



Quarterly Report
July - September 2019

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1 Introduction

- 1.1 This report includes complaint statistics and a summary of ANO activities during the July to September 2019 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 July to the end of September 2019, the ANO received a total of 47 complaints, comprising seven about Defence's management of military aircraft noise issues and forty regarding Airservices management of civilian aircraft noise issues. **Attachment 1** provides detailed complaint statistics for the quarter.
- 2.2 The number of complaints received this quarter (47 complaints) indicates a return to more normal levels of complaints for the ANO, although still at levels above average compared with previous years.
- 2.3 During the previous quarter – April to June 2019 – the ANO had experienced a sharp increase in complaints (a total of 315 complaints) due largely to the wide community dissatisfaction with Airservices' community engagement, information provision and complaint handling in connection with proposed flight path changes consequent to the planned new runway at Sunshine Coast Airport. This influx of complaints specifically about the Sunshine Coast abated somewhat in the current quarter and we have now commenced a multiple complaints investigation into Airservices' management of aircraft noise in connection with its proposed flight path changes at Sunshine Coast.
- 2.4 The ANO has continued work on its systemic review of the effectiveness of Airservices' community engagement systems. The Review will particularly focus on the organisation's readiness to engage effectively 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.

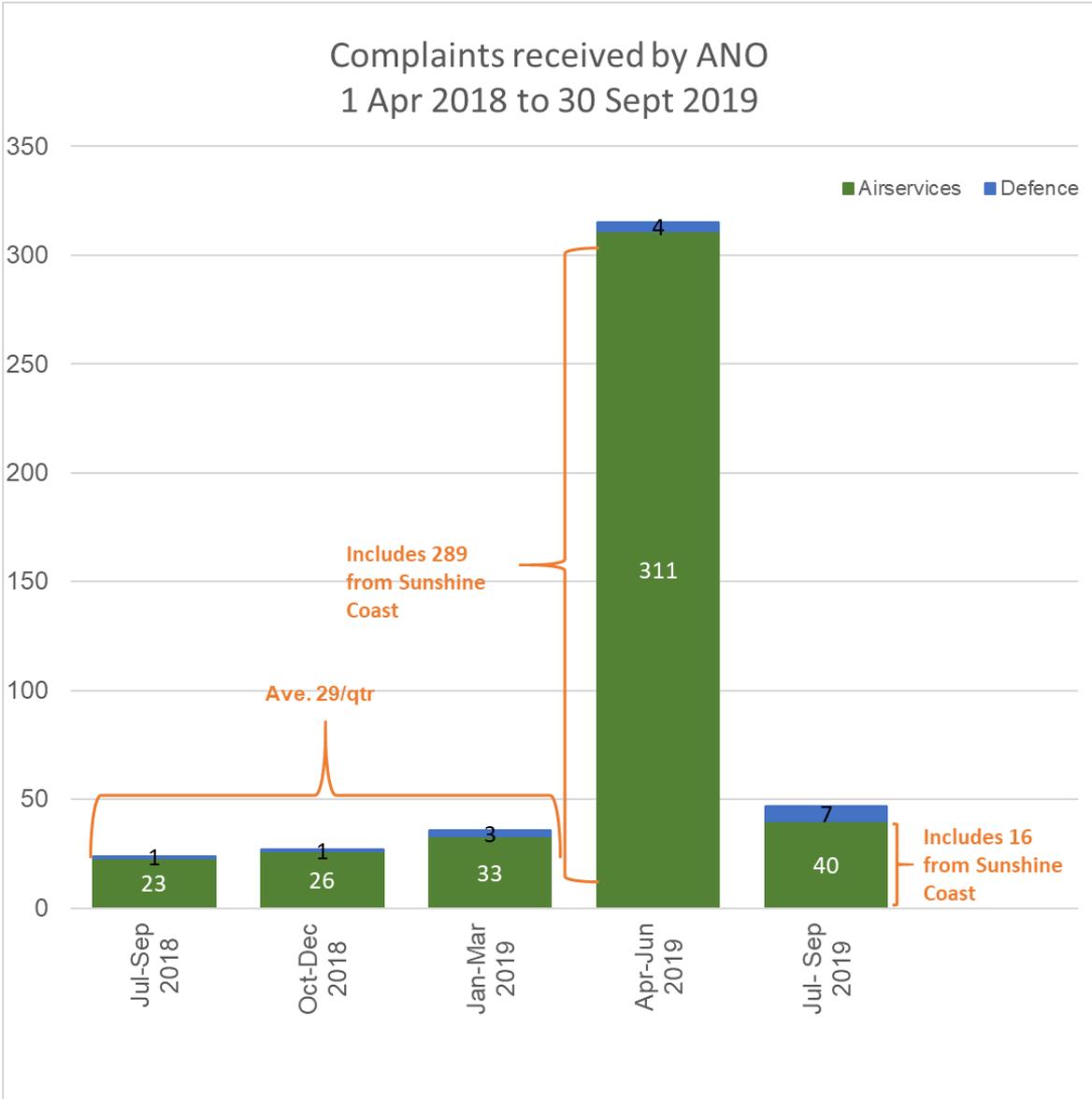
The ANO will report to the Airservices Board accordingly.

