



**VICTORIAN AIRFREIGHT COUNCIL**  
ABN 80 094 762 473

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

**Re: Aviation White Paper**

Please find attached a submission by the Victorian Airfreight Council Ltd (VAC) on a number of the points addressed in the Issues Paper titled Towards a National Aviation Policy Statement published by Minister Albanese in April 2008.

Richard Pierse  
Chair  
Victorian Airfreight Council Ltd

## 1.1 International Services (page 3)

### *Extract from Issues paper*

**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?**

### *Comments by VAC*

A recent survey of major freight forwarders by the VAC demonstrated a lack of freight capacity from Melbourne to/from USA and NZ.

The survey indicated capacity issues from/to most key markets throughout the world at various times of the year, with seasonal shortages of capacity to/from Europe and Middle East.

### *Extract from Issues Paper*

**How might access to Australian destinations 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?**

**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?**

### *Comments by VAC*

The VAC strongly supports the "open-cargo" policy for dedicated freight services. Although a substantial proportion of cargo is carried in passenger aircraft the dedicated freighters are much more likely to see the advantage of the smaller airports than passenger airlines where differing commercial requirements are in play. However the high cost of air freighter operation means that it is unlikely that freighters will operate to smaller Australian airports on a scheduled basis, although there may be some opportunity on a seasonal basis.

The VAC believes that there are many opportunities to improve the movement of valuable and/or time-sensitive freight. These include improvements in ground services by airports and cargo terminals, reduced waiting times for both lodgment and pickup of freight, pro-active "pushing" of freight to customers (rather than customers having to queue at airport cargo terminals) and ensuring that road access is optimized.

## 4.2 Aircraft Noise (page 21)

### *Extract from Issues Paper*

**Which airports in Australia need to remain curfew free and under what conditions?  
Can operations at airports be better managed to ensure the community is protected  
while at the same time providing for night time access?**

### *Comments by VAC*

The VAC believes that it is essential that Melbourne Airport remains curfew free to ensure that economic development of 24 hour supply chain operations are supported and encouraged. The VAC is also of the opinion that the current Curfews in place at Sydney and Adelaide airports must be reviewed and either removed or relaxed to remove current impediments to nation-wide transshipments of overnight Express Products for Businesses, Industry and Consumers ,and urgent Medical Supplies. Whilst we recognise that exemptions have been granted with regard to Urgent Medical Supplies, it is far from an ideal situation.

There are also inconsistencies in the way in which curfews are defined at these two airports. An example of this is that specific aircraft are given permission to land in Sydney overnight whereas Adelaide curfew is "noise" based. If Sydney used the noise criteria then larger aircraft could be allowed to land which reduces the number of aircraft movements to carry the same quantity of cargo.

## 5.1 Aviation Security

### *Extract from Issues Paper*

**Has enough been done to enhance air cargo security? Are there alternative approaches to air cargo security that should be examined?  
Is the Australian approach to air cargo security consistent with the highest international standards**

### *Comments by VAC*

The VAC believes that Australia has created an aviation security response that is superior to most other signatories of ICAO Annex 17 particularly in the areas of training, Regulated Air Cargo Agent programs and screening at uplift. However there remains more to do in relation to regular shipper programs and other services associated with airfreight.