

**A submission by  
The Western Australian Minister for Planning and  
Infrastructure**

**to the**

**National Aviation Policy Issues Paper**

**released by  
the Department of Infrastructure, Transport, Regional  
Development and Local Government**

## Contents page

<b>Chapter</b>	<b>Page</b>
List of abbreviations used in this submission	3
Priorities for Western Australia	4
<b>The Australian aviation industry</b>	<b>5</b>
Western Australia's reliance on aviation	5
Air Service Agreements	5
Regional aviation	7
General aviation	8
Charter v Regular Public Transport services in Western Australia	9
Enroute Charges Rebate Scheme	10
Ageing aircraft	11
Skills needs in the aviation industry	12
Multi-crew Pilot Licences	14
<b>Aviation infrastructure</b>	<b>16</b>
Airport land planning	16
Regional airport infrastructure	19
Airport charges	21
Air traffic management	21
<b>Aviation safety</b>	<b>22</b>
<b>Customer and community protection</b>	<b>23</b>
Climate change and aviation emissions	23
Noise	26
Disability standards	27
<b>Aviation security</b>	<b>29</b>
Security in regional airports	29

**List of abbreviations used in this submission**

ADS-B	Automatic Dependent Surveillance -Broadcast
ASA	Airservices Australia
CASA	Civil Aviation Safety Authority
CO <sub>2</sub>	Carbon dioxide emissions
ETS	Emissions Trading Scheme
EU	European Union
FIFO	Fly-in fly-out
FT	Fischer-Tropsch
GA	General Aviation
IATA	International Air Transport Association
ICAO	International Civil Aviation Organisation
ILS	Instrument Landing System
IPCC	International Panel on Climate Change
LCC	Low Cost Carrier
MPL	Multi-crew Pilot License
NAS	National Airspace System
NO <sub>x</sub>	Nitrogen oxide emissions
OAR	Office of Airspace Regulation
RADS	Regional Airports Development Scheme
RASP	Remote Aerodrome Safety Programme
RFDS	Royal Flying Doctor Service
RPT	Regular Public Transport
TAFE	Technical And Further Education
TEEII	Trade Exposed Emissions Intensive Industry

## Priorities for Western Australia

The initiative of the Federal Government to develop the National Aviation Policy is strongly supported, in that it will draw together the diverse portfolio of issues affecting all of the stakeholders in the aviation sector, creating a holistic approach to aviation not seen before in Australia.

Aviation is a critical transport modality where we have small isolated population centres servicing vast resources operations and important tourism facilities. Aviation policy needs to consider our internal services as well as the national and international linkages. Western Australia's expanding resource sector supports the nation's economy and its workforce is conveyed primarily through regional air services from Perth Airport.

The issues that have been raised in this submission need to be addressed to ensure that the diverse population in Western Australia can continue to be serviced safely and efficiently through air transport. Some of the issues will be common across the other states and territories, and there are others that are specific to WA.

The format of our input is in line with the broad categories as per the *Issues Paper*, however particular issues that are critical to Western Australia are:

- processes associated with land use planning and development around major airports;
- reviewing policy on Bilateral Agreements impacting on the State;
- proposed legislation amendments from CASA which would allow a mix of charter and Regular Public Transport passengers on a single aircraft;
- security requirements at regional airports;
- financial policies relating to grant funding; and
- the shortage of skilled workers in the aviation industry.

The issues raised in this response do not address every question raised in the *Issues Paper*, but provides preliminary comments on those matters overseen by the Department for Planning and Infrastructure. Consultation was undertaken with other State Government agencies and industry, including Tourism Western Australia, the Department of Local Government and Regional Development, the Western Australian Local Government Association, the Chamber of Commerce and Industry, Perth Airport and several regional airlines also consulted in the course of WA's Intrastate Air Services Review. More comprehensive comments will be forthcoming during the consultation phase of the Green Paper.

We expect that all proposed policy changes as a result of this process conform to the protocols set forward in the *Inter-Governmental Agreement establishing principles guiding inter-governmental relations on Local Government matters* as agreed between the Federal, State and Local Government bodies.

## The Australian Aviation Industry

### Western Australia's reliance on aviation

It is well known that the future of aviation is uncertain in the current environment<sup>1</sup>. Increasing fuel costs, pilot shortages and increased charges at airports (due to increasing infrastructure and security costs) are all affecting the airlines' bottom line and pushing airfares up. A number of American and European airlines are announcing closure or cessation of some services<sup>2</sup>. The airline industry is struggling, and is looking to government for support<sup>3</sup>.

This causes a major vulnerability for Western Australia as the State is highly dependent on air services to connect to regional centres located hundreds or thousands of kilometres from the only major airport in Perth. In addition to the services required by regional communities, the booming WA resource sector, which shows no sign of slowing, requires fly-in fly-out air services for a significant portion of its workforce. The Chamber of Minerals and Energy suggests that this trend will continue<sup>4</sup>. We are a population of slightly more than 2 million – spread across one-third of the continent.

It is obvious that this and the prevalence of fly-in fly-out requires an aviation policy settings that may be different from more densely settled, less resource - oriented jurisdictions.

### Air Service Agreements

Air service agreements with other countries are essential for ensuring transport links for both business and leisure purposes. Given the importance that agreements play in the development of trade and tourism it is essential that they are not structured in a way that they would be a barrier to growth. Australia's aviation policy needs to maintain a progressive and liberalised approach to development of these agreements. Capacity needs to remain ahead of demand to enable planning for growth.

Despite the agreement recently negotiated for AirAsia X to commence services between Perth and Malaysia later this year<sup>5</sup>, Perth is significantly underexposed to the international market, even in comparison to other Australian ports<sup>6</sup>. Increasing competition at Perth International Airport for this type of service will

---

<sup>1</sup> Button, K. (2008, June). *Aviation and its growing role in economic growth and development*. Presented at the BITRE's 8th Transport Colloquium, Parliament House, Canberra, ACT.

<sup>2</sup> American Airlines to cut flights, jobs as oil prices spike. (2008, 22 May). *Sydney Morning Herald*. Retrieved May 24, 2008 from <http://www.smh.com.au/news/world/airline-to-cut-flights-jobs-as-oil-prices-spike/2008/05/22/1211182949388.html>

<sup>3</sup> Financial crisis prompts airlines to ask governments to help out. (2008, May-June). *Aircargo Asia-Pacific, Volume 179*, page 3.

<sup>4</sup> Chamber of Minerals and Energy (2008, January). *Fly-in, Fly-out in the Western Australian resources sector*. [Brochure]. Perth, Western Australia.

