Proposed amendment to allow access to the Obstacle Restriction Area of an Aerodrome – (CD 2410AS)

# Overview

We’d like your feedback on proposed changes to the Part 139 Manual of Standards (MOS) relating to access to the Obstacle Restriction Area (ORA) of an aerodrome. There are key safety and maintenance activities that need to occur frequently within the ORA, particularly the Runway Strip. The Part 139 MOS unintentionally restricts these activities by requiring written approval by CASA.

Following a review of the detail in the Part 139 MOS, we are proposing significant changes to subsection 6.21 (3) of the Part 139 MOS that would allow certain types of activities to be conducted within the ORA at controlled and non-controlled aerodromes.

Clear restrictions and directions are provided in the proposed revised subsection 6.21 (3) of the Part 139 MOS (refer to the Related documents below).

By removing the requirement to seek approvals or exemptions for certain activities, the changes will:

* reduce administrative burden and cost to industry
* reduce delays to operations
* provide enhanced efficiencies for aerodrome staff.

For further detail on the proposed changes please read the summary of proposed change on CD 2410AS.

## **Opportunity to comment**

Your feedback will help us make sure the proposed requirements are suitable, the final instrument is clear and will work as intended.

Please submit your comments using the survey link on this page.

If you are unable to provide feedback via the survey link, please email regulatoryconsultation@casa.gov.au for advice.

# **Documents for review**

All documents related to this consultation are attached in the ‘Related’ section at the bottom of the overview page. They are:

* SPC on CD 2410AS – this document is the summary of the proposals in the draft instrument
* Consultation Draft – Part 139 Manual of Standards Amendment Instrument 2024 (No. 2)
* MS Word copy of online consultation on CD 2410AS, for ease of distribution and feedback within your organisation.

# **What happens next**

At the end of the response period, we will:

* review all comments received
* make responses publicly available on the consultation hub (unless you request your submission remain confidential)
* publish a Summary of Consultation which summarises the feedback received and outlines any intended changes and next steps.

All comments received on the proposed instrument will be considered. Relevant feedback that improves upon the proposed instrument will be incorporated into the final instrument.

# Give Us Your Views

[Appears on the overview page at the bottom]

Online Survey

[This link is on the front page of the survey and takes you to the survey questions]

## **Related**

[This section is at the bottom of the front page and contains all the links to other sites and documents related to this consultation]

**Related Documents**

List of documents attached to the consultation

* SPC on CD 2410AS
* Consultation Draft – Part 139 Manual of Standards Amendment Instrument 2024 (No. 2)
* MS Word copy of online consultation on Proposed amendment to allow access to the Obstacle Restricted Area of an Aerodrome – (CD 2410AS).

# Audience & Interest groups

**Audience**

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| * Aerodrome operator
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| * Air traffic service provider(s)
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| * Certified aerodrome owner/operator
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| * Aerodrome owner/operators
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| * CASA aerodrome inspector
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| * Aerodrome industry consultant
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**Interest**

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| * Safety management systems
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| * Aerodromes
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| * Aerodrome Reporting Officer Training
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# Page 1. Comments on the proposed instrument

If you intend to comment on proposed Consultation Draft – Part 139 Manual of Standards Amendment Instrument 2024 (No. 2), we will ask you for:

* **personal information**, such as your name, any organisation you represent, and your email address
* **your consent** to publish your submission
* **your responses** to the proposed changes in the regulations
* **any comments** you may want to provide
* **demographic information** to help us understand your interest in the instrument

Our [website](https://www.casa.gov.au/rules/changing-rules/consultation-industry-and-public)contains more information on making a submission and what we do with your feedback.

# Page 2. Personal information

## First name

(Required)

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## Last name

(Required)

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## Email address

If you enter your email address, you will automatically receive an acknowledgement email when you submit your response.

Email

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## Do your views officially represent those of an organisation?

## (Required)

Please select only one item

[ ]  Yes, I am authorised to submit feedback on behalf of an organisation.

[ ]  No, these are my personal views.

If yes, please specify the name of your organisation.

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Which of the following best describes the group you represent?

*Please select all that apply*

[ ]  Aerodrome owner/operator

[ ]  ATC/AFIS

[ ]  Aerodrome Consultants

[ ]  Aerodrome Reporting Officer

[ ]  Other

Please specify ‘Other’ if selected.

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# Page 3. Consent to publish submission

To provide transparency and promote debate, we intend to publish all responses to this consultation. This may include both detailed responses/submissions in full and aggregated data drawn from the responses received.

Where you consent to publication, we will include:

* **your last name** if the submission is made by you as an individual or
* **the name of the organisation** on whose behalf the submission has been made
* **your responses** and comments

We **will not** include any other personal or demographic information in a published response.

Do you give permission for your response to be published?

*(Required)*

*Please select only one item*

[ ]  Yes - I give permission for my response/submission to be published.

[ ]  No - I would like my response/submission to remain confidential but understand that de-identified aggregate data may be published.

[ ]  I am a CASA officer.

Information about how we consult and how to make a confidential submission is available on our [website](https://www.casa.gov.au/rules/changing-rules/consultation-industry-and-public).

# Page 4. Feedback on the proposed amendment.

**Proposed Policy**

We are proposing to amend subsection 6.21 (3) of the Part 139 Manual of Standards (MOS), to enable aerodrome operators and authorised persons to conduct certain activities within the ORA, particularly the Runway Strip without the need for an exemption or approval.

Proposed instrument Part 139 Manual of Standards Amendment Instrument 2024 (No. 2) addresses:

* access to the Flyover Area and the Graded Strip
* communications requirements for access to the Runway Strip
* allowance for ‘Workers and Hand Tools’ only, to operate within the Runway Strip.

**Aim**

Our aim is to provide clear restrictions and direction for controlled and non-controlled aerodrome operators on the boundaries and process for operating:

* within the ORA
* within the Graded portion of the Runway Strip
* on the Runway surface.

By making these changes we hope to:

* reduce administrative burden and cost to industry
* reduce delays to operations caused by current requirements for approvals and exemptions for certain types of activities
* provide enhanced efficiencies for aerodrome operators through effective and timely resource application.

**Link:** Consultation Draft – Proposed instrument Part 139 Manual of Standards Amendment Instrument 2024 (No. 2)

Do you agree the proposed amendment to subsection 6.21(3) of the Part 139 MOS, achieves the policy aim?

*Radio buttons*

[ ]  Agree

[ ]  Agree, but with changes (please specify suggested changes below)

[ ]  Disagree (please explain why and provide any alternative suggestions below)

[ ]  Undecided / Not my area of expertise

Comment

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**General comments**

## Do you have any further comments about the proposed instrument? Please include any unforeseen **impact** these changes may have on your operation(s).

## Comments

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