

30 April 2008

Department of Infrastructure, Transport, Regional  
Development and Local Government  
GPO Box 594  
CANBERRA ACT 2601

Dear Sir

### **Development of a National Aviation Policy Statement**

Reference is made to your invitation to make a submission in response to your issues paper "Towards a National Aviation Policy Statement".

I am a retired aeronautical engineer and I have over the last two years or so become acutely aware of the dangers aviation is causing the environment, and I am trying to do something about it. I have been working with Engineers Australia and the Royal Aeronautical Society Australia Division and have obtained their agreement to a policy with respect to aviation and the environment. In November 2007 I presented at a Conference in Sydney on their behalf on the issues confronting the aviation industry and opportunities to make substantial reductions to greenhouse gas emissions the industry creates.

Unfortunately I have only just become aware of your program and I am about to go overseas for a period that extends beyond your closing date of 29 June 2008, but I wish to take the opportunity to make a brief submission touching only on Section 4.1 "Aviation emissions and climate change" of the Issues Paper.

I am concerned that Section 4.1 is not aggressive enough in attacking a problem which will continue to get worse unless the global aviation industry makes step changes. Projected annual growth of 5-6% in the industry cannot be countered by incremental efficiency improvements of 1-2% per year. The industry is setting itself ambitious goals but the Advisory Council for Aeronautics Research in Europe (ACARE) itself has said that these objectives are not achievable without important breakthroughs, both in technology and concepts of operations. Australia should be a leader in our Region to achieve these breakthroughs.

There are a number of fundamental facts which do not have to be quantified to register their importance. They are

- That aviation lives on kerosene and that any substitutes such as bio fuels and synthetic fuels are unlikely to make a dent in the kerosene usage or the emissions created by burning it.
- That aviation is growing at a faster rate than efficiencies are improving.
- That for every kilogram of kerosene burnt three kilograms of CO<sub>2</sub> are produced, and that other by-products of burning increase that level to a CO<sub>2</sub> equivalent of five to six kilograms.
- Anthropogenic global warming caused by aviation is directly proportional to the amount of kerosene burnt. To reduce fuel usage.
  - Airlines must introduce technologies which will lead to efficiency improvements to keep pace with the growth of aviation.
  - Governments must develop policies and regulations which encourage or even mandate reductions in fuel usage.

- That global warming is a global problem and that global solutions have to be found and acted on by everybody. The fact that aviation is a small emitter (2%) and that Australia is responsible for a small amount of the global emissions is irrelevant. Australia is the second most profligate producer of CO<sub>2</sub> on a per head basis (Malaysia beats us by a whisker) has a huge responsibility to act and to be seen to act by the rest of the world.

Given these facts it is the Australian Governments's responsibility to act decisively to lessen the effect of aviation on the environment, and 2008 and 2009 are the years to do it. I believe that there are real opportunities for Australia to be proactive and to contribute to resolving a global problem. Four opportunities I see are

- For the Australian Government to provide tax breaks and the like to the airline industry to rapidly introduce new equipment with new technologies which lead to step change reductions in emissions, and for the airlines to use their purchasing power to pressure aircraft suppliers to put environmental performance very high on their agendas.
- For the Australian Government to adopt policies that tax fuel and mandate fuel reductions by the airlines.
- For Australia to collaborate with the European Union (EU) and European aerospace companies in their Clean Sky Joint Technology Initiative. Collaboration can include funding and use of Australian resources such as CSIRO, DSTO, Australian aviation industry, Australian aviation agencies such as Air Services, CASA and the like. There are aspects of the problem in which Australia has a special capability or interest such as ATM services, long range travel, and combustion technology which are relevant on a global scale.
- For the Australian Government to use its influence to take the lead in the Asia/Pacific region to develop aviation policies and operational practices appropriate to our region. Thus far the debate is largely confined to Europe and USA as the biggest users of aviation. But Asia/Pacific now has 25% of the market and its share is growing. Australia is well placed geographically and politically to take a leading role, perhaps through APEC or through the Association of Asia Pacific Airlines (AAPA) of which Qantas is a member. AAPA is the only organisation which represents the Asian/Pacific region but currently receives little support from Governments. Asian/Pacific carriers are hampered by not having a strong voice to counter or contribute to the rhetoric of Europe and USA.

I hope that the Green Paper will reflect these concepts and the Government take steps to implement them.

Yours faithfully

Robin Stanier FRAeS