

Our Reference : 2/3/1  
Date : 27 June 2008

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

**Dear Sir**

**Re:- Towards a National Aviation Policy Statement**

Further to the invitation to comment included in the Issues Paper April 2008 for the development of the National Aviation Policy Statement, please note the following information from Adelaide Airport Limited (AAL).

AAL is a private company comprising a majority of superannuation investment funds and was the successful bidder for the rights to lease and operate both **Adelaide** and **Parafield** Airports for a term certain of 50 years, with a right of renewal for a further 49 years from the date of effect 28 May 1998.

Adelaide Airport is the major gateway to the State of South Australia and services international, domestic and regional flights with a total passenger throughput of some 7 million passengers per annum and 99,000 aircraft movements. The airport is located 6 kilometers due west of the CBD of Adelaide City and 2 kilometers from the shores of the Gulf St Vincent. It is surrounded by residential, recreational and light industry developments.

Our airport at Parafield services predominantly general aviation and flying training with approximately 330,000 movements per annum. There are currently no Regular Public Transport services. The airport is located 17 kilometers north east of the Adelaide CBD and surrounded by residential, retail, recreational and light and heavy industry developments.

Our submission contained herewith, reflects our sometimes parochial views from the day to day Operation and Management of both our airports, our active participation in various Government Reviews, Consultative and Advisory forums and a firm belief that this review is both overdue and timely.

We welcome the opportunity to comment further in any forum that may be deemed necessary to enhance our opinions and recommendations and to the future opportunity to consult further in the next or Green Paper phase of this process.

**Yours sincerely**

**Phil Baker  
Managing Director  
Adelaide and Parafield Airports.**

**NATIONAL AVIATION POLICY STATEMENT  
ISSUES PAPER – COMMENTS from Adelaide Airport Limited**

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<b>Section</b>	<b>Title</b>	<b>Issues</b>	<b>Comment</b>
<b>1</b>	<b>Australian Aviation Industry</b>		
1.1	International Services (key challenges)	<i>Do Australia's international air services policies serve Australia's national interest and balance the need to have an Australian based industry with robust competition from international competitors? What should our negotiating priorities and approach be in the future?</i>	<p>Adelaide Airport Ltd (AAL) supports the "Open Skies" Policy in principle.</p> <p>However, we understand that unilateral declaration of such status on all routes may adversely affect Australia's base carriers and thereby engender instability in the market. Open skies needs to work for all parties and not just foreign based companies, especially those still run by their respective State (openly or otherwise).</p> <p>In relation to bi-lateral negotiations, from our perspective there is some uncertainty with the definition of the word "Regional" and may create the wrong impression when negotiating with International Carriers.</p>
		<i>How might the Australian Government continue to develop improved competition and access to services while maintaining appropriate levels of aviation safety and security?</i>	We would support a system that recognises QANTAS/VIRGIN as the home based operator and that then requires all other international operators be required to comply to the same safety and security standards that QF/DJ is mandated within country.
	(Expansion of air services relationships)	<i>How will new routes, technology and business structures change the profile of Australia's aviation market? Given Australia's evolving aviation sector, to which markets should the Australian Government seek improved access?</i>	<p>AAL believes this may be more apparent when the Low Cost Carrier (LCC) phenomenon settles and the fuel crisis is resolved i.e. the price stabilises.</p> <p>China and India are the growing markets within this region, both of whom have more and more residents with disposable income – to recognise this will place Australia in a catch up situation.</p> <p>These markets may also be an answer to our future labour shortages within industry and provide a source for in country training and development facilities.</p>
		<i>How might the Australian Government best ensure all international airlines flying into Australia maintain the highest of safety standards? How might the Australian Government most effectively monitor and enforce safety standards of airlines that lease aircraft rather than operating their own aircraft?</i>	<p>Take the politics out of CASA and empower CASA with the appropriate level of infrastructure in personnel and equipment to undertake a monitoring and partnering role in aviation safety.</p> <p>In our experience certain jurisdictions handle this problem more effectively than others and we suggest that the examples of the UK and the USA with particular African based airlines may be relevant and ICAO may not be the best bench-mark.</p>
		<i>How might access to Australian destinations</i>	We also believe that a slot allowance system be developed where an international carrier

