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Australian Government
Civil Aviation Safety Authority

**ANNEX A TO SOC ON MULTI-PART
AC 139-05, AC 171-05 AND AC 172-03
V1.0**

Airports Plus feedback and CASA's response/disposition

May 2024

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A.1 Airports Plus feedback and CASA response/disposition to Draft AC 139-05, AC 171-05 and AC 172-03 - All-weather operations at aerodromes v1.0

A.1.1 Airports Plus feedback

"I have the following comments on the Draft AC for AWO at Aerodromes:

- a. The definition for holding points (runway and intermediate) should be amended to allow their use at non-towered aerodromes as they are used extensively across Australia and are the only marker currently available to define a point at which persons entering a runway should stop to ensure that it is safe to continue.
- b. The current definition is also a problem at partially controlled aerodromes when the tower is not on duty as it is not then possible to obtain a clearance by the aerodrome control tower.
- c. It is a well know marking and it makes sense to make it useable at non-controlled aerodromes."

A.1.2 CASA response/disposition

The AC reflects the equivalent definition for holding point in the Part 139 MOS. We will include the matter for consideration in a future update to the Part 139 MOS. However, we propose no change to the AC in this regard.

A.1.3 Airports Plus feedback

All abbreviations should be listed in the table of abbreviations, such as the Part 139 MOS.

A.1.4 CASA response/disposition

We note this and will recheck and amend the AC to include all abbreviations in the relevant table.

A.1.5 Airports Plus feedback

"AWO should not be permitted at non-controlled aerodromes:

- a. It is inherently unsafe, or a very high risk, for a person to enter a runway to observe runway lights in conditions of low visibility.
- b. Non-controlled aerodromes generally do not have the facilities required for all weather operations, or for departures below 550 m RV
- c. The term "begin to limit the aerodrome operator's ability to identify hazards" is very vague and subjective – the limit's should be defined as they are for controlled aerodromes.
- d. Non-controlled aerodromes generally do not cater for arrivals with a visibility less than 2 NM, so not having AWO procedures will not be an imposition on the industry.
- e. An aerodrome operator should be able to determine that AWO will not be provided at an aerodrome:
 - i. This draft AC does not give that option.
 - ii. CAR 93 does not give any rights to use aerodromes against the owner/operator of the aerodrome, so this may be in breach of CAR 93."

A.1.6 CASA response/disposition

An all-weather operation (AWO) is any operation at an aerodrome where visual reference is limited by weather conditions and is not exclusively a low visibility operation. This means a non-controlled aerodrome with an instrument approach procedure able to support arrival operations in weather conditions that otherwise preclude visual arrivals is logically supporting an AWO. Accordingly, it is appropriate to provide advice on the various measures required, or useful, for supporting an AWO to a non-controlled aerodrome.

The phrase "begin to limit the aerodrome operator's ability to identify hazards" cannot be otherwise stated because no specific value for when an aerodrome operator, who is unlikely to same facilities provided for air traffic control (an elevated view over the manoeuvring area surface movement radar, positive control over movements etc), becomes unable to identify what is happening out of sight on the aerodrome. Similar to controlled aerodromes, each location is unique. However, an aerodrome operator should have experience of deteriorating weather and should be able to settle on a condition whereby action has to be taken. For example, the aerodrome operator may determine that when a particular feature becomes obscured by weather (fog or rain), this would mark the point where aerodrome maintenance or vehicle/personnel operations are suspended. Nothing in the AC prevents the operator of a non-controlled aerodrome from setting similar decision points as would be relevant for a controlled aerodrome.

Finally, nothing in the AC impinges on the protection rights mentioned in regulation 93 of the *Civil Aviation Regulations 1988*.

A.1.7 Airports Plus feedback

"If it is intended to rely on references to various ICAO publications, the publications should be made available to all aerodrome and aircraft operators. Alternatively, the requirements contained in the quoted ICAO publications should be included in the AC and in any amendments to any Manual of Standards:

- a. Not all aerodrome operators have access, or can afford to purchase access, to ICAO documents.
- b. Furthermore, busy local government managers who also manage an aerodrome do not have the time to find the required standard within an ICAO document."

A.1.8 CASA response/disposition

We intend the AC to be useable without additional reference to ICAO documents. In particular, the AC does not impose any obligation pertaining to an ICAO standard unless an obligation already exists under Australian legislation.

In general, an ICAO-based obligation will be fully detailed in the CASR or the relevant MOS. However, on request, CASA can arrange for an aerodrome operator to view all relevant ICAO documents and publications.

A.1.9 Airports Plus feedback

"This AC seems to be based on the European conditions with a couple of paragraphs added for non-controlled aerodromes. The AC indicates that AWO are possible at non-controlled aerodromes although the greater majority of all the requirements contained within it are based on having an ATC service, as is Europe.

- a. My understanding is that Australia is unique in that:
 - i. Most of our aerodromes are non-controlled.
 - ii. Australian aerodromes are certified based on the facilities available (TIFPs) instead of on usage.
- b. If it is intended to have AWO operations at ALL aerodromes then this AC will require further work, and it should involve operators of non-controlled aerodromes.
- c. It should also require aerodrome operators to "opt-in" instead of having to "opt-out" based on the fact that the majority of aerodromes in Australia are small local government aerodromes where there is

no benefit in AWO for departures only (cannot cater for low visibility arrivals) and the aerodrome operator does not normally have the time to full understand of these high risk requirements."

A.1.10 CASA response/disposition

We have worked with the respondent to identify and resolve references within the draft AC that are potentially unclear, or vague, or which imply an obligation to support AWO where this is not intended or justified.

As mentioned earlier, an all-weather operation (AWO) does not exclusively mean a low visibility operation but is any operation at an aerodrome where visual reference is limited by weather conditions. This means a non-controlled aerodrome with an instrument approach procedure able to support arrival operations in weather conditions that otherwise preclude visual arrivals is logically supporting an AWO.

Accordingly, it is appropriate for CASA to provide advice on the various measures required or useful for supporting an AWO to a non-controlled aerodrome. Nothing in the AC impinges on the protection rights mentioned in regulation 93 of the *Civil Aviation Regulations 1988*.