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Aviation White Paper Branch  
Domestic Aviation & Reform Division

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

## RE MOORABBIN AIRPORT TERMS OF REFERENCE SUBMISSION

Thank you for the opportunity to provide a submission for the Aviation White Paper Terms of Reference.

### **Scope & Theme: How to maximise the aviation sector's contribution to achieving net zero carbon emissions including through sustainable aviation fuel and emerging technologies**

Metropolitan airports are well placed to deliver and support sustainable operations and this should be recognised in aviation policy. We seek Government to:

- Recognise one size fits all policy solutions for aviation results in sub optimal outcomes, policy should specifically consider the general aviation sector;
- Create an industry knowledge hub to identify, gather and distribute current and emerging technology initiatives for general aviation businesses, metropolitan airports and the community
- Create a sustainability scorecard for metropolitan airports that tracks airport sustainability including initiatives commenced/ completed, future initiatives, funding capability and takes into account limitations that smaller airports face (eg limited land for solar farms, heat islands)
- Create policy that supports identifying industry best airport design and infrastructure solutions for sustainable outcomes (e.g. at Moorabbin activating hangar sites and aircraft parking areas closer to the airfield results in a 6-12 minute battery run time reduction as legacy sites at Moorabbin were between 1 – 2.5km from holding points. Similarly efficient taxiway redesign minimised ground running time and reduced energy consumption). Government needs to understand and support change for sustainability.
- Adopt Circuit Booking Systems at training airports as a standard airspace management procedure— at Moorabbin this 2017 initiative has reduced aircraft wait times for circuit training airspace access to near zero resulting in 10's of thousands of litres of avgas saved.

We seek policy change that supports regulators to remain ahead of the technologies, facilitating on a timely and low cost to industry basis:

- Certification of new aircraft
- Certification of alternate fuels (low or no lead, SAF, hydrogen)
- Inclusion of next generation of sustainable aircraft in syllabus materials at all levels (high school, training organisations, universities etc)
- Increased recognition of training elements in simulators
- electric aircraft operations.

This may include government having engineering and scientific capabilities.

### **Scope & Theme: changing aviation technologies and ways to position our policies, regulations and systems to encourage uptake and manufacturing of new, more efficient, transport technologies**

Metropolitan airports are well placed to trial and assess changing technologies. We are mature sites with access to reliable offsite power networks, trained and skilled workforces and are proximate to industry innovators. Further Metropolitan airports and our stakeholders have already invested into emerging technology, including electric aircraft (eg our largest rotary operator has forward orders for more 40 electric aircraft and major Victoria aviation universities with leading innovation and sustainability hubs have decades long aviation courses based at Moorabbin).

Schools, universities and training organisations should be required to include aviation sustainability in their curriculums to better inform our next generation of pilots and their families that sustainable aviation is achievable and the emerging industry norm. This will provide true transparency at a grass roots level

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on a major aviation industry change. Further it is our view that flight training organisations and general aviation businesses that adopt sustainable practices will hold an increasing competitive advantage both locally and internationally.

Government funding for aviation training programs (pilots, engineering) and VISA requirements should preference sustainable aviation organisations.

Airspace policy changes we support include:

- mandatory requirement for aircraft transponders in controlled airspace (VH registered, RA AUS)
- a clear pathway for logistics facilities at airports to implement drone based delivery operations
- Redraft airspace management procedures to support electric aircraft operations noting limited battery life and requirement for minimum of 30-minute fuel / electric power reserves (eg numbers of aircraft in circuits, mix of aircraft types in circuits, efficient access to airspace noting limited battery life)
- protecting and expanding existing off airport training areas so as to allow next generation aircraft (electric and hydrogen etc) to conduct advanced training elements over non built-up areas.

Next generation aircraft type take up will be led in metropolitan airport settings as we have highest GA clusters in the state and our customers have the largest fleets. This requires:

- Regulatory change to certify new aircraft types through CASA
- Certification of new fuel types
- Land use reviews and guidance for exclusion zone or extended PSA for new fuel type storage
- A roadmap to inform investment decisions for the general aviation industry. We are aware of a university acquiring 22 new single engine lead fuelled piston aircraft, this may limit their ability to invest into next generation aircraft in the immediate term.

