



Knowledge Influence Support

CHAMBER OF COMMERCE AND INDUSTRY
WESTERN AUSTRALIA



26 June 2008

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

Dear Sir or Madam

TOWARDS A NATIONAL AVIATION POLICY STATEMENT

The Chamber of Commerce and Industry of Western Australia (CCI) is pleased to make this submission to the Department of Infrastructure, Transport, Regional Development and Local Government in response to the Issues Paper – *Towards a National Aviation Policy Statement*.

About CCI

CCI is the leading business association in Western Australia and is the second largest organisation of its kind in Australia, with a membership of over 5,500 organisations in all sectors including retail, hospitality, accommodation, manufacturing, resources, information and communications technology and agriculture, among others.

Most members are private businesses, but CCI also represents organisations in the not-for-profit sector and the government sector. Approximately 90 per cent of CCI's members are small businesses and are located in all regions of the State.

Comments

CCI is concerned about key aviation issues identified in the Issues Paper including the regulation of regional routes, regional airport security, pilot shortages, aircraft noise curfews and the ability for airlines to meet environmental standards. CCI strongly urges the Federal Government to consider the following recommendations for inclusion in the National Policy Statement.

Regional Air Services

Regulation of routes

Prior to 2001 the Western Australian intrastate aviation industry was not regulated. Following the collapse of Ansett, the State Government imposed regulation on certain routes to restrict competition. Currently, two networks and three routes are regulated by the Western Australian State Government, which issues exclusive licenses for non-jet aircraft operating regular passenger services within these networks and routes.

CCI is concerned that the current regulatory framework is not in the public interest, especially in the current economic climate, where Western Australia is demonstrably the nation's fastest growing economy and is also experiencing population growth of around 2.5% annually.

Regional Airport Security

While an outcome of the Wheeler Review was the introduction of harmonised airport security in 2005, CCI is concerned that the security and safety measures adopted for major capital city trunk routes, which have a strong focus on protecting airport infrastructure, are similar for Perth International Airport and isolated air strips situation in the Pilbara region of the State.

CCI recommends that the Australian Federal Police adopt a risk assessment approach to airport security to ease compliance cost burdens on regional airports and airlines at low risk of security breaches.

Pilot Shortages

CCI believes that attracting and retaining pilots is critical to ensuring the long-term viability of Australia's airline industry. We further understand that prohibitive costs for pilot accreditation, the impact that CASA restrictions on aircraft depreciation can have on a trainee's ability to complete their accreditation hours and competition between airlines to provide low cost fares have all contributed to skills shortages.

CCI urges the Federal Government to introduce a HECS-HELP scheme to help address the costs of pilot accreditation and conduct a review into the restrictions imposed by CASA.

CCI also recommends that airlines develop a system to retain trainee pilots that could include paying for training to encourage graduates to remain with the airline.

Aircraft Noise Curfews

CCI notes that Perth Airport is located at the end of the network line and has a high percentage of international passengers transiting between 11pm and 6am to connect with overseas flights. We consider that enabling the airport to maximise access to overseas markets is critical to maintaining key airport services.

CCI contends that improved land planning use will ensure residential areas are minimally affected by aircraft noise, eliminating the need to introduce curfew periods.

Environmental Standards

CCI understands that greenhouse gas emissions from aircraft are expected to grow at approximately 3 per cent in the coming years and that practical steps can be taken by the Australian aviation industry to reduce emissions.

We believe that subject to a feasibility study, airlines should follow the lead of Qantas in reassessing flight paths to improve efficiency that will use less fuel, introduce the use of more fuel efficient engines and carry less fuel where practicable. Airport infrastructure should also be

improved to reduce waiting times in aircraft taking off and landing that contributes to greater fuel consumption.

Ms Renée Dunstan, Adviser - Industry Policy would be pleased to discuss this submission with you and can be contacted on (08) 9365 7498 or email: Renee.Dunstan@cciwa.com.

Yours sincerely

A handwritten signature in black ink, appearing to read "Trevor Lovelle". The signature is written in a cursive style with a large initial 'T'.

Trevor Lovelle
Director Industry Policy