



Quarterly Report

October – December 2017

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1 Introduction

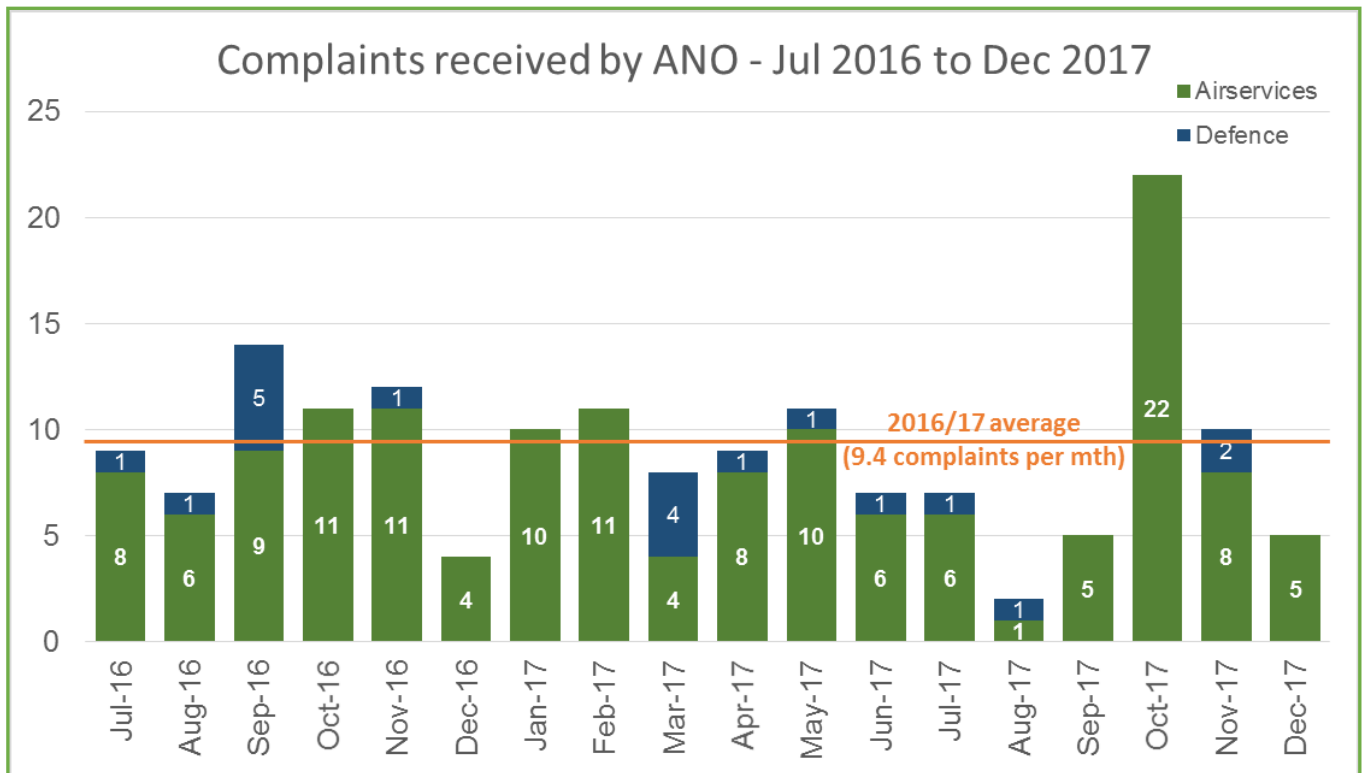
- 1.1 This report includes complaint statistics and a summary of ANO activities during the October to December 2017 quarter. It is structured around the three key functions of the ANO, these being the review and monitoring of Airservices Australia's and the Department of Defence's:
- a. complaint handling;
 - 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, the ANO received a total of 37 complaints, including two about Defence's management of aircraft noise issues. This is a 31.2% increase on the average of 28.2 complaints received per quarter over the 2016/17 financial year.
- 2.2 This increase in complaints received reflects a spike in complaints from Hobart residents concerned about Airservices' introduction of new flight paths in mid-September 2017. In October the ANO initiated a formal review of Airservices' community consultation and information provision in relation to these changes, in response to the complaints received. The associated investigation work has been a major focus for the ANO office during the quarter.
- 2.3 The ANO's *Review of Defence's Aircraft Noise Complaints Management System*, submitted to Defence in November 2016, made seven recommendations, all of which were accepted by Defence. Pleasingly, Defence has continued to action these recommendations and, on the basis of changes made to the Defence complaints website, the ANO has now closed Recommendation 2. The ANO looks forward to a number of key activities to address the remaining recommendations being progressed in the coming period. **Attachment 2** provides a summary of action on all outstanding recommendations.
- 2.4 A number of noise improvement initiatives arising through the review of complaints received by the ANO have been finalised in the past quarter.
- 2.5 During the quarter, the ANO team continued to attend a number of community consultation group meetings at various airports, met with a variety of individuals and organisational representatives and also attended a number of aviation industry forums. This was in support of our role in monitoring Airservices' and Defence's consultation and information provision, to conduct training on aircraft noise management, and to keep abreast of emerging issues and activities in aircraft noise management.
- 2.6 Another significant activity for the ANO office in the last quarter of 2017 involved responding to a review of the ANO's governance and resourcing arrangements, which was initiated in October by the Airservices Board. The review's outcomes are expected to be provided to the Airservices Board very soon.