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		<i>outside the four major gateways of Sydney, Brisbane, Melbourne or Perth be increased? What role could State governments and communities have in attracting foreign and Australian airlines to Australia's smaller international airports?</i>	is permitted a dedicated number of slots to the major ports when they achieve that number they are then required to negotiate with the secondary majors – such as Adelaide.
		<i>Should Australia continue to pursue an “open-cargo” policy for dedicated cargo services? What cost effective strategies could be employed to avoid delays in the transport of time sensitive air freight?</i>	<p>AAL is located in an area where there is plenty of cargo by out bound services but currently restricted in importation which militates against the level of pure cargo operations we might otherwise achieve impost – the result is a high level of road freight to Melbourne adding to the road infrastructure costs and indeed carbon emissions.</p> <p>We need to discuss the issue of “open cargo policy” in greater detail as we are not certain at this stage how that may be defined by the Federal Government.</p> <p>Our existing curfew impost also is a major detrimental factor in this region securing the level of operations commensurate with the tonnage available (again to the economic advantage of Victoria.)</p> <p>Delays in the transport and processing of “time sensitive’ airfreight could be addressed by:-</p> <ul style="list-style-type: none"> <li>Pre-inspection at point of origin</li> <li>Allocation of appropriate Government processing staff resource</li> <li>Cost effective processing of passengers before air freight</li> </ul>
	(Access to air markets)	<i>Are the current restrictions on foreign airlines accessing the domestic market appropriate? Should we be encouraging more international airlines to operate from Australia to third markets?</i>	In general we agree on restrictions to international carriers however, where there is a demonstrable shortfall in capacity on domestic routes such operators may be allowed to augment the capacity at least in the short term or pick up any seasonal demand which the domestic carriers may find hard to accommodate.
	(Facilitation and Border control)	<i>How might existing Australian airport infrastructure best adapt to the challenge of processing large influxes of passengers?</i>	<p>We understand the staffing of border agency control lags no less than one year behind traffic forecasts which are produced by all airports the tourism industry the government and others – we therefore we suggest the Australian Government needs to review its border agency staffing allocations and use the most up to date data available.</p> <p>In respect of airport infrastructure as previously stated at the recent Senate enquiry into the increase of the Passenger Movement Charge (PMC), the “hypothecation” of a portion of the tax, as identified in previous Australian National Audit Office audits, be provided to airports to encourage development of areas occupied by Border Agencies.</p>
		<i>What are the implications of expanded international operations at secondary airports, including for border security? Should Australia</i>	We are unclear whether the definition of “secondary airports” are those other than Sydney, Brisbane, Melbourne and Perth or are those not currently not internationally certified.

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		<i>seek to limit international airline and charter operations to a defined set of international airports to ensure affordable border security.</i>	<p>Any initiative that grows the aviation business is supported without preferential treatment.</p> <p>We do not believe that the number of international ports should be restricted provided the business case can support the costs involved and the relevant staffing is available. If the secondary airports (clearly defined) are able to attract those services there are social and economic flow-on to those communities that should be encouraged to contribute to the costs.</p>
1.2	Domestic Services (Key challenges)	<i>Does the deregulated domestic airline market remain the best model for delivery of Australia's interstate air services? Are there any constraints on the ability of Australian owned airlines to remain competitive with foreign owned airlines in the Australian market?</i>	<p>The 'status quo' is relevant to the current market place.</p> <p>The only concern is to repeat the potential for an uneven playing field where private commercial companies may be competing with major foreign state supported entities.</p> <p>Some of the CASA and Politically driven Regulations such as "noise sharing," "slot limits," "selective curfews" impede the industries (both airline and airport) maximize the efficient use of capacity and other infrastructure.</p> <p>The Australian Government could perhaps do more to support Australian airlines in foreign ports?</p>
		<i>Do the existing criteria strike the right balance between allowing Australian airlines to access global investment markets and promoting an Australian based aviation industry</i>	Refer to comment above – "State sponsored airlines" should be prevented from weakening Australian domestic airlines.
1.3	Regional and General Aviation (Key challenges Regional)	<i>What should be the basis of government and industry policy towards air services to regional and remote communities?</i>	<p>AAL recognises the vital role regional air services play in this State. Therefore the Australian Government needs to provide a supportive role to State/Territory and Local Governments in encouraging air services to Regional and Remote communities – aviation provides an essential service in the provision of medical legal educative and welfare resources in a time sensitive manner.</p> <p>Regional and Rural planning must be encouraged to respect future aviation growth and support infrastructure with funding from the beneficiaries not just the passenger base.</p> <p>AAL currently provides advice and support to other Regional ports in an 'ad hoc' manner and is considering whether a more formal arrangement would not be appropriate and is currently consulting with a range of airports and their major airline customers on this issue.</p>

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			<p>We believe a mutually beneficial solution is possible which may include “network price” within the State for RPT and GA operators alike.</p>
		<p><i>Are security and safety measures adopted for major capital city trunk routes appropriate for regional and remote services? If not, what alternative measures could be adopted?</i></p>	<p>Security and Safety measures should be risk based outcome focused across the board that way the one size fits all conundrum is solved – we must avoid ‘knee jerk’ reactions, which a more based on public perception than security outcomes.</p> <p>AAL recognises the extensive reviews to security screening and methodologies running parallel to this Issues paper and looks forward to some meaningful outcomes.</p>
(Key challenges General Aviation)		<p><i>How has micro economic reform impacted on general aviation businesses and what strategies need to be put in place to ensure that access to airport infrastructure does not impede industry viability and growth? Do the needs of general aviation operators warrant any changes to airport regulatory and planning arrangements?</i></p>	<p>General aviation participate in all the benefits that are available that the deregulated and privatised industry has brought – such as improved infrastructure, increased safety and security and so on – but has not grown out of the Government funded mind set of two decades ago.</p> <p>The concept of “user pays” is widespread in society and often espoused as “a cost of doing business”.</p> <p>In regard to access to airport infrastructure there are many and varied airports in and around metropolitan areas that provide a choice to the GA operator – but it must be on a ‘User pays basis’.</p>
		<p><i>How can general aviation operators, particularly small businesses, establish viable business models that allow them to take advantage of current buoyant conditions in the aviation market? In particular, how do these businesses meet the increased cost of skilled labour and improve recruitment and retention of their skilled workforce?</i></p>	<p>Any business wishing to “take advantage of the current buoyant conditions.” would need to have a robust business plan and manage accordingly whether pure GA, charter or RPT it is noted that one or more carriers developed through those stages.</p> <p>A government subsidized training program for GA or anyone wishing to get into the GA business to enable them to learn how to do a proper business plan may be an initiative of this policy.</p>
		<p><i>What role should all levels of government have in protecting secondary airport infrastructure and in providing for new infrastructure?</i></p>	<p>All airports should act in a commercial manner and not be a direct drain on the public purse other than exceptional circumstances. All levels of government need to plan for the protection of the aviation infrastructure and future growth – particularly in the areas of precinct planning, height limitations and safety protection zoning.</p> <p>All levels of government need to recognise that airports must continue to be able to diversify business activities to remain sustainable. Major airports in some cases may be able to play a role in the development of their regional feeder ports.</p> <p>States and Territory Governments should be encouraged to develop their own Aviation Policies that role out from the National Aviation Policy – with a review process of approximately every 5 years.</p>

