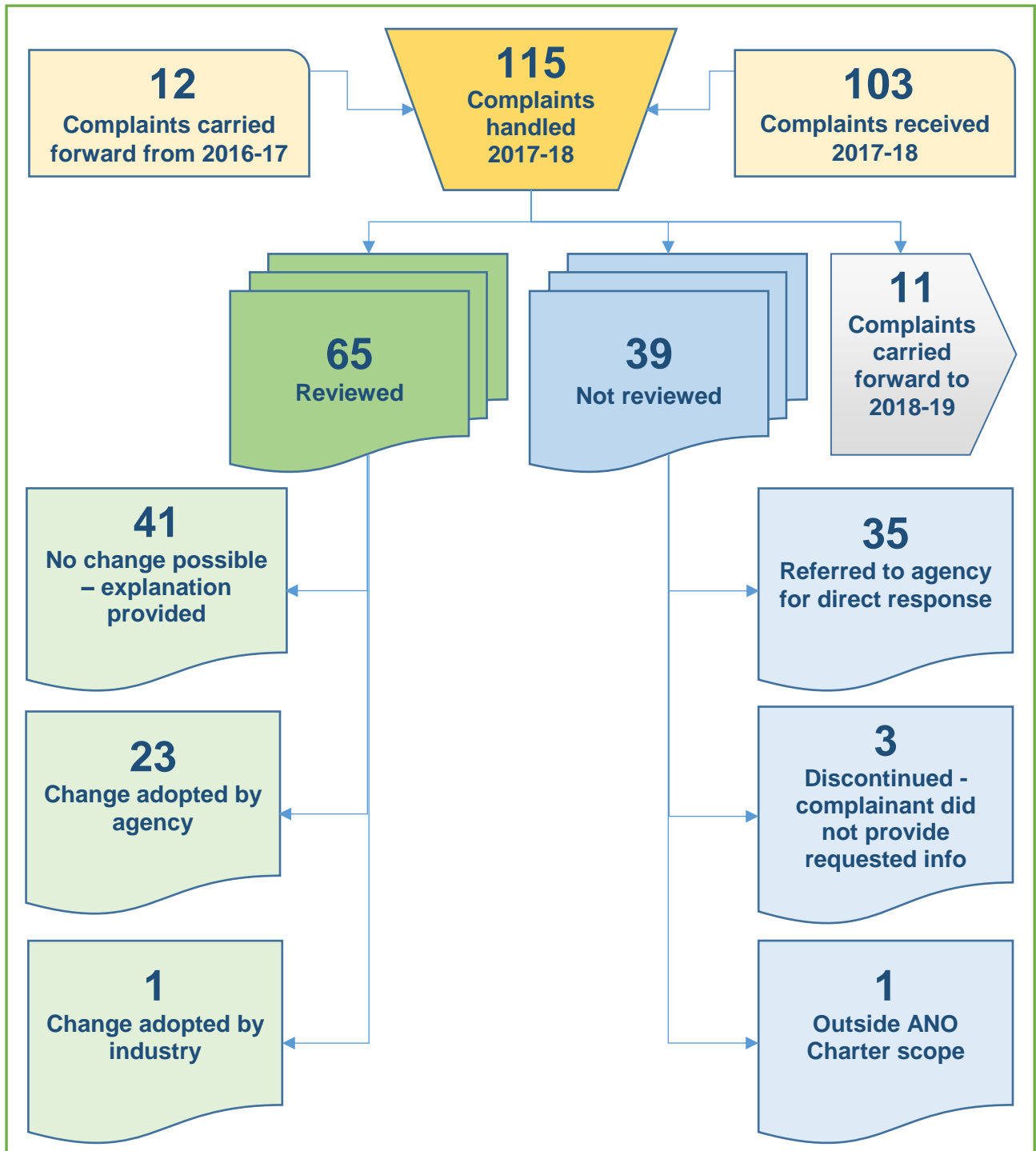


Narelle Bell
Aircraft Noise Ombudsman
6 September 2018

2 Complaints

Complaint statistics

2.1 The ANO received 103 complaints in 2017-18, which is down slightly when compared with the previous financial year. The following image shows how we handled the complaints.



2.2 **Attachment 1** provides a summary of ANO complaint statistics for 2017-18.

2.3 The table below shows the changes in the annual and per month average for ANO complaints received over time.

Table 1: Complaints received by financial year, with % change from previous year

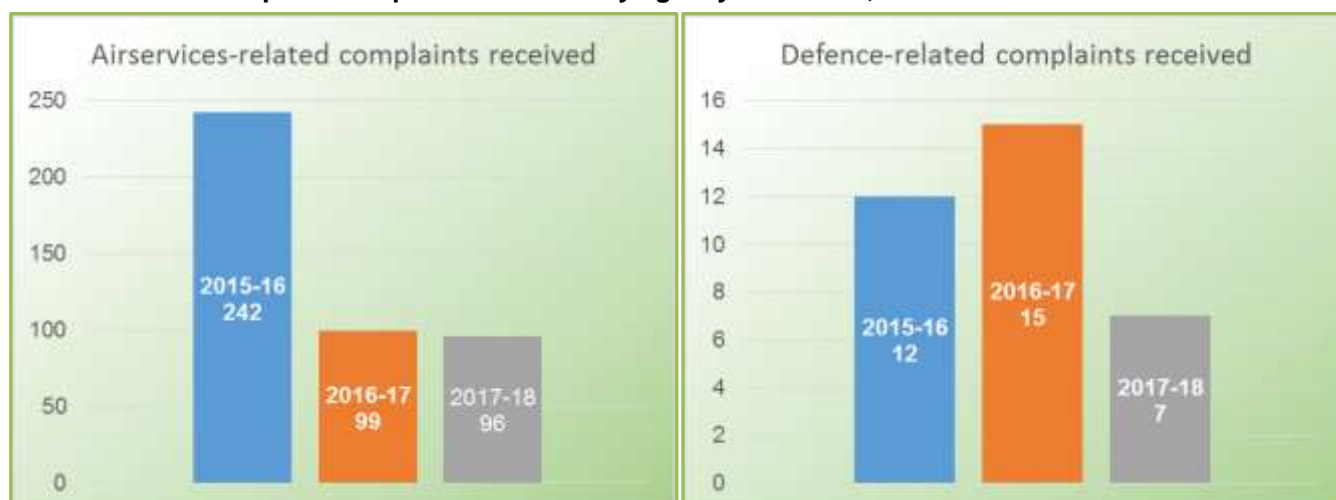
	Total fin. year	Ave per month	% Change
Sep 2010-Jun 2011 (10 mths)	101	10.1	
Jul 2011-Jun 2012 (12 mths)	109	9.1	↓ 10.1%
Jul 2012-Jun 2013 (12 mths)	88	7.3	↓ 19.3%
Jul 2013-Jun 2014 (12 mths)	106	8.8	↑ 20.5%
Jul 2014-Jun 2015 (12 mths)	239	19.9	↑ 125.4%
Jul 2015-Jun 2016 (12 mths)	254	21.2	↑ 6.3%
Jul 2016-Jun 2017 (12 mths)	114	9.5	↓ 55.1%
Jul 2017-Jun 2018 (12 mths)	103	8.6	↓ 9.6%

2.4 The reduction in complaints received in 2017/18 compared to the previous financial year is largely due to a halving in the number of Defence related complaints and a slim reduction in Airservices related complaints (see graph below).

