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9 January 2026

s47F

Airservices Australia
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Dear s47

AUSALPA SUBMISSION TO AIRSERVICES: HOBART FLIGHT PATH REVIEW

The Australian Airline Pilots' Association (AusALPA) is the Member Association for Australia and a key member of the International Federation of Airline Pilot Associations (IFALPA) which represents over 100,000 pilots in 100 countries. We represent more than 7,500 professional pilots within Australia on safety and technical matters. Our membership places a very strong expectation of rational, risk and evidence-based safety behaviour on our government agencies and processes and we regard our participation in the work of Australia's safety-related agencies as essential to ensuring that our policy makers get the best of independent safety and technical advice.

AusALPA welcomes the opportunity to contribute to the Hobart Post Implementation Review (PIR) and suggested flight path changes.

General Comments

AusALPA is not opposed to the focus of this phase of the Hobart PIR change, being that of consideration for moving the Runway (RWY) 30 Required Navigation Performance Authorization Required (RNP-AR) Standard Instrument Arrival (STAR) path 2-3 kilometres to the east.

However, AusALPA is opposed to a continued piecemeal approach to resolving flight path issues in the Hobart airspace, and that noise abatement appeasement continues to be the "trigger point" steering what is prioritised, instead of the legislated factors that Airservices must consider.

AusALPA suggests that consideration be given to retaining the current RNP AR and adding the suggested flight path, so that noise sharing can be facilitated. I.e. add the new RNP AR and retain the current one. We also request a review of the RWY 30 RNAV Z.

Aircraft Noise: "an" Environmental Concern, not "the" Environmental Priority

The Air Services Act ("the Act") provides the legislative head of power for the establishment of Airservices Australia (AA) and the manner in which AA must perform its functions, which is found in section 9 of the Act.

Section 9 of the Act (quoted below in total) sets out that:

- (1) In exercising its powers and performing its functions, AA must regard the safety of air navigation as the most important consideration.
- (2) Subject to subsection (1), AA must exercise its powers and perform its functions in a manner that ensures that, as far as is practicable, the environment is protected from:
 - (a) the effects of the operation and use of aircraft; and
 - (b) the effects associated with the operation and use of aircraft.
- (3) AA must perform its functions in a manner that is consistent with Australia's obligations under:
 - (a) the Chicago Convention; and
 - (b) any other agreement between Australia and any other country or countries relating to the safety of air navigation.

Paragraph (3) (a) refers to the ICAO standards and principles.

Paragraph (2) requires AA to consider environmental protection whilst performing its functions, but it does not explain or provide determinations regarding the prioritisations of environmental protection factors. For example, flight paths that are longer to avoid impacting populated areas from noise pollution is taken as an environmental consideration, however the lengthier flight and increased fuel emissions are also a detriment to the environment.

AusALPA believes that it is a reasonable interpretation that, impacts to *the environment* can be differentiated to impacts to "*the community*", which we note is a term utilised in the Civil Aviation Act (1988). Arguably, the greater priority of environmental protection for flight path establishment and alteration decisions should be with respect to increases in flight time and fuel burn, than it is with aircraft noise impacts to the community. Although, AusALPA notes the importance of including all these aspects in flight path considerations, it remains important to call out the inappropriate prioritisation shift that has occurred and is being "normalised" by Airservices.

Regardless of a need for Airservices to have more specificity in how to weigh up how much environmental impacts outweigh community noise impacts, the Act is clear that "the safety of air navigation [is] the most important consideration" (Section 9, paragraph 1).

Safety and Efficiency of Airspace and Flightpaths

The Hobart SID and STAR structure was designed before the surveillance coverage and is based on the procedural separation available at the time. Thus, there exists opportunities for benefits to be realised by air operators, the community, pilots and ATC if a holistic review was adopted. Some of these benefits would be in alignment with legislated requirements for environmental considerations given that improvements would lead to many efficiencies of flight too.

AusALPA believes that, if the Hobart flight path structure and system were revised and fixed as a whole, the overall issue of noise-based complaints would be improved. Albeit, with some members of the community remaining steadfastly lifelong complainants.

As an initial step towards a wider review of the SIDs and STARs, we suggest that it is sensible for revision of the RNP AR limitations - remove NAP times of day – as we believe that these are not required with the proposed current suggested changes.

Furthermore, if Airservices achieved the ability to sequence aircraft on different types of approaches, not just at Hobart, this would lead to efficiency benefits being realised (including environmental improvements).