<sup>5</sup> New low-cost airline to bring millions of tourist dollars to WA. (2008, 15 May). Retrieved May 16, 2007, from the Government Media Office:

<http://www.mediastatements.wa.gov.au/Pages/CurrentMinistersSearch.aspx?ItemId=130196&minister=McHale&admin=Carpenter>

<sup>6</sup> Geatches, B. (2008, June). *The vital role of Aviation in WA - Perth Airport Redevelopment Plan*. Presented at the BITRE's 8th Transport Colloquium, Parliament House, Canberra, ACT.

provide benefits to all stakeholders. The introduction of Tiger Airways services to Perth has increased competition with Jetstar and Virgin Blue and allowed passengers a wider choice of service providers. Given the increased cost of fares due to increasing fuel costs, climate change initiatives and pilot shortages, there needs to be a push for Perth to have a greater opportunity to attract a larger market share in the future. Perth should be afforded the benefit of a choice to develop its own business to increase its international market share. This objective could be achieved by giving Perth unrestricted access as is the case with the airports covered under the Regional Benefits Package e.g. Adelaide, Darwin and Cairns.

The national interest would be best served by ensuring a strong western as well as a strong eastern gateway through an appropriate aviation policy that recognised this objective.

As China and India are growing commercial and tourist markets, opportunities exist for Perth to capitalise on this market. Increased tourism and commerce with these countries, which are two of our largest developing import/export partners will strengthen relationships and encourage the provision of efficient air travel between countries.

It is understood that Minister Albanese recently met with India's minister for civil aviation and discussed the 'enormous opportunities' for Australian companies to assist India as it moves to invest around AUD \$500 billion in infrastructure development. The Minister reportedly stated that a high level delegation would travel to India next year to focus on practical ways in which Australia can assist in developing India's aviation infrastructure<sup>7</sup>. Currently, no Indian airlines fly direct to Australia. However this could, and should, change. Supporting India's development of aviation infrastructure would further grow the relationship between the two countries.

Existing bilateral agreements need to be revisited. Currently, a number of these agreements allow only one airline from each country to operate a limited number of services to Australia. The conditions of existing bilateral agreements should be eased to improve travelling conditions and increase potential passenger numbers.

For example, there are pressures to expand some existing bilateral agreements, particularly with South Africa and Thailand. WA is ideally positioned to increase its share traffic and accommodate these countries which have a growing number of inbound and outbound passengers. Increased competition will encourage the routes to be fully utilised.

For larger, commercially viable routes such as interstate domestic traffic, a deregulated market is appropriate, assuming that there are a sufficient number of

---

<sup>7</sup> Australian group to visit in 2009. (2008, May-June). *Aircargo Asia-Pacific*, Volume 179, page 23.

providers. However, investigations should be undertaken regarding the implications that relaxing existing competitive restrictions would have on Australian air operators, such as Qantas.

Currently, the competitive restrictions in place include:

- international air service agreements restricting international airlines from providing services for domestic customers, carrying stopover traffic in Australia and providing services to and from Australia;
- restrictions on international cargo services to Perth, Brisbane, Sydney and Melbourne airports; and
- foreign ownership limits on Australian international airlines.

Whilst relaxing these restrictions would allow a broader scope of competition on domestic and international flights by introducing foreign carriers, it is unlikely that Australian airlines would be treated reciprocally in other countries. By allowing international competition to Australian domestic routes and other countries not allowing international competition to their domestic routes, Australian airlines are put at a significant disadvantage and are likely to lose their share of the domestic market, without given an opportunity to expand market share elsewhere.

***Recommendation 1.1***

***That Federal Government continues its policy of liberalising Air Service Agreement.***

***Recommendation 1.2***

***That Perth Airport be dealt with outside the current four major gateways policy.***

***Recommendation 1.3***

***That existing bilateral agreements are reviewed, and where warranted, expanded to allow competition on the relevant routes.***

Regional Aviation

Airports are an important element in the national economic and social infrastructure. Effective and efficient transport links to regional areas of Western Australia have a significant role in sustaining the long term economic growth and prosperity of the state and Australia as well as creating viable and sustainable rural and remote communities.

Australia's Transport Ministers agreed that a transport policy objective of the National Transport Plan should be to *promote social inclusion by connecting remote and disadvantaged communities and increasing accessibility to the transport network for all Australians*. The requirements of the remote

communities in Australia should be considered as the National Aviation Policy is formed.

Shortages of skilled personnel, particularly in regional WA in industries driving the resources boom, are impacting on the capacity of airport operators to attract and retain airport operations staff. Recent significant increases in fuel prices have highlighted the volatility of input costs for provision of services. The uncertain economic environment leads airlines to develop competition strategies which may not support the provision of sustainable air services within WA.

The challenge to developing a policy framework is to develop and support a system and services that accommodates the varied needs of regional areas, fosters competition and consumer choice and builds on the separate sources of demand to achieve economically sustainable air services for all communities.

***Recommendation 1.4***

***Policy development ensures that the varied needs of regional and remote areas are recognised so as to achieve economically sustainable air services that ensure competition and consumer choice.***

***Recommendation 1.5***

***That the unique circumstances of aviation in different states and territories are accommodated in policy development.***

General Aviation (non-commercial air services)

Although general aviation (e.g. RFDS, agricultural crop dusters, private use and pilot training) is robust in Western Australia, its major facility Jandakot Airport (leased by the Federal Government to Jandakot Airport Holdings) is nearing capacity and is expected to grow with a number of training schools, the RFDS and an active aero club using the facilities. Consideration needs to be given to establishing a second general aviation airport, preferably north of Perth city to cater for increased growth. Additionally, with the push to increase pilot training, a second GA airport will be required to cater for the extra training flights.

***Recommendation 1.6***

***That the Federal Government provides support to establishing a second airport, primarily for general aviation, preferably north of the metropolitan area.***

Charter v Regular Passenger Transport (RPT) services in Western Australia

---

It is the State Government's clear intention to ensure that RPT routes remain viable and that a balance is maintained between charter services over-flying RPT routes and operating into RPT ports. This ensures regional communities can obtain some benefit from FIFO operations by way of improved air services.

Under the State's *Transport Coordination Act 1966*, (the Act) approval is required from the Minister to operate charter services that overfly Regular Public Transport routes. Applications for charter services are assessed on their merits, that is, the frequency of the services requested, types of aircraft used, and impact of the additional service(s) on the RPT scheduled services.

Growth in WA's aviation sector, primarily driven by the resource industry developments requiring fly-in fly-out workers, was not anticipated by any aviation stakeholders.<sup>8</sup> Since 2001-02, there has been an increase in domestic services to Perth Airport of 108%, with 41% of current air movements through Perth being charter or general aviation.<sup>9</sup>

The high volumes of charter flights are primarily to service the resource sector. In some cases, where the charter services are used to convey staff directly to mine sites, they can erode the utilisation of the existing RPT services or mitigate against the improvement of RPT services to adjacent towns. The challenge is to develop a strategy to manage regional aviation in these areas to ensure that communities are not excluded from provision of air services because of their proximity to mine sites.