Table 2: Complaints received by agency in 2016/17 and 2017/18

	Total Airservices	% Change	Total Defence	% Change
2016/17	99		15	
2017/18	96	↓ 3.0%	7	↓ 53.3%

Graph 1: Complaints received by agency in 2015/16, 2016/17 and 2017/18



- 2.5 The ANO started the financial year with 12 open complaints and received a further 103 complaints during the period. Of the total 115 complaints handled in 2017-18, we closed 104. Of these, we reviewed 65 complaints in detail, referred 35 back to either Airservices or Defence to respond to directly, closed three without review due to a lack of information from the complainant and closed one as it was outside the scope of the ANO Charter.

Table 3: Complaints reviewed versus total complaints handled over time

	Complaints handled	Complaints reviewed #	Complaints reviewed %
2011-12	120	88	73%
2012-13	120	82	68%
2013-14	128	75	59%
2014-15	253	58	23%
2015-16	271	120	44%
2016-17	131	70	53%
2017-18	115	65	57%

- 2.6 Of the complaints reviewed in 2017-18, more than one third (36.9%) led to a change and just under two thirds (63.1%) did not lead to any change (see table below). In the latter cases, the ANO, having investigated the issues, provided a detailed explanation to the complainant about why there was no practical change that we could identify for the short to medium term.

Table 4: Outcome of complaints reviewed by the ANO in 2017-18

Complaints reviewed and closed:	65	
No change possible - explanation provided	41	63.1%
Change adopted by Airservices/Defence	23	35.4%
Change adopted by airport operator	1	1.5%
Change adopted by operator	0	0%

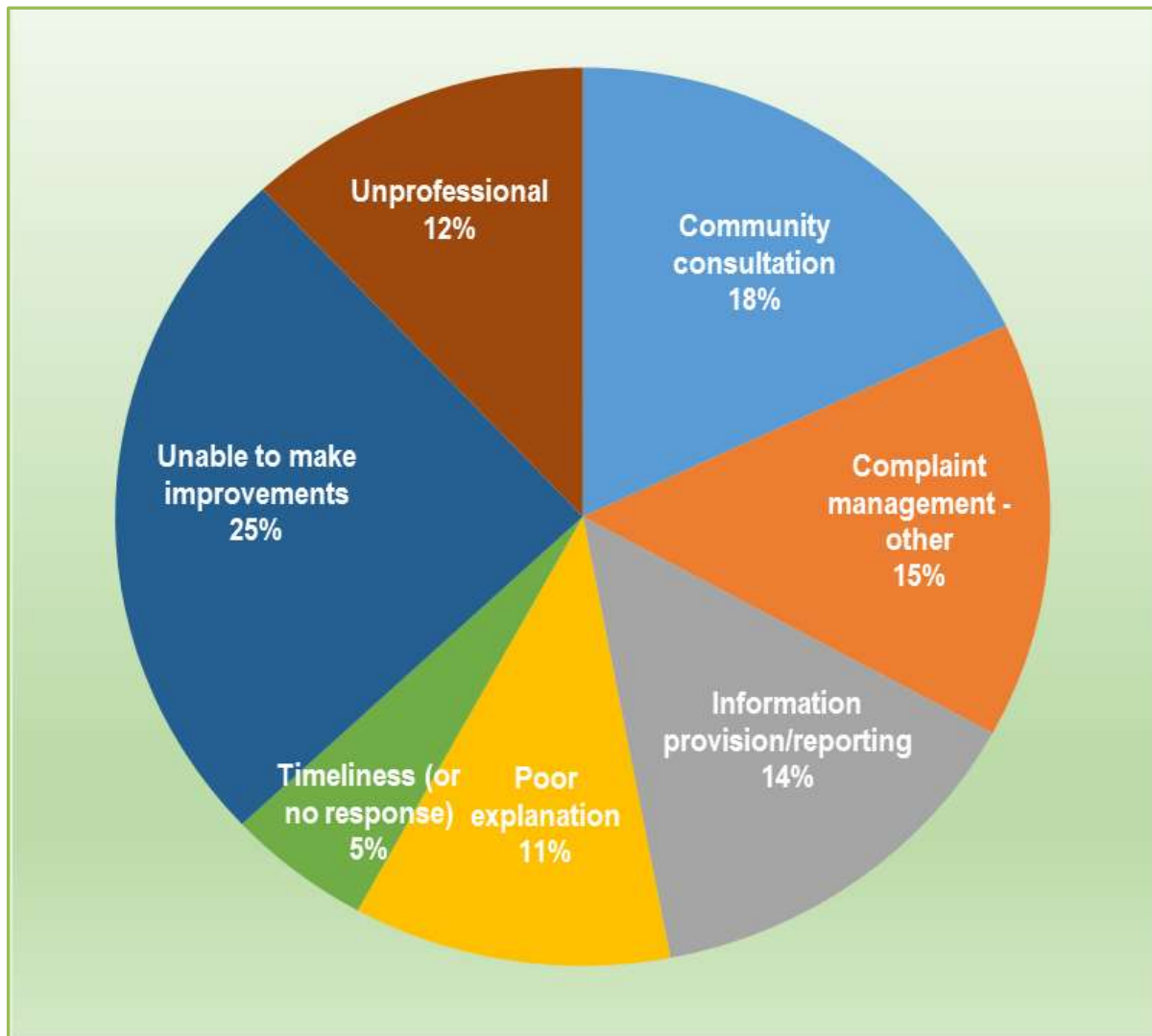
- 2.7 Seventeen of the 23 complaints that led to a change by Airservices/Defence arose from community reactions to new flight paths at Hobart Airport, introduced by Airservices in September 2017. This, and Airservices' community consultation performance, was the subject of a major investigation by the ANO and our report, *Investigation into complaints about the introduction of new flight paths in Hobart - April 2018* (including Airservices' response) was published in April 2018 on our website: <http://www.ano.gov.au/reportsstats/>. Airservices accepted all of the recommendations in the report and is taking steps to address these. Further discussion on this key review by the ANO office is included in section 5, *ANO Reviews*, of this report.

- 2.8 Two other Airservices-related complaints led to changes being adopted by Airservices. One was a flight path change for departures during the Sydney curfew period to operate further from the coast, providing a noise improvement for residents of Bundeena. A more detailed summary of this change is available in the Noise Improvements table at Attachment 2. The other complaint related to a perceived lack of professionalism by an Airservices staff member handling a call and a lack of clarity about the escalation process for the complainant to follow. Airservices undertook a thorough, thoughtful and sensitive review of the issues, which led to sensible findings and appropriate actions to address the particular issues raised.
- 2.9 Four Defence-related complaints led to changes by Defence. Three of these involved noise improvements and are described in detail in the Noise Improvements table at Attachment 2 (Pallarenda Queensland, Point Cook Victoria and Richmond New South Wales). The fourth case involved changes to consultation practices and information provision by Defence in relation to exercises being conducted in the Rockhampton area. This arose in relation to the Talisman Sabre 2017 exercise and complaints from landowners affected by aircraft transiting to and from the exercise areas, who had not received any prior information or consultation about the potential impacts. Defence recognised that they had only concentrated consultation efforts on those residents within the exercise areas. In response, Defence established an email distribution list of landowners in transit zones (based on current information) that they will use for consultations and information provision on future exercises.
- 2.10 The change adopted by an airport operator was made at the Gold Coast, where the airport decided to no longer permit the specific type of short scenic helicopter flight operations. This was in response to significant community concern that had been raised with the airport about the frequency and low level of such activities over residential homes near the airport. The airport engaged in numerous face to face consultations with local residents from the outset and attempted, over a period of time, to have the operator consider alternative arrangements for the operations. Residents had also raised their concerns with Airservices and subsequently with the ANO when Airservices' detailed investigation into the issues concluded that Airservices could not take any action.