3 Complaint handling

3.1 During the quarter the ANO received 37 new complaints, two of which related to Defence’s aircraft noise management. Over a third of these complaints are attributable to concerns about flight path changes in Hobart, introduced by Airservices on 14 September. The average number of complaints received in the 2016/17 financial year was 28.2 per quarter (or 9.4 per month). The 37 complaints received in the October to December 2017 period represent a 31.2% increase on the average number of complaints per quarter.



3.2 At the end of the quarter, 19 complaints remained open. Twenty-nine complaints were closed during the quarter, of which 15 were reviewed in detail, 13 referred back to the relevant agency for a direct response and for one complaint the complainant did not provide further requested information.

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

Noise improvement opportunities

3.4 Complaints received 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 and Defence, arising from ANO reviews of complaints about the agencies' complaint handling.

Complaint received by ANO	Description of initiative	Current status
Nov 2016	Pallarenda: ATC procedure changes to reduce overflight of residential areas	The ANO is pursuing with Defence a possible noise improvement for residences in the Pallarenda area north of RAAF Base Townsville and in early July, the ANO team visited Townsville to progress this matter. Several potential changes were identified to reduce the number of aircraft overflights by both civilian and military aircraft departing Townsville Airport to the north. 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 – north-west of the main runway. The ANO is pleased with these initiatives. Early monitoring has suggested that already there has been some reduction in overflights. This case will likely be finalised once the results of longer term monitoring can be reviewed.
May 2017	Point Cook: flying orders amendment	In response to complaints about a military exercise, Defence has 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. Defence 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. The ANO commends Defence on its responsiveness in this case.
June 2017	Perth: changes to northern smart tracking approach path to reduce noise impacts for residents	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 of the 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. The ANO was pleased to be able to verify that there has been significant activity on this issue, albeit over a protracted period.
June 2017	Wagga Wagga: changes to circuit operations	Following a complaint about 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 ANO met with relevant airport staff, who have been responsive to the opportunity to reduce noise impacts. The ANO is advised that CASA considers a permanent change to the circuit direction can be accommodated, subject to confirmation from Defence that they no longer intend to conduct routine helicopter training at the airport.

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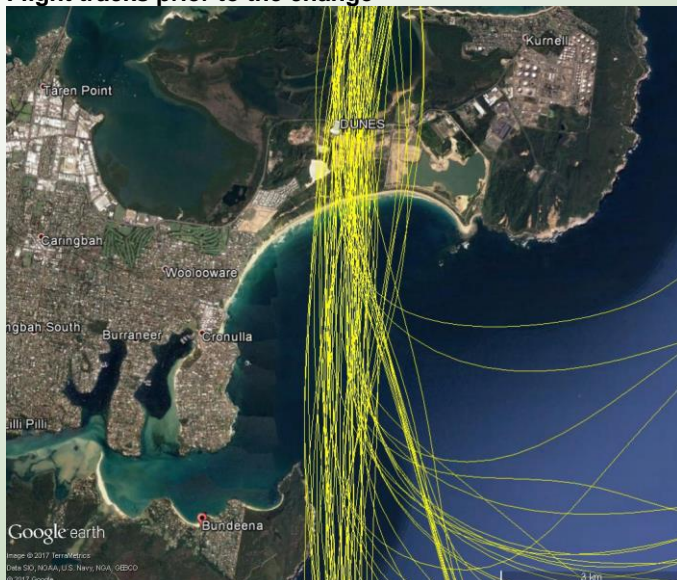
Complaint received by ANO	Description of initiative	Current status
Nov 2017	Richmond: noise sensitive area	<p>Following a complaint about frequent low level training activities over a rural property north of the Base, RAAF Base Richmond introduced a procedure to avoid low level flights over the property 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 which is considerate of local communities and also to improving its complaint management processes at RAAF Base Richmond.</p>

3.7 The following is an example of a noise improvement first raised in a complaint to Airservices, reviewed by the ANO and later pursued and implemented by Airservices. Improvements such as these do much to enhance Airservices' reputation as an organisation focussed on effective aircraft noise management.

