



Friday, 10 March 2023

Jason Dymowski  
Deputy Secretary  
Aviation Whitepaper Branch  
Domestic Aviation and Reform Division  
Department of Infrastructure, Transport, Regional Development  
Communications and the Arts

Via email: [aviationwhitepaper@infrastructure.gov.au](mailto:aviationwhitepaper@infrastructure.gov.au)

Dear Jason,

On behalf of Brisbane Airport Corporation (BAC), I thank the government for releasing the Terms of Reference (ToR) for the Aviation White Paper and seeking input from the sector.

BAC agrees that a safe, efficient, sustainable and competitive aviation sector is critical to the economy and standard of living of all Australians. As you may know, Brisbane Airport plays a critical role in the social and economic life of Queensland, directly contributing more than \$2.6 billion annually to the state economy. The BNE site is also the workplace of around 24,000 people. By 2032, our economic impact will rise to \$3.4 billion, with 32,000 people employed within our precinct.

This growth will be driven by a significant population increase in the southeast corner of the State. BAC is responding to this growth with an infrastructure investment plan worth over \$5.5 billion over the next decade. In the context of this investment, BAC will be looking to governments at all levels to ensure the aviation sector's role as an essential service is recognised and supported and, where relevant, appropriately resourced. This is particularly critical for Government owned aviation service providers and regulators.

We therefore welcome the ToR for the government's White Paper process, noting that the following are areas of priority for BAC:

- **Aviation's role in economic development, trade and the visitor economy:** As detailed above, Brisbane Airport is a major economic driver for Queensland. BAC's forward investment program is essential to the region and the state meeting their economic development goals and enabling local and global connections for residents and businesses. Our major projects include significant investment in terminal and apron capacity, and record investment in security enhancements and parking capacity. However, as these are large commercial investments, BAC needs the right regulatory framework in place to attract capital, meet market demand and provide investment certainty for the long term.
- **How to maximise the aviation sector's contribution to achieving net zero carbon emissions:** BAC takes its obligations around environmental management and protection seriously, supporting the objectives of the broader aviation sector of net-zero carbon emissions by 2050. We believe that sustainability is critical to maintaining our social licence with the community, as well as a key driver of our long-term competitiveness as a 24/7 gateway. BAC is acutely aware that Scope 3 emissions represent the overwhelming proportion of airport emissions, with aviation

fuel contributing 50% of these emissions. BAC has been working closely with all levels of government, industry, and academia to support the manufacture, distribution, and adoption of Sustainable Aviation Fuels (SAF) as part of the energy supply chain. With its proximity to Queensland's agricultural supply chain, major transport linkages, and experience in trialling SAF with airline partners, BAC is highly motivated to work with Government as a participant in the Jet Zero Council and trusted advisor within the aviation sector to drive investment, promote regional growth, enhance fuel security, and decarbonise our industry.

- **Aircraft noise and noise mitigation:** BNE's new runway was a \$1.2 billion investment in the state's future. BAC has strived to work collaboratively with all levels of government, political representatives, and the community to address community concerns around aircraft noise. We support mechanisms that better engage the community in addressing noise concerns and investigating options to mitigate noise impacts wherever possible. BAC looks forward to working with government to develop and implement frameworks that promote an informed and transparent dialogue on airport operations with innovative approaches to mitigate noise.
- **Maintaining fit-for-purpose aviation safety, air navigation and aviation security systems and service delivery agencies:** BAC recognises the importance of aviation related safety, navigation, security, and service delivery agencies. It is imperative that the nation's aviation agencies are of a calibre appropriate to the importance that aviation plays in a country as isolated as Australia, and with the geographic challenges that we face. BAC would recommend a review of all Federal agencies tasked with providing aviation services to ensure they are fit for purpose and structured to embrace global best practice and continuous improvement in aviation and public administration. We also encourage agencies to better co-ordinate resources, policy, planning and implementation to address issues that are increasingly complex and multi-faceted. Ideally, as with other international jurisdictions, a dedicated aviation authority with specific resourcing and capability in aviation matters should be established and resourced. This will ensure that aviation perspectives are co-ordinated and embedded within whole of government decision making. Further, government should consider how accountability and transparency in decision-making is monitored at key regulatory agencies, noting that an uneven approach to the sector undermines a sense of fairness and confidence in public administration.

Noting the above areas outlined in the ToR, we believe the following considerations should be incorporated as part of the any review of the aviation sector in Australia:

- **Future pandemics and border control:** BAC strongly urges the Federal Government to develop clear, consistent advice and policy settings on border openings, vaccination, and quarantine in preparation for any future international health emergencies. This includes threats from both passengers and agriculture (as experienced with the most recent foot and mouth outbreak). Proactive planning should be undertaken with States, Territories, and industry to ensure that contingency arrangements are in place to minimise any impact on the aviation and tourism sectors. These steps are vital to ensure that international and domestic travel can continue to recover as quickly as possible, while minimising the risks of future restrictions and border closures, factors that together have decimated aviation over the past 2 years.
- **Red tape reduction:** BAC continues to work closely with the Department on a range of regulatory reviews driven by the sunseting of certain regulatory provisions by April 2024 and April 2025. Building on this review, we encourage government to consider wider regulatory reforms linked to broader government objectives for the sector (which themselves are informed by longer term strategic trends in aviation). For example, BAC notes the move towards more risk-based regulatory approaches across key industry sectors. Providing frameworks that regulate entities based on their operational maturity and systems promotes innovative approaches to manage airport operations and development, while still allowing rigorous oversight where required. This approach will ensure a balance between the efficient operation and development of BNE against the protection of government and community interests in what is a key infrastructure asset.



- **Evolving security environment:** while security remains a critical component of airport operations, BAC encourages government to take a more strategic and co-ordinated approach to security arrangements across major airports. This includes providing for better alignment of legislation to simplify obligations and expectations on airport operators; understanding the practical application of legislation in an operational context; and allowing for flexibility in security frameworks to account for the progress of technology across security interfaces. These matters are particularly important when considering evolving threats within the transport network, together with increased community expectations around the airport travel experience.
- **Better mechanisms to co-ordinate transport infrastructure across three levels of government:** large-scale transport infrastructure is complex, resource heavy, and time intensive. BNE is a major road traffic generator in Southeast Queensland and to ensure BNE can support passenger and commuter growth into the future, detailed investigation, planning and consultation is required across all levels of government. At present, BAC is not aware of clear objectives for ground transport provision at airports at a Federal level. What's more, responsibilities between each level of government remain unclear. A clear program of planning, investment and delivery also needs to be developed to ensure that infrastructure provision is delivered on time, and to the standard required to provide real benefits for the region – now and into the future. Without proactive, co-ordinated planning and investment led across government, we risk significant shortfalls in our ground transport system's capacity and connectivity, which in turn stifles growth, employment and prosperity into the future.

I trust this information is of assistance. If you have any questions regarding this response, please contact Rachel Crowley, Executive General Manager, Communications and Public Affairs on (07) 3406 5775 or [rachel.crowley@bne.com.au](mailto:rachel.crowley@bne.com.au). I look forward to working with you to shape a prosperous future for the aviation sector.

Yours sincerely



Gert Jan de Graaff  
Chief Executive Officer