Current CASA standards are more favourable for charter than RPT operations – discouraging the RPT solution. With the proposed changes to CASA standards, the operating standard requirements for charter aircraft will become more closely aligned to that of RPT requirements. This will further enhance the opportunities of combined charter / RPT flights to service communities and the resource industry, such as at Newman, Leinster and Exmouth. By example, Ravensthorpe currently has a RPT service operating three times per week from Perth, in a BA146 jet aircraft, which regularly has large block bookings by the resource industry. This allows the community to access regular air services in an aircraft that would not normally be sustainable for that route without being underwritten by the charter volume.

Advancement of the proposed changes to CASA regulations, particularly in relation to parts 119 and 135 (regulations dealing with certification requirements), will remove the distinction between charter and RPT passengers on the same aircraft, and is strongly supported. In Western Australia, a significant amount of RPT traffic is driven by the resource industry's FIFO services.

---

<sup>8</sup> Geatches, B. (2008, June). *The vital role of Aviation in WA - Perth Airport Redevelopment Plan*. Presented at the BITRE's 8th Transport Colloquium, Parliament House, Canberra, ACT.

<sup>9</sup> Geatches, B. (2008, June). *The vital role of Aviation in WA - Perth Airport Redevelopment Plan*. Presented at the BITRE's 8th Transport Colloquium, Parliament House, Canberra, ACT.

In smaller mining communities which would otherwise not warrant an air service, or a smaller, lower quality service, the institution of these regulations would allow for an RPT/charter mix of passengers on the same aircraft, giving the public access to higher quality services in terms of frequency of service, aircraft type, comfort, convenience and performance.

In Western Australia, there are many of these smaller communities near mine sites, particularly in the Northern Goldfields. Though the public passenger levels are low, these regulations would allow them the opportunity to travel in comfort and also allow charter operators to offset some costs by selling empty seats to the public.

**Recommendation 1.7**

***That CASA should expedite changes which would bring certification standards for charter and RPT aircraft into line thereby facilitating growth of the RPT services into regional centres.***

Enroute Charges Rebate Scheme

Minister Albanese, in his speech on the National Aviation Policy, stated that one of the challenges of this policy is to ensure access to regular air services in regional and remote areas, where regular flights are essential for communities, regional development and social services<sup>10</sup>. The Airservices Australia Enroute Charges Rebate Scheme, which has been operating since January 2002, helps to ensure that regular air services are made available to these communities.

Skywest Airlines, Skippers Aviation and Golden Eagle Airlines are Western Australian operators who benefit significantly from this scheme, operating regulated RPT routes between regional ports and providing an air service which may otherwise not be provided. Regional airlines have indicated that they are in receipt of letters indicating that the Enroute Charges Rebate Scheme is due to cease on 30 June 2012. Whilst it is agreed that regional aviation is stronger than it was shortly after the collapse of Ansett, regional and remote communities in Western Australia are still very dependent on regular air services, which in some cases are only provided as the operators are required to under the terms of a network licence. When the rebate is removed, these routes will become less commercially viable and communities would be unable to access the same level of air services - and those available would be at a higher cost, as increased cost of travel will be passed on to the passenger.

---

<sup>10</sup> Speech for the Hon. Anthony Albanese MP, Minister for Infrastructure, Transport, Regional Development and Local Government (2008, April 10). Retrieved 20 June, 2008, from Minister Albanese's website: [http://www.minister.infrastructure.gov.au/aa/speeches/2008/AS02\\_2008.htm](http://www.minister.infrastructure.gov.au/aa/speeches/2008/AS02_2008.htm)

It is understood that as of 1 July 2008, the assistance of the Enroute Charges Rebate Scheme will no longer be available to new regional routes. It may be useful for Federal Government to gather feedback on the announced termination of the scheme and the expected impact that it will have on regional air service providers. The effect that the removal of the rebate will have on these airlines may have been underestimated.

The Department for Planning and Infrastructure is currently undertaking an Intrastate Air Services Review to assess the current regional air services within Western Australia. The review is to cover RPT and charter operations to both regulated and deregulated ports. Currently, WA has two network configurations, a subsidised route in the Kimberley and a protected route between Perth and Derby. However, the review may put forward recommendations to amend the existing regulated routes and network structures. It is apparent that any new configurations will now not be compensated for the enroute charges. The availability of the rebate alters the viability of several key services.

**Recommendation 1.8**

***That the termination of the Enroute Charges Rebate Scheme is reviewed following stakeholder consultation and that the exclusion of new routes is reconsidered.***

Ageing aircraft

The issue of ageing aircraft is one of many that need to be considered to ensure the ongoing stability of the Australian aviation industry. Over the last two years, some larger airlines were in a position to order newer aircraft, primarily to support a growth in services rather than to retire old aircraft. They were in a position to do so because the aircraft utilisation provided sufficient returns for their capital investment. Unfortunately, a number of smaller airlines have recently announced that they are retiring aircraft and may reduce their order of new aircraft due to high operating costs and skills shortages and taxation disincentives. The sharp rise in the cost of fuel<sup>11</sup> is a major contributing factor.

While the average age of the Australian aircraft fleet is below 11 years, single and multi-engine piston fixed wing aircraft had an average age of 31 years in 2005<sup>12</sup>. These aircraft are used significantly in general aviation for pilot training and recreational flights, as well as being used for small charters in remote and regional areas. They play a large part in aviation in Western Australia. However,

---

<sup>11</sup> Leyden, F. (2008, May 29). Fuel pain will ground Qantas aircraft and cut jobs. *Herald Sun*. Retrieved 20 June, 2008, from <http://www.news.com.au/heraldsun/story/0,21985,23775096-664,00.html>

<sup>12</sup> Australian Transport Safety Bureau (2007). *How old is too old? The impact of ageing aircraft on aviation safety*. Canberra: Australian Transport Safety Bureau.

as stated in a report by CASA<sup>13</sup>, there is difficulty for these operators in establishing fleet replacement programs as there is a shortage of suitable new models compatible with the operational requirements of the lower end of the Australian market. However, according to airline operators, it is their preference to purchase new or newer aircraft, but the capital gains tax payable on trading their existing aircraft and the unsustainable depreciation model makes it unaffordable. It is more difficult for smaller airlines to recoup or offset costs because the aircraft utilisation is significantly less than what the larger airlines can achieve.

**Recommendation 1.9**

**That Federal Government develops a more favourable depreciation model and capital gains model for airlines to trade up.**

Skills needs in the aviation industry

IATA has indicated that each year, the global airline industry needs 3,000 more pilots than training schools can currently provide.<sup>14</sup> Previously, airlines expected other organisations to train and teach pilots. Recently, airlines have started training their own pilots<sup>15</sup> to ensure the steady intake required to support the growing industry in Australia. However, given the financial stress which airlines are currently under, some have restricted training capacity.

To address some of these issues, a Future Pilot Task Force has been convened by the University of South Australia's Head of Aviation, Stephen Phillips<sup>16</sup>. The task force is comprised of representatives from major airlines including Qantas and Virgin Blue, flying training organisations, higher education institutions, industry organisations, CASA and the Department of Infrastructure. It has identified the pilot shortage as being at the top of the list of key risk factors for the Australian aviation industry, and noted that it is difficult to retain pilot instructors and that greater career path planning needs to be undertaken. It plans to establish an Airline Working Group to develop and introduce a unified industry 'pre-selection' process for pilots and has identified a number of key areas that need addressing to promote piloting to the community. Given its diverse composition, the recommendations of the task force represent a cohesive industry position and should be carefully considered for implementation where feasible.

