

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

National Aviation Policy Statement Response

Dear Sirs

We are airline General Sales and Service Agents (GSSA) for cargo for a number of international airlines operating into and out of Australia. We are also air charter brokers.

We have been engaged with some of our customers to assist in the development of export sales from certain Regional markets in Australia to foreign markets.

We have attempted to have freighter aircraft deviate via regional airports such as Darwin and Cairns. The economics of such require that the movement of domestic cargoes from the originating airport, mainly Sydney, Melbourne or Brisbane to the airport of deviation be allowed.

Despite representations from Industry and State and Territory Governments the right to carry domestic cargo (cabotage) has been refused, denying these regions the opportunity to further develop export oportunities.

It has been our sad experience that part of the process of cabotage application is to ask domestics carriers, primarily Qantas, to advise whether they can offer the market the lift required. They respond in the affirmative, but once the cabotage application is refused they do not follow through with the lift promised. This has been an ongoing problem.

We see an anomaly when foreign ocean carriers are permitted cabotage but when it comes to aviation there are different rules.

Furthermore when we have requests to offer domestic lift to out sized cargo requiring specialist freighter aircraft, rights are often denied.

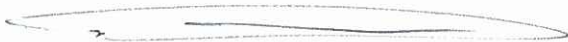
Contrary to some popular belief Australia does not have an “open cargo” policy for cargo services, dedicated or otherwise.

It is our opinion that Governments have little regard for the economics of running an aircraft and the nature of one way cargo corridors that impact greatly on these economics. The ability for carriers flying from Australia to carry domestic freight to northern regional communities could provide beneficial incentives.

We would suggest that the green paper seeks to identify opportunities for export growth understanding the economic drivers of airlines and the inducements required for cargo carriers to service smaller capital and regional cities.

If you have further questions please do not hesitate to contact us

Yours faithfully



David Williams
Chief Executive Officer