Airports are investing and designing infrastructure under 20-year master plans and we need to understand the transition process to new systems. Policy needs to cover:

- Runway, taxiway and apron requirements, including widths and strengths to support new types
- Electric battery performance capability materially impacts land use planning and airport design and prioritises activation of hangar sites and aircraft parking closer to the airfield
- Fuel storage implications and surrounding protection zones
- Greater clarity on airport ability to recover infrastructure investments when technology and aircraft types in common use change. We need to avoid airports investing in infrastructure that is not required in the long term – eg avoid the A380 experience
- Airservices technical capabilities should be completely upgraded to improve safety, airspace management and reporting to airports and community
- Recommend remote active surveillance of flight training operations by CASA and ASA to improve safety of operations
- Master Plan requirements to include more comprehensive sustainability initiatives

### **Scope & Theme: how to support and regenerate Australia's general aviation sector**

The General Aviation industry requires advocates across all sectors of industry, this includes individual voices for regional and metropolitan airports, maintenance and flight training.

Policy should recognise that general aviation includes large numbers of small businesses and may lack experience in understanding:

- business planning and commercial processes
- key touchpoints for safety, planning and collaboration forums
- true cost of providing and maintaining airport network infrastructure and supporting services and fair pricing to recover these costs.

Regulator / Stakeholder input is important and necessary

- Greater data sharing of basic general aviation industry KPIs
- Greater involvement in community forums to reinforce roles of airports and provide future outlooks

Red tape minimisation, including the certification of new aircraft listed above:

- Reviewing the need ASICs at metro and regional airports e.g. 2000 ASIC issued at Moorabbin due to a single RPT operator
- Metro airports should remain out of ACCC monitoring
- Certification of roles within small business, opportunities to perform simultaneous duties
- Reduced hurdles on international supply chains, particularly for parts and components as new aircraft enter industry

We need to encourage young people into Aviation and make flying accessible by:

- Developing pathways – greater promotion of aviation in schools at early ages
- Reducing complex loan structures – streamline VET Fee to remove delay in payments to schools who are cash flow dependent
- Reviewing training syllabus
- Greater use of simulators
- Removing complexity of maintenance training – LAME qualifications are restrictive and not transferable outside of aviation, not internationally recognised
- Reducing cost and providing incentives for manufacturers and schools to adopt sustainable aircraft and systems in training syllabus
- Making airspace accessible – improved sharing of airspace not currently available to GA
- Improving alignment of regulations to international standards where possible

**Scope & Theme: other significant issues raised during the consultation process.**

Other items that we would like to see considered in the Aviation White Paper are:

- Airport role clarity – metropolitan, secondary and regional airports roles and functions should be clearly defined together with the airport services and infrastructure that are specific to those roles.
- Metropolitan airports
  - acceptance that airports are urban activities
  - recognition of airport benefits to community – network infrastructure improvements on airport to off airport, public transport creation, Fly Friendly programmes, economic etc
  - Positive role for supporting connecting major infra projects (eg suburban rail loop)
- Strengthening of requirements for offsite development building activity. Large areas around airports are being redeveloped into larger facilities and longer builds are now common. Local and state governments, as well as developers, have little or no aviation awareness for NASF implementation and consultants with relevant experience are limited. The present system for airports to process controlled activity applications is unsustainable, costly, time consuming and requires immediate regulatory change to allow cost recovery or outsource.
- Airport head leases to be amended to allow immediate exercise of option terms to provide investment certainty for airports and customers.
- Clear direction on EGLT and EGCR
- PFAS Resolution – clear pathway and timelines provided
- Centralised information sharing and reporting for hazards & risks we face as a sector
- Greater support for financial debt management for operators and airports.

I look forward to continuing constructive engagement with the Department in relation to the Aviation White Paper and participating at the roundtable events later this month. Please do not hesitate to contact us if you have any further queries or questions.

Yours sincerely



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