



Quarterly Report
October - December 2018

Table of Contents

1	Introduction	1
2	Overview	1
3	Complaint handling.....	2
4	Consultation and Information Provision	5
5	Closing remarks	6
	Attachment 1 Complaint Statistics	7
	Attachment 2 Outstanding ANO recommendations.....	8

1 Introduction

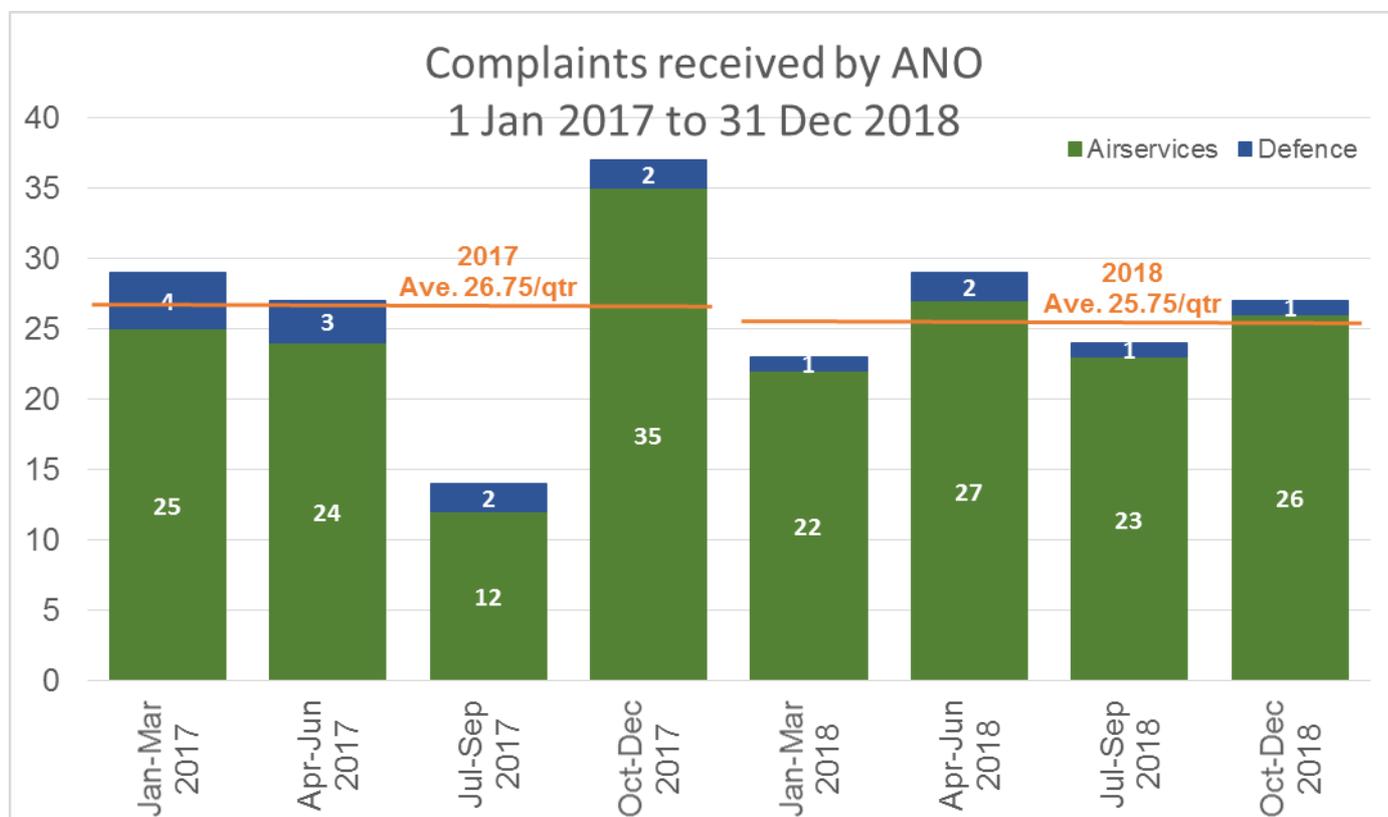
- 1.1 This report includes complaint statistics and a summary of ANO activities during the October to December 2018 quarter. It is structured around the three key functions of the ANO, these being the review and monitoring of Airservices Australia's and the Department of Defence's:
- a. complaint handling;
 - b. community consultation processes; and
 - c. provision of information about aircraft noise.

2 Overview

- 2.1 From the start of October to the end of December 2018, the ANO received a total of 27 complaints, including one about Defence's management of aircraft noise issues. **Attachment 1** provides detailed complaint statistics for the quarter.
- 2.2 Airservices has been highly visible in its community engagement in Hobart during the quarter and we took the opportunity to observe several of the on-site community engagement sessions it held as part of its airspace design review. We have also been pleased to close a further recommendation from our *Investigation into complaints about the introduction of new flight paths in Hobart (April 2018)*, recognising the shift in procedure and in practice by Airservices away from a focus on the Airports' Community Aviation Consultation Groups as the primary site of its community consultation. We continue to closely monitor Airservices' actions in addressing the outstanding recommendations from this Hobart focussed review, and also more broadly as it pursues community engagement at other locations across Australia.
- 2.3 Defence released its updated *Air Force Aircraft Noise Management Strategy 2018-2023*, which emphasises its commitment to continual improvement in aircraft noise management. It is still working to address the final recommendation from our *Review of Defence's Aircraft Noise Complaints Management System (November 2016)*, which is aimed at improving the aircraft noise information available through its website.
- 2.4 **Attachment 2** provides a summary of action on all outstanding recommendations from both of the Reviews referred to above.

