



Annual Report

2019-2020

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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
- community engagement
- information provision

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

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1 From the Ombudsman

This has been a year of substantial change for the Aircraft Noise Ombudsman (ANO).

Ms Narelle Bell completed her term on 8 February 2020 and I began my term the next day. It is clear from Ms Bell's work, as well as that of the previous ANO, Mr Ron Brent, that Airservices has faced substantial challenges in delivering effective community engagement when implementing new flight paths. The ANO report this year on Airservices' community engagement regarding new flight paths at the Sunshine Coast Airport demonstrates that these challenges persist.

Significant recommendations made by Ms Bell in her report on flight path changes at Hobart were aimed at improving Airservices capabilities, policies and practices in community engagement. The Board of Airservices accepted these recommendations and the remaining recommendations were implemented during the year.

This is a good start – Airservices has appointed a senior experienced officer with responsibility for the area and has begun a substantial revision of its community engagement procedures and how they fit into the rest of the organisation. This is a major undertaking and it will take time to become effective.

It will be a priority for the ANO over the next few years to engage constructively with Airservices as it develops its capacity to respond to and consult more effectively with the community. This will include the ANO providing feedback to Airservices on issues concerning affected communities; contributing to the development of relevant policies; and actively monitoring and advising on specific community engagement processes. Ideally, more effective community engagement will lead to fewer complaints.

Similarly, the ANO's work with Defence has focused on the need for a high level of community engagement and improved administrative practices including in the provision of noise related information. The ANO carried out extensive work to complete the second audit of Defence's compliance with the conditions relating to the Super Hornets and throughout this process, Defence demonstrated it was committed to responsibly managing aircraft noise impacts. However, improved administrative rigour is required to ensure Defence can clearly substantiate this.

Complaints, however, will remain a core function of the ANO. This year the ANO:

- handled 455 complaints, including 350 reviewed in detail, of which 310 led to a change adopted by the agency
- finalised two major reports – a multiple complaints investigation into Airservices' community engagement and provision of information in connection with proposed flight path changes at Sunshine Coast Airport; and a systemic review of Airservices' community engagement
- finalised the second compliance audit against Defence's conditions of approval for the Super Hornets at Amberley
- finalised Defence's 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.

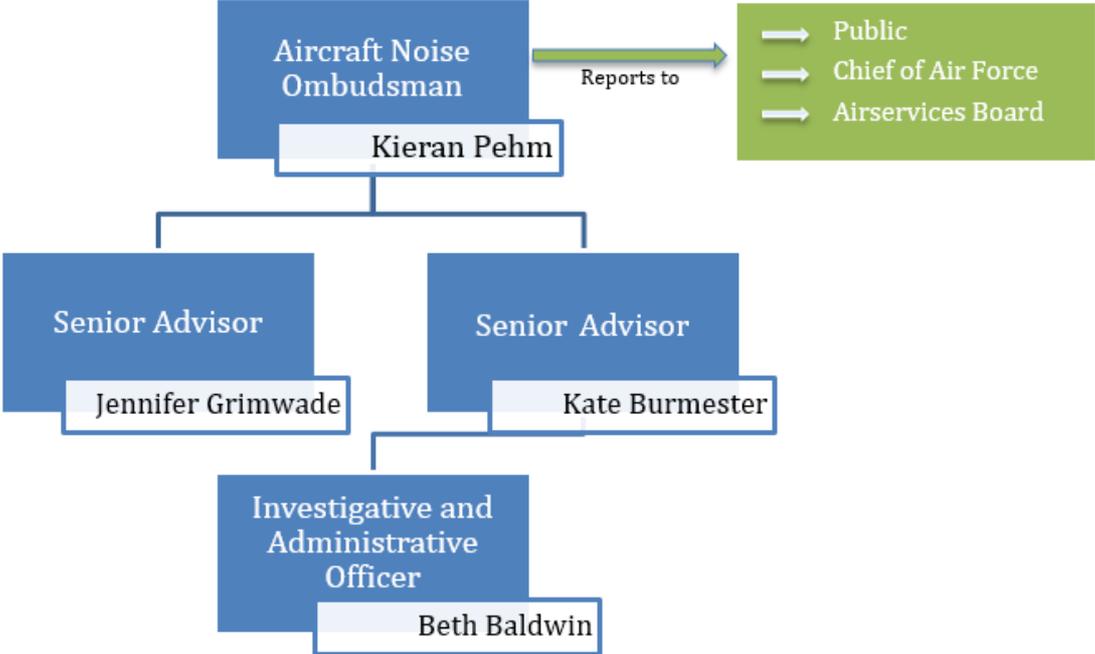
In March, the ANO office adapted well to new working arrangements for all staff due to the COVID-19 pandemic. The ANO staff continue to work remotely in line with Government guidance and the office has successfully managed to continue all of its operations with limited disruption.

In June, the ANO office farewelled long-term Senior Advisor, Kate Burmester, who was a founding staff member of the office and who made a significant contribution to the development and growth of the office over the last 10 years.

The ANO is well placed to deliver on the responsibilities set out in its Charter. I would like to thank the previous ANOs for their hard work in increasing the capacity of the office and look forward to building on their work.