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		<i>How can the general aviation industry provide the necessary investment to renew the ageing aircraft fleet? Is there a role for governments?</i>	Develop appropriate business plans with possible tax incentives from the Australian Government and a more supportive or partnering role by CASA in fleet selection etc.  Subsidies may be a consideration but only in exceptional circumstances and not through any levy of tax from other areas within the industry.
		<i>Are additional measures required to ensure the continued safe operation of ageing aircraft?</i>	A less bureaucratic role by CASA in the interpretation of the relevant Regulations – with a more participative role in the maintenance and development of replacement parts and equipment.  If possible regulation to be more focused on actual operations and not solely documentation and paperwork i.e. interview electronic filing to replace audit files and manuals.
1.4	Addressing Skills needs in the aviation industry (Key challenges)	<i>What strategies should the industry adopt to attract, retain and plan for their future skills needs to remain competitive in a tight labour market and how can these be improved?</i>	Government should continue the early work on expressing encouragement for “blue” collar or trades education.  Similar programs as the HECS be developed for trade entrants.  The education system from the secondary level be encouraged to focus on career path studies and be offered tax breaks in the equipping and supply of necessary machinery or infrastructure.  Regular support of Careers Expos and apprenticeship grant schemes.
		<i>What are the long term training needs for the Australian aviation industry? Where will the future pressures lie? How do we ensure the industry remains internationally competitive in retaining key staff and in attracting new entrants to the workforce?</i>	The issue is industry wide from pilots and licenced engineers to airport inspectors and competent regulators.  Take lessons from those areas that are draining our workforce and implement similar or competitive programs.  As mentioned above the education program should start at least at the secondary level not wait until the potential person has left the school system with consideration to degree courses and an MBA in Aviation.  Retain the knowledge base with a mentoring program for development of new “key” staff
		<i>How should the Australian Government and industry work together to ensure the needs of the aviation industry are taken into account in its broader skills framework?</i>	Government needs to adopt consultation rather than dictation with industry and be less Sydney-centric be more national in its appreciation of the issues. Investigation of a wider qualification through the 457 visa and other appropriate channels to ‘tap’ into the global workforce.
		<i>Are proposals such as a national industry run flying school to train flying instructors worth</i>	AAL is supportive of the proposal but it should probably be undertaken by private enterprise with Government inducements along the same lines as Universities including

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		<i>investigating and, if so how might such a school operate?</i>	the HECs and R&D Grants.
<b>2</b>	<b>Aviation Infrastructure</b>		
2.1	Airport Planning and Development	<i>Are the planning and development mechanisms under the Airports Act working effectively?</i>	Yes – however, there needs to be greater certainty around the ‘stop the clock’ mechanism with more feedback/transparency from the relevant government agencies during the review period.
	(Key challenges)	<i>How can we improve consultation with State and local authorities and with the community?</i>	<p>The consultative process arising from the very recent Airports Act review is working well at the majority of leased airports. There is still a propensity for the government to consider all airports behave similarly when in fact all are different and relevant to their individual location.</p> <p>There is a concern that the ability and motivation for “gaming” on the part of certain elected members is not always recognised.</p> <p>In the National Policy review we would encourage that a similar program be entertained at Regional and Rural airports to ensure the future of those ports is protected from urban growth access infrastructure and airspace protection.</p>
		<i>Could the regulatory regime better facilitate genuine long term co operation between airport operator companies and state and local governments on land use planning?</i>	<p>Yes – The Australian Government needs to remind State and Territory Governments of the agreements reached in the pre-privatisation negotiations and that these essential transport infrastructure facilities are an important part of the national and local economies and that State and Local planners must identify the airports in their strategic plans as part of the local landscape and not some “Commonwealth Black Hole”.</p> <p>There is still some way to go in the local context, i.e. written determination on the rates matter.</p> <p>The very recent public review of the Airports Act has gone a long way to achieving this outcome provided it has Federal support and is allowed time to “bed down”.</p>
	(Non-aero development)	<i>How can we better integrate investment on airports with the funding and construction of improved road and rail links to and from our airports?</i>	<p>While the situation is improving, there is still a considerable amount of effort required of State and Local government to recognise the important role aviation has on their relative economies of airports in any Strategic Planning scenarios.</p> <p>Sea Ports on the other hand receive massive amounts of infrastructure support in harbour deepening, new roads and rail access and improved services in power, water and sewerage. – airports seek to be recognised as similar in importance as these other major infrastructure providers.</p>
		<i>What mechanisms might be used to ensure an effective ongoing dialogue between airport</i>	AAL had mechanisms in place before the Australian Government developed a community driven set of consultative guidelines which it has directed that the federally

