



To70 Aviation (Australia)

ABN 30 119 069 911

Level 24, 570 Bourke St

Melbourne VIC 3000

admin@to70.com.au

Aviation White Paper Branch

Domestic Aviation & Reform Division

Department of Infrastructure, Transport, Regional Development, Communications and the Arts

GPO Box 594

CANBERRA ACT 2601

RE: Submission in response to Aviation White Paper Terms of Reference

To70 Aviation (Australia) appreciates the opportunity to make a submission in response to the Terms of Reference for the Aviation White Paper. Our perspectives are gathered through the research, analysis and consultation that To70 performs on behalf of aviation industry clients across Australia. As an advocate for a strong and sustainable aviation sector, we support the Government's objective to establish long-term policies which will guide and influence growth and innovation within the industry.

Our response outlines several aspects which we believe will present opportunities and constraints in the period through to 2050. For ease of reference, the submission addresses the four topic areas raised by the Terms of Reference.

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

Flexible, outcome-based airspace design guidelines

An opportunity exists to implement principles in airspace design that prioritise both safety and environmental performance. For example, the United Kingdom has set a precedent by identifying

noise as the critical factor from surface to 4,000 feet, while efficiency and emissions become the critical factors at around 7,000 feet, and the area in between is subject to a balanced approach¹. This design supports the traditional principles of airspace design while also mitigating the impact of community noise and reducing emissions.

Impact of mandated environmental performance

The period covered by the Aviation White Paper up to 2050 is expected to be a significant turning point for environmental performance obligations. It is incumbent on industry participants to develop strategies for reducing emissions. In conjunction with these best efforts, the industry must also prepare for potential legislation that may be introduced to enforce emissions reduction targets. Carbon intensive industries must be prepared for a future where they are compelled to augment or reduce traditional methods of operation through legislation. Policy guidance can help operators best prepare for this change.

The economic reforms needed to improve productivity across the sector, including addressing skills shortages, competition between airports and airlines, and charting a course out of the pandemic.

Barriers to entry for non-flying skilled workforce

The availability of qualified and certified aircraft and avionics maintenance engineers is diminishing in Australia and aircraft owners are finding it harder to locate these services. Many LAME certified resources are very close to retirement and there is an insufficient cohort coming through to replace them, especially in regional areas.

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

GA accessibility and sustainability

To sustain the interest of younger generations, it is imperative that aviation remains both accessible and enjoyable for participants. Unfortunately, the general aviation sector is facing numerous challenges, primarily stemming from the encroachment of federal leases on critical aerodrome locations without adequate safety oversight and consideration for aviation growth. As it stands, the general aviation sector is barely surviving and the exorbitant costs associated with aerodrome operations are significantly impacting business operating margins. Continuing to appropriate land at

¹ United Kingdom Department of Transport Air Navigation Guidance 2017 Section 3.3: Altitude Based Priorities
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/918507/air-navigation-guidance-2017.pdf

these city aerodromes will inevitably result in the displacement of GA and flight training facilities to such an extent that they will no longer be a feasible or appealing option for the vast majority of individuals.

Better mechanisms for consultation on and management of issues like aircraft noise, airport development planning and changing security requirements.

The role of Airservices

Over time the role of Airservices has evolved with industry and market changes which has created ambiguity in critical areas of scope and responsibility. Some aspects which we believe may require review include the following:

Aircraft noise community management: The role of Airservices as both an air navigation service provider and also a receiver of aircraft noise complaints should be reviewed and consideration given to a separate entity being appointed to manage the task. This would enable independent assessments and a reporting structure where complaints and concerns could be fed back to the owner of the operation, if required, or to the proponent of any change which had occurred.

Airspace Change Proposal environmental impact assessment: The responsibility of conducting an environmental impact assessment of any proposed changes should rest with the proponent. Airservices' role should only commence once the new flight paths become operational, and their responsibility should be limited to ensuring that aircraft are able to adhere to the intended flight path without issue. Naturally, Airservices should be involved in the design process in order to provide expert technical input.

Monetisation of aviation data: Access to Australian electronic aviation data gathered by Airservices comes at significant cost, in comparison to overseas jurisdictions (incl. EUROCONTROL and the FAA) that adopt an open disclosure and information sharing standard. We believe open access to data stimulates research and innovation, and allows for a better informed discussion.

The resourcing and performance of CASA

The Civil Aviation Safety Authority (CASA) possesses substantial authority but is hindered by a lack of adequate resources to exercise it effectively. Consequently, there are areas within the Australian aviation industry where CASA's presence acts as a hindrance to innovation and growth. Despite outward statements from CASA asserting that they do not intend to impede progress, current actions with regards to the regulation of the Urban Air Mobility (UAM) sector and aerodromes are an example indicate the contrary. Failure to establish suitable regulatory and operational frameworks

in a timely manner will result in missed opportunities for the integration of emerging aviation technologies.

Aviation Security Screening

There is a pressing need to restructure aviation security measures in order to adopt outcome-based solutions that are measured in terms of risk and reward, rather than being dictated by standards that were established following the events of the early 2000s. The current approach to airport security, which involves confiscating innocuous items such as nail clippers and manicure scissors, causes undue delays and frustration among passengers. With the advent of new aviation technologies, it is crucial that the implementation of Advanced Air Mobility (AAM) does not exacerbate existing issues by imposing the same levels of screening, which would only serve to further congest departure points and slow down journey times.

Airport Safeguarding Provisions

Our experience over the last few years supporting developers has shown that when presented with procedure change requests that would result in win-win situations for developers and aviation, the ball is passed around between various (semi-)government aviation authorities and decision making is glacial. The National Airports Safeguarding Framework (NASF) should be the subject of an holistic review. Where developers can demonstrate, through systematic and comprehensive analysis and consultation, that changes to PANS-OPS and other protected surfaces can be made without any impact on the safety, efficiency, environment or regularity of current or future aircraft operations then a mechanism to make the changes should be available.

About To70:

To70 is one of the leading global aviation consultancies providing research and advisory services to the aviation community.

At To70 we believe that society's demand for transport and mobility can be met in a safe, efficient, environmentally responsible and economically viable manner. To achieve this, policy and business decisions should be based on objective information. With our diverse team of aviation specialists around the globe, To70 provides pragmatic solutions and expert advice, based on high quality data-driven analyses.



Our clients include Airports, Airlines, Governments and Air Navigation Service Providers. To70 maintains offices in The Hague (The Netherlands), Melbourne and Brisbane (Australia), Montreal (Canada), Bangkok (Thailand), Frankfurt (Germany), Medellín (Colombia), Shanghai (China), Singapore, Sao Paulo (Brazil), Brussels (Belgium), Genève (Switzerland) and Bangalore (India).