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**Preliminary COMNAP advice in regards to  
ATCM process of review of  
Resolution 1 (2013)**

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### ***Background***

ATCM XLII (2019) Final Report (paragraph 259) says “The Meeting agreed that it would begin a process of reviewing and updating the operative paragraphs of ATCM Resolution 1 (2013).” To assist the Parties in this process of review, COMNAP has revisited the resolution’s operative paragraphs and offers preliminary advice, of a technical and practical nature. The outcomes of the COMNAP Antarctic Aviation Workshop will likely provide further advice.

### ***Summary of safety-related issues to address***

- Unreliable and incomplete advance information exchange
  - Requires improvement in clarity, completeness and consistency of information across sources (such as between the Pre-season EIES operational information and the COMNAP database that informs AFIM)
- De-conflict active airspace in the Antarctic Treaty area
  - Requires advance information exchange of all proposed air operations (government and non-governmental)
  - Requires real-time information exchange of air activity type and positioning
  - Requires information from all air operators (government and non-governmental)
  - Requires information from all air infrastructure operators (governmental and non-governmental)
  - Requires investment in and mandatory use of awareness, tracking and distress technology in all aircraft and on the ground in Antarctica
- Address incident risk from increased activity
  - Requires ensuring all air operators are aware of safety requirements
  - Requires identification in advance of activity of alternative landing sites
  - Requires advance communications between air operators and operators of infrastructure at any landing sites or alternative landing sites
  - Requires that operators of any identified landing site have been consulted in advance of activity
  - Requires ensuring all air operators (via Parties) contribute information into relevant databases (such as between the Pre-season EIES and the COMNAP database that informs AFIM)
  - Requires ensuring all air operators have access to AFIM
- Address emergency response challenges from increased and diverging types of activity
  - May require a threshold for activity in addition to the environmental standard required in a EIA for proposed activity
  - Requires recognition of limited or no capacity to respond
  - Requires ensuring survival capacity until assistance can arrive

We believe that some of these safety issues can be partially addressed by reviewing ATCM Resolution 1 (2013) in order to be more inclusive of all air-related activity and infrastructure, and to ensure proper procedures for information exchange in advance of any proposed air activity are implemented. We remind the ATCM of COMNAP’s ATCM XLII (2019) WP008 “Challenges that might occur in relation to increased air operations in the Antarctic treaty area: A national Antarctic program perspective”.

### **ATCM Resolution 1 (2013) Air Safety in Antarctica**

The operative paragraphs are considered below in light of the safety-related issues above. Suggested changes are made in track-changes format and accompanying notes provide explanations for the proposed suggestion. COMNAP requests that the ATCM consider the following suggestions as part of the process of review.

**Operative paragraph 1.** for the purpose of ensuring that measures for improved air safety apply to all flights and all aviation-related infrastructures in the Antarctic Treaty Area, measures to improve air safety set out in paragraphs 2-8 below should be elaborated on the basis of ICAO criteria, taking due account of the specific features of Antarctica as well as of existing practices and services.

Note 1a: It is important that this operative paragraph continues to apply to “all flights” so as to include governmental and non-governmental activity.

Note 1b: It is suggested to explicitly include “and all aviation-related infrastructures” in order to recognize that there is now a change in circumstances and some Antarctic aviation infrastructure is now established and operated by non-governmental entities.

#### **Operative paragraph 2.**

Note 2a: There are no suggested changes to the text as currently presented in this operative paragraph.

Note 2b: It is suggested that the information fields of the EIES be reviewed. This suggestion is because Resolution 1 (2013) replaced Recommendation XV-20 (Paris, 1989). Recommendation XV-20 had an attachment entitled “Advance notice (information on planned air operations)” which was not carried forward with Resolution 1 (2013), since, by 2013 Parties had the EIES for “advance notice” (i.e. “pre-season information exchange). However, comparing the information requests of the XV-20 advance notice attachment, to the information request fields of the EIES, there is information requested in the advance notice missing/not requested to be provided by Parties into EIES. Therefore, a complete, advanced, overall picture of ATA aviation-related activities is currently not possible. The EIES should be updated to add in the “overlooked” information fields related to the Recommendation XV-20 advance notice attachment. This does not require a change to Resolution 1 (2013) but would require a separate agreement to add queries to the EIES pre-season information exchange. COMNAP suggestions for EIES additional information fields can be found in our ATCM XLII WP008 (2019).

