



OVERNIGHT AIRFREIGHT OPERATORS ASSOCIATION

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

Dear Sir

Towards a National Aviation Policy Statement.
Issues Paper OAOA Submission

The Australian Express Freight Industry plays a very important role in the Australian economy by providing a reliable, cost effective, just in time express freight service. This service is utilized by Industry, Commerce, Fisheries and Agriculture, Medical services as well as the General Community across the length and breath of Australia.

To achieve the Industry delivery service standard requires the coordination and scheduling of aircraft from all areas across Australia. This enables aircraft from regional and remote areas to link up with the aircraft being utilized on a National network at the mainland capital city airports.

The critical factor in the total Network operations is aircraft being able to have access to airports, twenty four hours per day seven days a week.

Aviation Industry

The Association endorsed the continuation of the "open -cargo ' policy for both International and Domestic air freight services.

Due to the monopoly enjoyed by Australia's privately owned major airports, some airport managements have abused this monopoly power to continue to impose higher and higher airport user charges.

The current regulation of airport pricing is not working. While it is acknowledged that airport owners need to make a return on their investment they should not be allowed to continue the abuse the monopoly.

There is an urgent need for stronger and more stringent regulations or even a new regulator to be employed to monitor airport pricing across Australia.

Aviation Infrastructure.

Our Capital City Airports and our major Regional Airports are national assets and are key infrastructure in Australia's continuing economic development and they require continual protection.

The co-operation between the Federal and some State Governments and Local Authorities is not working. The recent rezoning of land under the eastern high noise flight path at Canberra Airport for residential purposes a good example of this problem.

Appropriate Federal action need to taken to safeguard these National Assets , as it is understood that Federal law over rides State law and thus Local Authority approval powers. Federal action is the only way that will prevent further stupid planning decisions under known aircraft high noise flight corridors from occurring.

If such planning approvals continue it will result in calls from the local airport communities and budding political aspirants for operational restrictions including curfews being placed on airports.

Similar action also needs to taken to prevent OLS penetration around Airports. The penetration of the OLS has the potential to raise airport operational minimums in bad weather conditions which will result in an increase in the number of missed approaches at the airport concerned.

It is agreed the while the ANEF system as served its purposed in the past, it is now not a reliable measure of aircraft noise exposure. If a more informative system is available that analyses and explains aircraft noise impacts to land use planners and the general public, then that system should be adopted as soon as possible.

Customer and Community Protection

Aircraft Noise

The Association members are cognizant of the impact aircraft noise has on the communities surrounding airports particularly at night. In this regard the Association has worked with Airservices Australia, airport managements and in consultation with airport communities (through Airport Consultative forums) to develop airport flight paths that minimize aircraft noise impacts especially during the night hours.

To achieve the Industry delivery service standard sort by the Express Freight Industry customers, access to all Australian airports, twenty four hours per day seven days a week is required.

The Association acknowledges the Airport curfew restrictions currently in place at Adelaide , Coolangatta, Essendon and Sydney Airports.

However these curfews need to standardized with regards to the aircraft permitted to operate during the airport curfew hours. At Adelaide Airport aircraft that are certified as meeting the 90/95 Rule are permitted to utilize the low Noise Heavy Jet aircraft movement slots available, while the Sydney Airport Curfew Act specifies the Bae 146 aircraft as the only aircraft type that can be operated utilizing the 74 low noise heavy jet movement slots per week available during the Sydney Airport curfew hours.

The Sydney Airport Curfew Act needs to amended to permit aircraft to be operated at Sydney Airport utilizing the 74 low noise heavy jet movement slots during the curfew hours if the aircraft are certified as meeting the 90/95 Rule.

This is not a request for any relaxation of the Sydney Airport Curfew Act restrictions of time or approved number of movement slots.

By standardizing Curfew restrictions to aircraft that do not meet the 90/95 Rule noise level this will allow for better aircraft fleet utilization and thus better economies of scale and the possibility of the introduction of even lower noise generating aircraft when they become available.

Reports from the current Noise Enquiry, Complaint Service with regards to aircraft noise complaints need to be standardized across all airports. At several airports such as Sydney

and Canberra the reports provides the number of complaints and the number of complainants and their suburban location. While other airports it is the number of complaints received that is reported.

The reporting of the number of complaints, the number of complainants and their location allows for a better understanding of the issue rather than just the number of complaints which can easily be influenced by repetitious complainants.

Aviation Security

The biggest threat to aviation safety is not security related, it is the unintentional carriage of undeclared of Dangerous Goods.

In so far as Air Freight Security is concerned the the Australian approach is consistent with International standards. When considering the threat and risk factors involved in the carriage of air freight, the current approach being adopted in Australia is of the higher levels in International standards.

If the level of security measures for air freight adopted at the Australia's major airports were to be implemented at the regional and remote airports, the costs involved would prevent this service from being viable. This would ultimately see the airfreight service withdraw from these centres to their detriment.

The current measures being implemented at regional and remote airports when the threat and risk involved are analyzed, it is considered that these measures are working effectively and are appropriate.

If further information or confirmation is required on any of the issues raised please do not hesitate in contacting the writer on 0409 207 374

Yours sincerely

A handwritten signature in blue ink, appearing to read "Howard Knox". The signature is fluid and cursive, with a long horizontal stroke at the end.

Howard Knox OAM
Executive Director
Overnight Airfreight Operators Association