---

<sup>13</sup> Civil Aviation Safety Authority. (2007, July). Australia's aviation environment. In *CASA Corporate Plan 2007-08 to 2009-10*. Retrieved 20 June, 2008, from <http://www.casa.gov.au/corporat/corpplan/environment.pdf>

<sup>14</sup> Pearson, D. (2008, April 25). Global pilots shortage worsens. *The Australian*. Retrieved 20 June, 2008, from <http://www.theaustralian.news.com.au/story/0,25197,23593585-23349,00.html>

<sup>15</sup> Moy, P., Patel, N. (2008, June 2). Cathay acts on pilot crisis. *The Standard*. Retrieved 20 June, 2008, from [http://www.thestandard.com.hk/news\\_detail.asp?pp\\_cat=30&art\\_id=66661&sid=19168197&con\\_type=3](http://www.thestandard.com.hk/news_detail.asp?pp_cat=30&art_id=66661&sid=19168197&con_type=3)

<sup>16</sup> Pilot instructors an urgent priority for Australian aviation (2008, February 13). Retrieved 20 June, 2008, from the University of South Australia: <http://www.unisa.edu.au/news/2008/130208.asp>

Independently, a number of airlines in Australia are creating training schools or colleges to entice pilots to train with them, and then bonding them to ensure the pilots stay with the airline for a number of years. However, a number of the smaller regional airlines do not have the infrastructure or funding to provide this level of training, nor to meet the high accreditation costs incurred for CASA certification.

It should be considered that Qantas has recently announced it will be closing its training school at Cairns Airport<sup>17</sup>, putting further pressure on the existing training infrastructure to provide the required pilots to support the future of aviation. Though there is some possibility of maintaining current pilot numbers for a lower number of services provided due to increasing fuel costs and some airlines cutting services, this will not be enough to service the forecasted deficit in the industry<sup>18</sup>.

The existing training schools in Western Australia are also finding it difficult to access training mechanisms (particularly the Instrument Landing System) at Perth Airport with the increased number of commercial flights. The Department is investigating the establishment of a second Instrument Landing System (ILS) within 100 nautical miles of Perth, or a simulator which could be utilised for all but one or two touch and go flights on an actual ILS. Unfortunately, installation and maintenance of an ILS is expensive and investigations are progressing towards use of a synthetic flight simulator or other alternative.

In addition to physical requirements, there needs to be a change in the educational approach to encourage people to train in the areas where the aviation industry is becoming deficient. The current pilot shortage<sup>19</sup> has already affected the level of air services in Australia<sup>20</sup>. A number of initiatives could be encouraged - training facilities to provide courses in particular areas of expertise (pilot training, maintenance and engineering), and special facilities to speed-up the process of licence renewal and to minimise the cost of pilots travelling interstate or overseas to access simulators and special training equipment. Apprenticeships in areas where they are possible (engineering etc) should also be encouraged. Minister Albanese's recent announcement of further funding through the Aviation Training Package is to be applauded.<sup>21</sup> Further incentives like this are required to ensure that training is provided for the industries which are unable to sustain their own training.

---

<sup>17</sup> Fuel prices force further Qantas cutbacks. (2008, May-June). *Aircargo Asia-Pacific, Volume 179*, page 29.

<sup>18</sup> Neville, I. (2008, June). *Meeting skills gaps in Australia's transport industries*. Presented at the BITRE's 8th Transport Colloquium, Parliament House, Canberra, ACT.

<sup>19</sup> Creedy, S. (2007, October 10). Pilot shortage could ruin airlines. *Perth Now*. Retrieved 20 June, 2008, from <http://www.news.com.au/perthnow/story/0,21598,22561995-951,00.html>

<sup>20</sup> Creedy, S. (2008, February 27). Pilot shortage grounds Qantas. *News.com.au*. Retrieved 20 June, 2008, from <http://www.news.com.au/travel/story/0,26058,23283644-5014090,00.html>

<sup>21</sup> Rodgers, E. (2008, June 17). Albanese details \$1.9b bid to fight off pilot shortage. *ABC News*. Retrieved 20 June, from <http://www.abc.net.au/news/stories/2008/06/17/2276939.htm?section=business>

While the pilot shortage is the main focus of the current skills shortages, there are a number of careers within aviation that require attention to ensure a sufficient supply of staff in the future. Westralia Airports Corporation, lessee and operator of Perth Airport, has proposed a new development to support aviation skills training, such as aviation engineering, to be based at Perth Airport. Ideally, the development would be based on the Aviation Australia model currently in place at Brisbane and Cairns Airports in Queensland. The principle of the school is endorsed by the State and it is strongly recommended that the Federal Government provided support, in light of the success of the training school in Queensland. It is anticipated that within five years the development would be self sustaining.

**Recommendation 1.10**

***That the Federal Government considers in detail the recommendations put forward by the Future Pilot Task Force.***

**Recommendation 1.11**

***That CASA reviews its fee structures and accreditation processes to increase efficiency and affordability for pilot training colleges and trainees.***

**Recommendation 1.12**

***That the Federal Minister for Transport liaises with Education Ministers to continue to improve access to aviation training (air and ground support) across different educational avenues - apprenticeships, TAFE and university qualifications.***

**Recommendation 1.13**

***That the proposal put forward by Perth Airport is developed and Federal Government consider investment in the proposed training facility, on the basis that it will encourage aviation training and airline development in Western Australia with a view to becoming self-sustaining. The development of additional training facilities in WA should complement the existing facilities at Jandakot and Merredin.***

Multi-crew Pilot Licences (MPL)

Though a number of airlines have introduced their own pilot training schools and cadetship programs to encourage growth in the number of employable pilots, it can take up to 18 months to become second officers on large aircraft and a further 4 to 5 years to acquire the expertise of a captain.

Multi-crew Pilot Licences (MPLs) have the potential to improve the pilot training industry. The MPL is a new pilot qualification established by the International Civil Aviation Organisation (ICAO) in November 2006 specifically for airline co-

pilots. The new licence was incorporated into and is based on the recommendations of ICAO's flight crew licensing training panel which held a series of meetings on the MPL during 2004 and 2005. The meetings were prompted by calls from industry for better ways to train co-pilots amid mounting evidence that deficits in teamwork were major contributors to airline accidents.<sup>22</sup>

MPL is designed to improve safety standards governing operation of multi-crew civil aircraft by enhancing crew communication skills. Training devices that provide for more multi-crew interaction play a more effective role, for example, in threat and error management scenarios.<sup>23</sup>

Though there is little data available at this stage regarding the effectiveness of MPL training, participants are in the process of completing the first MPL course being run as a beta test at Alteon in Brisbane.