Issues analysis

- 2.11 Issues were recorded only for those complaints that were reviewed by the ANO and reflect what the complainant reported as the main issue(s) in dealing with either Defence or Airservices. The aim of collecting this data is to allow the ANO to better identify systemic issues and to target areas for improvement.
- 2.12 For Airservices, the graph on the next page shows reported issues arising from complaints about Airservices that were reviewed by the ANO and closed in the 2017-18 financial year.

Graph 2: Concerns raised in complaints about Airservices in 2017-18



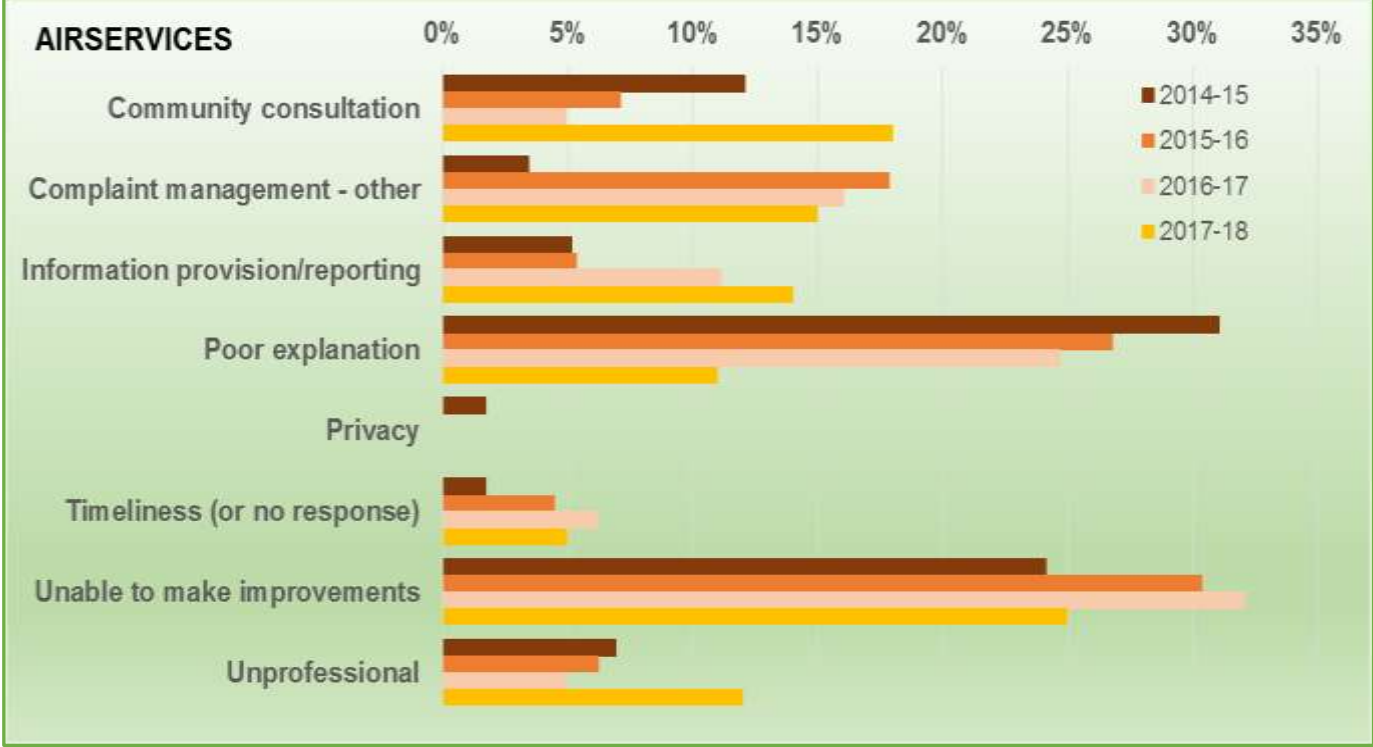
2.13 The graph on the next page shows how these figures compare with the issues raised in the three previous financial years. It shows that there has been a marked reduction in the 'poor explanation' category while there has been a substantial increase in concerns about community consultation and unprofessional complaint handling.

2.14 The ANO has seen Airservices continue to improve its suite of information packs and standard texts for responding to issues arising. This may have contributed to the reducing number of complainants identifying a poor explanation as an issue in complaints to the ANO. The increased concerns about consultation are driven in large part by complaints received from Hobart residents following Airservices' introduction of new flight paths without prior consultation with affected communities.

2.15 The 'unable to make improvements' category continues to be the issue raised most about Airservices' handling of aircraft noise issues. Complainants are seeking a review by the ANO of this determination. In doing so, the ANO tests the reasons Airservices gives for its determination and, in most instances, the ANO accepts the outcome of the complaint as handled by Airservices.

2.16 However, in some cases, when pressed to explain or expand on the reasons given, Airservices does identify alternatives that offer noise improvements. Alternatively, Airservices may undertake further analysis before it reaches a final reasoned conclusion that no change can be made. Cases such as these are discussed in section 3 *Noise improvement opportunities*.

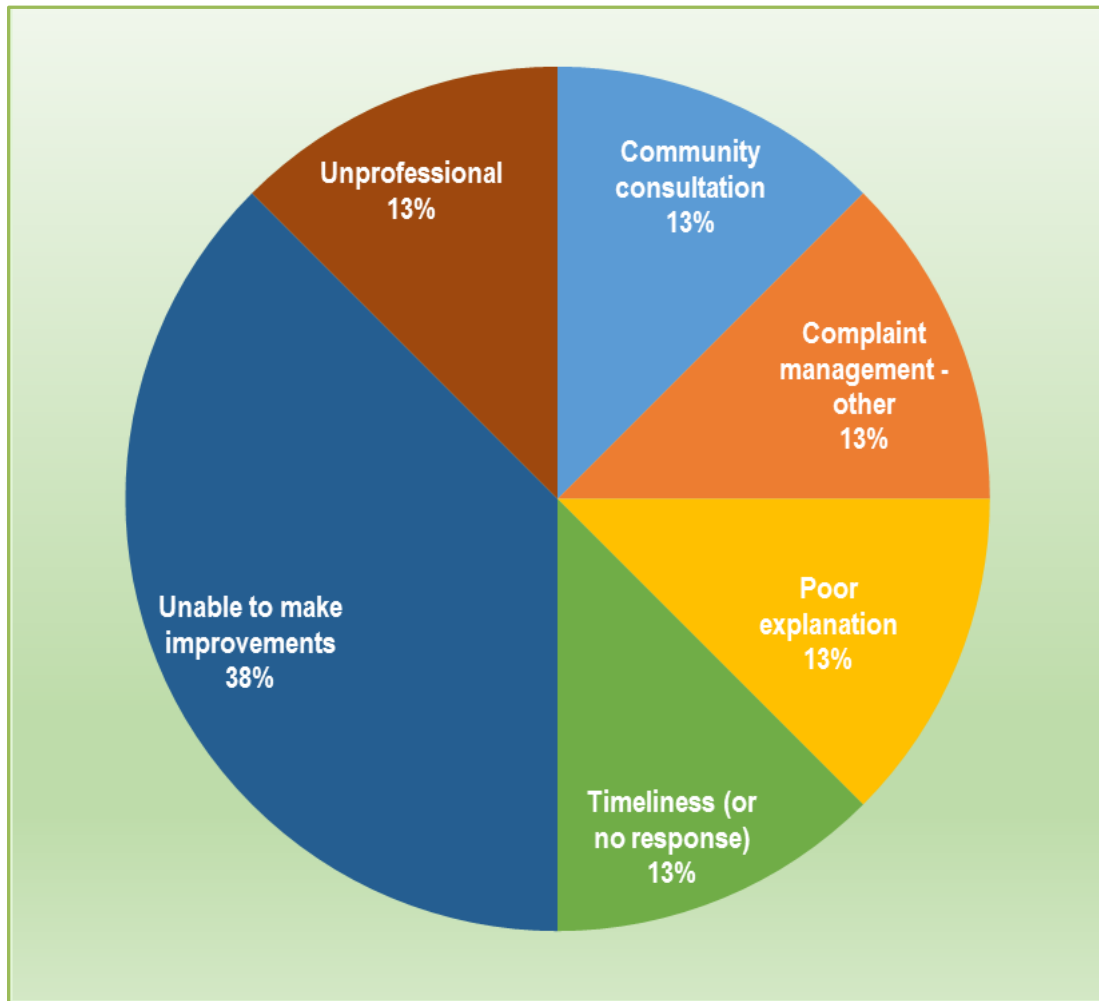
Graph 3: Airservices issues identified in complaints reviewed by the ANO, 2014-15 to 2017-18



