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10 March 2023

Mr Jason Dymowski  
Assistant Secretary, Aviation White Paper and Reform Branch  
Department of Infrastructure, Transport, Regional Development, Communications, and the Arts  
GPB Box 594  
CANBERRA ACT 2601

**By email:** [Jason.Dymowski@infrastructure.gov.au](mailto:Jason.Dymowski@infrastructure.gov.au)

Dear Mr Dymowski,

### **Consultation on Aviation White Paper Terms of Reference**

QBE Insurance (Australia) Ltd (**QBE**) welcomes the invitation to provide a submission on the Terms of Reference (**TOR**) for the forthcoming Aviation White Paper (**White Paper**), provided by letter dated 7 February 2023.

QBE is a major national provider of aviation insurance. QBE has a strong depth of knowledge and understanding of the needs of the aviation industry and is a keen advocate of risk management and accident prevention.

We note the intended outcome of the Whitepaper is to “articulate the Commonwealth Government’s policies on desired aviation outcomes in relation to efficiency, safety, sustainability and competitiveness to ensure the sector is appropriately positioned to deliver aviation services for the Australian public and international visitors out to 2050.” We are of the view that the areas of focus set out in the TOR are appropriate to support this intended outcome.

QBE has an interest in several of the subject matter areas addressed in the ‘Scope and Themes’ section of the TOR and we appreciate the opportunity to respond as follows:

- **Aviation’s role in economic development, trade, and the visitor economy, across all the categories listed.**

QBE suggests that the Green / White Paper should address within the ‘general, domestic’ categories identified, the aerial work and unmanned aircraft sectors. We believe these sectors will continue to have an important role to play in the broader aviation sector, now and into the future to 2050.



- **How to maximise the aviation sector's contribution to achieving net zero carbon emissions including through sustainable aviation fuel and emerging technologies.**

QBE strongly supports this TOR Scope and Theme. In February 2022, QBE Insurance Group Limited announced it had joined the UN-convened Net Zero Insurance Alliance, and in doing so committed to the gradual transition of its underwriting portfolio to net zero greenhouse gas emissions by 2050. QBE looks forward to continuing to support its customers (and working with the aviation industry as a whole) in the transition to a net zero economy.

- **Changing aviation technologies and ways to position our policies, regulations, and systems to encourage uptake and manufacturing of new, more efficient, transport technologies.**

QBE fully supports the TOR exploring this Scope and Theme. We consider the Australian aviation eco-system is on the praecipies of revolutionary change. Emerging transport technologies are central to industry wide net-zero progress but there are also significant social value / benefits which can be derived for all Australians through emergent transport technology. QBE, through QBE Ventures, the venture investment and development arm of QBE Insurance Group Limited, is already investing and building alongside early-stage technology companies who we believe have the potential to reshape the insurance industry and create new value for customers, partners, and the communities in which we operate. We look forward to considering future thinking policy proposals in this space in the Green / White Paper.

- **How to support and regenerate Australia's general aviation sector.**

QBE supports the proposal to use the Green / White paper as a vehicle to explore options to provide not only support to the aviation sector but also to ensure the regeneration (post-COVID) and longevity of Australia's general aviation community. QBE acknowledges the significant economic, social, and recreational contribution that Australia's active and vibrant general aviation sector contributes, as well as the many worthy industry associations working to support Australian general aviation.

- **Future industry workforce skills and training requirements.**

QBE acknowledges that current workforce skills and training shortages and industry skills future proofing are critical industry issues with serious commercial implications for the sector. However, skills and training in aviation has wider implications across safety, diversity and inclusion, mental health, and access and employment in regional Australia, just to identify a few. QBE is encouraged to see this sector wide critical issue being prioritised for exploration in the Green / White paper.

- **Maintaining fit for purpose aviation safety, air navigation and aviation security systems and service delivery agencies.**

QBE supports the proposal to explore this Scope and Theme. We consider that each subset identified in this theme bears its own weight and significance, whilst at the same time also being inextricably linked (i.e., aviation safety should underpin, fit for purpose air navigation service / delivery).



- **The role of airlines and airports in supporting regional economies.**

QBE supports the exploration of this issue in the Green / White paper noting that aviation services in many regional communities are critical to the provision of a variety of essential services (beyond commercial transport). In addressing this Scope and Theme for the purpose of the Green / White paper, QBE considers it is important to also note the role and contribution that general aviation plays in supporting regional economies and wider regional aviation ecosystems.

We would be happy to provide any further information to support this response. Should you have any questions or require further clarification or information, please do not hesitate to contact Michael McNamara, Head of Underwriting – Aviation (m. +61 408 134 083), or me.

QBE otherwise awaits the release of the Green Paper in mid-2023 and looks forward to the opportunity to comment further upon the release of the paper.

Yours sincerely,

A handwritten signature in black ink that reads "S O'Hara".

Shannon O'Hara  
Senior Legal Counsel, Aviation

**Cc:** [Frederick.Beale@infrastructure.gov.au](mailto:Frederick.Beale@infrastructure.gov.au)