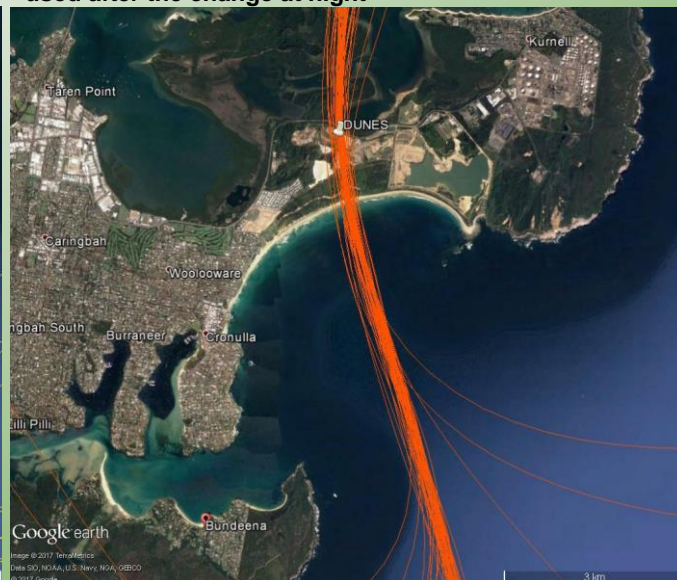
Noise improvement during Sydney curfew

Last quarter the ANO reported on a noise improvement initiative arising from an ANO investigation, which ultimately led to a change to the departure flight path during curfew and a reduction in noise impacts for coastal residents during the curfew hours of 11pm to 6am. The change was introduced on 9 November and Airservices has published the following images that demonstrate the noticeable shift to the flight path away from residents of Bundeena and other coastal areas.

Flight tracks prior to the change



Flight tracks for aircraft using the flight path to be used after the change at night



Improving aircraft noise complaint handling

- 3.8 A key objective of the ANO's review of complaints about Defence's and Airservices' handling of complaints about aircraft noise is the identification of improvements to the agencies' complaint handling practice. The ANO achieves this by providing feedback on a case-by-case basis, and also by sharing general learnings and insights about effective complaint handling through complaint management workshops.
- 3.9 During the quarter the ANO facilitated complaints management workshops at RAAF Base Richmond, and with RAAF Public Affairs officers at HMAS Harman, to help foster effective complaint handling and public engagement.
- 3.10 Defence is also continuing to progress actions in response to the recommendations made in the ANO's *Review of Defence's Aircraft Noise Complaints Management System (November 2016)*. One recommendation has been closed during this quarter (see Attachment 2 for details).

4 Consultation and Information Provision

- 4.1 The key consultation issue for the ANO during this quarter has been in relation to the Hobart flight path changes introduced by Airservices in mid-September 2017. In response to the complaints received, the ANO initiated a review of the community consultation and decisions that led to concentrated noise impacts on areas that had previously been only rarely overflown by aircraft. Airservices has subsequently reviewed the flight path that triggered the largest community reaction and, based on a limited consultation process, has decided to introduce a further change to this path that will take effect in March 2018. Airservices will also conduct a longer term review of alternatives for further changes to this path and also for the other flight paths introduced in September.
- 4.2 The ANO will be finalising a report, including findings and recommendations, for submission to the Airservices Board before the end of March 2018. Public release of the report will follow the Board's consideration and response.
- 4.3 In addition, Airservices has undertaken a thorough internal review of its processes associated with aircraft noise management. It is heartening to see the serious focus now being given by Airservices to identifying, and seeking to address, the underlying systemic issues that contributed to some of the consequences of implementing the flight path changes.
- 4.4 During the quarter, the ANO office attended a number of industry and community consultative meetings. This activity supports the ANO's role of monitoring Airservices' and Defence's consultation and information provision. It also fosters a broader understanding and awareness of aircraft noise management issues.