Kieran Pehm
Aircraft Noise Ombudsman
28 August 2020

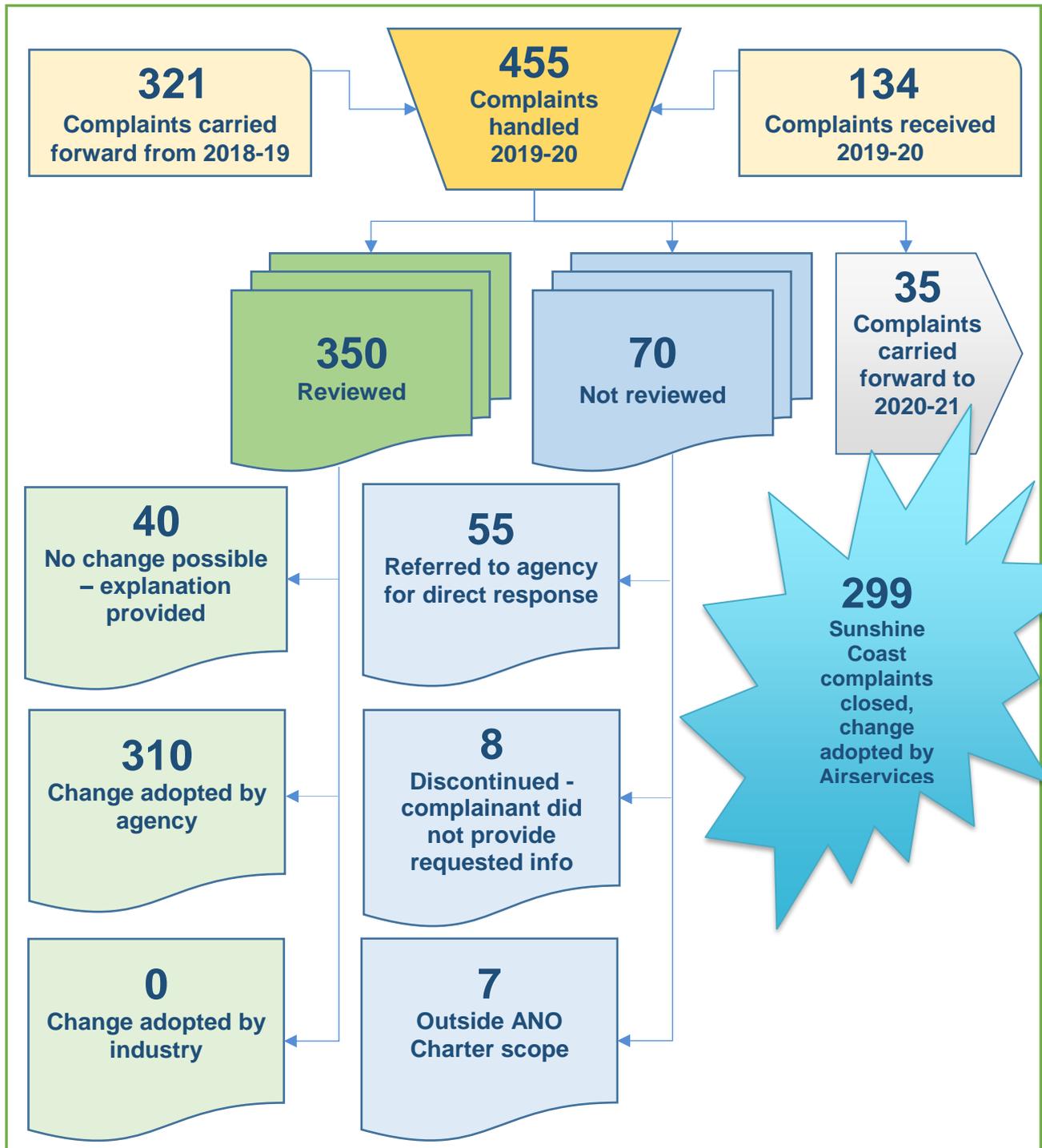
ANO Structure 2019-20



2 Complaints

Complaint statistics

2.1 The ANO received 134 complaints in 2019-20, which remains slightly high but represents a return to more normal levels of complaints. The following image shows how the complaints were handled.



2.2 The ANO started the financial year with 321 open complaints and received a further 134 complaints during the period. Of the total 455 complaints handled in 2019-20, 420 were closed. Of these, 350 complaints were reviewed in detail, 55 were referred back to either Airservices or Defence to respond to directly, eight

were closed without review due to a lack of information from the complainant and seven were closed as outside the scope of the ANO Charter. This left 35 open complaints carried forward into the 2020-21 financial year.

2.3 **Attachment 1** provides a more detailed summary of ANO complaint statistics for 2019-20.

2.4 **Table 1** below shows the number of complaints reviewed compared with the total number of complaints handled over the last five years. This shows an increase in the percentage of complaints that are handled by the ANO are being reviewed.

Table 1: Complaints reviewed versus total complaints handled over time

	Complaints handled*	Complaints closed	Complaints reviewed**	Complaints reviewed %
2015-16	271	254	120	47%
2016-17	131	119	70	59%
2017-18	115	104	65	63%
2018-19	413	92	39	42%
2019-20	455	420	350	77%

*Complaints handled – includes all complaints received; **Complaints reviewed – includes only those complaints investigated (others are not reviewed due to being out of scope or need to be referred to the agency in the first instance)

2.5 **Table 2** below shows the changes in the annual and per month average for ANO complaints received over time.

Table 2: Complaints received by financial year, with % change from previous year

	Total fin. year	Ave per month	% Change
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%
Jul 2018 –Jun 2019 (12 mths)	402	33.5	↑ 290.2%
Jul 2019 –Jun 2020 (12 mths)	134	11.2	↓ 66.7%

2.6 The decrease in complaints received in 2019-20 compared to the previous financial year is due to the large amount of complaints received in 2018-19 relating to the proposed flight path changes at Sunshine Coast Airport.