It appears that the MPL course will take as long to qualify trainees as traditional training methods and the training costs are thought to be similar. However, one of the benefits of MPL is that airlines believe pilots who have completed the course (as is the case in Denmark) are 'better prepared' than if trained by traditional methods<sup>24</sup>.

It is anticipated that the benefits of MPL will become evident over time as more trainees complete the course and join the aviation industry.

**Recommendation 1.14**

***That CASA further investigates the use of MPLs in Australia and assess the beta test undertaken at Alteon in Brisbane.***

---

<sup>22</sup> Civil Aviation Safety Authority. (2007). Multi-crew pilot licence (MPL). Retrieved 20 June, 2008, from CASA: <http://casa.gov.au/fel/multicrew/index.htm>

<sup>23</sup> 'MPL represents a state-of-the-art ab initio airline pilot training programme' ICAO Journal No.3 2007, p16

<sup>24</sup> S. Phillips, personal communication, 20 June, 2008.

## **Aviation infrastructure**

### Airport land planning

Over the past ten years planning and development on airport land, particularly in relation to non-aviation uses, has been undertaken without reference to the impacts of that development outside the airport boundaries, and so compromising the capacity of perimeter infrastructure such as roads and undermining strategic land use planning.

There is a need to ensure that both the aviation and non-aviation planning of airports respects the planning processes of the State and local government authorities that are impacted by the airport. Whilst the State recognises that the aviation is the responsibility of the Commonwealth Government, the State seeks to enter into dialogue on the planning of airports at the earliest possibility so as to ensure we get a result that works both inside and outside of the airport boundary.

The conflict over the use of non-aviation development at Australia's airports demand a response anchored in cooperative Federalism. Western Australia has previously proposed through the Local Government and Planning Ministerial Council and through the ATC a way of dealing with non-aviation development at Airports by:

*"Amending the Airports Act 1996 to require the Commonwealth Minister to formally consider State, Territory and Local Government planning and environment policies governing the region involved by submitting all airport master plans and major planning proposals for review by an independent panel, with the non-aviation proposals to be assessed for their impact on local land uses, schemes and infrastructure."*

This does not encroach on Federal Government's hegemony in relation to control of aviation and is consistent with the 1997 COAG agreement. Previously the position adopted by Western Australia and the other States and Territory was that planning and approvals for non-aviation uses should be returned to State/Territory control.

Western Australia would see this current proposal working by the panels for each State consisting of three appointments by the Federal Minister for Transport, including the Chair of the Panel and two appointments from the State Government, nominated by the Planning Minister in the relevant State.

The State's appointments would be persons who in their normal positions would be required to exercise statutory planning duties. State appointments would not be subject to any direction from the State. Federal appointments would be a person with knowledge and experience in planning. The Chair would be a person who would have considerable experience in statutory planning. The key

is ensuring that the Independent Panels considers the wider local and regional planning context.

This could ensure that the transport implications of both passenger growth and non-aviation employment growth are fully considered by the Airport and the State Government before approval is provided for a new Master Plan. Currently there is a lack of sufficient detail provided by the Western Australian Federal Government airports (Perth Airport and Jandakot) regarding employment generation and growth provided within the Airport Master Plan to enable the forward planning of transport infrastructure to occur.

It is important to note that many State and local government controls relating to land surrounding airports are directly related to protecting and enhancing current and future airport operations. In addition, State Governments have made large investments in transport infrastructure to provide efficient access to major airports.

This will require greater openness from federally leased airports in identifying the transport assumptions which underlie a Master Plan, providing to the State Government any technical work carried out and working with the State Government to assess the implications.

There is no statutory obligation for the federally leased airports to contribute to the cost of off-site infrastructure such as road and public transport improvements. In addition, the State or local government has insufficient time to properly address such matters at the Major Development Plan stage, since this refers only to an individual site, and must be put forward by the State Government within the short consultation period. The State or local government is further prejudiced by this unsatisfactory situation because there are no opportunities to appeal an adverse decision made by the Federal Government.

The airport lessees need to be subject to an application and consideration process similar to that of other major developers, with a statutorily enforced assumption that contributions to off-site infrastructure investment will be required. The scale of contributions needs to be fixed at the precinct level before a major development is progressed, so that the airport lessee is made aware of the likely contributions required at a conceptual stage and prior to the preparation of a Major Airport Master Plan.

There is limited opportunity to engage directly and to meaningfully participate in early decisions during the preparation of airport master plans approved under the *Airports Act 1996* (Cth), particularly those relating to non-aviation development (other than defence or airport ancillary development inside terminal buildings). The current process of engagement at the Master Plan stage of a development application introduces an element of 'decide and defend' into the process, whereas an early, participative approach that includes joint exploration of development options and problem solving ensures sustainable, robust outcomes.

This is particularly true of the large nature and/or extent of the non-aeronautical uses planned within Commonwealth owned airport precincts/sites, which have the potential to significantly prejudice off-site developments, by incurring substantial off-site infrastructure related cost and/or where such development may cause significant negative impacts on the function and/or operation of predetermined planning precincts at a regional, sub regional and district scale.

It is recognised that development at major national and international airports includes substantial commercial development not directly connected with aeronautical uses, and that these uses are increasingly important to diversify the revenue base of airport operators. It is also recognised that the interests of all State and Territory governments is to ensure that Australia's major metropolitan airports function effectively and that the benefits they provide to the economy and the community are maximised. Therefore, master plans prepared in terms of Federal Government leases of major airports to private operators, particularly those intended for commercial non-aeronautical purposes, need consistency with State land use, planning, building and environmental policies and laws.

The problem for the States and Territory on this issue is worth noting. Since 1996 airport land development has become a major economic driver for airport lessees but this has been conducted in isolation from reality of the regional planning context. All states and territories accept the Federal Government's primacy over aviation activities at Airports. The Western Australian Government, along with all State and Territory Governments, strongly supports appropriate aviation and non-aviation development at airports. However any planning and approval of non-aviation development should take place within the proper regional and local planning context.

To assume, as the present system does, that the Federal Transport Minister is best able to make planning and development approval decisions without any requirement to recognise the wider planning and environmental requirement is a nonsense.

Perth, for example, has a metropolitan regional strategy, Network City. Perth Airport is recognised for its potential to be major and important activity centre within Perth. However what type of activity is focused on this centre is important to making it work in a regional context. The region around the airport is already well served by retail centres at Midland, Morley, Cannington, and Belmont.

The areas immediately to the east and south of Perth Airport are vital freight and logistics industrial areas, and to the north and north-east are mainly residential. The airport and the area around it are presently well served by an extensive network of major roads, which will require upgrades to accommodate any major development on Perth Airport.

Any inappropriate development at the airport which encourages a constant flow of additional vehicles (i.e. major retail) would result in unnecessary congestion

detrimentally affecting one of the state's key freight and industrial areas. The possibilities exist for more appropriate development to occur at airports to the benefit of all parties. The previous Federal Government approved a brickworks manufacturing plant at Perth Airport and with four other brickworks already in the area and failures to observe Western Australian industrial buffer zones policies it is extremely doubtful it would have been approved under State law.