**Operative paragraph 3.** for the purpose of improving air safety in Antarctica, all operators, governmental and non-governmental, operating aircraft or managing air-related infrastructures, camps or aviation facilities or services in the Antarctic Treaty Area, national Antarctic programmes operating aircraft in Antarctica and their aircrew s should, be provided at the request of their competent authority or National Antarctic Program, be provided with a continuously updated compendium produced by the Council of Managers of National Antarctic Programs (COMNAP) and now known as the COMNAP Antarctic Flight Information Manual (AFIM) describing ground facilities, aircraft (including helicopters) and aircraft operating procedures and associated communications facilities operated by each national Antarctic programme in the Antarctic Treaty Area (out of the use of which questions of liability will not arise) and, therefore, they should:

- (a) facilitate the ongoing revision of AFIM by their national Antarctic programme operators by collective action through COMNAP;
- (b) adopt a format in which information provided by each national operator is kept in a manner that facilitates updating of information;
- (c) request their national Antarctic operators to provide timely, current and accurate information for the purpose of maintaining the AFIM;

(d) ensure consistency of information across the various data repositories within the Antarctic Treaty system.

Note 3a: Broaden the operative paragraph beyond national Antarctic programs. Currently, this operative paragraph refers only to governmental/national Antarctic programs as air operators. Recognising that the situation is changing with non-governmental operators of aircraft and infrastructures, we suggest improved provision for requests from non-governmental operators for AFIM, and also requests to non-governmental operators to provide their data to inform AFIM.

Note 3b: Suggest inclusion of “competent authority” as the entities with the broadest, collective oversight of all activities in the Antarctic Treaty area by way of the EIA process.

Note 3c: Add new point “d” that is suggested because there is often critical information inconsistency across sources (for example between the Pre-season EIES and the COMNAP database that informs AFIM).

#### **Operative paragraph 4.**

Note 4a: There are no suggested changes to the text as currently presented in this operative paragraph at this time. However, we believe this operative paragraph will require an update based on the outcomes of the COMNAP Antarctic Aviation Workshop. Suggestions will be brought back to a future ATCM.

#### **Operative paragraph 5.**

Note 5a: There are no suggested changes to the text as currently presented in this operative paragraph. However, we believe this operative paragraph will require an update based on the outcomes of the COMNAP Antarctic Aviation Workshop. Suggestions will be brought back to a future ATCM.

**Operative paragraph 6:** so as to ensure compliance with Article VII, paragraph 5 of the Antarctic Treaty and also Recommendation X-8, Part IV, Parties should keep one another informed about non-governmental flights, and should request COMNAP to provide access to AFIM to any operator of a non-governmental flight or infrastructure within the Antarctic Treaty Area. and a reminder about the AFIM should be given to all pilots filing a flight plan for flights to Antarctica.

Note 6a: It is suggested to explicitly involve the Parties in regards to AFIM access requests since COMNAP only has awareness of COMNAP Member activity.

#### **Operative paragraph 7.**

Note 7a: There are no suggested changes to the text as currently presented in this operative paragraph.

#### **Operative paragraph 8.**

Note 8a: There are no suggested changes to the text as currently presented in this operative paragraph. However, we believe this operative paragraph will require an update based on the outcomes of the COMNAP Antarctic Aviation Workshop. Suggestions will be brought back to a future ATCM.

Suggestions for two additional operative paragraphs (see also COMNAP ATCM XLII WP008):

Additional operative paragraph A: for the purpose of consideration of emergency response that might be required, Parties should consider that any increase in air activity brings with it increased risks that must be

managed or mitigated, and in cases of Search and Rescue (SAR) or emergency response it is the national Antarctic programs that are often called upon to respond. This should be considered when Parties are made aware of non-governmental applications for air activities that are not in support of science.

Additional operative paragraph B: for the purpose of improving air safety in Antarctica request that all Antarctic air operators, government and non-governmental alike, ensure that they are aware of safety requirements and have identified alternative landing sites and communicated their intentions in advance directly with the operators of the alternative landing sites; Many airfields in the Antarctic Treaty Area have limited and seasonal capacity and there should be no presumption of capabilities, operations or ability to assist.