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		<i>operators and their local communities?</i>	<p>leased airports abide by – the two are so similar that we have had no need to change our procedures.</p> <p>Whilst, these guidelines have been practiced by some airports for many decades and in those areas the effectiveness is quite visible – we recommend that similar guidelines be encouraged to be adopted by State/Territory and Local Governments.</p>
(Non aero developments)		<i>How can the regulatory regime better ensure non-aeronautical developments do not compromise the aeronautical requirements of airlines and airports?</i>	<p>The Regulatory system already exists through the CASA Act and Regulations, Airports Act and Regulations, the Statutorily appointed Airport Building Controller and Airport Environment Officer and including prime lease conditions that the airport be run as an airport – additionally the federally leased airports are built in accordance with ICAO Annex 17.</p> <p>In addition Commercial Law responsibility to shareholder investment mandates that airports abide by the intent of that investment to run and receive a return from airport and land development operations which was allowed for in the sale agreements.</p> <p>All airports operate as essential infrastructure providers and most have demonstrated the importance thereof through massive capital investment to date and billions more planned for the immediate future. No airport would damage its reputation through short term ill conceived commercial investment at the expense of aviation but diversification is vital to both maintain returns and support the aviation infrastructure</p> <p>It cannot be said that off airport non aeronautical planning has the same mandates and it is in this area that National Policy must take some leadership in encouraging State/Territory and Local governments to take a more responsible approach to planning around airports to ensure that these economic drivers are permitted to continue to provide the essential business, tourism and welfare benefits that an airport provides.</p>
		<i>How should the potential commercial impact of off airport competition be taken into account in planning on airport non aeronautical development?</i>	<p>Airports take into account market competition when they propose developments.</p> <p>There is always a natural sea anchor to all proposals in that within South Australia in particular leasehold land is far less attractive to would be developers. In addition, the applicable rules MDPs, Minor Variations, public display periods, environmental regulations together act as an effective filter to all but the most robust proponents.</p> <p>On airport developments have the same conditions and requirements as off airport developments excepting that the approving principal may be different.</p> <p>The fact that one may have freehold(off airport) advantages over the other who only has leasehold(on airport) use with the obvious long term asset values should be considered as a balancing argument.</p>

<b>Section</b>	<b>Title</b>	<b>Issues</b>	<b>Comment</b>
	(Safe guarding airport infrastructure)	<i>How should guidance be formulated for airport operators and others about public safety zones for locations at significant risk of on ground fatalities from aircraft operations?</i>	<p>We are advised that the PSZ is to be based on the English or American criteria.</p> <p>Whilst it is actually affects State and Local Government zoning, it is AAL's intention to include PSZ in our Master Plan review process assuming we have sufficient information as to the efficacy and impact both immediate and long term in order consult effectively with the local community that will be seriously affected or concerned by the "shadow" of the PSZ itself which in our case will cover several hundred properties.</p> <p>The likelihood of major incidents, particularly by the new generation aircraft and navigational systems and the general Australia climate, is very low, the PSZ should have been assessed accordingly as a local scheme and not assuming one size fits all.</p>
		<i>How can the mechanism for guiding development around airports be improved to ensure potential issues from aircraft noise are fully addressed in planning?</i>	The National Policy must take some leadership in encouraging State/Territory and Local governments to take a more responsible approach to planning around airports to ensure that these economic drivers (airports) are permitted to continue to provide the essential business tourism and welfare benefits that an airport provides and not be compromised by urban creep with the subsequent issues of noise complaint, OLS intrusion etc. .
		<i>How can we better ensure off airport developments subject to state and local government planning regimes, such as tall buildings, do not compromise the safe and effective use of aviation infrastructure?</i>	Encourage CASA to use the powers that they have and to also encourage State/Territory and Local Governments to amend planning rules to make reporting of developments mandatory. Too often we believe that a compromise is reached e.g. shadowing (where an existing building which itself penetrates the OLS is then used to approve several others).
	(Future needs)	<i>How can future airport needs best be addressed, recognizing the importance of airports as an element of the national economic infrastructure?</i>	<p>Greater enforcement of existing Regulations and less compromise.</p> <p>All the above points are also relevant.</p>
		<i>What are the current and future pressure points in relation to airport capacity?</i>	<p>AAL's list would include but not be constrained to the following;</p> <ul style="list-style-type: none"> <li>➤ Curfews at some airports and the drive to introduce more</li> <li>➤ Noise sharing procedures and artificial slot allocations e.g. Sydney</li> <li>➤ Outdated (1960's) Air traffic control separation procedures</li> <li>➤ Fixed wing and rotary mix, jet non-jet and lack of prioritisation</li> <li>➤ PSZ's and RESA</li> <li>➤ OLS and Pans-Ops infringements</li> <li>➤ Surface Traffic access</li> <li>➤ Adequate State Utility capacities</li> <li>➤ Emissions Trading Schemes and other environmental effects</li> <li>➤ Aircraft design and development technologies (including engines)</li> </ul>
		<i>Can the growing use by civil aviation of joint user or Defence owned airports be safely and effectively accommodated?</i>	Whilst it is not applicable to Adelaide we believe it should be possible with or without changes to CASA Regulations – the limitations of which are somewhat dated.
		<i>How can the protection of the communities around airports from undue aircraft noise best be</i>	State/Territory or Local Government should assess what value the airport is to the social and economic well being of the community and insert relevant clauses in Planning

