Pages 1 to 11 of document 1 have been removed under s45, s47C and Section 4 of the FOI Act

Summarised Organisations' ToR Submissions

Organisation	
Airlines for Australia and New Zealand (A4ANZ)	International Air Transport Association (IATA)
ACT Government	Jet Zero Australia
Air New Zealand	s45
s45	Melbourne Airport
Aircraft Noise Ombudsman (ANO)	s45
Australian Airports Association (AAA)	Moorabbin Airport Corporation
Australian Association for Uncrewed Systems (AAus)	s45
Australian Business Aviation Association (ABAA)	Neste Asia Pacific
ACCC	NSW Government
Australian Federation of Air Pilots (AFAP)	NT Government
Australian Licenced Aircraft Engineers (ALAEA)	NUW Alliance
Australian Manufacturing Workers' Union (AMWU)	Perth Airport
Australian Services Union (ASU)	Qantas Group
Bioenergy Australia/SAFAANZ	Queensland Consumers Association (QCA)
Board of Airline Representatives of Australia (BARA)	Regional Aviation Association of Australia (RAAA)
Boeing Australia	Regional Development Australia – Darling Downs and South-West
Brisbane Airport Corporation (BAC)	Regional Development Australia – Adelaide Hills, Fleurieu and Kangaroo Island
Brisbane Flight Path Community Alliance (BFPCA)	Residents Against Western Sydney Airport (RAWSA)
Business Council of Australia (BCA)	Royal Federation of Aero Clubs of Australia (RFACA)
Canberra Airport	s45
CHOICE & Consumers' Federation of Australia (CFA)	
East Melbourne Group	Tasmanian Government
s45	Transport Workers' Union (TWU)
ExxonMobil Australia	United Fire Fighters Union of Australia (UFUA)
Flight Attendants' Association of Australia (FAAA)	Virgin Australia
General Aviation Advisory Network (GAAN)	WA Government
Infrastructure Partnerships Australia (IPA)	Western Australian Local Government Association (WALGA)

*confidential submission

SUBMISSION – issues and proposals	From
1. Aviation's role in economic development, trade and the visitor economy – general, domestic, regional and international aviation	
NT Government notes that without long-term population retention and growth, the territory's economic growth will be limited, with travel and accessibility playing an important role. Low population base and constant demand for fly-in, fly-out (FIFO) travel in NT means investment and spending heavily rely on air travel to the NT. Policies must consider the preservation and continuation of regional air routes that contribute heavily to Australia's tourism industry (e.g. Alice Springs and Yulara).	NT Government
Virgin Australia supports this being in scope and proposes it be expanded to include actions from Government – e.g. liberalisation of traffic rights.	Virgin Australia
ACT Government recommends ensuring negotiations on bilateral agreements provide incentives for airlines to connect to regional airports, with additional benefit of relieving capacity constraints on major international gateways. Urge careful consideration of amendments to bilateral agreement and open skies policies. Recommends amendments consider incentives to connect regional centres.	ACT Government
Infrastructure Partnerships Australia (IPA) recommends the landside infrastructure that connects airports to the broader economy be designed to optimise public and private transport and time-sensitive freight.	Infrastructure Partnerships Australia (IPA)
Air New Zealand recommends focusing on regional alignment with NZ and the Pacific in the regulation of airlines and airports. A consistent framework would improve efficiency of flying to NZ and create trust between border agencies to improve efficiencies and jointly manage risks. Governments should explore a seamless trans-Tasman travel experience.	Air New Zealand
BARA suggests adding a clear aim for the government to establish goals for the size and composition of the total visitor economy to the ToR. Evaluate and specify the extent of aviation growth, particularly internationally. Suggest more explicit targets and timelines for desired passenger levels travelling to/from Australia to ensure international supply and demand are balance, allowing for appropriate and economically efficient infrastructure development.	Board of Airline Representatives of Australia (BARA)
Brisbane Airport Corporation advocates for the right regulatory framework to be in place to attract capital, meet market demand and provide investment certainty for the long term.	Brisbane Airport Corporation