2.17 There is a notable increase in complaints about ‘unprofessional’ complaint handling and a further increase in complaints raising ‘information provision/reporting’. Analysis suggests that the information concerns were about the accuracy of WebTrak, the conduct of the information sessions held in Hobart by Airservices and the perceived inaccuracy/inconsistency of information presented by Airservices about Hobart flight paths. Concerns about ‘unprofessional’ complaint handling were varied, and included perceived mishandling of calls, unhappiness about the use of form letters, not providing responses within timeframes indicated and complainant perceptions that they were being told they cannot make further complaints. While the ‘complaint management – other’ category is at a similar level to previous years, the ANO noted that 9 of the 15 complainants referred to the lack of an email address through which to engage with Airservices on complaints.

2.18 For Defence, the ANO reviewed just six cases in total during 2017-18. Within this small sample, the dominant issue was ‘unable to make improvements’ (as it was for Airservices), which was raised in three complaints. Interestingly, in each of these three complaints, a change to improve the noise outcome or the handling on complaints for the resident’s area was able to be made.

Graph 4: Concerns raised in complaints about Defence in 2017-18



Graph 5: Defence issues identified from complaints reviewed by the ANO, 2015-16 to 2017-18



3 Noise improvement opportunities

- 3.1 Investigations into potential noise improvement opportunities that stem from complaints reviewed by the ANO are tracked in our quarterly reports. These reports are available on our website.
- 3.2 Three new noise improvement opportunities were identified in the 2017/18 financial year and considered in addition to six opportunities that had been identified but not finalised from the previous year. Six of these nine were finalised, with four leading to noise improvements changes and two leading to determinations that, although feasible changes were identified, they would not be practical to introduce at the time.

Table 5: Noise improvements considered in 2017/18

Noise Improvements Considerations	Total	Airservices	Defence
2016-17 carried forward	6	4	2
2017-18 new	3	2	1
Total considered 2017-18	9	6	3
Improvements made	4	1	3
No changes made	2	2	0
Carried forward to 2018-19	3	3	0

- 3.3 **Attachment 2** summarises the noise improvement opportunities considered in 2017-18. The following two case studies provide examples of the noise improvements that can arise following ANO reviews of agency decisions.

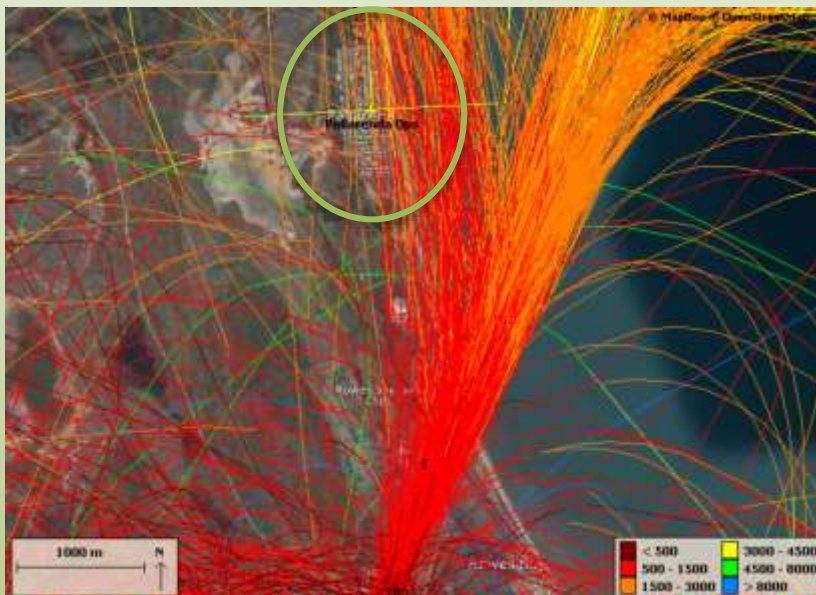
C Why do the planes fly over the homes not the sea?

CASE STUDY 1

In response to a complaint, the ANO asked Defence to consider if there were any viable options for aircraft to reduce the number of departures that flew over the residential area of Pallarenda to the north of RAAF Base Townsville. The ANO was seeking clarification of why the departing aircraft could not be required to track off the coast.

Defence consulted stakeholders and considered the broader air traffic management implications. It was determined that a change could be introduced that kept departing aircraft on runway heading a little longer, until over the coast, before turning to the north, except when other traffic or weather conditions required otherwise. This meant that north-bound aircraft would generally remain over the sea rather than flying over Pallarenda.

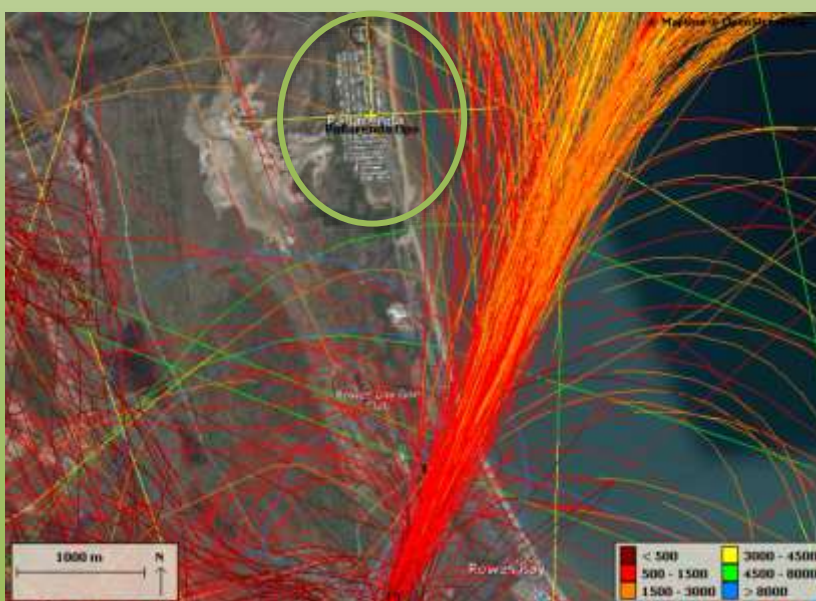
The ANO requested Defence monitor the effect of the change which was introduced in late November 2017. The subsequent analysis provided in March 2018 demonstrated a reduction in noise events at the Pallarenda noise monitor and tracking data showing a clear reduction in the number of flights over the suburb.