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		<i>addressed as demand for services continues to grow?</i>	<p>Approvals that the property is in the vicinity of an airport that the owner occupier should sign off against that advice and that the owner occupier be responsible for any mitigating measures.</p> <p>AAL would be pleased to work with Government to re-introduce the noise insulation program but under a more equitable basis for those affected by the aircraft generated noise. AAL was engaged in discussion with the then DOTARS about a specific scheme for the Adelaide community rather than the one size fits all Sydney model just prior to the secret imposition of the current scheme</p>
	(Pricing of airport services)	<i>As the aviation industry grows and changes with the advent of low cost carriers and other innovative service providers, should changes be made to the regulatory framework for the pricing of airport services and monitoring of service quality?</i>	We believe the status quo works and that regulation is superfluous especially given airlines can and will seek redress if required.
		<i>Is there sufficient transparency in the setting of charges for services at those airports that are not subject to price or quality of service monitoring?</i>	We do not believe it is fair for us to comment. We are aware these smaller airports are often highly dependant on one major RPT operator who has significant market power – this ‘monopoly’ of supply should receive some formal scrutiny by perhaps the ACCC.
2.2	Air Traffic Management (Key challenges)	<i>How can Australia’s air traffic management system best take advantage of new and emerging satellite navigation technologies? What is the role of government in the take up of the new technologies? Are there any regulatory impediments to maximizing the use of new and emerging surveillance and navigation technology?</i>	<p>It is our understanding that Airservices Australia is ahead of the game in the implementation of these technologies.</p> <p>The only issue we would have is that they do not appear to be able to change some of their old CASA Regulations.</p> <p>We wonder why the number of movements per hour is so slow when compared to some of the overseas airports that are managing three or four times the number of movements of our capital city airports and in some cases on only one runway – with the same safety record.</p>
		<i>How do we enhance both air traffic management safety and capacity and efficiency?</i>	<p>AAL believes that some attention needs to be given to the ground movement to increase capacity and would particularly recommend call for start procedures be introduced and which has the benefit of unnecessary fuel burn</p> <p>In addition sequencing of aircraft access to the runway to minimize separation by mode should be introduced and not ‘first come first served’ as exists now. AAL recognises we may need to provide more taxiway infrastructure for such procedures.</p> <p>Send our air traffic controllers to Europe for practical training or have a mentoring program where we exchange air traffic controllers with Europe or America.</p>
		<i>How effective have Australian regulatory agencies</i>	The process seems to have been quite effective but was a long and drawn out process due

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		<i>been in pro-actively assessing the Australian air traffic management system and setting clear risk-based safety and efficiency outcomes requirements, having regard to international developments?</i>	mainly to the influence of political perception – it is believed that if the decisions were left to the industry consultative process it would have been much quicker.
		<i>Are we effectively aligning airspace classifications and the level of services and facilities provided to reduce risk to passenger transport operations? Can we better identify risk factors?</i>	
		<i>How do we ensure the development of Australia’s air traffic control systems is compatible with global and regional systems?</i>	Exchange programs may be one way of arriving at some form of compatibility and through our membership of CANSO.
		<i>How can Australia’s air traffic management development be aligned with broader policy considerations such as national security and the environment?</i>	It is our understanding that Airservices Australia has many developments in the pipeline that are aligned but that are constrained by other more politically sensitive issues such as Curfews, noise sharing and artificial slot allocations and outdated regulations.
		<i>What steps need to be taken to ensure the retention, training and future supply of skilled air traffic controllers and associated professionals?</i>	We understand that Airservices have spent a long time on working through this issue and are dealing with it.
		<i>What should a national air traffic management plan cover and who should be responsible for its development and implementation?</i>	Airservices Australia should be responsible through consultation with all of industry and audited by CASA
<b>3</b>	<b>Aviation Safety</b>		
3.1	Safety Regulation and Regulatory Reform	<i>Are there ways in which the approach to Safety Management Systems could be enhanced?</i>	We believe that by reducing the political and one issue lobbyists intrusions would permit CASA to get on with their mandate which would be enhanced by having competently trained risk auditors within the CASA structure.  More responsive and accountable airport inspectors.  Equal focus to be given to operational outcomes as to the content and style of documents.
	(Key challenges)	<i>Should the governance arrangements for CASA be strengthened to better support the role of the safety regulator?</i>	Yes – particularly in off airport planning and development – for example in the area of OLS and Pans-Ops intrusions, it is pointless having the authority to prevent an issue occurring but to do nothing until after the event and then rely on the airport to “fix” the problem by compromising operational capacity.
		<i>How can CASA strengthen the way it relates to industry while meeting the community expectations of a firm regulator?</i>	CASA should be encouraged to take a partnering role working with the airport to avoid conflict particularly giving us the benefit of their experience during the process.
		<i>How can the Australian government and industry ensure CASA completes its long running</i>	Australian aviation is somewhat dysfunctional and for CASA to have to countenance and console so many competing aviation stakeholders and interests would be a somewhat