3 Complaint handling

3.1 During the quarter the ANO received 27 new complaints, one of which related to Defence's aircraft noise management. This is slightly above the quarterly average of the past two calendar years, as shown in the graph below.



3.2 Twenty complaints were closed during the quarter, of which ten were reviewed in detail and ten were referred back to the relevant agency for a direct response. One complaint led to a change being adopted by Airservices – enhancement of information in support of the Hobart consultations, and one complaint led to a change being adopted by Defence – enhancement of its web information in relation to Williamstown airspace activity.

3.3 Complaint statistics for the quarter are summarised at **Attachment 1**.

Noise improvement opportunities

- 3.4 Complaints reviewed by the ANO sometimes raise opportunities to improve noise outcomes. Sometimes a complainant will suggest a particular change which may in turn prompt consideration of additional options for improved outcomes. Generally, the practical opportunities for change arising from complaints received by the ANO are limited. This is due to it commonly being the case that there are no feasible, practical and safe alternatives available. In addition, Airservices and Defence may have already identified and implemented the available change opportunities.
- 3.5 However, even when no noise improvement can be achieved, the reflection on alternatives and provision of detailed and logical reasons for decisions not to pursue one or all of the alternatives considered promotes good decision-making. Occasionally, it highlights an opportunity that has not been fully explored.
- 3.6 The table below reports on the noise improvement opportunities that the ANO continues to pursue with Airservices, arising from ANO reviews of complaints about the agency's complaint handling.

Complaint received by ANO	Description of initiative	Current status
June 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”. In January 2018, Airservices provided the ANO with material showing a potential alternative approach path, which it advised would be consulted with relevant industry stakeholders ahead of possible community consultation. The initial timeframe provided suggested this would be during 2018.</p> <p>The ANO has continued to seek updates from Airservices and was recently advised that Airservices’ noise modelling and a targeted environmental assessment indicated its proposed modification to the smart tracking approach would provide the best overall aircraft noise outcome. However it elected not to pursue the change immediately, pending Perth Airport’s finalisation of its Master Development Plan for the new parallel runway. Airservices advised that this was “to enable a proper assessment of the impact of the MDP, and its associated new runway flight paths, on the proposed Smart Tracking approach modification.” This approach, Airservices advised, “ensures the proposed modification is not completed in isolation from the proposed flight paths for the new runway in Perth, potentially resulting in a requirement to further modify the Smart Tracking approach and unnecessarily burdening the community”.</p> <p>The ANO will seek further information and continue to seek updates until a final decision is made.</p>

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Complaint received by ANO	Description of initiative	Current status
June 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 and is developing a <i>Fly Friendly</i> procedure to accommodate this, subject to final approvals.</p> <p>The ANO continues to monitor this case until a decision is reached.</p>

Improving aircraft noise management

- 3.7 A key objective of the ANO's investigation of complaints about Defence's and Airservices' aircraft noise management is the identification of potential improvements to the agencies' aircraft noise management-related practices. This includes complaint handling, community consultation and information provision. We do this through our review of decisions or actions in response to individual complaints, or as a single investigation in relation to multiple complaints such as our *Investigation into complaints about the introduction of new flight paths in Hobart (April 2018)* and our *Review of Defence's Aircraft Noise Complaints Management System (November 2016)*.
- 3.8 This quarter, both Defence and Airservices adopted changes to their information provision in response to feedback arising from an ANO review of their complaints.
- 3.9 Airservices has continued to address the recommendations of our *Investigation into complaints about the introduction of new flight paths in Hobart (April 2018)* during this quarter. We closed one recommendation during the period, bringing the total number closed to six (of thirteen) recommendations. Airservices is making encouraging progress on the remaining recommendations. Likewise Defence has continued to work towards closing the last outstanding recommendation from our *Review of Defence's Aircraft Noise Complaints Management System (November 2016)*.
- 3.10 See **Attachment 2** for details of Airservices' and Defence's progress on the recommendations arising from these reviews.