- 2.5 During this quarter, the ANO continued to monitor Airservices' actions to address outstanding recommendations from our *Investigation into complaints about the introduction of new flight paths in Hobart (April 2018)*. As at 30 June 2019, the ANO was continuing to monitor seven outstanding recommendations from its Hobart review. In this quarter, (Q3, 2019), four of these seven outstanding recommendations were closed.

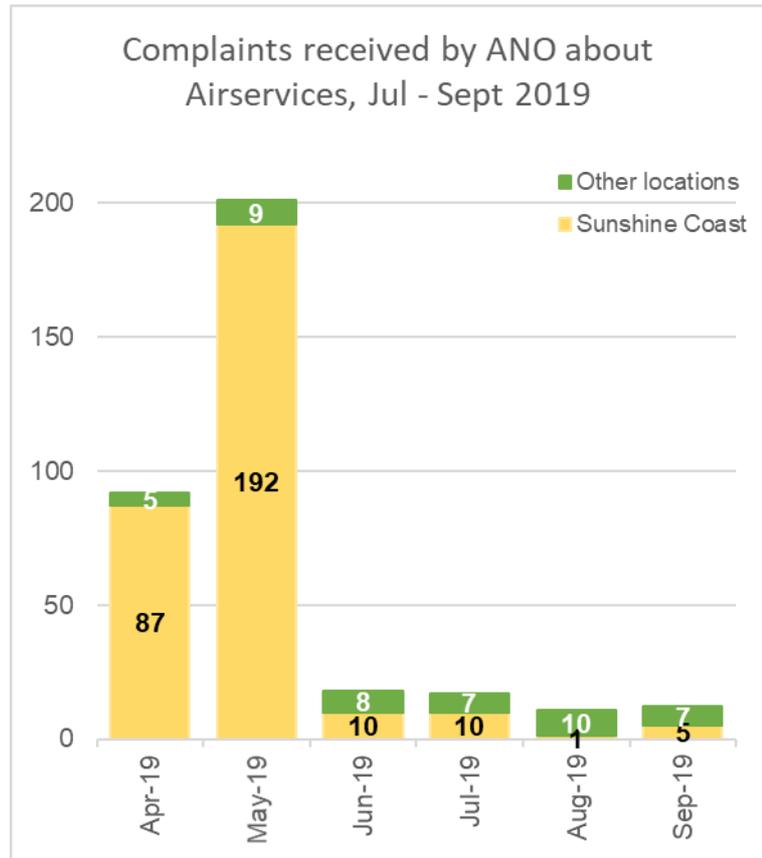
- 2.6 Defence is still working to address the final recommendation from our *Review of Defence’s Aircraft Noise Complaints Management System (November 2016)*, which is aimed at improving the aircraft noise information available through its website. We have also been busy during the quarter continuing to progress the second compliance audit of Defence’s *Australian Super Hornet Flying Operations, RAAF Base Amberley Project*.
- 2.7 **Attachment 2** provides a summary of action on all outstanding recommendations from both of the Reviews referred to above.