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		<i>regulatory reform process as soon as possible to give clarity to industry and to clear the way for new approaches to meeting regulatory challenge?</i>	difficult task.  Given the scope of the task and the demand on CASA to consult extensively the regulatory reform process is not as bad as it appears – it may have been improved if the requirement to consult was not obligatory but one can only guess at the political backlash that may have caused?
		<i>What changes could be made to improve how Australia’s aviation safety agencies work together?</i>	Regular consultation plus a combination of all the above would assist in closer ties.
		<i>What steps can the aviation industry as a whole take to ensure it maintains safety standards as it grows and diversifies?</i>	Most of the aviation industry in addition to Government Mandates has corporate responsibilities to their respective stakeholder and shareholder bases accordingly, these corporations automatically apply measures to mitigate against any risk be it safety or security that would place their corporate future at risk
		<i>What steps should be taken to ensure Australia maintains a high standard of aviation safety in the context of global developments?</i>	Pro-Active participation in the ICAO conventions and becoming a louder and stronger voice for this region. – If needs be support the active support of representative bodies such as the Airports Council International and the Australian Airports Association as advisors at these forums.
		<i>What issues should a 21<sup>st</sup> century aviation regulator be focused on?</i>	Compliance to appropriate regulation with a view to self administration by those with a sound track record of compliance. As previously stated they should be encouraged to facilitate outcomes and not be a hurdle to overcome.
		<i>Is self administration a key factor in the growth of recreational aviation? Is there more scope for some parts of the industry to self administer? What are the opportunities and risks to the industry, regulators and the community in the greater “self administration”?</i>	The Canadian model of self administration is suggested as a way forward and was almost being implemented in CASA before one of its senior executive had to return to Canada for family reasons – but encourage local adaptation.  It is recommended that CASA investigate this model and apply it to the Australian industry due to the similarities in fleet mix, wide and diverse terrain etc., etc.
<b>4</b>	<b>Customer and Community Protection – (addressing the impacts of aviation)</b>		
4.1	Aviation Emissions and Climate Change (key challenges)	<i>What practical measures can the aviation industry take right now to reduce greenhouse gas emissions? Are carbon offset schemes enough?</i>	The aviation industry has been aware of this issue for some time particularly in the noise and fuel reduction arenas which also have a complimentary carbon emission reduction outcome.  Adelaide Airport recognizing the direction that global warming and carbon emission control was going has introduced significant measures towards being carbon neutral as a

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			<p>company by mid 2009 and in conjunction with the AAA we are liaising with the Dept of Climate Change to ensure an appropriate level of compliance for airports.</p> <p>We did inherit very tired and inefficient asset on takeover in 1998 but since that time have constructed and directed the construction of new sustainable and energy efficient infrastructure and our forward planning continues to set these high standards.</p>
		<i>What measures should the aviation industry be taking in the short-medium term to reduce emissions, such as clean engine technology and clean aviation fuels?</i>	The industry is doing its part as it has for the past decade or so – we would encourage any revenues generated by mandate from the government be put back into Research and Development in partnership with industry.
		<i>Given the international nature of aviation, what opportunities are there to minimize greenhouse emissions and trade emission permits through emission trading schemes?</i>	<p>Adelaide Airport Limited is of the view that if you are the controlling authority of what is emitting the carbon then you have the responsibility to manage account for and minimize that emission.</p> <p>We are also active participants in the consultation program between the Australian Airports Association and the Dept of Climate Change and have volunteered as a test case airport in the development of any airport related measurement and trading schemes etc.</p>
4.2	Aircraft Noise (key challenges)	<i>Could the ANEF system be improved or be supplemented by other planning tools to better explain the impact of aircraft noise? Should State and local governments play a greater role in aircraft noise management? What should be the responsibilities of airports?</i>	<p>The ANEF system is somewhat dated and needs to be reviewed to a more readily understandable system. The DITRDLG environment branch has a system that may well be the way forward called TNIP.</p> <p>Airports themselves do not generate any significant noise and the noise emissions from today's modern aircraft are significantly less now than when the ANEF system was developed. Highway/road noise is a more intrusive yet constant source than aviation.</p> <p>Airports will always be the focal point for noise related issues and should provide the conduit for discussion and consultation between the responsible stakeholders.</p>
		<i>Should emphasis be given to airport/community partnership approaches, for example, based on locally negotiated agreements rather than generic legislative approaches?</i>	The Airport Consultative Committee forums that exist at most airports are a good start but possibly require independent chairmanship with accountable representation from the Regulators.
		<i>Can techniques for sharing information on aircraft noise impact be further developed to improve the supply of information to potential property purchasers and other affected parties?</i>	As mentioned earlier in this submission, the Federal Government should direct State/Territory and Local Governments where applicable to include in relevant planning documentation that properties are in the vicinity of an airport/highway/rail corridor or whatever and that the buyer is responsible for any mitigation measures that may be required.
		<i>Which airports in Australia need to remain curfew free and under what conditions? Can operators at</i>	It is our recommendation that there be a complete review of the curfew impost on airports particularly in relation to the Regulations and their currency given the changes