Nov 2017
(0600-1000)

1100 tracks

155 tracks (14%)
within 1km of
Pallarenda



Feb 2018
(0600-1000)

882 tracks

40 tracks (4%)
within 1km of
Pallarenda

The ANO was satisfied that the measures taken by Defence led to a noticeable reduction in aircraft noise and flights over Pallarenda.

CASE STUDY 2

Can the night-time flights be further out to sea?

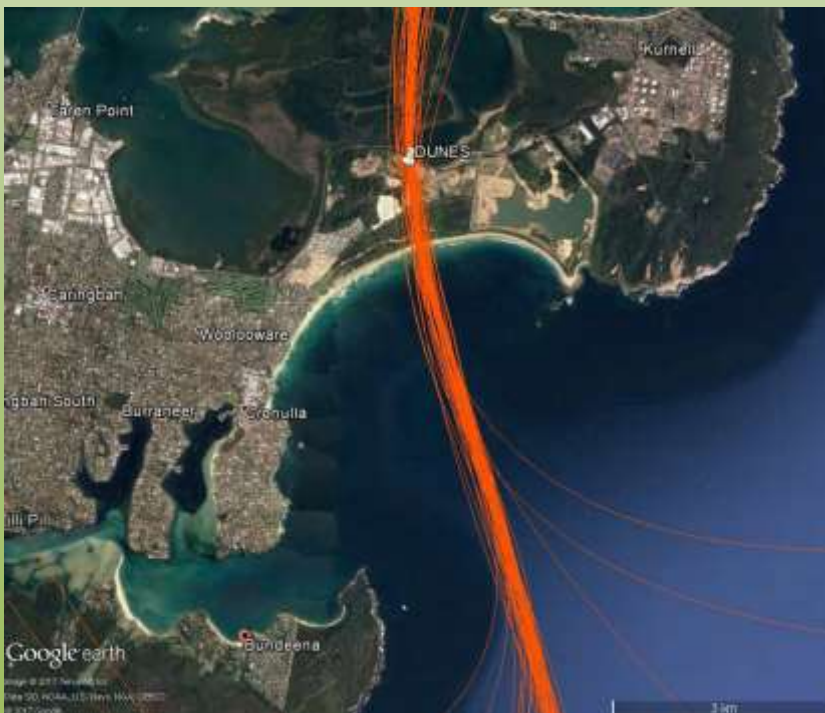
Following ANO review of a complaint, Airservices re-visited its initial investigation into the feasibility of changing the standard instrument departure route for flights departing during the curfew and identified a potential opportunity to achieve a better noise outcome for coastal residents living to the south of Sydney Airport. Airservices undertook its formal change process, including detailed procedure design, necessary assessments and relevant consultation on an alternative departure path. A new path was introduced in November 2017.

CASE STUDY 2



Pre-Nov 2017

Flight path used by aircraft departing during the curfew hours up to 9 Nov 2017.



Post-Nov 2017

Flight path used by aircraft departing during the curfew hours after 9 Nov 2017.

The ANO was pleased that a change was introduced to move the curfew departure path further out to sea, reducing the noise experienced from these night-time flights by potentially thousands of coastal Sydney residents (particularly in Bundeena).

4 Community engagement and information provision

- 4.1 As in previous years, the ANO office continued to attend a variety of community and aviation industry meetings across Australia during 2017-18. By observing these meetings we gain a first-hand perspective of community and industry issues, can identify emerging aircraft noise management issues and take the opportunity to monitor Airservices' and Defence's information presentation and consultation activities. It also helps to increase awareness of the ANO role and our recent activities.
- 4.2 During the 2017-18 financial year, ANO staff attended 16 Airport Community Aviation Consultation Group (or equivalent) meetings. We also attended various industry meetings, including the major annual conferences of the Australian Airports Association (AAA), and the Australian Mayoral Aviation Council (AMAC).

5 ANO reviews

5.1 **Attachment 3** summarises the ANO assessment of progress on all recommendations that were either open at the start of or made during this financial year.

Airservices

5.2 Following an unusual influx of complaints from residents of Hobart about new flight paths introduced by Airservices, the ANO undertook a multiple complaints review, culminating in our report *Investigation into complaints about the introduction of new flight paths in Hobart*, published in April 2018. The report made thirteen recommendations for action by Airservices to:

- incorporate consideration of potential noise impacts from the commencement of flight path design and integrate that consideration throughout the design process;
- broaden the purpose of environmental assessment, widen the range of potential impacts to be considered, review the criteria on which assessments are based and bring to bear a critically analytical perspective on the assessment of the potential impact on the community of proposed flight paths;
- enhance complaint management by advising complainants at an early stage of efforts being made, including investigation, to address concerns; and
- develop and support a sophisticated approach to community consultation in line with and informed by modern standards of community engagement by:
 - obtaining and supporting subject matter expertise in the practice of community consultation;
 - reviewing concentration on Community Aviation Consultation Groups as the primary site of community consultation;
 - prioritising transparency towards and knowledge of communities impacted by aircraft noise;
 - turning a critically analytical perspective to its consultations; and
 - bringing these matters to bear on Airservices' current Review of Hobart SIDS and STARS.



5.3 Airservices accepted all recommendations and is working to address the recommendations.

Defence

- 5.4 No new Defence-related reviews were undertaken in 2017-18.
- 5.5 During the period, Defence did make excellent progress in finalising all but one of the recommendations from our *Review of Defence's Aircraft Noise Complaints Management System* (published in November 2016). The review assessed the effectiveness of Defence's handling of complaints about aircraft noise against the requirements for 'Operation of the Complaint Management System' set out in Chapter 8 of the Australian/New Zealand Standard 10002:2014 "Guidelines for complaint management in organizations". It culminated in seven recommendations, all of which Defence accepted. The outstanding recommendation relates to a website review required to enhance the quality and accessibility of aircraft noise information provided by Defence.