3 Complaint handling

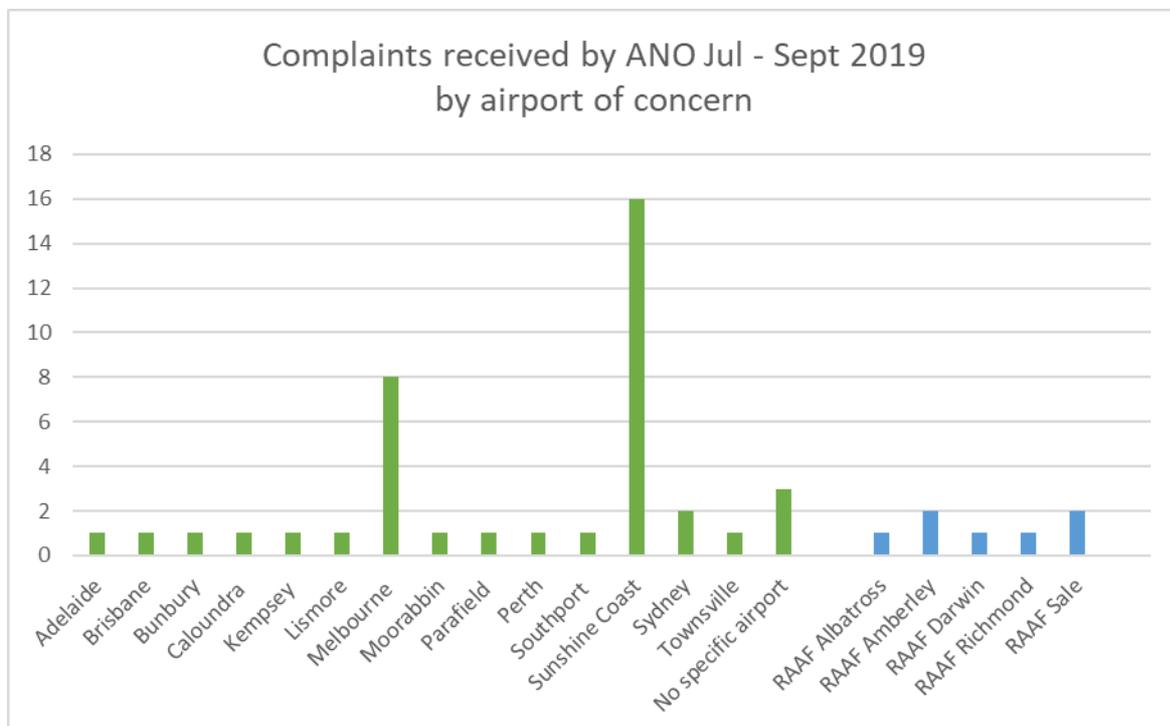
3.1 During the quarter the ANO received 47 new complaints, seven of which related to Defence’s aircraft noise management and 40 related to Airservices’ aircraft noise management. While this is a return to a lower level of complaints, it is still above the quarterly average of the twelve months prior to the influx of Sunshine Coast complaints, as shown in the graph below. The higher than average result is largely explained by the 16 further complaints received in relation to Sunshine Coast issues, as shown at para 3.2.



3.2 The graph to the right shows the reduction in concentration of Sunshine Coast complaints that were submitted to the ANO in July - September in comparison to April, May and June 2019. Complainants continued to contact the ANO in Q3 2019 with concerns about the consultation process, information provision, and the subsequent complaint handling by Airservices.



3.3 In addition to the 16 Sunshine Coast complaints received during this quarter, the ANO also received 24 complaints pertaining to a further 13 civilian airports. Three complaints were about activity that was not airport specific or the airport was not identified, and the seven complaints about Defence related to five different RAAF bases, as shown in the graph below.



- 3.4 Twenty-eight complaints were closed during the quarter, of which eleven were reviewed in detail and ten were referred back to the relevant agency for a direct response. Of the remaining seven, three were outside the ANO Charter scope and four were closed when the complainant did not provide further requested information to allow a review to proceed.
- 3.5 Of the 27 complaints closed during the quarter, one complaint led to a change being adopted by Airservices to provide more accurate information on its website. Three complaints led to changes being adopted by Defence, including to improve its relationship with communities and enable more effective complaint handling; to manage operations in order to minimise impacts on residents; and through providing a more detailed and thorough response to a complainant.
- 3.6 There are 340 complaints still open as at 1 October 2019. This is a reflection of the large volume of complaints relating to the Sunshine Coast matter that will remain open while our multiple complaints investigation continues.
- 3.7 Complaint statistics for the quarter are summarised at **Attachment 1**.

Noise improvement opportunities

- 3.8 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 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.
- 3.9 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.
- 3.10 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 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>Since that time, the ANO has 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 sought an update from Airservices and was advised 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>

4 Consultation and Information Provision

Sunshine Coast Review

- 4.1 As previously reported, on 30 May 2019 I advised the Chairman of the Airservices Australia Board of my intention to conduct a multiple complaints investigation into Airservices' community engagement and provision of information in connection with proposed flight path changes consequent to the planned new runway at Sunshine Coast Airport.
- 4.2 Subject to the provision of further information needed for our investigation and subject to any unforeseen issues or areas of inquiry emerging, the ANO aims to provide its investigation report to the Board of Airservices early next year.
- 4.3 In addition, in my last report I said that we were considering revisiting recommendations made following the Hobart investigation to ensure that progress made and recommendations found to have been met have not been negated in the context of Sunshine Coast. I carried out this review and determined that we would not re-open any of the recommendations. Further information about the status of all other recommendations in the Hobart Review is outlined below.

Hobart Review

- 4.4 The ANO continued to monitor Airservices' actions to address outstanding recommendations from our *Investigation into complaints about the introduction of new flight paths in Hobart (April 2018)*. At 30 June 2019, the ANO was continuing to monitor seven outstanding recommendations from its *Hobart* review. In this quarter, four of these seven outstanding recommendations were closed, leaving three recommendations still open. These are listed at **Attachment 2**.
- 4.5 Since the end of this quarter, Airservices has provided some additional information in relation to two of the three outstanding recommendations which the ANO is currently considering.