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		<i>airports be better managed to ensure the community is protected while at the same time providing for night time access?</i>	<p>which have occurred over the past decade or so AAL has a number of suggestions to make in this regard.</p> <p>Given the advances in aircraft technology, since curfews were developed in the late 1970's, the socio economic benefits that aviation brings to a community, measures already introduced to minimize noise in nearby residents and paid for by the traveling public, the need to minimize carbon emissions and fuel burn then it would be irresponsible for Government to not review this archaic impost.</p> <p>In South Australia the business and tourism communities would encourage a review of the airport curfew or to at least identify some measures that could control the arrival departure and ground management of aircraft – we therefore feel it is a prejudicial impost when Government says it cannot look at Adelaide unless Sydney changes.</p> <p>It was not our shareholders understanding that the privatization of airports was done on a Sydney-centric condition.</p>
		<i>How effective are the current noise enquiry and noise complaint services? Are there more effective ways to deal with people's complaints and requests for information? Can the services be better provided?</i>	<p>Locally the system has shown a marked improvement over recent months due in the main to an independent chair of the airport consultative committee and a more consultative approach to community issues.</p> <p>AAL is not aware of what outcomes are required by the Government.</p>
4.3	Consumer Protection (Key challenges)	<i>Are existing consumer protections and airline procedures adequate in dealing with these challenges? Is it possible to improve passengers' travel experiences without adding unnecessary costs to airlines that would inevitably need to be passed on to all passengers?</i>	<p>Consumer protection in our industry should not be treated any differently than any other business.</p> <p>Particularly given the low cost carrier dynamic not all airlines can be treated as equal and therefore there will be differences in scope of benefits generally related to the fare paid.</p>
		<i>How can airlines ensure passengers are appropriately informed about restrictions? Furthermore, are existing airline terms and conditions reasonable?</i>	Market forces will determine the best way forward.
4.4	Disability Standards (Key challenges)	<i>Are the current Transport Standards adequate to ensure the removal of discrimination from air travel?</i>	We are an active participant on the Disability Standards Review committee and feel that the current transport standards for air travel are more than adequate.
		<i>Are there recommendations arising from the recent Transport Standards Review that might be implemented to improve services for people with a disability?</i>	An awareness campaign to the public at large that the airline carriers in Australia are prepared to assist provided they have advance notice of special needs – the community has got used to advising airlines in advance of any special dietary requirements and the needs of persons with disabilities can be given the same attention provided there is

Section	Title	Issues	Comment
			notice.
		<i>Are current complaint and compliance mechanisms effective?</i>	Yes we believe so – however, in our experience no two consultants agree with each other on all points and it is therefore very difficult to take an objective approach in all cases.
4.5	Compensation Arrangements in the Event of an Accident (Key challenges)	<i>Are Australia’s domestic arrangements for passenger and baggage/cargo liability appropriate in the context of international developments, including the Montreal Convention? Is there a better system or model for compensating people?</i>	It is our understanding that there is legislation before the Parliament at this time in regard to International Carrier Liability and that Australia’s domestic liability is already adopted.
		<i>Are the minimum insurance standards appropriate? Should the system be extended to require insurance for third party surface damage? Does the aviation industry face any difficulties in accessing appropriate levels of insurance to cover their potential liabilities?</i>	The present leasehold requirement for \$1.5 billion of liability insurance is out of step with the rest of the world. It adds a cost impact to airports (and therefore landing fees) that is unnecessary. The limit should be significantly reduced after a proper risk/maximum loss assessment is undertaken.
		<i>Is the voluntary Family Assistance Code an appropriate measure to ensure airlines meet their responsibilities in the event of an aviation accident and to what extent are airlines complying with the Code?</i>	Airlines to consider.
<b>5</b>	<b>Aviation Security</b> -( Key Challenges)	<i>Could Australia improve its approach to protecting air travelers from threats while facilitating quick and efficient travel? How can we improve the system to improve both security outcomes and passenger facilitation through airports?</i>	Adelaide Airport is cognizant of and an active participant into the suite of reviews currently being undertaken by Government into the security of airports and airlines and would propose that the outcomes of those reviews receive further consideration in the “Green Paper” consultative period – e.g. computers, shoes, belts, scissors etc., etc.
	(International Developments)	<i>Is enough information available for passengers to make well informed choices before they travel in order to comply with security requirements?</i>	Carrier and Regulator requirement and the airport does what it can at the last moment.
		<i>Can more be done at our international airports to assist passengers to comply with security requirements?</i>	LAGs bags are already provided to those that are not aware and a potential change to Duty Free allowances on arrival could have a huge beneficial impact which would include carbon emission reductions due to reduced weight in flight.
		<i>Should more be done at airports where passengers leave Australia to make clear our own security requirements?</i>	AQIS rules to be provided to departing passengers at the primary outward line and the current advertising campaign be amended accordingly.
		<i>What can be done by government and industry to achieve greater international harmonization of aviation security measures?</i>	Either Australia do its own thing for its local threat and risk analysis outcomes or copy only one model not try to be a hybrid of many.
	(Threat)	<i>Should aviation security remain the key focus for</i>	It would seem that internationally aviation security has raised the level to a standard that

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		<i>government and industry?</i>	makes it difficult for the terrorists to achieve their aims easily at airports or on airlines and they have changed their modus operandi to other forms of transport and mass gatherings.
		<i>Should more attention be paid elsewhere?</i>	It would seem logical that the same measure of intensity should be directed to rail and coach public transport and to places of mass gathering including nightclubs and sporting arenas.
		<i>Is enough being done to enhance security in the aviation sector?</i>	We would suggest that it is important to undertake some exit strategies where there is overlap in the knowledge that any draw back can be re-instated should the threat level vary
		<i>Are we thinking broadly enough about the likely threats we may face and how they may be countered?</i>	If we initiate measures to overcome every likely scenario we will suffocate the business. Current reviews and technology advances may well be the answer to better manage the procedures we currently have with newer technologies and profiling procedures
	(Efficiency and Cost)	<i>Could government spending on security be spent more effectively? Could more focused security measures provide a higher level of security?</i>	As to spending some transparency would be recommended.  Adelaide Airport is cognizant of and an active participant into the suite of reviews currently being undertaken by Government into the security of airports and airlines and would propose that the outcomes of those reviews receive further consideration in the “Green Paper” consultative period
		<i>Could the requirements imposed on industry be changed to achieve similar security results at less cost, or greater security at the same cost?</i>	As it is a national issue it should be nationally funded
		<i>Is the current charging regime for the provision of security screening services equitable between major metropolitan airports and regional airports? Should alternative arrangements be put in place?</i>	In addition to the above  We would support a National service provider (Government or Private) charging a network fee – if the threat level warrants. The role of AFP would then need to be clarified.
	(Growth and Industry Development)	<i>Whether current passenger security screening requirements based on jet aircraft should be extended to non-jet aircraft of similar capacity, speed or weight?</i>	At present there are holes in the system occasioned by the convoluted process that “triggers” security measures  We would propose that the outcomes of the current reviews receive further consideration in the “Green Paper” consultative period.
		<i>Is the security infrastructure at airports adequate?</i>	Yes – relevant to the Regulations that exist.
		<i>The current focus of the aviation security system is regular passenger transport services. Should it be extended to include aircraft providing for example, charter services?</i>	At present there are holes in the system occasioned by the convoluted process that “triggers” security measures  We would propose that the outcomes of the current reviews receive further consideration in the “Green Paper” consultative period.