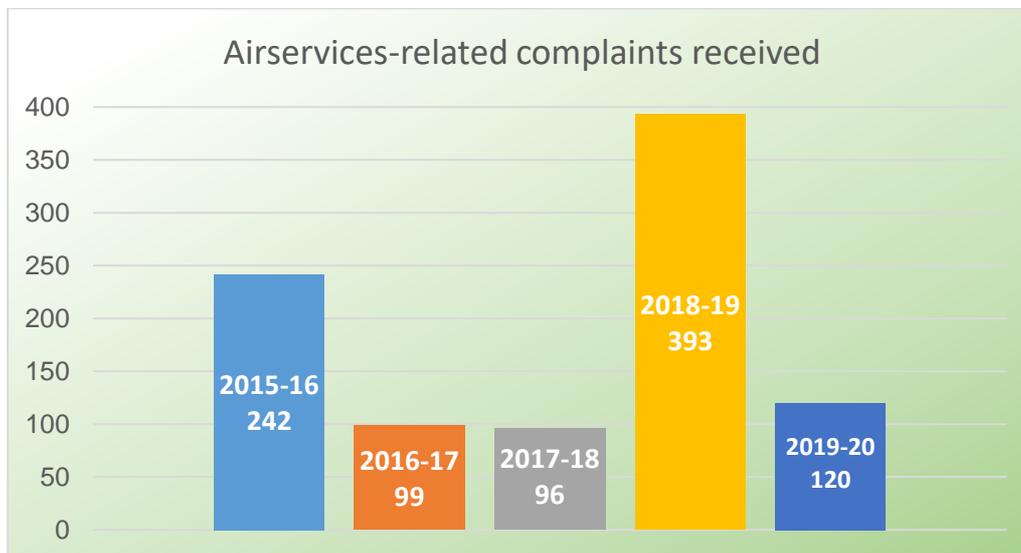
2.7 The table and graphs over the page demonstrate the return of the ANO to more regular numbers of complaints about Airservices following the significant increase during the 2018-2019 year from Sunshine Coast. However, complaints about Defence are higher than they have been since 2016-2017.

Table 3: Complaints received by agency in 2016-17 to 2019-20

	Total Airservices	% Change	Total Defence	% Change
2015-16	242		12	
2016-17	99	↓ 59.1%	15	↓ 25%
2017-18	96	↓ 3.0%	7	↓ 53.3%
2018-19	393	↑ 309.4%	9	↑ 28.6%
2019-20	120	↓ 69.5%	13	↑ 44.4%

Note – The above table does not include the one unidentified 2019-20 case where neither Defence nor Airservices were identified as the relevant agency.

Graph 1a: Complaints received about Airservices, 2015-16 to 2019-20



Graph 1b: Complaints received about Defence, 2015-16 to 2019-20



- 2.8 **Table 4** below shows that of the 350 complaints reviewed in 2019-2020, 310 (88.57%) led to change. The remaining 40 cases (11.43%) did not result in a change, however, the ANO, having investigated the issues, provided a detailed explanation to the complainant about why there was no practical change identified for the short to medium term.
- 2.9 The 306 cases closed with a change adopted by Airservices is unusually high as it reflects the finalisation of the Sunshine Coast multiple complaints review on 30 June 2020 and the subsequent closure of 299 complaints about the Sunshine Coast flight paths.
- 2.10 Four complaints led to change by Defence. These changes included improving the complaint handling process at a Defence base; providing better information to a complainant; the development of infrastructure and operating procedures to support changes with the aim of further reducing the amount of traffic in the vicinity of a complainant's property; and, improving responsiveness of Defence to complainants.

Table 4: Outcome of complaints reviewed by the ANO in 2019-20

Complaints reviewed and closed:		%
No change possible - explanation provided	40	11.43%
Change adopted by Airservices/Defence	310	88.57%
Change adopted by airport operator	0	0
Change adopted by operator	0	0

3 Noise improvement opportunities

- 3.1 One noise improvement opportunity was identified in the 2019-20 financial year and a further one opportunity was carried forward that had been identified but not finalised from the previous year. Both were finalised in 2019-20.
- 3.2 **Attachment 2** summarises the noise improvement opportunities considered in 2019-20.

4 Community engagement and information provision

- 4.1 In 2019-20, ANO staff continued to attend a variety of community and aviation industry meetings however, since March 2020, the advent of the COVID-19 pandemic limited any travel for the Ombudsman and staff. Many meetings were able to be held via teleconference or on an online meeting platform, which enabled continued engagement and interaction.
- 4.2 ANO staff attended 12 meetings or events involving industry and community stakeholders over the year. The ANO attended an international meeting with the United Kingdom's Independent Commission on Civil Aviation Noise (ICCAN), an organisation established by the UK Government as an 'independent non-statutory advisory arms-length body asked to act as the credible and impartial voice on all matters relating to civil aviation noise'. This provided the ANO with a valuable opportunity to discuss international trends and practices in the management of aircraft noise.
- 4.3 ANO staff attended six airport Community Aviation Consultation Group (CACG) (or equivalent) meetings. Attending these meetings as observers provides the ANO staff with direct knowledge of emerging aircraft noise management issues as well as assisting to foster a broader understanding and awareness of the ANO's role and aircraft noise management issues.
- 4.4 Additionally, ANO staff take the opportunity at these meetings to monitor the effectiveness of community engagement undertaken by Airservices and Defence including their presentation and distribution of aircraft noise-related information.

