



Residents Against Western Sydney Airport Incorporated

Blaxland NSW

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Invitation to make a Submission to the Australian Government's 2023 Review of Aviation Policy and contributions to formulating content of the associated ToRs, Green and White Papers

The attached submission has been prepared by and on behalf of a community action group called Residents Against Western Sydney Airport (RAWSA).

While our organisation is primarily focused on the proposed Western Sydney Airport, we are very concerned with wider aspects of Australia's Aviation Policies outlined in this submission.

RAWSA is grateful for the opportunity to bring these matters to the attention of the review process and look forward to their inclusion in policies derived from the Review.

I have been asked to lodge this submission to highlight some of our concerns

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jenny Dollin', with a small flourish at the end.

*Jenny Dollin
President RAWSA
9 Boorea Street,
Blaxland NSW*

Submission to the Australian Government's Aviation Policy, White Paper Review – March 2023

Introduction

Current Australian aviation policy outcomes have consistently favoured the aviation industry and ignored the industry's adverse impacts on communities and the environment. Therefore the policy framework and detail have long since reached their *use by date* and are *not fit for purpose* in the pursuit of a sustainable industry within a sustainable community and environmental future.

This submission from Residents Against Western Sydney Airport (RAWSA) focuses on providing a comprehensive approach to the Environmental, Social and Economic aspects of ensuring the long term *sustainability*¹ (UN definition) of the industry and the associated Government aviation policy.

Without this comprehensive approach being incorporated in Australia's Aviation Policy, the economic benefits provided by the aviation industry will not be sustainable over time and won't be fully realised within the Australian economy. Similarly, without this comprehensive approach, the Social and Environmental impacts caused by the aviation industry will undermine any social licence in support of the industry and Government objectives on mitigating climate change effects will not be achieved.

Our submission is encompassed within the White Paper Terms of Reference (ToR), which state:

"The Government will promote an efficient, safe, sustainable and competitive Australian aviation sector that is critical to the economy and standard of living of all Australians"

Our submission is particularly relevant to:

- *Airport development planning processes and consultation mechanisms*
- *Other significant issues raised during the consultation process*
- *Examination of Government policy and economic reforms necessary to promote efficiency, safety, sustainability and competitiveness of the aviation sector*
- *More specifically articulating expanded Terms of Reference to incorporate the specific issues raised in this submission.*

¹ <https://www.un.org/en/academic-impact/sustainability>

Real Costs and Benefits of the aviation industry

Policy review Inclusion – The Policy Review process must incorporate a comprehensive cost to benefit analysis of the aviation industry which, includes accurate details of both benefits derived and an assessment of all the real hidden costs associated with the industry’s operation.

Justification for inclusion in Review

Due to Australia's geographic size and location, RAWSA acknowledges that the aviation industry plays an important economic, transport, tourism, social, and employment role for Australia.

However, in evaluating the true value of the industry and particularly in regard to expansion of the aviation industry, there needs to be a comprehensive cost to benefit analysis, as much of the current cost burdens are:

- Unevenly borne directly by selective communities affected by aircraft noise and pollution,
- Directly contributing to an increase in climatic extremes, weather related disasters and adversely impacting the liveability of local environments, and
- Are not part of the cost / benefit analysis because they are automatically transferred to the public purse through:
 - Publicly funded provision of airport related road, rail and supporting service infrastructure.
 - Cost of dealing with aviation derived health and environmental impacts which are also transferred to our three levels of government.

Aviation Policy & Industry Accountability

Policy review Inclusion – The Policy Review process must incorporate policy accountabilities such as defined, quantifiable and enforceable parameters to reflect real impacts on affected natural environments and communities. These accountabilities must be robust enough to be publicly reportable performance measures.

Justification for inclusion in Review

Governments, airports and airlines must acknowledge that the aviation industry cannot be sustained by the current *‘head in the sand approach’* to the inherent impacts associated with the industry’s operations.

Putting safety aside (which nobody disputes) the only current accountabilities imposed upon the aviation industry are financial efficiency & profit responsibilities to shareholders or owners.

The White Paper must address the current lack of the industry's accountability and government responsibility to communities and natural environments affected by aviation impacts such as defining quantifiable and enforceable parameters to address meaningless motherhood statements in government policy documents that:

- Are tailored to improving aviation profitability
- Are not quantified,
- Are not enforceable, and
- Cannot be assessed as performance measures on community or environmental outcomes,

Engagement & Consultation Processes

Policy review Inclusion – The Policy Review process must incorporate meaningful engagement and consultation processes that treat affected communities as genuine Stakeholders with the same status and opportunity for real influence, as aviation industry Stakeholders.

Justification for inclusion in Review

While airports, airlines and the industry generally, have access to Ministers, Dept. officials and policy development, the same can't be said for communities affected by aviation operations. Community Groups must be given the same:

- Access to Ministers and departmental policy makers,
- Opportunities for appropriately timed input to policy development and
- Level of credence and influence as stakeholders from the aviation industry.

The past custom and practice of Dept. officials formulating their own desired policy outcomes in isolation and then giving communities a short time to give feedback, is a tokenistic approach that must be abandoned. Communities must be directly included in the process right from the start and throughout the policy development process, ensuring that:

- Politically influenced Local Govt authorities do not represent community views,
- Affected community groups are included in all forums and meetings, and
- Community concerns are not summarily dismissed.

Current Community Airport Consultation Groups (CACGs) are biased in structure, operational control and produce predictable outcomes that favour the industry. The CACG system is little more than failed '*window dressing*' and should be restructured to produce balanced solutions to community concerns and aviation needs.