Systemic Review of Airservices' community engagement systems

- 4.6 As previously reported, as a result of ongoing concerns regarding Airservices' community engagement in relation to specific flight path changes, and at the Board's request, the ANO has commenced a systemic review of the effectiveness of Airservices' community engagement systems. The Review will particularly focus on the organisation's readiness to engage effectively about aircraft noise issues:
- arising through its own change initiatives;
 - resulting from its own 'business as usual' activities; and
 - specifically in the context of major airport infrastructure projects scheduled over the next decade.
- 4.7 The ANO will report to the Airservices Board accordingly.

Compliance Audit of Defence's Super Hornet Operations at Amberley

- 4.8 The ANO has worked intensively during the quarter on its audit of Defence's compliance with its Conditions of Approval for Australian Super Hornet Flying Operations at RAAF Base Amberley (QLD). At the time of this report, the ANO is close to finalising its audit report for submission to the Chief of Air Force.
- 4.9 The report will include recommendations and will be published on the ANO website once Defence has considered the report and made the necessary submissions to the Department of the Environment and Energy.

5 Closing remarks

The July to September quarter has continued to be busy as we work through the backlog of complaints that arose during the extended period at significantly reduced staffing. The huge influx of contacts from Sunshine Coast residents also created unforeseen pressures against the ordinary flow of work. As previously mentioned, by late July 2019 we had welcomed new staff to the ANO office, bringing our small team to full complement.

Over the next quarter, we will continue to address the complaints backlog; continue our multiple complaints investigation into the Sunshine Coast flight path changes; continue our systemic review of the effectiveness of Airservices' community engagement systems; and, once the second compliance audit of Defence's *Australian Super Hornet Flying Operations, RAAF Base Amberley Project* is finalised, support Defence to embed improved systems and processes to enhance its aircraft noise management.



Narelle Bell
Aircraft Noise Ombudsman

24 October 2019

Attachment 1 Complaint Statistics

The following tables summarise the complaint statistics for the quarter.

AIRSERVICES	July 2019	Aug 2019	Sept 2019	Total for quarter
Complaints received:	17	11	12	40
Complaints closed:	7	7	8	22

Total complaints closed - not reviewed:	3	6	5	14
Complainant did not provide further information	0	1	3	4
Outside charter scope	1	0	1	2
Referred to Airservices to respond directly	2	5	1	8

Total complaints closed - reviewed:	4	1	3	8
No change possible - explanation provided	3	1	3	7
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	July 2019	Aug 2019	Sept 2019	Total for quarter
Complaints received:	1	4	2	7
Complaints closed:	1	1	3	6

Total complaints closed - not reviewed:	0	1	2	3
Complainant did not provide further information	0	0	0	0
Outside charter scope	0	0	1	1
Referred to Defence to respond directly	0	1	1	2

Total complaints closed - reviewed:	1	0	2	3
No change possible - explanation provided	0	0	0	0
Change adopted by Defence	1	0	2	3

	Airservices	Defence	Total
Complaints carried forward on 1 Jul 2019	316	5	321
Complaints received	40	7	47
Complaints closed	22	6	28
Complaints open at 1 Oct 2019	334	6	340

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 and reviewing its 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 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 briefed the ANO on its actions to address this recommendation, 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>The ANO notes Airservices' latest version of its National Operating Standard addresses these requirements and has sought evidence of the procedure in use. Airservices has provided some information that the ANO is considering to determine whether the actions are adequate to address the intent of this recommendation.</p>

Ongoing recommendations	ANO assessment of agency response
<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>The ANO notes Airservices’ latest version of its National Operating Standard addresses these requirements and has sought evidence of the procedure in use. Airservices has provided some information that the ANO is considering to determine whether the actions are adequate to address the intent of this recommendation.</p>
<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>Reopened and Ongoing</u> – Airservices has:</p> <ul style="list-style-type: none"> - engaged a community engagement consultant to provide social impact and consultation advice for the duration of the Hobart Airspace Design Review; - recruited a Community Engagement Manager with extensive community engagement experience and skills to lead the Engagement team. <u>However, the departure of this Manager soon after her appointment means this action remains to be implemented;</u> - recruited other engagement staff with strong backgrounds in modern community engagement principles; - increased the capability of the community engagement team through training and access to community engagement specialists and expertise. <p>The ANO awaits evidence from Airservices that demonstrates it has re-acquired and embedded the relevant skilled and experienced subject matter expertise to address the recommendation.</p>