Airservices' Community Engagement

- 4.5 Pursuant to clause 61 of the ANO Charter, the ANO is working to build a constructive relationship with Airservices in discharging its responsibility to monitor Airservices' community engagement processes, presentation and distribution of aircraft noise related information.
- 4.6 The ANO and Airservices are developing a protocol for more active engagement by the ANO in the evolution of Airservices' community engagement including advising on policies and procedures as they are developed and liaising with Airservices staff on particular engagement projects as they are delivered.

5 ANO reviews

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

Airservices

Hobart

- 5.2 The ANO published its *Investigation into complaints about the introduction of new flight paths in Hobart*, in April 2018. The report made thirteen recommendations and the Board of Airservices accepted all recommendations.
- 5.3 As at 1 July 2019, the ANO was continuing to monitor seven outstanding recommendations from its *Hobart* review. Airservices presented information to demonstrate its actions to address the outstanding recommendations – the ANO considered this information and was satisfied all seven recommendations could be closed.
- 5.4 The ANO is still considering a number of outstanding complaints about the Hobart Airspace Design Review process, which led to the subsequent redesign of the airspace and flight paths introduced in November 2019. We have also received complaints from individuals in areas newly affected by aircraft noise since these changed arrangements took effect.

Sunshine Coast

- 5.5 From 22 April to the end of July 2019, the ANO received 299 complaints regarding the proposed flight paths to support a new runway at Sunshine Coast Airport.
- 5.6 On 30 April 2020, the ANO completed its multiple complaints investigation into the new flight paths at Sunshine Coast airport and submitted its *Investigation into complaints about the introduction of new flight paths in Sunshine Coast* report to the Airservices Board.
- 5.7 The ANO's report found that while Airservices has a responsibility to engage with the community on the environmental impact of aircraft operations, it relied on consultation, in which it took no part, which was carried out by the airport development project subsequent to an environmental impact statement from 2014/15. Airservices' later consultation led to public confusion about the relative responsibilities of Airservices and the Sunshine Coast Council and this persisted throughout the consultation period and after.
- 5.8 The ANO's report made two recommendations for improving Airservices' community engagement framework and practices: that Airservices develop a robust and dependable framework for third party proposed changes; and that Airservices use its post-implementation review process to re-engage with communities and consider community-suggested alternatives to the implemented flight paths.

5.9 The Airservices Board accepted the ANO's recommendations and both the report and the Board's response were published on the ANO website on 30 June 2020.

Systemic Review of Community Engagement

5.10 In 2018 the Airservices Board requested the ANO conduct a systemic review of the effectiveness of the community engagement systems of Airservices as a result of significant concerns highlighted in the ANO's review of Airservices' introduction of new flight paths in Hobart. The systemic review examined Airservices' readiness to engage effectively with communities about aircraft noise issues:

- arising through its own change initiatives
- resulting from its own business as usual activities
- specifically in the context of major airport infrastructure projects scheduled over the next decade.

5.11 On 30 April 2020, the ANO completed its systemic review of Airservices' community engagement and submitted its *Review of Airservices Australia's systems for community engagement - Final Report* to the Airservices Board.

5.12 The ANO reviewed Airservices' policies, procedures, processes and systems relating to community engagement, reviewed previous community engagement activities and observed current community engagement events and processes. The ANO also considered feedback from industry and community stakeholders and considered contemporary standards and best practice principles of community engagement within Australia and internationally.

5.13 The ANO's report acknowledged Airservices' approach to community engagement has been undergoing significant change over the last 18 months, including a program of continuous improvement and introduction of new, contemporary engagement practices and frameworks. Airservices has improved its community engagement capacity and acquired relevant expertise through new appointments.

5.14 However, Airservices is facing serious challenges posed by the major airport infrastructure developments planned for the next decade. Airservices will need to ensure its evolving approach to community engagement allows flight paths and other airspace changes to be designed with a more internally integrated approach that involves community engagement from the beginning and a more collaborative approach with the community in line with best or common practice.

5.15 Further, the ANO highlighted that one of the biggest challenges for Airservices will be the complex relationships with other entities that arise from third-party initiated flight path changes which will require Airservices to fully develop and document principles for governance and risk minimisation of partnerships with third party change proponents.

5.16 The ANO made six recommendations arising out of these findings, which were accepted by the Airservices Board, and both the report and the Board's response were published on the ANO website on 30 June 2020.

Defence

Review of Defence's Aircraft Noise Complaints Management System

- 5.17 In November 2019, the ANO closed the final recommendation from its *Review of Defence's Aircraft Noise Complaints Management System (November 2016)*.
- 5.18 That review, delivered in November 2016, 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 organisations'.
- 5.19 The final recommendation was for 'Defence to review and improve web based information on aircraft noise'. The ANO closed this recommendation after Defence provided evidence it is taking action to address the issues with the website and advised that it will conduct a full review of its web based information in future.

Compliance Audit of Defence's Super Hornet Operations at Amberley

- 5.20 In October 2019, the ANO completed a comprehensive audit of Defence's compliance with the Conditions of Approval for its Australian Super Hornet Flying Operations at RAAF Base Amberley and submitted a report to the Chief of Air Force.
- 5.21 The ANO assessed Defence's level of compliance against each Condition of Approval and each requirement identified from the three associated approved plans. A finding on the level of compliance was made in line with the Compliance Finding categories defined in the *Independent Audit and Audit Report Guidelines*¹(2015 Guidelines) that were in force at the time the audit criteria and methodology were approved.
- 5.22 The ANO found that Defence was compliant with four of the eight Conditions of Approval, non-compliant with three and one Condition was not applicable. The ANO made nine recommendations aimed at improving Defence's compliance with the Conditions of Approval and the requirements of the plans and strategies required by these Conditions. Further, two suggested improvements were identified to enhance Defence's public reporting on its aircraft noise management more broadly.
- 5.23 In summary, the ANO considered that Defence had complied with the intent of the Conditions of Approval in relation to managing the effects of aircraft noise on the community and the environment. However, it had some work to do to establish effective systems to facilitate the necessary administrative, records management and reporting frameworks required to substantiate its performance against these Conditions.