4 Consultation and Information Provision

- 4.1 The ANO has been closely monitoring Airservices' consultation activities, during the quarter, including observing the Hobart Airport Community Aviation and Consultation Group meeting and several of Airservices' on-site community consultation sessions in Hobart, which were held as part of an extended community consultation period seeking input on its proposed airspace design. Airservices has advised that it received a substantial array of feedback, which it will be consolidating into a Consultation Summary Report, for publication in February 2019.
- 4.2 We have also seen significant efforts by Airservices aimed at enhancing the presentation and distribution of information about its proposed changes in Hobart. With more regular updates being published on its website and emailed directly to individuals, and no less than 19 community-specific fact sheets setting out the potential impacts and changes for each location that might result from the proposed flight path design, these innovations are valuable to and valued by the community. While pleasing in terms of collective communication, Airservices' responsiveness to individual requests for information was somewhat less consistent and continues to be an area we are monitoring.
- 4.3 We are pleased to see Airservices taking positive actions to better engage with not only the Hobart community but across other change projects it is pursuing at locations across the country. This is challenging work and a relatively new approach for Airservices. We are seeing many opportunities for Airservices to learn from its engagement experiences, which we hope will translate to a continual improvement of its skills and practices in this field.
- 4.4 Defence has also been proactively engaging with its communities about the arrival of its first two Joint Strike Fighters (FA-35s), which arrived at RAAF Base Williamstown with much fanfare in December 2018. It will be essential that Defence maintains a strong relationship with those communities likely to be most impacted by the operations of these new aircraft in Australia. We will be monitoring these activities with interest.
- 4.5 During the quarter, the ANO also presented at the Annual Conference of the Regional Aviation Association of Australia (RAAA), with a focus on the need for the aviation industry to keep improving its community engagement efforts and be open to the possibility of better ways of doing things.

5 Closing remarks

In summary, the last quarter has been challenging and exciting. We see Airservices moving towards a skilled platform of essential communication with the community and Defence consolidating its skills in complaint handling and community engagement.

With staff changes and close examination of our organisational structure and budget arrangements to enhance independence, we are entering a new chapter of work, strategically aimed at enhancing the performance of the agencies in complaint management, community engagement and provision of information and to take management of aircraft noise to the next level.



Narelle Bell
Aircraft Noise Ombudsman
23 January 2019

Attachment 1 Complaint Statistics

The following tables summarise the complaint statistics for the quarter.

AIRSERVICES	Oct 2018	Nov 2018	Dec 2018	Total for quarter
Complaints received:	2	17	7	26
Complaints closed:	6	5	7	18
Total complaints closed - not reviewed:	2	4	3	9
Complainant did not provide further information	0	0	0	0
Outside charter scope	0	0	0	0
Referred to Airservices to respond directly	2	4	3	9
Total complaints closed - reviewed:	4	1	4	9
No change possible - explanation provided	4	1	3	8
Change adopted by Airservices Australia	0	0	1	1
Change adopted by Airport operator	0	0	0	0
Change adopted by Aircraft operator	0	0	0	0

DEFENCE	Oct 2018	Nov 2018	Dec 2018	Total for quarter
Complaints received:	1	0	0	1
Complaints closed:	1	0	1	2
Total complaints closed - not reviewed:	1	0	0	1
Complainant did not provide further information	0	0	0	0
Outside charter scope	0	0	0	0
Referred to Defence to respond directly	1	0	0	1
Total complaints closed - reviewed:	0	0	1	1
No change possible - explanation provided	0	0	0	0
Change adopted by Defence	0	0	1	1

	Airservices	Defence	Total
Complaints carried forward on 1 Oct 2018	8	1	9
Complaints received	26	1	27
Complaints closed	18	2	20
Complaints open at 1 October 2018	16	0	16

Attachment 2 Outstanding ANO recommendations

The following table sets out the status of outstanding recommendations made by the ANO and the ANO's assessment of action against each. Recommendations that were previously reported as complete have been removed.

Defence Complaints System Review (November 2016)

Ongoing recommendations	ANO assessment of agency response
<p>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.</p>	<p><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.</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 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> – services 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 by June 2019.

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 has advised that since it began this work, it has identified dependencies with Recommendation 2 and the development of social impact criteria. Anticipated completion is now June 2019.</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 has additionally identified dependencies with Recommendation 2 and therefore work to address this recommendation is expected to be completed in June 2019.</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 significant progress has been made to address this recommendation, including:</p> <ul style="list-style-type: none"> - it has engaged a community engagement consultant to provide social impact and consultation advice for the duration of the Hobart Airspace Design Review; - it has undertaken a comprehensive literature review of social impact assessment and community - it has conducted recruitment processes for a Community Engagement Manager who will be required to have community engagement experience and skills. Expected completion of this recruitment has been delayed several times as a suitable candidate was not recruited in two approaches to market. Airservices continues to pursue this; - it has increased capability of the community engagement team through training and upskilling and access to community engagement specialists and expertise. <p>A revised timeframe for finalisation has not been advised by Airservices and is dependent on conclusion of its recruitment work.</p>
<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>Closed</u> – Airservices has demonstrated through its community engagement activities, in Hobart and in other changes across Australia through 2018 and into this year, that its engagement strategies are tailored to the individual circumstances of the proposed changes, in line with its updated guidelines.</p>
<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 it has links to the development of social impact criteria. As such, Airservices' work to address this recommendation is expected to be completed in June 2019.</p>

Ongoing recommendations	ANO assessment of agency response
<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.</p> <p>The ANO will await the current consultation efforts underway in Hobart before determining whether this recommendation can be closed.</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>The ANO will await the current consultation efforts underway in Hobart before determining whether this recommendation can be closed.</p>