

NATIONAL CIVIL AVIATION POLICY REVIEW SUMMIT SAFETY, SECURITY AND ENVIRONMENT WG¹

AIRLINE INDUSTRY PERSPECTIVES

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ISSUES IDENTIFIED BY WORKING GROUP (per Luvuyo Gqeke)

Issues identified by Working Group and to be addressed and for which Industry comment requested:

- Lack of compliance at Provincial and Municipal Airports Compliance to Civil Aviation Safety and Security Regulations as a result of lack of resourced and skills
- Lack of capacity in Government to act as an Enabler of Technological Development and Innovation:
- Regional Cooperation with Respect to Aviation Safety and Security so that Compliance in the African region can be improved
- Conflict between Aviation Safety and the Square Kilometre Array (SKA) Legislation
- Declaration of protected areas, inhibits the use of optimized instrument flight procedures in certain areas, which also increases emissions.
- Protection of Aviation Infrastructure Located Outside Airports eg. Weather stations and Air navigation equipment:
- The banning of aircraft higher than Chapter 2
- The role of local government in addressing Undesirable Land Usage with Various Noise Contours
- Operational Measures to reduce Emissions:

NOTE : WHERE REFERENCE IS MADE TO A POLICY STATEMENT (PS), THIS IS FROM 2017 NCAP WHITE PAPER

SAFETY

REGIONAL ISSUES: (ref PS 3)

- Support of SADC Aviation Safety Organization (SASO) establishment to expand cooperation and increase compliance within the region. (AASA is a consultative member of the SADC Civil Aviation Committee)
- Major challenge is resourcing and funding of SASO; AASA view:
 - South Africa can assist to resource of SASO – but must be reimbursed for resources and services provided
 - SASO to be funded by States requiring assistance – not through a passenger levy
- Support for expanding SASO mandate to include security and environment as long as funding can be satisfactorily resolved.
- Policy Statement to incorporate the above views recommended.

AIRPORTS – SUSTAINABILITY AND SAFETY OF REGIONAL AIRPORTS (PS 13, 15, 16)

- Concern over viability, sustainability, safety of smaller regional airports – level of traffic is a determinant
- Review of ownership and funding need further discussion before making a policy decision:
 - User charges at realistic levels will probably not cover the costs of airport
 - Accordingly, there is a concern over inclusion of these airports as regulated airports under ACSA or similar entity.
- Safety and compliance to be enhanced, but care must be taken not to over regulate or implement additional licensing requirements – lead to higher costs and charges, unviable operation, possible withdrawal of services.
- Suggest resolving safety and compliance issues – local authorities will need to continue supporting airport in interest of community business development.

SAFETY

SKA LEGISLATION

- Aviation cannot be negatively impacted by the SKA – both must co-exist.
- Delay in authorities from DEFF / DST / DOT ability to finalize terms of engagement is a concern – in meantime SKA project continues.
- Aviation industry is still not aware of the solution to satisfy both parties.
- Aviation must lead in terms of policy and final solution. Policy statement should reinforce this.

TECHNOLOGY AND INNOVATION

- Discussion on research capability requirements and cyber security policy supported.
- Suggest investigating public private partnerships to ensure cost effectiveness.

SEARCH AND RESCUE (PS 37)

- Authorities need to review capability of South Africa to manage and fulfil its responsibilities to undertake search and rescue operations over region – DOT together with other supporting Government departments .
- Discussions required with stakeholders to determine requirements – AASA and airlines wish to have discussions and be involved in development of policy with DOT.
- AASA should continue to be a member of SASAR Board and Aeronautical Sub-Committee.
- PS 37 should be reviewed and updated as necessary.

SECURITY

- **AVSEC**

- Principles of Aviation and Security are contained in the current NCAP and should be confirmed
- AVSEC regulations are implemented in accordance with Annex 17 and this should be maintained.
- No specific proposals are made.
- Where necessary, consultations with the AVSEC Managers from the aviation industry could be held to discuss new policy proposals.

In 2021, AASA aims to:

ENVIRONMENT

- Since NCAP 2017, two major developments can be expanded on:
 - **CORSIA** : ICAO carbon offsetting program. South Africa has not volunteered to join CORSIA. South Africa should make a policy decision on whether to join or not. PS 93 to be updated
 - **Carbon Tax Act** : Implemented 1 June 2019. Applicable for domestic aviation.
 - Domestic airline industry not supportive of Carbon Tax – view is it is not a deterrent for carbon emissions but just a source of revenue for the fiscus.
 - It is contrary to ICAO and IATA principles of States implementing regional or local environmental schemes and taxing aviation.
 - Airline industry view that there should be one scheme incentivizing carbon emission reduction e.g. carbon offsetting such as CORSIA – Carbon Taxes are contrary to PS93. Suggest further discussion to formulate policy along these lines.
- **ALTERNATIVE FUELS**
 - PS 95 : Government supports development of alternative fuels. This is supported. It appears to have lost momentum. Policy should reaffirm this project with involvement of State and private airlines – for further discussion.
- **PROTECTED AREAS**
 - Agree with concern over declaration of protected areas inhibiting efficient airline ops and increasing emissions
 - Not sure this is a policy issue. DEFF and DOT (SACAA) appear not able to resolve precedence in respect of implementing regulations and restrictions – the DEFF requirements should be clarified and agreed to, and DOT should have precedence on determination of airspace regulations. Policy to be determined accordingly.

ENVIRONMENT

- **NOISE**

- PS 77 deals with the establishment of the Airport Environmental Committee (AEC) by the Airports – this deals with amongst other issues, the prediction and management of noise contours. This is supported.
- PS 78 deals with establishment of Environmental Management Programs (EMP's). This has been included in regulations.
- PS 79 supports ICAO's balanced approach to the management of noise from various categories of aircraft. Prior to policy decisions on controlling noise from aircraft and banning of aircraft higher than Chapter 2, ICAO's current guidelines need to be considered (as per PS 80), and the enforcement on both South African and regional / international aircraft must be assured.
- PS 81 to 90 inclusive should be reviewed and confirmed as applicable.

- **OPERATIONAL MEASURES TO REDUCE EMISSIONS**

- Airlines support measures to amend procedures at airports and air traffic services providers to improve efficiencies for operations – will reduce operating costs.
- Policy should reaffirm continuous attention to achieve these goals.
- Further consultations with airline experts will no doubt identify areas of improvement.

OTHER ISSUES

- Suggest that following the Summit, that stakeholders be given the opportunity to :
 - Review the work of the Working Groups
 - Participate in discussions of the Working Groups in finalizing policy decisions
- The above to apply to Safety, Security and Environment Working Group and other working groups.