

SUBMISSION – AVIATION WHITE PAPER - TERMS OF REFERENCE

Introduction

The Government is to be commended for its initiating a further and very timely *Aviation White Paper* (AWP) process. Following the privatising of airports 1998 and subsequent inquiry in the latter 2000 period the Government released its *National Aviation Policy White Paper 16/12/2009*. This represented the first comprehensive aviation review to bring together the many aspects of the aviation industry providing forward provisions beyond 2020 in planning, regulatory and certainty.

The opportunity to partake in the initial commencement of this AWP process to set a path forward over the period to 2050 is most welcome, and consideration of the following subject matters outlined within the *Terms of Reference* will be much appreciated.

1.0 Safety

Aviation safety must always be the ultimate priority to continue Australia's excellent and long aviation safety record. Recent incidences (e.g. Sydney/Ballina) and failing management capability at our airports strongly suggest there is a need for urgent review of the model and systems for management of our skies and airports. This is of particular importance if the growth of aviation is to continue into the future safely, efficiently and in an equitable competitive environment.

Services for management of our skies and at airports are provided by the Government Corporation, *Airservices Australia* (AA) who are solely funded by airline fees. This arrangement creates a significant conflict of interest when expansion of airports services the increase in airline capacity, hence increases AA's funding source. Experience of communities over recent years raises real concerns the outcome needs of airlines are being prioritised over human communities and the environment.

PFAS: Significant PFAS contamination of soil/water from AA fire training operations on civilian airports has been confirmed from 2008. However, despite findings advised to AA that concentrations **'indicate a potential risk to human health'** was buried with no notifications to local communities, nor Local/State authorities and did not come to light until 2016 following pressure from communities.

Mounting evidence supports that PFAS contamination poses a real risk to ecological and human health and research recently released in the US is that the economic cost of ignoring PFAS contamination is greater than the clean-up costs with a UK pollution expert stating PFAS are, **'probably the greatest chemical threat the human race is facing in the 21st century'**.

There is a significant conflict of interest when the polluter (AA) is in charge of their own PFAS pollution investigations and requires urgent action to implement independent oversight such as the appointment of a Coordinator-General for Commonwealth sites as was recommended from the 2018 PFAS Inquiry.

Further, as airport sites are at risk of accidents relevant to pollutants and the real potential for such to escape into the environment, surrounding communities and waterways regulations need urgent review to implement requirements responsible entities are to notify Local/State authorities of any such incident.

2.0 Sustainability

It is commended the AWP proposes exploring the aviation sectors contributing to achieving net zero carbon emissions. However, the impacts of emissions on human health needs to be considered also.

Systems to monitor aircraft engine emission pollution at and around airports with standards and testing procedures on local air quality need to be implemented.

Aircraft engine emission pollution include volatile organic compounds and particulate matter consisting of an inorganic carbon core with associated polycyclic aromatic hydrocarbons and metals.

Studies are showing adverse human health effects and concentrations at and around airports can be significant. ICAO have defined the problem and important environmental concern of the effect of particulate matter on local air quality.

Liveability and health and well-being of human communities, and sustainability of the environment and natural resource assets require equitable consideration in the growth of the aviation industry and airport developments, not just focusing on economic outcomes.

3.0 Airport Development

Airport development planning processes need to be strengthened so there is better regard and respect for local planning regimes, and the environmental biodiversity values and natural resource assets both on airport sites and surrounding localities.

Equitable consideration to long existing planning regimes and land-owner existing land-use rights and other businesses in the growth of the aviation industry and development of airports is required, and a better focus and regard to the consequential impacts of any changing of aircraft/airport operations.

The above matters are particularly relevant to Gold Coast Airport's (GCA) land locked location within 2 major regional cities (Gold Coast/Tweed) and its close proximity to developed land with no runway end directly over a waterbody. These high density urban areas were planned many decades ago around a regional airport, and as such poses very difficult planning issues and inequitable restraints and costs on land development opportunities and expectations on existing land-use rights. Further, significant matters of adverse impacts on existing human communities and regulatory public safety exclusion areas must be a priority in any aviation growth and airport development.

Consultation on aviation changes/growth and airport development needs to be genuine, meaningful and transparent. The process of assessment of aviation and development requires review of the current procedures that are in place to address experiences of communities over recent years.