Meetings attended included:

- Meeting with Australian Mayoral Aviation Council, Executive Director;
- Hobart Community Aviation Consultation Group, Airport management, Mayors of Clarence and Sorrell councils and community member meetings;
- Government Aviation Complaint Handlers Forum;

- Presented at annual CACG Chair's Forum;
- Australian Airports Association annual conference;
- Adelaide Airport Consultative Committee, Parafield Airport Consultative Committee, Adelaide local Government and community member meetings;
- Government Aviation Noise and Environment Strategy Group meeting;
- Sydney Airport Master Plan briefing; and
- Melbourne Noise Abatement Committee Complaints Data workshop.

4.5 The ANO is pleased that during the quarter relevant Airservices officers and staff undertook a day of training in community engagement with the highly respected International Association for Public Participation. The implementation of flight path changes in Hobart, which Airservices has conceded included inadequate community consultation on its part, is a timely reminder of the fundamental importance of skilled and strategic community engagement design and practice. Effective community engagement requires a sophisticated and experienced approach. Adequate training and subject matter expertise are key.

5 Closing remarks

5.1 In my last two quarterly reports, I have stressed the importance of effective community engagement and my continuing focus on this key aspect of my Charter. For most of the year since my appointment, I have encouraged the Board of Airservices and Airservices management to turn its attention to raising the standard of community engagement expertise in the organisation. The recent complaints and our subsequent investigations into Airservices' introduction of new flight paths at Hobart have certainly underlined the need for substantial further work and for that work to progress swiftly. I anticipate that this will remain a high focus area in the first half of 2018.

5.2 On a more positive note, the number of Defence noise improvement opportunities that have reached a resolution during the quarter has been heartening. We are pleased by the serious attention noise issues are receiving and the practical initiatives that Defence is seeking to introduce as a result. These do much to build community confidence in Defence's management of aircraft noise issues. It may be useful for Defence to consider the Airservices experience in Hobart as it considers community engagement about its own activities, including routine flying, non-routine flying and exercises and strategic change programs such as the introduction of the Joint Strike Fighter.



Narelle Bell
Aircraft Noise Ombudsman
25 January 2018

Attachment 1 Complaint Statistics

The following tables summarise the complaint statistics for the quarter.

AIRSERVICES	Oct 2017	Nov 2017	Dec 2017	Total for quarter
Complaints received:	22	8	5	35
Complaints closed:	13	6	5	24
Total complaints closed - not reviewed:	8	2	3	13
Complainant did not provide further information	1	0	0	1
Outside charter scope	0	0	0	0
Referred to Airservices to respond directly	7	2	3	12
Total complaints closed - reviewed:	5	4	2	11
No change possible - explanation provided	4	4	2	10
Change adopted by Airservices Australia	1	0	0	1
Change adopted by Airport operator	0	0	0	0
Change adopted by Aircraft operator	0	0	0	0

DEFENCE	Oct 2017	Nov 2017	Dec 2017	Total for quarter
Complaints received:	0	2	0	2
Complaints closed:	1	2	2	5
Total complaints closed - not reviewed:	0	1	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	0	1	0	1
Total complaints closed - reviewed:	1	1	2	4
No change possible - explanation provided	0	0	0	0
Change adopted by Defence	1	1	2	4

	Airservices	Defence	Total
Complaints carried forward on 1 October	8	3	11
Complaints received	35	2	37
Complaints closed	24	5	29
Complaints open at 1 January 2018	19	0	19

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
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>Ongoing</u> – Defence has advised that work is underway to amend its internal complaint processes to incorporate the recommended improvements.
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. However, the ANO considers that more work is required 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>Ongoing</u> – Defence has advised that process review and refinement is underway. Bases have also been encouraged to engage with the ANO to obtain complaint handling training for new personnel dealing with noise complaints.
Recommendation 5 – Defence should adhere to its existing requirements for complaint recording and tracking.	<u>Ongoing</u> – Defence has advised that Bases have been reminded of existing requirements and this will be further addressed through an update to the Air Command Aircraft Noise Management Standing Instruction in 2018.

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Ongoing recommendations	ANO assessment of agency response
<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>Ongoing</u> – Defence has advised that work is well advanced on revising the OA39 Noise Complaint Form. It is being trialled and will soon be rolled out to all bases.</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>Ongoing</u> – Defence has established a procedure for handling complaints not readily ascribed to a base and advised that it will implement a centralised register for noise complaints to enhance the sharing of data, experience and learnings in the next few months.</p>