Flight Path Design Principles

Policy review Inclusion – The Policy Review process must integrate environmental and community focused outcomes that do not exist in the 2020/21 Policy document relating to Flight Path Design Principles.

Justification for inclusion in Review

The 2020/21 review of Flight Path Design Principles resulted in a further downgrading of outcomes on community concerns. While there is wide support for prioritising safety as the principle consideration in designing flight paths and airspace architecture, the 2020/21 Flight Path Design Principles create a clear hierarchy in the sequence and importance of applying the principles, such that:

1. Principles applying to safety are the first consideration
2. Principles of Airport/Airline efficiency (*read profits*) are the second priority to be applied, and
3. Principles related to community and environmental impacts are relegated to the lowest level of priority and importance as these principles will only be considered where practicable, when possible and where they don't affect safety and airline efficiency.

The sequence and importance of applying points 2 & 3 above, must be reversed so as to apply community impacts ahead of airport/airline efficiency and profits.

National Aviation Safeguarding Framework

Policy review Inclusion – The Policy Review process must integrate environmental and community focused outcomes that do not exist in the current National Aviation Safeguarding Framework.

Justification for inclusion in Review

The National Airports Safeguarding Framework² (NASF) exists to ensure that community and residential development around airports does not affect aviation operations.

While perhaps prudent for the long term planning of new airports to prevent residential areas being affected by aircraft operations, the NASF is a biased and one-sided mechanism in that, it is not also applied to prevent inappropriate airport developments and expansion.

² <https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aviation-environmental-issues/national-airports-safeguarding-framework>

The theme promoted by the aviation that aircraft noise problems are caused by inappropriate urban developments near airports is largely an illusion. The vast majority of aircraft noise impacts on communities is caused by inappropriate airport expansion and increased flight operations.

There is an inequity and lack of fairness in the current NASF of using ANEF zones to prevent future residential development but not preventing airport development that would create new ANEF zones within existing residential and bushland areas.

Within the NASF, community safety and environmental sustainability are totally ignored, as there is no protections for existing residential areas nor protections to flora, fauna or the natural environment, from inappropriate expansion of airport developments or increased operations. The building of the Western Sydney Airport so close to the World Heritage listed Blue Mountains National Park, clearly demonstrates that these factors need to be incorporated into the Review of Aviation Policy.

Aircraft Noise EIS Forecasting

Policy review Inclusion. – The Policy Review process must integrate environmental and community focused outcomes on aviation noise impacts that over decades have continued to produce inaccurate predictions within inadequate Environmental Impact Statements around the Nation.

Justification for inclusion in Review

Dating back to scathing 1995 Senate Inquiry Report - "*Falling On Deaf Ears*" into the EIS for Sydney Airport's 3rd Runway or assessing the dismal failures of more recent processes associated with the noise debacles at Perth, Hobart, Adelaide, Gold Coast and Brisbane, it is clear that successive Governments and their Agencies have been unwilling to rectify the short comings, inaccuracies and misrepresentations of EIS processes and noise impact predictions.

The short comings, inaccuracies and misrepresentations of aircraft noise assessments in the EIS process are clearly detailed the 2019 Report³ by engineer Dr Eric Ancich which focused on the inadequacy on noise assessment methodologies incorporated into the 2016 Environmental Impact Statement for the Western Sydney Airport (WSA) project.

While this report has WSA at its centre, the principles and conclusions reached by Dr Ancich have relevance to assessments across Australia and therefore reading and referencing this report will be a prudent inclusion in the current policy review process.

³ Ancich E.J. "Assessment Of Measured Aircraft Noise Levels Under The Existing Flight Paths of Sydney Kingsford Smith Airport With Reference To Western Sydney Airport", Report 9173.R1, Submitted to Blacktown City Council, March 2019.

Aviation Noise Ombudsman

Policy review Inclusion – The Policy Review process must ensure and support the true independence of the Aviation Noise Ombudsman by removing the roles and functions from Airservices Australia administration and transferring these responsibilities to the office of the Commonwealth Ombudsman administration.

Justification for inclusion in Review

The ANO has conducted seven major investigations⁴ into noise complaints in: Sydney, Parafield (Adelaide), Perth, Hobart, Sunshine Coast, East Melbourne and Brisbane. Each investigation found that communities were misled about the amount and/or location of aircraft noise expected from new runways or changes to flight paths. No meaningful change has resulted from any of these investigations. The true independence of the ANO will continue to be challenged and compromised, while ever the influence (whether actual or perceived) of Airservices Australia continues.

This situation can be resolved by transferring the ANO position/roles/functions to the administration of the Commonwealth Ombudsman, whose responsibilities⁵ are:

“The Ombudsman can investigate complaints about the actions and decisions of Australian Government agencies to see if they are wrong, unjust, unlawful, discriminatory or just plain unfair. The Ombudsman also seeks remedies for those affected by administrative deficiencies, and acts to improve public administration.”

Conclusions

Without incorporation of the enclosed Policy Review Inclusions, the 2023 White Paper Review and subsequently derived Policy, will demonstrate that:

- The current Government has not learnt anything from past policy mistakes,
- There will continue to be no defined, quantifiable and enforceable parameters to protect the health of affected human and natural environments,
- People and the natural environment are regarded by government as unimportant compared to the aviation industry’s profit making potential,
- There will continue to be community outrage which will affect a sustainable future for the Aviation industry, and that
- The assertion, that the powerful Aviation Industry has undue influence over policy decision making, will be validated.

⁴ Reports on these investigations can be found at <https://ano.gov.au/reportsstats>

⁵ <https://www.ombudsman.gov.au/complaints/australian-government-agency-complaints>