6 ANO publications

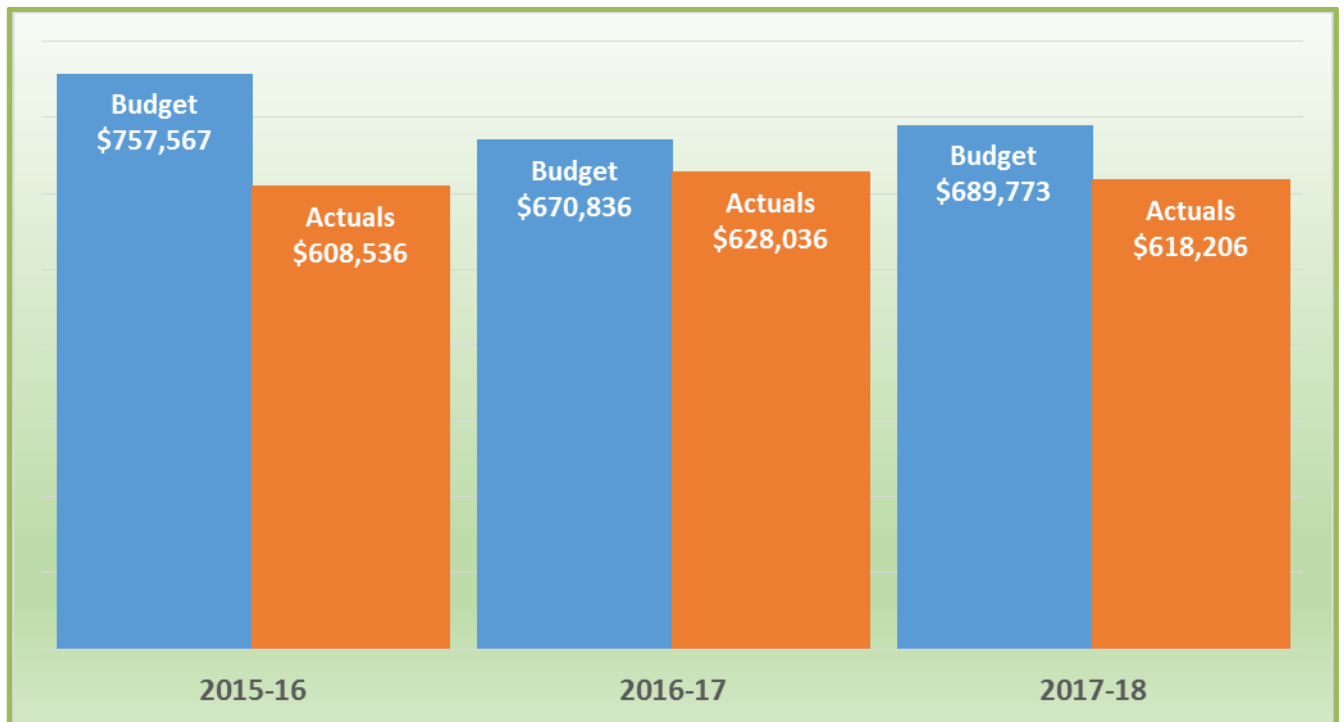
6.1 In addition to our quarterly reports and last year's annual report, the ANO published the following on our website during 2017-18:

- 27 April 2018 - *Investigation into complaints about the introduction of new flight paths in Hobart - April 2018* including Airservices' response

7 Financial results

- 7.1 The ANO operates autonomously in managing its financial accountabilities. In line with the ANO Charter, the ANO independently determines how funds and resources are allocated, within the budget provided by Airservices and Defence.
- 7.2 During 2017-18, the ANO has effectively managed its budget, with actual expenditure at 10% under budget for the financial year. The total operating expenditure of the office was \$618,206 against a total budget of \$689,773. The under-spend compared to budget mainly reflects savings in staff costs and reduced travel compared to expectations.

Graph 4: ANO budget and actual expenditure 2015-16 to 2017-18



Attachment 1 ANO Complaint Statistics

The following summarises the ANO complaint statistics for 2017-18.

	Total	Airservices	Defence
Complaints carried forward from 2016-17	12	9	3
Complaints received 2017-18	103	96	7
Total complaints handled in 2017-18	115	105	10
<u>Closed complaints - reviewed</u>			
No change possible - explanation provided	41	39	2
Change adopted by Airservices or Defence	23	19	4
Change adopted by airport operator	1	1	0
Change adopted by operator	0	0	0
Total complaints reviewed and closed	65	59	6
<u>Closed complaints - not reviewed</u>			
Referred to agency to respond to directly	35	32	3
Complainant did not provide further information	3	3	0
Outside Charter scope	1	1	0
Total complaints not reviewed and closed	39	36	3
Complaints closed during 2016-17	104	95	9
Complaints carried forward to 2018-19	11	10	1

Attachment 2 Noise improvement opportunities

A focus of ANO investigations into complaints is to evaluate whether the handling agency fully explored the potential to improve noise outcomes and provided sound reasons for its determinations. The following table summarises potential noise improvement opportunities arising from complaints reviewed by the ANO or through ANO monitoring during the 2017-18 financial year.

Noise improvement opportunities considered during 2017-18

Complaint received by ANO	Description of initiative	Current status
Mar 2016	Sydney: adjustment to flight paths over water during curfew hours	<p>The ANO asked Airservices to consider if a better noise outcome can be achieved for coastal residents south of Sydney Airport affected by flights departing during the curfew. Following ANO analysis and feedback, Airservices re-visited its initial investigation into the feasibility of changing the standard instrument departure. Airservices then undertook the formal change process, including detailed procedure design, necessary assessments and relevant consultation on an alternative departure path.</p> <p>The ANO was pleased that a change was introduced in November 2017 to move the curfew departure path further out to sea, reducing the noise experienced by potentially thousands of coastal Sydney residents from these night-time flights.</p>
Nov 2016	Pallarenda, Queensland: ATC procedure changes to reduce overflight of residential areas	<p>In response to a complaint, the ANO requested that Defence consider options for reducing noise from overflights for residents in the Pallarenda area north of RAAF Base Townsville. Defence has since introduced new departure procedures to reduce overflight of the Pallarenda community. To further reduce noise impacts for residents, practice engine failures are no longer permitted in the area north to north-west of the main runway.</p> <p>The ANO was pleased with these initiatives and finalised the case in March 2018 after the results of longer term monitoring demonstrated a significant reduction in the number of overflights of Pallarenda.</p>
Feb 2017	Brisbane: adjustment to arrival flight path to reduce overflight of residential areas	<p>Following a suggestion from a resident of Clear Mountain (north of Brisbane Airport), the ANO asked Airservices to give consideration to a possible noise improvement. The suggestion was to move one of the Standard Terminal Arrival Routes further west. This would potentially result in a significant reduction in the number of residential areas overflown.</p> <p>Airservices did a preliminary investigation and advised the ANO in August 2017 that the proposal was not feasible at this time. The ANO is satisfied by Airservices' reasoning that it would not be practical for Airservices to introduce a flight path change at Brisbane ahead of the major redesign work for the new runway, which is already well-advanced.</p>
May 2017	Point Cook, Victoria: flying orders amendment	<p>In response to complaints about a military exercise, Defence undertook a number of actions to improve its management of noise impacts. It updated its Fly Neighbourly Instruction for RAAF Base Williams in Point Cook to encourage helicopters to operate over less noise sensitive areas. The revised Instruction also includes restrictions on parking areas, where passenger loadings can take place and the times during which ground engine runs can occur. It also made changes to its complaint line, and has started using letterbox drops and an email distribution list to let local residents know about upcoming exercises.</p> <p>The ANO commends Defence on its responsiveness in this case, which was finalised in October 2017.</p>

Continued over page...