A co-operative approach with the Federal Government working with the States and Territories to find an agreed way forward on this unnecessary area of conflict is essential.

**Recommendation 2.1**

***That the Airports Act 1996 be amended to require the Commonwealth Minister to formally consider State, Territory and Local Government planning and environment policies governing the region involved by submitting all airport master plans and major planning proposals for review by an independent panel, with the non-aviation development proposals to be assessed for their impact on local land uses, schemes and infrastructure.***

**Recommendation 2.2**

***That federally leased airports are required to provide detailed information concerning employment generation and growth within the scope of the Master Plans.***

**Recommendation 2.3**

***That the timelines to approve development plans at major airports should be sufficient for State and Local Governments to contribute to and/or appeal decisions.***

**Recommendation 2.4**

***That the lessees of federally owned airports be required to contribute financially to off-site infrastructure development necessary for accommodating growth on airport land and this contribution to be comparable with that imposed on developers on State controlled land.***

Regional airport infrastructure

Infrastructure should be developed appropriate to the transport needs of a community to ensure that high level infrastructure does not facilitate the population to move elsewhere, or provide a means to access existing amenities

further from the regional centre, causing long-term hardship with potentially detrimental consequences.<sup>25</sup>

The Department for Planning and Infrastructure's Planning for Aboriginal Communities team is in the process of collating information on remote indigenous airstrips in Western Australia. In the Kimberley and Pilbara regions, there are hundreds of remote communities, and a number of these have their own airstrips.

For efficiency and planning purposes, the team is undertaking a study to develop an airport hierarchy; to identify which airstrips have strategic importance and which communities are able to access landing strips at communities nearby rather than maintaining their own. This strategic indigenous airport study will ensure that funding for airport upgrades and maintenance is rationalised and utilised as effectively as possible whilst also ensuring all surrounding communities have access to emergency services.

The Department is considering undertaking a similar study for larger regional airports around Western Australia in the future. The study would seek input from other State departments, as well as a range of affected stakeholders. Ideally, the study would again identify several strategic airports in each region, prioritising funding and recommending airports to have supported regular air services, even if they require a subsidy from the State Government.

Currently, there is no overarching Commonwealth, State and Local Government strategy to guide airport investment. The demand driven nature of air services in WA, particularly in the resource sector, does not provide long-term certainty to airport infrastructure requirements. Basic service levels defined for regional aviation would assist in long term planning and assessment of areas of need. This will guide the capital, operational and financial planning necessary to address deficiencies.

The Western Australian State Government administers the Regional Airports Development Scheme (RADS) which, every year, allocates up to \$2 million to regional airports for airside infrastructure development or maintenance. Along with the Federal Department of Infrastructure's Remote Aerodrome Safety Programme (RASP), a number of small, remote airports have the opportunity to apply for funding to support existing facilities. This encourages services for communities as well as increases accessibility for the RFDS and other emergency and supply services. Each of the state and territory governments should be encouraged to establish schemes to assist airport owners to develop and maintain their airport infrastructure. In Western Australia and Queensland, the remote communities in particular are benefactors.

---

<sup>25</sup> Button, K. (2008, June). *Aviation and its growing role in economic growth and development*. Presented at the BITRE's 8th Transport Colloquium, Parliament House, Canberra, ACT.

These state-based airport infrastructure programs also allow the State Governments to petition the Federal Government to provide additional funding for large regional projects. WA is investigating re-scheduling the call for submissions for the next RADS funding round to align better with the RASP timeline.

While there are opportunities for air transport nodes to receive funding through the WA Regional Infrastructure Fund and RASP, it is important that air transport be considered in general transport grant programs. Similarly, the Federal Government should seek to continue its current financial support to remote air services and airports through the Remote Air Service Subsidy and RASP.

**Recommendation 2.5**

***That the Federal Government works cooperatively with State Governments to identify strategic regional airports as nominated regional centres to facilitate economic and tourism growth.***

**Recommendation 2.6**

***That the Federal Government ensures air transport is included in general transport grant programs and continues to support existing programs such as the Remote Aerodrome Safety Programme and the Remote Air Service Subsidy.***

Airport charges

Increasing costs of operating airport facilities - including increased construction costs (due to competing with the resource sector), security costs, air traffic control costs and maintenance costs - are recouped by airport owners through airport charges for the various elements able to be easily identified. The ability of the airport owner to impose an amended charge on airlines at short notice causes frustration to airlines and the passengers, who end up paying for the increased cost.

**Recommendation 2.7**

***That increases in airport charges at federally leased airports are to be appropriately justified.***

Air traffic management

Automatic Dependent Surveillance -Broadcast (ADS-B) technology is likely to be the easiest to adapt to a changing fleet of aircraft in Australia. The Australian Strategic Air Traffic Management Group has requested CASA to initiate a project to mandate ADS-B as part of the Air Traffic Management strategic plan.

Of note is ADS-B's ability to feed data received by ground stations to air traffic management systems for even more precise tracking than radar. Aircraft equipped with an ADS-B receiver can, in flight, access a 'real-time' display of traffic information that relates to its intended track. ADS-B is also cost effective to acquire, install and maintain, particularly in remote areas, when compared to radar. It seems logical to replace the secondary surveillance radar with ADS-B at the end of the radar's economical life in 2010.

The provision of ADS-B above 30,000 feet is primarily for the larger commercial air transport section of the market; however, the potential of ADS-B for lower airspace and for smaller regional aircraft of the General Aviation (GA) community would be highly beneficial. While the lower level is yet to be determined, industry sources have suggested 5,000 feet would be sufficient.

It is considered within industry that the widespread implementation of ADS-B to a lower altitude level will significantly contribute to mitigating safety concerns by providing the pilots with cockpit displays that enable them to enhance their capacity to see and avoid. It will also reduce the current reliance upon pilot radio broadcasts for providing alerted see and avoid.

Several aviation organisations believe that a quicker roll out of ADS-B Stage 2 will address most of the issues associated with NAS. The issue will be the cost for the ground stations and for on-board equipment, particularly in the GA sector.

Ongoing consultation with the International Civil Aviation Organisation (ICAO) and the International Air Transport Association (IATA) should ensure that any developments to airspace management in Australia are compatible with the global environment. Any satellite or navigational system should be easily incorporated by foreign airlines to ensure that Australia does not form barriers to entry for potential participants in the aviation market.

**Recommendation 2.8**

***That the Federal Government investigates the costs associated with installing and implementing ADS-B navigational aids across Australia, with a view to ensuring the system is able to incorporate lower altitudes as soon as possible.***

**Aviation safety**

The Department for Planning and Infrastructure, while a State representative for aviation matters, does not deal directly with safety and regulatory reform issues. In all instances, the Department has referred these issues to the Civil Aviation Safety Authority to ensure that due process is followed appropriately.