*confidential submission

OFFICIAL: SENSITIVE

AAus sees an opportunity for Government to express a national vision and priority for aviation that acknowledges the significant value and criticality of aviation to Australia, and the opportunity, particularly in relation to new aviation sectors (jobs growth, manufacturing and export) and the benefits through their many applications (e.g., sustainability, primary industry, regional services, land and infrastructure management, disaster response, etc.).	Australian Association for Uncrewed Systems (AAus)
A viable airport sector adds depth and diversity to the economy and contributed significantly pre-pandemic. The AAA recommends the AWP review the bilateral service agreement process to ensure Australia's forward aviation services agreement negotiations are more strategic in nature, compared to the current 'just-in-time' approaches aimed at specific countries and markets.	Australian Airports Association (AAA)
Melbourne Airport notes constraints on capacity and aircraft movements impacts the broader national aviation network and restricts capacity, disrupts airport efficiency - delaying passengers and freight, increases fuel costs for airlines, increases emissions and produces less competition. Consideration should be given to better coordination between local, state and federal tourism, trade and economic development agencies to enable a more strategic approach to aviation policy settings. Recommended consideration is given to the efficacy of the bilateral service agreement (BSA) process to ensure forward negotiation frameworks are future focused. The current framework enables stakeholders to use the BSA to expand international services only every few years rather than incentivising stakeholders to take a more coordinated approach attracting international airlines.	Melbourne Airport
The AFAP is concerned the growing shortage of trained and experienced aviation professionals will have a detrimental impact on the future Australian aviation industry. A whole-of-industry approach is required to retain pilots. AFAP believes the retention of a highly skilled and professional aviation workforce is open to being challenged by losses overseas, overseas workforces in Australia and the use of cabotage. • The AFAP suggests the Government adopt a policy to train and retain our own skilled aviation workforce and support this policy with viable and well-funded pilot training programs. (see TOR Workforce Skills).	Australian Federation of Air Pilots (AFAP)
The ALAEA recommends future aviation policy recognises the potential export market for aviation training products and supports the industry to maximise trade returns and augment visitor growth.	Australian Licenced Aircraft Engineers (ALAEA)

*confidential submission

OFFICIAL: SENSITIVE

Perth Airport suggests addressing barriers and obstacles faced by airports in delivering the infrastructure required to support future growth in industry areas such as the resources sector (resources sector is planning significant expansion that will require corresponding expansion of FIFO flights to and from Perth Airport). Assessment of how future growth plans of aviation-reliant industries can be translated into future planning for airport infrastructure and capacity should be considered, and the role and responsibility of government examined to ensure the infrastructure can be delivered in a timely and cost-effective manner. Australia must position itself as a destination of choice for international airlines. Proposal: minimise barriers to entry, including review the cost, processing times and length of stay/repeat visits permitted when granting visas. Airline growth from several key markets is constrained by bilateral agreements relating to air services. Proposal: review and early start on negotiations to alleviate restrictions, moving towards open skies agreements wherever possible.	Perth Airport
Western Australia recommends the ToR be expanded to consider the role of aviation in the development of: • opportunities to increase direct flights to enhance opportunities for international markets to visit, study and do business in Australia, thereby supporting key sectors such as tourism and international education. • opportunities for partnerships with the aviation industry to provide enhanced defence infrastructure.	WA Government
Qantas suggests that the Government continues to be vigilant to ensure the liberal aviation regime does not compromise national interest inherent in the development and maintenance of a strong Australian aviation sector. Encouraged to consider: • implications of rising costs across the sector, including through government-imposed charges (e.g. passenger movement charge) and opportunities to minimise their impact. • Way to best enable the efficient operation of airport infrastructure, including forward-looking and fit-for-purpose infrastructure investment. • Policy measures to ensure skills needed by the industry are available, through domestic skills system and migration. • Opportunities by the development of a domestic SAF industry. • Options to streamline the travel experience for passengers, e.g. streamlining trans-Tasman travel experience. • Importance of a level playing field in a liberalised environment, including ensuring substantive compliance with Airservices	Qantas

