
From: Katelyn Birs [REDACTED]
Sent: Thursday, 9 March 2023 8:35 PM
To: Aviation White Paper
Subject: Aviation White Paper draft ToR

Good Evening,

I am contacting you to provide feedback on the Aviation White Paper Terms of Reference. I am a resident who lives in Brisbane whose life has been significantly impacted by the new flight path design.

I'm hoping the white paper can address some of the following points.

I would advocate for stronger and evidence-based consideration of all issues of the impacts of aircraft noise and other pollution on mental and physical health, and the role of strong regulation to achieve net aircraft noise pollution reductions.

When I submit noise complaints to Airservices I have received the following response:

"There is no regulated maximum noise level for aircraft flying over residential areas. Without any maximum level set out in legislation or regulation, there is no objective measure to determine whether any aircraft flying in Australia is "too noisy", or whether the combined load of aircraft experienced by a community is "too much" noise."

Firstly, I don't understand why there is no legislation given there is plenty of research around the health impacts of excessive aircraft noise. In 2019, the World Health Organisation published a report where they recommended aircraft noise levels do not exceed 45 decibels over residential areas. The majority of the Brisbane inner city suburbs are currently experiencing 70 - 80 decibels. I am 15 kms from the airport and not directly under a flight path, however I am still experiencing aircraft noise at 65-75 decibels, sometimes even 80 decibels. I don't believe this level of noise is reasonable or safe. I'm particularly concerned around the impacts this has on children's development, education and sleep.

Secondly, this lack of legislation does not negate Airservices or Brisbane Airport's Duty of Care. I have seen the serious impacts this is causing in my community including community members experiencing significant mental distress and sleep disturbances. I hear the distress of parents who have their children waking up at 10pm, 11pm and 12am due to large international flights taking off over the suburbs.

I believe there needs to be a legislative and regulatory overhaul of the Air Services Act 1995 to achieve true regulatory independence, eliminate actual, possible or perceived regulatory / state capture, a broader scope for consideration of contemporary factors (e.g., climate change, social licence to operate) that will affect future airport and flight path design and operations, rather than the current limited focus on safety, efficiency and private industry profits. I don't feel we have the right systems in place to balance the needs of the industry and the health and wellbeing of the communities they fly over.

I would also like to see a standardised criteria to all capital and regional airports regarding the specification and adoption of curfews, flight movement caps, and airport capacity declarations as provided for under the Airports Act 1996, Section 195. It's unclear to me why it is acceptable in some cities to have protections against sleep disturbances from aircraft (e.g. curfew) and not in others.

Finally, I would like to see international best practice and genuine community engagement processes and impact reporting by qualified, independent experts across all jurisdictions regarding planned and ongoing airport operations. I don't believe we have had genuine community engagement here in Brisbane with the post implementation of the flight paths. It has felt more like engagement theater. I have not seen adequate forms of outreach to engage the community. We have never received a flyer in the mail or seen a listing in a local bulletin/newspaper. It has been up to local community groups to explain how to engage with the post

implementation review. This process has also felt biased as Airservices' main purpose is to support the aviation industry and this will always be prioritised over community needs.

I believe there is a way to grow our aviation sector without compromising the health and safety of the communities they fly over. I would love to see the White Paper find a way to balance both needs in a reasonable and evidence based way.

Kind Regards,
Katelyn Birs