¹ Commonwealth of Australia, *Independent Audit and Audit Report Guidelines for controlled actions which have been approved under Chapter 4 of the Environment Protection and Biodiversity Conservation Act 1999*, 2015, p. 11-12

- 5.24 In May 2020, the Department of Agriculture, Water and the Environment ('the Department') advised the ANO that the *2015 Guidelines* had been updated in July 2019 and amended to remove the Compliance Finding category 'undetermined'. The Department asked the ANO to clarify any findings in its Audit report that reference a compliance rating as 'undetermined' to align with the updated *2019 Guidelines'* Compliance Finding categories.
- 5.25 The ANO prepared an Addendum to the October 2019 report, which determined that, in each case where an 'undetermined' finding had been made, the appropriate Compliance Finding in line with the updated *2019 Guidelines* was 'non-compliant'.
- 5.26 The ANO noted that clarification of the Compliance Findings did not result in any amendment, addition or removal of the recommendations made in the original Audit report of October 2019. The ANO's overall conclusion was unchanged from the original Audit report of October 2019 – that is, the ANO considers that Defence had complied with the intent of the Conditions of Approval in relation to managing the effects of aircraft noise on the community and the environment but that it had some work to do to improve some aspects of its performance.

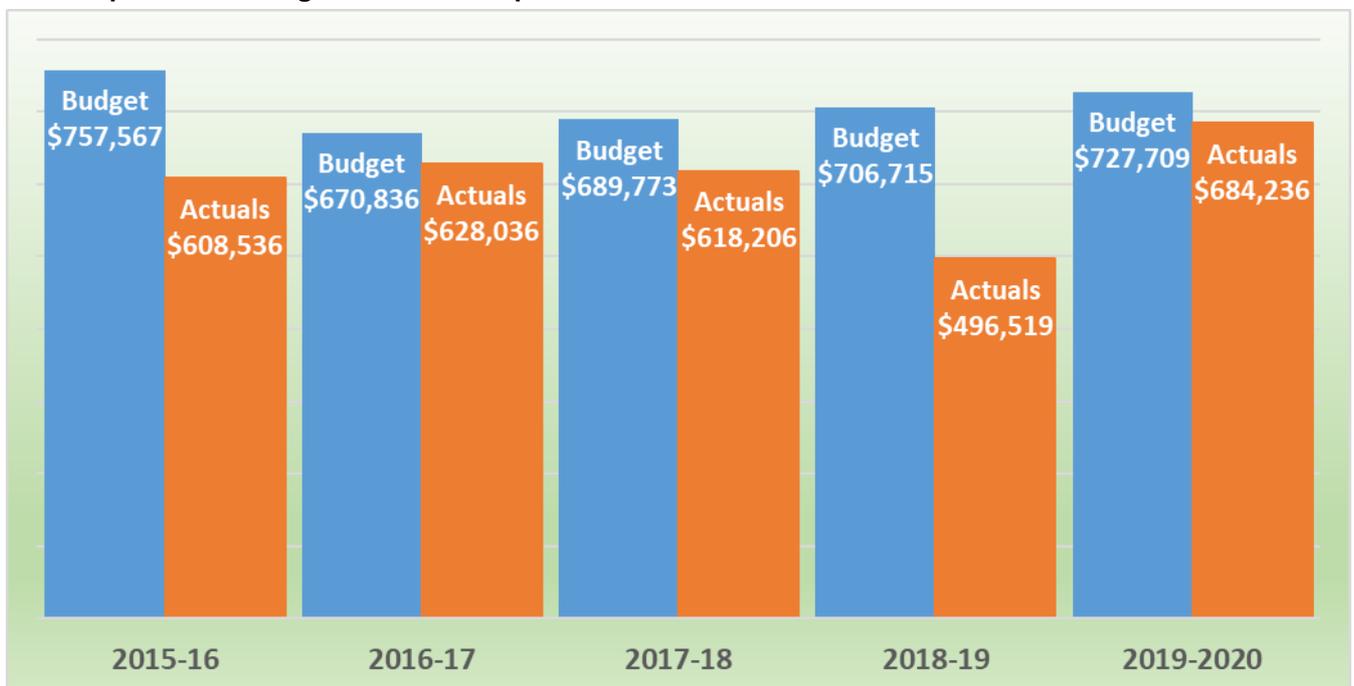
6 ANO publications

- 6.1 In addition to its quarterly reports and last year's annual report, the ANO published the following on its website during 2019-2020:
- *Review of Airservices Australia's systems for community engagement - Final Report (April 2020)*
 - *Airservices Board response to ANO Review of Airservices Australia's systems for community engagement (June 2020)*
 - *Investigation into complaints about the introduction of new flight paths in Sunshine Coast (April 2020)*
 - *Airservices Board response to ANO Investigation into complaints about the introduction of new flight paths in Sunshine Coast (June 2020)*
 - *Addendum to Compliance Audit of Australian Super Hornet Flying Operations at RAAF Base Amberley - October 2019 (issued May 2020)*
 - *Compliance Audit of Australian Super Hornet Flying Operations at RAAF Base Amberley - October 2019.*