Complaint received by ANO	Description of initiative	Current status
Jun 2017	Perth: changes to northern smart tracking approach path to reduce noise impacts for residents	<p>This suggestion was first raised by residents prior to the new path being introduced in Sept 2015. At the time Airservices advised that the 12-month trial would be conducted with the path as designed and consideration of options to change the path would be part of the Post Implementation Review (PIR) process. The PIR report noted that “the Perth Aircraft Noise Technical Working Group will consider the input from...residents when reviewing the use and design of Smart Tracking during 2017”. The ANO has recently reviewed some material already developed by Airservices for a potential alternative approach path, which will be consulted with relevant industry stakeholders ahead of possible community consultation later this year. We note that Airservices has emphasised that the changes are efficiency driven rather than purely noise focussed</p> <p>The ANO was pleased to see that Airservices has been pursuing this issue, albeit over a protracted period. We look forward to resolution by the end of 2018.</p>
Jun 2017	Wagga Wagga: changes to circuit operations	<p>The ANO received a complaint about Airservices not being able to pursue any changes to reduce the noise impacts of frequent circuit training flights over residential areas to the north of the airfield. The ANO sought advice from the airport operator, Wagga Wagga Council, about whether the sparsely populated area to the south could be used more often, when practical. The Council undertook to consider a change to the circuit direction.</p> <p>The ANO continues to monitor this case until a decision is reached.</p>
Oct-Nov 2017	Hobart: flight path changes introduced	<p>The ANO received multiple complaints about Airservices’ introduction of new flight paths across Hobart, some of which were over new areas that had previously had only occasional overflights. In October 2017, we initiated a major investigation, culminating in a report that was published in April 2018. Meanwhile Airservices was working to address the significant community concerns and in March 2018, Airservices made a change to one of the new flight paths to reduce the number of residents overflowed. Additionally, Airservices has commenced a review of all of the Hobart airspace to determine the best flight path design to minimise noise impacts while meeting its operational safety objectives and air traffic management efficiency goals. This airspace design review is anticipated to be completed by March 2019.</p> <p>The ANO continues to closely monitor Airservices’ management of noise and flight path issues in Hobart.</p>
Nov 2017	Richmond, New South Wales: noise sensitive area	<p>Following a complaint about frequent low level training activities over a rural property north of the Base, RAAF Base Richmond introduced a procedure to avoid low level flights over the property when it is safe and practical to do so, designating the property be treated as a ‘noise sensitive area’. It also implemented improvements to local complaint handling systems.</p> <p>The ANO is pleased to see Defence’s commitment to undertaking its flying activities in a manner that is considerate of local communities and also to improving its complaint management processes at RAAF Base Richmond.</p>

Continued over page...

Complaint received by ANO	Description of initiative	Current status
Feb 2018	Wallan, Vic: changes to northern departure paths to reduce impacts on residential areas	<p>The ANO received a complaint about Airservices not being able to pursue any changes to reduce the noise impacts in the township of Wallan, some distance north of Melbourne Airport. The ANO sought an explanation of Airservices' advice to the complainant and Airservices advised that: "Airservices has identified a potential noise improvement for the flight path that passes to the north of Wallan. However, Airservices has decided not to progress this, or to explore any other potential improvements that may exist, for the reasons set out". These reasons include the likely timing of any change in relation to airspace changes required for introduction of the new runway at Melbourne Airport, the low priority of the change due to the noise levels being considered by Airservices as "not in the high range", and Airservices' resource commitments for other work it deems to be of higher priority.</p> <p>While the ANO is disappointed that Airservices has decided to not pursue this potential noise improvement opportunity, we accept Airservices has made a reasoned decision.</p>

Attachment 3 ANO assessment of action on recommendations

At the start of the financial year, Defence had five recommendations not yet closed from our *Review of Defence's Aircraft Noise Complaints Management System (November 2016)* and Airservices had no recommendations outstanding from previous reviews.

During the 2017-18 financial year, the ANO finalised one major review of Airservices: *Investigation into complaints about the introduction of new flight paths in Hobart*, published in April 2018.

The following tables summarise the action taken by Defence and Airservices during the 2017-18 financial year to address each of the outstanding recommendations.

Review of Defence's Aircraft Noise Complaints Management System (November 2016)

Ongoing recommendations	ANO assessment of agency response
Recommendation 1 – Defence should expand the focus of complaint investigation beyond compliance checking to also identify and pursue opportunities for noise improvements, improved community engagement and better public information.	<u>Completed</u> – Defence has updated its complaint tracking form (OA39 form) to include additional fields for identifying and documenting considerations of improvement opportunities.
Recommendation 2 – To help in managing complainant expectations, Defence should improve the public information about the complaints process to address the information requirements outlined in the Standard and as identified within the report.	<u>Completed</u> – Defence has updated its website to provide good public information about its complaints handling process. The ANO considers this now addresses the information requirements of the Standard.
Recommendation 3 – Defence should review the Defence Aircraft Noise web information and, taking account of comments in this report, make improvements to information provision, presentation and functionality.	<u>Ongoing</u> – Defence has advised that it has made some changes already, including launching its online complaint form. Defence is also reviewing the web information to address the issues identified in the review.
Recommendation 4 – To support the timely release of written responses, Defence should: <ol style="list-style-type: none"> document the procedures to be followed in the event of written complaints (whether received through post, email or an online form), ensuring such procedures incorporate a timely acknowledgement of the complaint streamline any necessary review and approval processes for written responses to complaints consider the provision of training and support material for staff that will be responding to complaints, in particular via email following the introduction of electronic complaint submission. 	<u>Completed</u> – Defence has advised that current procedures for complaint responses do not differentiate by lodgement method. Review and approval processes for release of written responses to complaints are aligned with normal Base procedures for external communications. Bases are obtaining complaint handling training from the ANO for personnel who deal with noise complaints to improve complaint handling across all complaint types. A shared complaint register enables Bases to draw on the responses of others to help develop their own.

Ongoing recommendations	ANO assessment of agency response
<p>Recommendation 5 – Defence should adhere to its existing requirements for complaint recording and tracking.</p>	<p><u>Completed</u> – Defence has updated the Air Command Aircraft Noise Management Standing Instruction and established a centralised register for complaint recording and tracking to help monitor compliance with existing requirements.</p>
<p>Recommendation 6 – Defence should update its localised recording systems and the OA39 form as appropriate to incorporate:</p> <ul style="list-style-type: none"> a. Closing date b. A place to record consideration of noise improvement opportunities, community engagement improvements and public information improvements c. Undertakings or follow up action required (including who is accountable for delivery). d. A mechanism for tracking any undertakings or follow up actions through to completion. 	<p><u>Completed</u> – Defence has updated its complaint tracking form (OA39 form) to include additional fields for identifying and documenting the requirements of this recommendation. It has also established a centralised register for complaint recording and tracking as a mechanism for tracking any undertakings of follow up actions arising from complaints.</p>
<p>Recommendation 7 – Defence should:</p> <ul style="list-style-type: none"> a. ensure that complaints not readily ascribed to a Base are managed as effectively as other complaints b. share data, experience and learnings across Bases to maximise noise improvement opportunities and enhance complaint management across Defence. 	<p><u>Completed</u> – Defence has established a procedure for handling complaints not readily ascribed to a Base and a centralised register for noise complaints to enhance the sharing of data, experience and learnings.</p>

Airservices - Investigation into complaints about the introduction of new flight paths in Hobart (April 2018)

Ongoing recommendations	ANO assessment of agency response
<p>Recommendation 1: Airservices should incorporate consideration of potential noise impacts from the commencement of flight path design and integrate that consideration throughout the design process.</p>	<p><u>Ongoing</u> – Airservices has advised that it has taken a number of actions that it considers address this recommendation, including:</p> <ul style="list-style-type: none"> - it has revised its National Operating Standard for the environmental management of flight path changes - it has amended its National ATS Administration Manual - it has delivered targeted training for all Airservices managers and staff involved in flight path change management, covering requirements for effective environmental assessment, community engagement and risk management. <p>The ANO is awaiting evidence to support Airservices’ advice and to determine whether the recommendation can be closed.</p>
<p>Recommendation 2: Airservices should review its environmental assessment criteria to ensure they are appropriate as a quantitative measure for analysis against the EPBC Act requirements and for assessment of social impact.</p>	<p><u>Ongoing</u> – Airservices has advised that its actions to address this recommendation are ‘in progress’, including:</p> <ul style="list-style-type: none"> - it is reviewing its environmental assessment referral criteria to ensure it is appropriate and aligned to the EPBC Act requirements and when complete will seek the advice of the Department of Environment. This review will be completed by June 2019; - it is also developing social impact criteria for aircraft noise management, to be completed December 2018.