Section	Title	Issues	Comment
		<i>Should the cost of aviation security at particular airports be more evident to passengers?</i>	Needs further explanation and may well be best considered in the “Green Paper” consultation period.
		<i>Could industry manage its costs more effectively?</i>	Costs are under constant review by airports at all times
	(Technology)	<i>Should we introduce new technologies for passenger screening that can improve processes even if they are more invasive or costly?</i>	Needs further investigation and may well be best considered in the “Green Paper” consultation period – having said that if Millimeter Wave technology is being considered, a limited and endorsed screening staff with the visual being obscured from public view may be a solution. – Yes, relevant to the threat.
		<i>Biometrics are an effective way to manage access arrangements at airports and an improvement on current practice. Is there value in introducing biometrics into Australia’s airports for people working there?</i>	If it enhances the outcome then it should be considered but not because it is a “nice to have” and it must “speed up the facilitation flow”.
		<i>Should we expect the same security technology standards from all airports regardless of location, the traffic levels at the airport, and the costs?</i>	One size does not fit all – however, if there is a network service provider with a network pricing regime then there would be some support. – AAL believes that the threat level is not the same at all airports.
	(Passenger Experience)	<i>How can we improve/optimize passenger screening arrangements within Australia?</i>	Adelaide Airport is cognizant of and an active participant into the suite of reviews currently being undertaken by Government into the security of airports and airlines and would propose that the outcomes of those reviews receive further consideration in the “Green Paper” consultative period
		<i>Should special arrangements be put in place to enable frequent travelers who understand security requirements, often business travelers, to move through passenger screening more quickly? What type of special arrangements, if any, would be appropriate?</i>	There is a distinct difference of opinion and requires more discussion. For example one school of thought is that any such system in a security environment leaves people open to coercion whereas others believe that regular business persons who are well known to their airlines etc, and particularly who travel in premium classes should receive special attention. i.e. Fast Track as exists in other secure countries
		<i>Do we adequately address the requirements of people with special needs?</i>	Adelaide Airport is cognizant of and an active participant into the suite of reviews currently being undertaken by Government into the security of airports and airlines and would propose that the outcomes of those reviews receive further consideration in the “Green Paper” consultative period
		<i>Are we consistent enough in the delivery of services to passengers?</i>	Given that everyone is different and circumstances are different we are reasonably consistent.  A network service provider may well be the answer to achieving a nationally consistent service standard
	(Legal Requirements)	<i>Is the current regime too heavy handed? Could it provide a similar level of protection while reducing demands on passengers, industry and workers?</i>	

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		<i>Are the legislation and regulations in need of simplification?</i>	<p>The original intent when the legislation and regulations were put to industry prior to 2001 was for a simple easy to understand set of laws – however, the rapid change following Sept 2001 has not achieved that original intent.</p> <p>It would be a good idea to be able to take a deep breath and review the suite of Legislation and Regulation from across all disciplines and try to achieve some consistency.</p>
	(Air Cargo Security)	<i>Has enough been done to enhance air cargo security? Are there alternative approaches to air cargo security that should be examined?</i>	<p>At present there are holes in the system occasioned by the convoluted process that “triggers” security measures and air cargo falls into one or more of these holes and we understand there is a review in progress under separate cover.</p> <p>The pace on cargo has been far slower than passenger whereas the risk is possibly similar or could be argued as worse.</p>
		<i>Is the Australian approach to air cargo security consistent with the highest international standards?</i>	No – but the threat level is different e.g. El Al
	(Identity and Background Checking)	<i>What can be done to improve the robustness and timeliness of background checks, particularly for applicants from overseas?</i>	Adelaide Airport is cognizant of and an active participant into the suite of reviews currently being undertaken by Government into the security of airports and airlines and would propose that the outcomes of those reviews receive further consideration in the “Green Paper” consultative period
		<i>Should the ASIC eligibility criteria be further strengthened?</i>	Reduce the number of issuing authorities particularly those that do not have a direct association with the end user.
		<i>What should be the relationship between “background checking” of staff and access control arrangements?</i>	There should be a relationship – Access to relevant areas should not be given without proof of background check
		<i>Should background checking be extended to include managers/directors of companies with employees who hold an Aviation Security Identity Card?</i>	Most Managers and relevant staff would be under this regime now and would see no issue either way but would not support a move to include Directors or Shareholders representatives.