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 In February 2019, the ANO received approval for a three-year budget allocation covering the period 2018-19 to 2020-21. This means the ANO no longer needs to seek funding annually, allows for flexibility in managing expenditure peaks and troughs across financial years and further strengthens the office's independence.
- 7.3 During 2019-2020, the ANO effectively managed its budget, with actual expenditure 6% below the budget allocation. The total operating expenditure of the office was \$684 236 against a total budget of \$727 709. The small under-spend compared to budget reflects reduced expenditure on travel costs in the last quarter of the financial year due to the restrictions imposed by COVID-19. It is expected COVID-19 will continue to have an impact on travel for the Ombudsman and ANO staff into the next financial year with limited attendance in person at any events or meetings for the foreseeable future. Given the uncertainty of the aviation sector, the ANO is also mindful of the need to be prudent with any expenditure into the 2020-2021 financial year.
- 7.4 **Graph 2** below shows the ANO budget and actual expenditure over the last five years.

Graph 2: ANO budget and actual expenditure 2015-16 to 2019-2020



Attachment 1 ANO Complaint Statistics

The following summarises the ANO complaint statistics for 2019-2020.

	Total	Airservices	Defence	Unidentified
Complaints carried forward from 2018-19	321	316	5	0
Complaints received	134	120	13	1
Total complaints handled in 2019-2020	455	436	18	1
<u>Closed complaints – reviewed</u>				
No change possible - explanation provided	40	34	6	0
Change adopted by Airservices or Defence	310	306	4	0
Change adopted by airport operator	0	0	0	0
Change adopted by operator	0	0	0	0
Total complaints reviewed and closed	350	340	10	0
<u>Closed complaints – not reviewed</u>				
Referred to agency to respond to directly	55	50	5	0
Complainant did not provide further information	8	8	0	0
Outside Charter scope	7	5	1	1
Total complaints not reviewed and closed	70	63	6	1
Complaints closed during 2019-20	420	403	16	1
Complaints carried forward to 2020-21	35	33	2	0

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 2019-20 financial year.

Noise improvement opportunities considered during 2019-20

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 during the consultation exercise prior to the new path being introduced in Sept 2015. At that time Airservices elected to implement the path as designed and undertook to look at the opportunity to reduce noise impacts as part of an upcoming post-implementation review. In the PIR, Airservices again deferred consideration of the change pending other change initiatives and referral to the Airport's technical noise working group.</p> <p>The ANO continued to seek updates from Airservices. In early 2018, Airservices advised that its 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 to not 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". At the time, the anticipated timeframe for Perth's MDP approval was the first quarter of 2019.</p> <p>The ANO was advised by Airservices in late 2019 that "Based on Ministerial approval of the new parallel runway MDP by the end of 2019, and subject to any caveats placed by the Minister on the associated airspace management plan for the new runway, Airservices aims to implement the smart tracking change in the second half of 2020. The change is currently active in the Airservices flight path change pipeline, with relevant pipeline activities underway towards achieving an implementation timeline of the second half of 2020."</p> <p>In April 2020 Airservices advised the ANO that it had conducted an investigation into the proposed change to determine if it would deliver a net overall noise improvement for the communities in the area including conducting a social impact analysis of the current and proposed change. The analysis of social and environmental impacts determined that the proposed flight path change:</p> <ul style="list-style-type: none"> • does not provide an overall noise improvement for residents in the area, as measured by count of dwelling and population overflight • would have a negative impact by increasing operations over sensitive sites, including schools and educational facilities, childcare centres, religious facilities, hospitals and aged care centres • had potential to increase the aviation noise exposure of future housing developments in the vicinity. <p>Based on these findings Airservices advised it would not be proceeding with the proposed change.</p>
July 2019	Lismore: changes to holding pattern	<p>During the course of investigating a complaint about the noise from the existing holding pattern of small planes approaching Runway 15 at Lismore Airport, Airservices agreed that further consideration could be given to whether the opportunities exist to move the holding pattern away from the more populated areas.</p> <p>This proposed change has now been placed onto Airservices' ATS change program for consideration when workloads allow. Airservices advised the ANO that it will correspond directly with the complainant with updates as the change consideration process progresses. The ANO will not be monitoring further.</p>

Attachment 3 ANO assessment of action on recommendations

During the 2019-2020 financial year, the ANO continued to monitor one recommendation Defence had outstanding from the ANO's 2016 review and seven recommendations Airservices had outstanding from the ANO's 2018 Hobart review. All of these recommendations were closed during 2019-2020.

Further, in this financial year, the ANO began monitoring 17 new recommendations arising out of three new reports.

The following tables set out the status of all outstanding recommendations and the ANO's assessment of action against each. Recommendations that were previously reported as closed have been removed.

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

Ongoing recommendations	ANO assessment of agency response
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>Closed</u> – Defence has advised that it is maintaining the Defence Aircraft Noise Website as a business as usual practice. It has launched its online complaint form, has reviewed and updated its web information and fixed any links to address the issues identified in the review. Defence's new practice is to check a random page once a week and fix links and make updates as required. Defence bases are also regularly updating the information on their individual pages. Defence advised that a full review of its website will be conducted in due course.