Instrument Approach Design and Sector Altitude Review

Instrument Flight Procedure (IFP) departure, arrival, and approach procedures should ideally be designed with normal climb and approach angles.

AusALPA suggests that a review of the Minimum Sector Altitude (MSA) to the south of Hobart could aid IFP redesign, which may allow aircraft to be at lower altitudes at waypoints, such as PIDOS, for runway 30 arrivals. This could make it possible for runway 30 approaches to have a more generic and constant descent approach angle, which is known to be safer – reduce workload, likelihood of unstable approaches (and go arounds), and risks of runway excursions.

Additionally, the RNAV RWY 30 IAP is not coded to the runway, and this causes automation and workload issues for flight crew, particularly at low level at the end of the approach and minima. AusALPA requests a review of this issue so that coding continues past the missed approach point. At the point where the coding finishes, other workload factors occur.

Conclusion

AusALPA looks forward to the outcomes of this phase of consultation and remains available to contribute to the improved overall end state for the – safe, efficient, noise sharing - Hobart airspace SIDs, STARs and IFPs.

Yours sincerely,

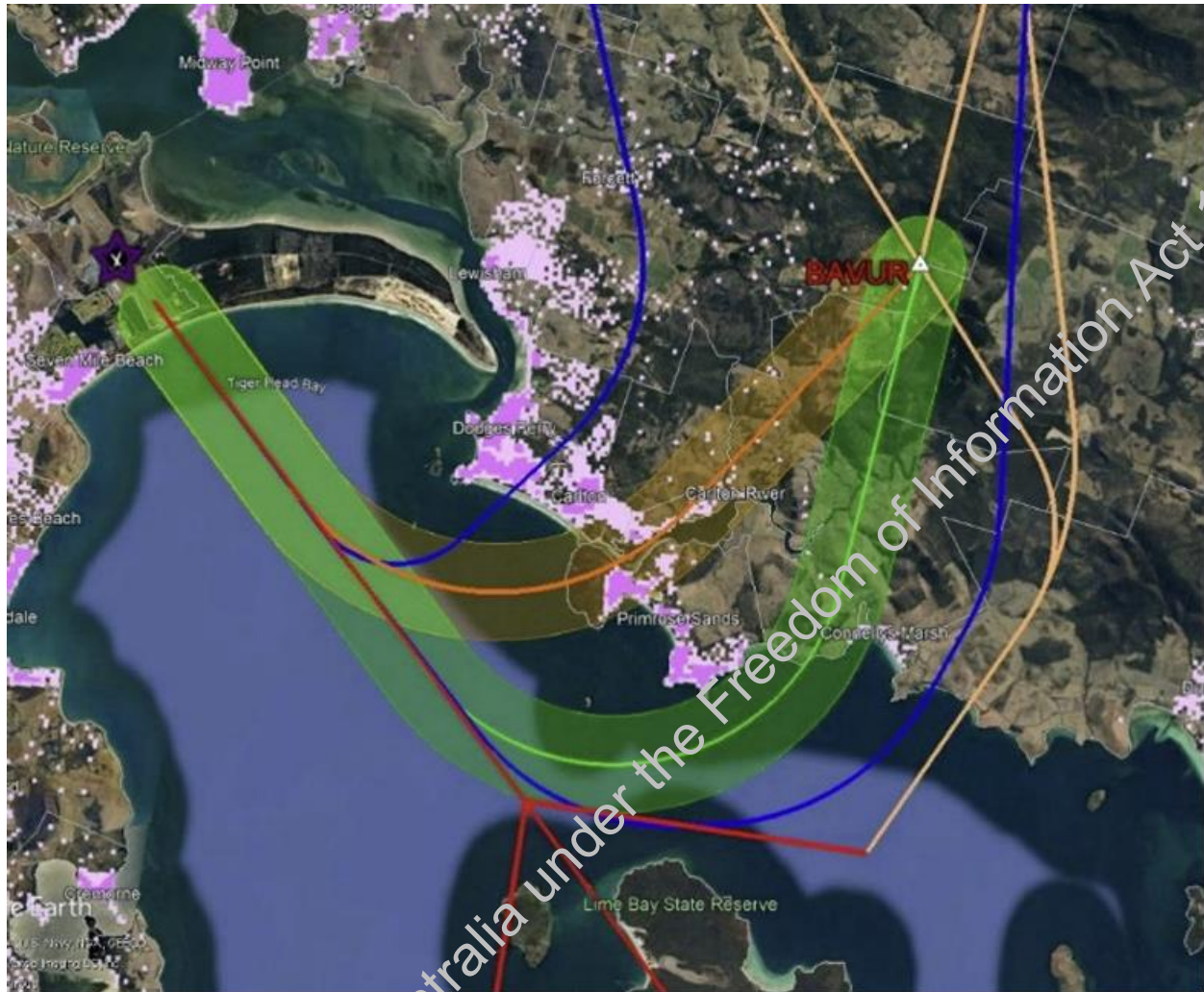
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Appendix A: Hobart Runway 30 RNP-AR



Hobart Runway 30 RNP-AR – current in dark orange and proposed option in green, with a 2km buffer applied to the nominal flight path centreline. Existing departure paths are in blue and RNAV arrival in light orange.