Airports facilitate the aviation industry. Pursuant to the *Airports Act* airport operators are required to develop *Master Plans* (MP) every 8yrs detailing a 20yr strategic direction for the airport, and *Major Development Plans* (MDP) for development to be undertaken. The airport operator facilitates the public exhibition process and undertakes the review of submissions of both preliminary draft MPs and MDPs they have developed to then finalise to draft plans for submission to the Minister for approval.

This current process does not enable any independent oversight in addressing issues that may arise, and potentially a selective process on what is picked up and included in the submission report response. Consideration is required to remedy the lack of independence in the assessment process for Ministerial approval of MPs and MDPs.

4.0 Flight Paths – Aircraft Noise

Earlier years had seen consultation undertaken to establish flight paths and noise abatement procedures to minimise noise impacts on communities around airports and under flight paths.

Over the years this has resulted in the adoption of ANEFs which is the only metric approved and promoted by the Federal Government for use assessing suitability of land-use against aircraft noise. It also enables accessible noise/planning information for potential purchaser's decisions on life-long house/land/business investments.

In recent years AA have made changes to flight paths without public consultation claiming there will be no noticeable difference in noise, however communities are experiencing significant changes in both flight tracks and noise patterns. When asked why the changes have been made the advice has been it is due to the direction of CASA in some cases, but when asked for that information it has been denied. Changes to flight paths and subsequent noise impacts have been subject of Aircraft Noise Ombudsman (ANO) investigations in recent years resulting in some requirements to rectify the issues.

Essential noise monitoring is not in place to verify noise levels of aircraft. There are currently significant issues with the noise complaint system and false logging of aircraft tracks, hence these issues do not enable a representative record of noise issues, particularly when MPs propose significant increases in aircraft movements and increases in runway capacity.

Under Government regulation AA is "*the endorser*" of ANEFs and must be satisfied that *runway usage and flight path data* used is suitable and *contours have been modelled correctly*.

Urgent attention to addressing these matters is required so that flight path data input is operationally correct enabling correct contours, along with updating of noise modelling/information for future MPs.

Consideration is required into the appropriateness of AA appointing the ANO who then reports to AA. This arrangement creates a significant conflict of interest and potentially impedes proper processes of addressing noise issues and restoring community confidence in the noise complaint handling system.

Curfews: Curfews exist for very good and real reasons and the intent and integrity of curfews need to be respected and upheld. The adverse impacts on health and sleep disturbance from the burden of aircraft noise is well documented by the International Civil Aviation and World Health Organisations.

Relevant to the unique locality of GCA being book-ended within 2 densely populated regional cities in such close proximity, and extensively documented health and well-being impacts, a further review is required to prohibit air freighter movements within the curfew period with an amendment to the *Air Navigations (Gold Coast Airport Curfew) Regulations* by deletion of s.12 and 13.

Any aviation growth and increased runway capacity in existing built environments needs to be considered with implementing a noise levy to finance noise amelioration for existing surrounding residential and business development.

5.0 Resilience

The COVID 19 pandemic had a massive impact on the aviation industry along with the many other industries, businesses and human population. The impacts have continued and needs to be a real wake-up call for self-sufficiency to build resilience into the future.

Ongoing experiences for travellers and airport operators with failures of airline/air service management capability requires earnest consideration to future proof any growth of the aviation industry with adequate staffing capacity levels and increased training opportunities.

Thought needs to be given to re-establishing increased regional routes that had existed prior to privatisation and the early years that followed with growing populations and changes to work practices across the regions and tapping into regional tourism industries. This would enable sectors of the aviation industry to remain afloat should there be a pandemic in the future or global peace interrupted.

Conclusion

The importance of the aviation industry and airport infrastructure as a significant component of our transport network and its contribution to the economy is acknowledged and appreciated.

However, to grow the aviation industry and increase airport capacity must be considered equitably with the health and well-being of human communities, existing urban footprints and associated existing landowner land-use rights. Further, the sustainability of environmental biodiversity values and natural resource assets needs to be also equitably considered.

The precautionary principle needs to be a key consideration in laying the footprint forward and integration of both long-term and short-term economic, environmental, social and inter-generational equity must all be equally prioritised – not just driven by economic outcomes for private Corporations shareholder profits.

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