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>Closed</u> – Airservices has reviewed its criteria and had them approved by Department of Environment and has identified the matters to be considered in Social Impact Assessments.</p> <p>ANO considers that Airservices has addressed this recommendation.</p>
<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>Closed</u> – Airservices has provided sufficient evidence of actions taken including:</p> <ul style="list-style-type: none"> • updating its National Operating Standard (V15, Jun 2019) to address these requirements • demonstrating this procedure in use through providing a recent example of a completed Environmental Assessment and Social Impact Analysis. <p>The ANO considers that Airservices has addressed this recommendation.</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>Closed</u> – Airservices has provided sufficient evidence of actions taken including:</p> <ul style="list-style-type: none"> • updating its National Operating Standard (V15, Jun 2019) to address these requirements • demonstrating this procedure in use through providing a recent example of a completed Environmental Assessment and Social Impact Analysis. <p>The ANO considers that Airservices has addressed this recommendation.</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>Closed</u> – Airservices has embedded the relevant skilled and experienced subject matter expertise through:</p> <ul style="list-style-type: none"> - completing an internal restructure with the Airports and Environment team, Community Engagement team and Flight Path Design team all reporting to the same Environment & Community Manager - recruiting a new Environment and Community Manager (at a senior management level) with extensive community engagement experience and skills. The new Manager commenced in this role on 30 March 2020 and will report directly to a member of the Executive - recruiting and appointing other community engagement staff with strong backgrounds in modern community engagement principles - increasing the capability of the Community Engagement Team through training and access to community engagement specialists, expertise, tools and technology. <p>The ANO considers that Airservices has addressed this recommendation.</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>Closed</u> – Airservices' flight path change cross-functional flowchart describes a process that incorporates social impact analysis immediately after a high level preliminary concept design is produced and anticipates review and amendment, if necessary, of the design in the context of the social impact analysis.</p> <p>The ANO considers that Airservices has addressed this recommendation.</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>Closed</u> – Airservices has pointed to the material produced for the community consultation on the Melbourne flight path changes. This material demonstrates satisfaction of the 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>Closed</u> – Airservices has pointed to a number of instances in which it has identified inconsistencies in information provided and taken effective action to correct the information. This material demonstrates satisfaction of the recommendation.</p>

Defence - Compliance Audit of Australian Super Hornet Flying Operations at RAAF Base Amberley (October 2019)

Ongoing recommendations	ANO assessment of agency response
<p>Recommendation 1 – Defence should establish robust administrative systems that ensure it obtains the required approvals for changes to its activities prior to implementing those changes. These systems should ensure annual reviews are conducted that would enable the identification and early rectification of any non-compliances.</p>	<p><u>Ongoing</u> - Defence has prepared a remediation action plan and has commenced actions to address this recommendation.</p>
<p>Recommendation 2 – Defence should re-instate or adopt new or additional record management practices to ensure it can demonstrate its compliance with the Conditions of Approval and the requirements of the plans and strategies required by these Conditions</p>	<p><u>Closed</u> - Defence has demonstrated it has put in place an internal audit process of its Aircraft Noise Management including reviewing the Australian Super Hornet Noise Management Plan and sub plans and advised that record management associated with the ASH Plans and Sub plans will be audited to ensure compliance with the Conditions of Approval.</p>
<p>Recommendation 3 – Defence should:</p> <ol style="list-style-type: none"> a. review its draft version 4.0 Noise Management Plan in light of the findings of this audit report, the questions and comments made to date by the Department of the Environment and Energy, and in consideration of any other changes or assumptions that may be now relevant; b. ensure the revised Noise Management Plan retains a level of detail that is appropriate to its purpose as a public account of Defence’s planned noise management activities and includes an appropriate requirement to regularly review the plan in light of any outcomes of its Noise Monitoring Program; c. set out clearly the changes compared to the version 3.0 Noise Management Plan and outline the reasons for these; and d. re-submit the revised version 4.0 Noise Management Plan for approval in line with Condition 8 of its approval 	<p><u>Ongoing</u> - Defence has prepared a remediation action plan and has commenced actions to address this recommendation.</p>

Ongoing recommendations	ANO assessment of agency response
<p>Recommendation 4 – Defence should regularly review its Noise Management Plan, with consideration to be given to relevant matters, including but not limited to:</p> <ul style="list-style-type: none"> a. any foreseeable variations approved by the SADFO-Amberley; b. any changes to Super Hornet flying operations limitations or planning assumptions, which occur as a result of evaluation of the noise monitoring outcomes and the complaints process detailed in the Noise Monitoring and Complaints Handling Strategy; and c. the results of audits of compliance with its Conditions of Approval for Australian Super Hornet Flying Operations 	<p><u>Ongoing</u> - Defence has prepared a remediation action plan and has commenced actions to address this recommendation.</p>
<p>Recommendation 5 – Defence should use its Annual Super Hornet Noise Reports to explicitly evaluate noise outcomes against the noise modelling undertaken for the Public Environment Report 2009, and also for any subsequent approved noise modelling undertaken</p>	<p><u>Ongoing</u> - Defence has prepared a remediation action plan and has commenced actions to address this recommendation.</p>
<p>Recommendation 6 – Defence should table its Annual Super Hornet Noise Reports at the Amberley Consultative Working Group (ACWG) meetings and ensure this is minuted</p>	<p><u>Ongoing</u> - Defence has prepared a remediation action plan and has commenced actions to address this recommendation.</p>
<p>Recommendation 7 – Defence should regularly review its Noise Monitoring and Complaints Handling Strategy, with consideration to be given to relevant matters, including but not limited to:</p> <ul style="list-style-type: none"> a. any changes to the Noise Management Plan and Noise Mitigation and Complaints Resolution Strategy; b. those arising through the complaints process detailed in the Noise Monitoring and Complaints Handling Strategy; and c. the results of audits of compliance with its Conditions of Approval for Australian Super Hornet Flying Operations. 	<p><u>Closed</u> - Defence has conducted its annual review of its Noise Monitoring and Complaints Handling Strategy and has published it on its website.</p>
<p>Recommendation 8 – Defence should identify and implement an effective method for publicly reporting on its actions in response to recommendations made in relation to its Conditions of Approval for Australian Super Hornet Flying Operations.</p>	<p><u>Ongoing</u> - Defence has prepared a remediation action plan and has commenced actions to address this recommendation.</p>