From: s47F
To: [Airservices Stakeholder Engagement](#)
Subject: RE: Airservices Hobart Airspace Design PIR update for industry
Date: Friday, 9 January 2026 10:38:43
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

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Hi s47F

Thank you for the ongoing opportunity to comment on Hobart Airport airspace and flight path designs.

The Qantas Group supports the proposed changes to RNP-AR W RWY 30. The changes represent a practical application of efficient RNP-AR flight paths whilst ensuring their design appropriately considers all stakeholders.

Should the change to the flight path go ahead we request that any time-based restrictions on this approach be removed. Given the new flight path appears to avoid key population areas, it would be appropriate for this approach to be available at all times.

Additionally, the Qantas Group supports the other safety improvements planned for RNP-Z RWY30 which is to reduce the Initial Approach Fix (IAF) altitude. This adjustment will reduce the descent gradient and subsequently lower the risk of unstable approaches.

Kind regards,

s47F

Qantas Airways Limited

SYDQCB1

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From: Airservices Stakeholder Engagement

Sent: Tuesday, 16 December 2025 11:03 AM

Subject: FW: Airservices Hobart Airspace Design PIR update for industry

OFFICIAL

Good morning,

This is a friendly reminder regarding the Airservices engagement underway in relation to the Hobart Post Implementation Review (PIR) recommendations.

As highlighted previously, we are requesting industry's feedback in parallel with community feedback, to inform our preferred design assessment outcome anticipated in the first half of 2026. No final decision has been made.

For further information please visit the *Engage Airservices* webpage linked here: [Hobart Community and Industry Suggested Alternatives | Engage Airservices](#)

We have extended the engagement period to **11 January 2026**. If you would like to provide feedback through the engagement period, please do so by reply email to stakeholder@airservicesaustralia.com.

Kind regards,

s47F



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Building 330, Tower Road,
Melbourne VIC 3045, Australia



We acknowledge the Traditional Owners of Country throughout Australia and recognise their continuing connection to land, waters and culture. We pay our respects to their Elders past, present and emerging.

OFFICIAL

From: Airservices Stakeholder Engagement

Sent: Tuesday, 18 November 2025 10:15 AM

To: Airservices Stakeholder Engagement <stakeholder@airservicesaustralia.com>

Subject: Airservices Hobart Airspace Design PIR update for industry

Good morning,

Thank you for your engagement to date in relation to Hobart Airport airspace and flight path designs.

As you may be aware, Airservices conducted community engagement in late 2024 on the Hobart Airport Post Implementation Review (PIR) Recommendations:

- Recommendation 4 - Shift the Runway 30 RNP-AR 2 to 3km to the east
- Recommendation 6 - Move Runway 30 arrivals to the east coast over water

Following community and industry engagement, Airservices conducted an assessment and published the Option Assessment Outcomes on the Engage Airservices platform in July 2025, identifying Recommendation 4 would be progressed to Preferred Design stage and that Recommendation 6 would not be considered further.

Airservices community campaign for Recommendation 4 begins this week, with engagement sessions to commence from 23 November. Please find link to the *Engage Airservices* webpage below and a factsheet attached.

- [Hobart Community and Industry Suggested Alternatives | Engage Airservices](#)

We are requesting industry's feedback in parallel with community feedback, to inform our preferred design assessment outcome anticipated in the first half of 2026. No final decision has been made.

Community engagement will also cover industry-suggested improvements to the RNP-Z RWY30 procedure. These changes aim to reduce the Initial Approach Fix (IAF) altitude from 4,000 ft to 3,600 ft, enabling a reduced descent gradient, lowering the risk of unstable approaches, and improving overall safety outcomes.

If you would like to provide feedback through the engagement period, please do so by reply email to stakeholder@airservicesaustralia.com, kindly requested by 18 December 2025.

Kind regards

s47F



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Building 330, Tower Road,
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