## **Customer and community protection - addressing the impacts of aviation**

### Climate change and aviation emissions

The aviation industry in Australia, and particularly in Western Australia, has been growing rapidly with national domestic passenger numbers increasing 46 per cent between 1996 and 2005. Recent estimates indicate that domestic and international air passengers in Australia are expected to grow at 4.6 and 5.1 per cent per annum respectively between 2005 and 2020, ensuring a doubling of passenger numbers in 15 years.

Significant increases in emissions driven by industry expansion are, forecast with annual aviation efficiency improvements of 1-2%, predicted to have a minimal impact. ICAO expects CO<sub>2</sub> emissions to reach more than 1,200 million tonnes annually by 2025, more than doubling today's levels<sup>26</sup>.

At the time of writing, rapid increases in global oil price are adversely affecting airline profitability. It is not clear what the long-term effects on demand and industry expansion will be, but air travel is price sensitive. Despite the potential for reduced demand from increased oil prices, the National Aviation Policy paper still needs to consider the full effects that aviation has on climate change, particularly non CO<sub>2</sub> emissions. The Intergovernmental Panel on Climate Change (IPCC) estimates that aviation has an effect 2.4 times greater than general carbon emissions. As such, there is a need for improved understanding of all aviation emissions, including the effects of contrails and aerosols on cirrus cloud formation, the role of NO<sub>x</sub> in changing ozone and methane concentration as well as the effects of aviation emissions at different atmospheric levels<sup>27</sup>.

It is understood that there is currently no national or international calculator or framework for measuring the full impact of aviation related greenhouse emissions. While it is understood the ICAO is currently addressing this issue<sup>28</sup>, it should also be included in the National Aviation Policy Paper, as it will be an important precursor to an Emission Trading Scheme (ETS).

Improvements in air traffic control, such as reducing distances between aircraft, minimising waiting before landing, continuous descent approaches and optimised flight plans have the potential to decrease emissions by 6%-12%<sup>29</sup>. Airservices Australia is already addressing these issues both within Australia and with regional partners and it is likely that the reduction of fuel costs through other operational improvements (such as minimising aircraft weight and increasing load factors) will also occur because of commercial constraints.

---

<sup>26</sup> Croft, J. (2008, 1-7 April). Counting the Cost. *Flight International*. Page 36.

<sup>27</sup> Croft, J. (2008, 1-7 April). Counting the Cost. *Flight International*. Page 51.

<sup>28</sup> Croft, J. (2008, 1-7 April). Counting the Cost. *Flight International*. Page 36.

<sup>29</sup> Penner, J. E., Lister, D., Griggs, D. J., Dokken, D. J. & McFarland, M. (1999). *Aviation and the Global Atmosphere: A Special Report of the Intergovernmental Panel on Climate Change*. Cambridge University Press.

Taxes, including fuel taxes, air passenger duties, removing tax breaks on duty free shopping and increasing landing charges are considered to be crude policy options, as they do not accurately reflect emissions nor do they guarantee emissions reductions. However, some airport operators and governments in the EU are considering the introduction of NO<sub>x</sub> charges (varying according to an aircraft's specific NO<sub>x</sub> emissions) to accompany the ETS. This recognises that the emissions impact from aviation is greater than CO<sub>2</sub> emissions alone.

In regard to offsets, the aviation industry could explore the development of a more rigorous carbon offset program, including an intentional 'opt out' of the offset program (i.e. passengers chose *not* to purchase offsets when they fly). Alternatively, it could be mandated that offsetting be done during the online booking process. A study this year<sup>30</sup> found that 12 per cent of Jetstar passengers offset their flight, compared with only 1 per cent of Qantas and Virgin passengers.

The reason for the difference was that Jetstar offered the offset service during the booking process, while Qantas and Virgin only allowed offsetting after the flight was booked, and was therefore an additional step. It is recognised that offset programs may not be required once an ETS (which includes coverage of the aviation sector) is introduced, as it could lead to 'double counting' of emissions. However, it may be an appropriate interim measure prior to the introduction of an ETS.

There appear to be limited opportunities in the short or medium term to reduce emissions through clean or alternative aviation fuels. Fischer-Tropsch (FT) synthetic fuel is a possible replacement for jet fuel, and does not require expensive changes to aircraft design for it to be viable. Unlike ethanol and bio-diesel, the fuel has similar performance and storage properties to current fuel. However, carbon sequestration and storage technology will have to be developed for a large environmental benefit to be achieved as FT fuel has higher life cycle emissions than standard jet fuel. Methods that rely on crop production (i.e. ethanol, bio-diesel) currently have adverse flow on effects to agriculture.

Large improvements in aircraft technology are unlikely with incremental and holistic improvements in aircraft technology being at the limit of what can be achieved. Current engine technology achieves a balance between fuel burn (and consequently CO<sub>2</sub> emissions), NO<sub>x</sub> emissions, noise and maintenance costs. Reducing CO<sub>2</sub> emissions per aircraft by 35% is possible. However, it will impact on other variables for which the public, airlines and regulators would need to accept penalties<sup>31</sup>. For example, increasing the engine bypass ratio will reduce noise and CO<sub>2</sub> emissions, but increase NO<sub>x</sub> emissions<sup>32</sup>.

---

<sup>30</sup> Murphy, M. (2008, January 28). Jetstar's carbon offset program soars ahead. *The Age*. Retrieved June 20, 2008, from <http://business.theage.com.au/jetstars-carbonoffset-program-soars-ahead-20080127-1ogg.html>

<sup>31</sup> Trimble, S. (2007, June 26). Emission Impossible?. *Flight International*. Retrieved June 20, 2008, from <http://www.flightglobal.com/articles/2007/06/26/215206/emission-impossible.html>

<sup>32</sup> Learmount, D. (2007, December 3). Cost of Waiting. *Flight International*. Page 29.

Even if unexpectedly large technological leaps are achieved, aircraft have 20-30 year lifecycles, meaning only 5% of the aircraft fleet would be replaced each year. Australia is limited in its ability to encourage new aircraft technology, as technological developments are determined by government industry support policies in North America and the EU, which incorporate the majority of the world's aircraft manufacturing industries.

An emissions trading scheme (ETS) is considered the best policy instrument available as it allows the aviation industry to trade permits with other industries that have greater technological capacity to reduce emissions. However, there are some issues in regard to the design and implementation of the ETS, and how it relates to the aviation sector.

Firstly, how will the 'point of obligation' be measured? In the road transport sector, it is proposed that this be measured at the point of fuel excise, as measuring each individual emitter (i.e. passenger vehicles) is not feasible. The difficulty with taking the fuel excise as the point of obligation for the aviation industry is that it can encourage the purchase of fuel offshore. Likewise, measuring emissions from each individual airline may also encourage carriers, as trade exposed emissions intensive industries (TEEIs), to relocate their operations to countries without an ETS (a problem referred to as 'carbon leakage'). This would disadvantage domestic and regional airlines that cannot spread their costs. Greater detail on the compensation policy for TEEIs will be required. This would provide a mechanism to incorporate aviation emissions into the carbon price, while reducing risks of carbon leakage and competitive disadvantage from overseas airlines.