Ongoing recommendations	ANO assessment of agency response
<p>Recommendation 9 – Defence should regularly review its Noise Monitoring and Complaints Handling Strategy, with consideration to be given to relevant matters, including but not limited to:</p> <ol style="list-style-type: none"> any changes to the Noise Management Plan and Noise Monitoring and Complaints Handling Strategy; those arising through the complaints process detailed in the Noise Monitoring and Complaints Handling Strategy; and the results of audits of compliance with its Conditions of Approval for Australian Super Hornet Flying Operations. 	<p><u>Closed</u> - Defence has conducted its annual review of its Noise Monitoring and Complaints Handling Strategy and has published it on its website.</p>

Airservices – Investigation into complaints about the introduction of new flight paths in Sunshine Coast (April 2020)

Ongoing recommendations	ANO assessment of agency response
<p>Recommendation 1 – Airservices should develop a framework for third party proposed changes that:</p> <ol style="list-style-type: none"> provides robust and dependable governance arrangements to manage its early and ongoing engagement with third parties establishes clear lines of accountability and documents these arrangements as they evolve ensures an effective consultative process, which includes monitoring the adequacy of any third party consultations being relied on. 	<p><u>Ongoing</u> – The Airservices Board accepted this recommendation and advised it is agreed as necessary. A Third Party Proposed Changes Framework is planned for implementation by 30 September 2020.</p>
<p>Recommendation 2 – Airservices should, as soon as practicable, design an effective post-implementation review (PIR) process for the Sunshine Coast flight path designs, that does not perpetuate design constraints requiring alignment with EIS concepts, and which encompasses:</p> <ol style="list-style-type: none"> consideration of identified community-suggested alternatives a community engagement process that provides for genuine opportunities for community contributions to influence decisions application of the latest version of Airservices’ National Operating Standard (NOS) Environmental Management of Changes to Aircraft Operations (AA-NOS-ENV-2.100). 	<p><u>Ongoing</u> – The Airservices Board accepted this recommendation and advised:</p> <ul style="list-style-type: none"> a PIR Terms of Reference (TOR) will be developed for discussion and agreement with the ANO by September 2020 to complete the PIR, it is necessary to gather 12 months of post-implementation operational data to enable assessment of actual operation against the assessed impact. It is therefore anticipated this PIR will be completed not later than 18 months after runway opening.

Airservices – Review of Airservices Australia's systems for community engagement – Final Report (April 2020)

Ongoing recommendations	ANO assessment of agency response
<p>Recommendation 1 – Airservices should finalise its internal review and restructure of its Environment and Community Group including establishing a fully developed and settled suite of procedures and policies for community engagement, with a scheduled review and evaluation mechanism.</p>	<p><u>Ongoing</u> – the Airservices Board accepted this recommendation and advised the restructure has been completed and Airservices’ development of policies and procedures is well progressed with completion planned for 30 September 2020.</p>
<p>Recommendation 2 – Airservices should continue to strive to ensure its community engagement practice is in line with modern standards and methods of community engagement and draws on experience in other industries and countries. In particular, Airservices should consider emerging methods of community engagement such as ‘deliberative engagement’ as an effective tool on the broader spectrum of community engagement.</p>	<p><u>Ongoing</u> – The Airservices Board accepted this recommendation and advised this recommendation is being addressed through Airservices’ new Community Engagement Framework due for completion 30 June 2020. In addition, the Airservices’ community engagement team has recently completed certificate training through the International Association for Public Participation (IAP2).</p>
<p>Recommendation 3 – Airservices should meet with the ANO on a quarterly basis in relation to its community engagement activities and its presentation and distribution of aircraft noise related information.</p>	<p><u>Ongoing</u> – The Airservices Board accepted this recommendation and advised the Airservices’ Environment and Community Manager has established a program of regular meetings with the ANO, and discussions have progressed in this regard.</p>
<p>Recommendation 4 – Airservices should finalise and publish its <i>Community Engagement Framework</i> as a matter of priority to reflect its improved community engagement processes including (but not limited to) better planning and timing, reach and reasons for decisions.</p>	<p><u>Closed</u> – The Airservices Board accepted this recommendation and advised the Framework was being progressed as a priority and due for completion by 30 June 2020. (Airservices consulted the ANO on a draft Framework in 2019-2020 and published the Framework on its website in August 2020).</p>
<p>Recommendation 5 – Airservices should use its existing network of aviation industry meetings and groups to engage and coordinate more with the aviation industry on planned community engagement activities, in particular accessing the industry’s knowledge of local conditions and concurrent community engagement activities.</p>	<p><u>Ongoing</u> – The Airservices Board accepted this recommendation and advised the use of these networks is agreed as a positive action and internal discussions are progressing to develop appropriate processes to ensure this occurs.</p>
<p>Recommendation 6 – Airservices should develop a framework for third party proposed changes that:</p> <ol style="list-style-type: none"> a) provides robust and dependable governance arrangements to manage its early and ongoing engagement with third parties b) establishes clear lines of accountability and documents these arrangements as they evolve c) ensures an effective consultative process, which includes monitoring the adequacy of any third party consultations being relied on. 	<p><u>Ongoing</u> – The Airservices Board accepted this recommendation and advised this is agreed as necessary. A Third Party Proposed Changes Framework is planned for implementation by 30 September 2020.</p>