Ongoing recommendations	ANO assessment of agency response
<p>Recommendation 3: Airservices should ensure that its additional analysis of social impact to form part of the Environmental Assessment:</p> <p>(a) includes a clearly defined purpose;</p> <p>(b) includes explicit commentary on social impact taking into account particular community history, context and sensitivities; and</p> <p>(c) incorporates a critically analytical assessment of the potential impact on the community of proposed change referring to both qualitative and quantitative values.</p>	<p><u>Ongoing</u> – Airservices has advised that its actions to address this recommendation are ‘in progress’, including:</p> <ul style="list-style-type: none"> - it has amended its Environmental Assessment template to document the more detailed social impact information required; - its subsequent stakeholder engagement plans will incorporate the appropriate social impact analysis and context; - it has contracted a social impact specialist firm to strengthen its community engagement planning; - this focus is already included in the re-engagement with Hobart stakeholders and the community. <p>Airservices’ work to address this recommendation is expected to be completed in Q4-2018.</p>
<p>Recommendation 4: In undertaking its Environmental Assessments and preparing reports on those assessments, Airservices should:</p> <p>(a) ensure that all assessment criteria, for both EPBC Act purposes and for assessment of social impact, are clearly explained in its documentation in a way that makes clear their purpose, whether they are primary or secondary, the assessment methodology, and the consequences that follow if a threshold is exceeded;</p> <p>(b) explicitly document any assumptions made and explain the basis for each assumption;</p> <p>(c) explicitly document its consideration of change proposals against its stated criteria;</p> <p>(d) undertake a more nuanced assessment of whether a change is ‘significant’ in social impact or under the EPBC Act requirements, taking into account both quantitative and qualitative values so that a non-binary and more informative approach is taken to assessment against criteria; and</p> <p>(e) refer to or document all relevant information that forms the basis of its environmental assessment and conclusions in a single explanatory Environmental Assessment report.</p>	<p><u>Ongoing</u> – Airservices has advised that its actions to address this recommendation are ‘in progress’, and that its response is the same as for Recommendation 3.</p> <p>Airservices’ work to address this recommendation is expected to be completed in Q4-2018.</p>

Ongoing recommendations	ANO assessment of agency response
<p>Recommendation 5: Airservices should access, through recruitment or otherwise, skilled and experienced subject matter expertise in the practice of community consultation. Leadership should give prominent support to this expertise so as to promote its influence and effect on Airservices' better performance in community consultation.</p>	<p><u>Ongoing</u> – Airservices has advised that its actions to address this recommendation are 'in progress', including:</p> <ul style="list-style-type: none"> - it has engaged a community engagement consultant; - it is conducting recruitment for a Group Community Engagement Manager who will be required to have community engagement experience and skills. Expected completion of this recruitment is Aug 2018; - external assistance may be sought on a case-by-case basis for other sensitive changes in the future.
<p>Recommendation 6: Airservices should abandon its stated policy of making the Community Aviation Consultation Groups the primary site of its community consultation and instead, with the input and leadership of a skilled practitioner of community engagement, develop a community consultation strategy and guidelines to inform individual detailed strategies for individual changes.</p>	<p><u>Ongoing</u> – Airservices has advised that its actions to address this recommendation are 'in progress', and that its response is the same as for Recommendation 5.</p>
<p>Recommendation 7: Airservices should develop a policy that, on those occasions when incorrect statements are made to the community or other stakeholders, it will acknowledge the error and remedy it.</p>	<p><u>Ongoing</u> – Airservices has advised that it has taken action that it considers addresses this recommendation, including:</p> <ul style="list-style-type: none"> - it already has in place a number of mechanisms, policies and procedures that provide guidance to staff on Airservices expectations of appropriate behaviour, conduct and performance; - Airservices is on the public record with regard to the inadequate community consultation at Hobart and has now put robust plans in place to re-engage with all Hobart stakeholders. <p>The ANO is seeking evidence of additional actions taken to ensure existing arrangements, policies and procedures that were already in place when the issues identified in our Review arose are followed.</p>

Ongoing recommendations	ANO assessment of agency response
<p>Recommendation 8: Airservices should ensure that, before deciding to propose a change and to commence to engage with a community about that change, it has acquainted itself with the context and recent history of that community and takes those matters into account, as far as practicable, in its decision making and in its engagement design.</p>	<p><u>Ongoing</u> – Airservices has advised that its actions to address this recommendation are ‘in progress’, and that its response is the same as for Recommendation 3.</p> <p>Airservices’ work to address this recommendation is expected to be completed in Q4-2018.</p>
<p>Recommendation 9: Airservices should, as part of its community consultation activity, approach the assessments and other material on which it bases its consultations from a critically analytical perspective so as to ensure that all relevant matters have been considered and the information provided to the community is timely, correct, relevant, transparent, comprehensive, consistent and logically sound.</p>	<p><u>Ongoing</u> – Airservices has advised that its actions to address this recommendation are ‘complete’, and that its response is the same as for Recommendations 1, 2, 3 and 5.</p> <p>Given the interdependencies identified by Airservices, the ANO will await the evidence that supports closure of each of these recommendations before determining whether this supports closure of this recommendation.</p>
<p>Recommendation 10: In its Hobart SIDS and STARS Review, Airservices should consult with the community well in advance of settling its findings and recommendations. Airservices should take immediate steps to obtain the community’s views on the most practical and effective ways to arrange this consultation.</p>	<p><u>Ongoing</u> – Airservices has advised that it has taken a number of actions that it considers address this recommendation, including:</p> <ul style="list-style-type: none"> - Airservices has engaged a community engagement specialist to help engagement with the Hobart community in relation to its SIDS and STARS review; - It held a series of engagement sessions in mid-June 2018 focusing on how the community would like to be consulted. <p>The ANO is awaiting publication of the Community Engagement Strategy to see how the community’s views have been obtained, analysed and incorporated, before determining whether this recommendation can be closed.</p>

Ongoing recommendations	ANO assessment of agency response
<p>Recommendation 11: Where significant issues arise from complaints, Airservices should advise complainants and other stakeholders at the earliest possible stage of efforts being made, including investigation, to address concerns.</p>	<p><u>Ongoing</u> – Airservices has advised that it has taken a number of actions that it considers address this recommendation, including:</p> <ul style="list-style-type: none"> - The experience at Hobart highlighted the need for Airservices’ staff to regularly familiarise themselves with existing policies and procedures, particularly if these policies have been refined or changed. Managers are having these conversations with their staff and identifying and initiating training needs as required. <p>The ANO notes that Airservices revised its Noise Complaints and Information Service procedures in April 2018 and is seeking to understand whether these procedural changes along with the identified training activities supports closure of this recommendation.</p>
<p>Recommendation 12: Where Airservices identifies through complaints inconsistencies in information provided to residents and other stakeholders, Airservices should take early action to correct information given.</p>	<p><u>Ongoing</u> – Airservices has advised that it has taken a number of actions that it considers address this recommendation, and that its response is the same as for Recommendation 7.</p>
<p>Recommendation 13: Airservices should not pre-empt the outcome of internal investigations in its responses to complaints by advising complainants that there is unlikely to be any change.</p>	<p><u>Ongoing</u> – Airservices has advised that it has taken a number of actions that it considers address this recommendation, and that its response is the same as for Recommendations 7 and 11.</p>