Secondly, how will the distribution of permits impact on regional aviation? This is a significant issue for Western Australia, which has unique circumstances relating to community mobility and a dependency on aviation due to its large geographic spread in population. It is understood that some airlines (under the EU scheme) have lobbied for the distribution of permits to reflect the efficiency of flights, measuring environmental impact per passenger. Under this system, the higher the load factor of an aircraft, the higher the permit allowance received. This would benefit routes with higher volumes and larger more efficient aircraft, and disadvantage regional airlines. The most efficient and viable routes would maintain profitability, while marginal routes (a number of which operate throughout WA) would be put under pressure due to a difficulty in recovering the additional costs.

In addition to this, it should be recognised that light and propeller powered aircraft that fly in the troposphere do not have the same emission impacts as large airliners. CO<sub>2</sub> emissions are similar in both kinds of flight, irrespective of altitude; however, effects of non carbon emissions such as NO<sub>x</sub> and water vapour vary according to altitude. Commercial airliners typically cruise at around 10km altitudes in temperate latitudes.

**Recommendation 4.1**

***That the Federal Government, in consultation with State and Local Governments, explores the full effects that aviation has on climate change, particularly non-CO<sub>2</sub> emissions, and consider the development of a framework/calculator to measure emissions from the aviation sector.***

**Recommendation 4.2**

***That Federal Government notes that the increasing cost of oil will drive improvements in operational efficiency of airlines independently of policy measures.***

**Recommendation 4.3**

***That the Federal Government encourages research and development into clean or alternative fuels and aircraft improvement so as to reduce emissions.***

**Recommendation 4.4**

***That the economic and social benefits of servicing regional and remote areas are taken into account when designing the ETS.***

**Recommendation 4.5**

***Under the ETS, consideration be given to a graduated NO<sub>x</sub> charge that takes into account the type of aircraft and altitude of aircraft.***

Noise

Perth has a competitive advantage over eastern states ports by not having a curfew imposed on operations. Approximately 28 percent of Perth's international flights and 14 percent of domestic flights operate between the hours of 2300 and 0600, the times when a curfew is traditionally imposed. Being in proximity to Singapore and other Asian markets, carriers are able to better utilise their aircraft by operating to Perth during their off-peak hours. This increases the number of services and competition to Western Australia, and does have the added benefit of scheduling of services to the eastern states.

Regional airports should not require curfews to be imposed. To most of the regional airports, after hours operations are emergency access or the RFDS. A number of local governments have developed 'Fly Neighbourly Agreements' in discussion with the community affected by airport operations and general aviators. These have provided the community with some structure for aircraft operations and an avenue to follow should aircraft operators not follow the guidelines.

Generally speaking, the 'Fly Neighbourly Agreements' have been well accepted by the communities. They allow the local governments freedom to customise the agreements for the communities. Some communities require restrictions on flight paths whereas others only refer to communicating the hours of operation to the community and to advise them when unusual aircraft activity is going to occur. Some suggest regular meetings and others are rarely referred to at all. Unfortunately, this approach does not work as well with major airports or those based in metropolitan areas.

The current noise complaint hotline provided by AirServices Australia (ASA) does not seem to be recognised by the public as being an efficient or effective way of dealing with noise complaints or enquiries. The opportunity to report to ASA online is becoming a preferred option.

A lot of public confusion regarding flight paths and aircraft noise could be eliminated if flight path and noise footprints are provided online by the airports.

**Recommendation 4.6**

***That the Federal Government supports Perth Airport in remaining open for operations without curfew.***

**Recommendation 4.7**

***That regional communities are encouraged to establish Fly Neighbourly Agreements using guidelines suggested by OAR.***

**Recommendation 4.8**

***That major airports be required to provide noise footprints on their websites to increase public awareness about the expected level of noise pollution around airports.***

Disability standards

There are some gaps in the existing *Disability Standards for Accessible Public Transport 2002* regarding the requirements of small aircraft operators or charter operators to provide direct assistance to seat passengers in wheelchairs. However, amending the Standards to incorporate small aircraft would require these operators to carry disability aids which are not always practicable in smaller aircraft. The lack of clarity is causing some smaller aircraft operators to publish access limitations in their conditions of travel.

Increasingly in Western Australia, regional airlines are carrying injured or ill passengers, as regional centres often do not have the required medical infrastructure to treat these patients locally. The RFDS, which undertakes a number of patient transfers, has limited capacity to continue to provide this

service. The pressures on these regional services to carry injured or ill passengers should also be considered in the review of the Standards.

***Recommendation 4.10***

***That the gaps in the Disability Standards for Accessible Transport 2002 legislation are addressed during the review currently in progress, with the support of Federal Government.***

## Aviation security

### Security in regional airports

The State Government supports security for air travellers as a necessary measure. However, the affordability of security measures have to be measured against a realistic assessment of risk.

Notwithstanding the assessment on which airports require passenger screening, the cost of security is factored into the cost of the airline ticket. The Department for Planning and Infrastructure notes that the already struggling regional airline industry in Australia is further burdened by the additional cost of security. Added costs on a ticket for a regional service can be higher per person than a domestic or international flight given the lack of economies of scale.

In general, the regional aviation industry believes that the Commonwealth should take greater financial responsibility for the cost of regional aviation security measures implemented and the identification of funding sources. Whilst the Commonwealth has provided \$35million for non-jet regional airports to provide security such as fencing and lighting under their Transport Security Program, regional jet airports do not receive the same benefit. Should the Commonwealth in the future decide to extend passenger screening to non-jet ports, it should provide adequate assistance to meet the costs that would otherwise be a considerable impediment on those airports.

The current benchmark for installing further security measures that airports serviced by jets are required to install a higher level of security screening, should be reconsidered. Recent aircraft to be introduced to regional routes have shown increased seating capacity of turboprop aircraft and smaller jets<sup>33</sup>, which questions the distinction between the size of the two aircraft types. The security risk on an airline service to Albany performed by a 50 seat jet is no greater than when the service is provided by a turboprop.

The benchmark for when to install Check Bag Screening limits the ability of certain aircraft types to service some airports. Without significant investment, regional airports physically able to accommodate jet aircraft are unable to accept jet services. This means that larger airlines are unable to compete in these ports.

These issues should be considered when reviewing the policy for security requirements for regional airports.

---

<sup>33</sup> Blackwell, D. (2008, June). *Regional aviation security challenges & opportunities*. Presented at the BITRE's 8th Transport Colloquium, Parliament House, Canberra, ACT.

**Recommendation 5.1**

***The aircraft type may not be an appropriate benchmark for triggering security measures and the benchmark should be reconsidered.***

***Furthermore, in the event that the Federal Government imposes new security measures at regional ports, which would create a financial impost on them, then the Federal Government should consider appropriate funding solutions that would minimise the impact on these ports***