s45

2. How to maximise the aviation sector's contribution to achieving net zero carbon emissions including through sustainable aviation fuel and emerging technologies	
SAF: proactive and consistent position from Australian Government on SAF investment is needed to secure access for airlines and create new jobs. Implement policy set to encourage safe use in near, medium and long-term. Implement policies to influence fleet renewal and disincentivise use of less-fuel efficient aircraft.	NT Government
A4ANZ notes the aviation sector has limited options for reducing emissions to meet net zero by 2050. The four key levers are: efficiency gains from improvements in engine and aircraft technology, including through fleet modernisation, and the potential use of hydrogen and electric planes; efficiencies through the optimisation of flight paths, air traffic management, and operations; deployment of SAF; and economic or market-based measures (i.e. carbon offsetting). Challenges to establishing a SAF industry: securing sufficient quantities of appropriate feedstocks able to be integrated with a biorefinery; challenging economics (SAF at a higher cost compared to conventional jet fuel); and lack of a supportive policy framework to encourage uptake. Australian Jet Zero council should enable supportive policy framework for domestic production and deployment of SAF.	Airlines for Australia and New Zealand (A4ANZ)
There is a lot of uncertainty amongst RAAA members about how to get to net zero. It is imperative the white paper provides regional aviation companies a clear pathway and understanding of government support to reach net zero by 2050. Much needs to be done to improve our air traffic control system for further efficiency gains.	Regional Aviation Association of Australia (RAAA)
The ACT Government suggests policy settings should foster future innovation and support investment in emerging solutions e.g. hydrogen, SAF, electric planes, sustainable battery power. Support for ongoing research and development initiatives in Australia through research institutions can support the transition to more sustainable models, skills attraction and investment in our aviation sector.	ACT Government
Sustainable aviation fuels will be essential to reducing the carbon emissions from the aviation industry. The priority for the government should be both supporting the broader deployment and cost reduction of sustainable aviation fuels, as well as a focus on development and manufacturing of these fuels in Australia. The White Paper will need to solidify this into practical programs.	Business Council of Australia
SAF is the most promising technology pathway for significant emissions reduction in aviation and domestic production is a strategic industrial and national priority. Australia holds the most certified organic agricultural lands in the world and produces surplus volumes of sustainable ethanal so is well positioned to benefit from production of SAF. Jet Zero will lead work to develop Australia's first Alcohol to Jet Fuel facility.	Jet Zero Australia
SAF should be prioritised in the White Paper. According to Australia's Bioenergy Roadmap, the bioenergy sector could contribute to around $10 billion in extra GDP per annum and 26,2000 new jobs, reduce emissions by 9 per cent, divert an extra 6 per cent of waste from landfill and enhance fuel security. Without a viable domestic SAF industry, Australia risks becoming a net importer of renewable fuel despite the abundance of feedstock for SAF production.	Bioenergy Australia/ SAFAANZ

*confidential submission

BARA emphasises the importance of policy initiatives to support sustainability should not be developed in isolation to broader government policy settings (e.g. infrastructure to support SAF uptake).	Board of Airline Representatives of Australia (BARA)
Brisbane Airport Corporation outlines how it has embedded its commitment to environmental management and protection and supports the objective of this term of reference. BAC notes that in terms of scope 3 emissions, aviation fuel is responsible for 50%. It notes this is not something airports can deal with alone and notes it is working closely with all three levels of government and industry in supporting the manufacture, distribution and adoption of SAF. BAC notes its proximity to SAF supply chains, it states it wishes to work with government as a participant in the Jet Zero Council "as a trusted advisor within the aviation sector to drive investment, promote regional growth, enhance fuel security and decarbonise our industry".	Brisbane Airport Corporation (BAC)
Air NZ emphasises the importance of the Jet Zero Council working closely with industry and cooperatively with NZ's equivalent public-private body; Sustainable Aviation Aotearoa. The White Paper should take a regional approach to developing a market for SAF. Facilitating early trans-Tasman dialogue on the challenge of SAF feedstock availability is strongly encouraged.	Air New Zealand
BFPCA suggests amending the ToR to specify greenwashing tactics, minimise impact on the environment, health and standard of living of local communities through low greenhouse gas emission aviation fuel, noise mitigation and other emerging technologies, or technical means to achieve legislated reductions to net zero 2050 in the aviation sector are not available or feasible. Implement other active measures to achieve the same goal.	Brisbane Flight Path Community Alliance (BFPCA)
ABAA identifies a strong history of innovation and is well-positioned to adapt to meet net zero targets. However, ABAA argues there is a degree of uncertainty regarding what support will be available to the industry to support achieving the target. ABAA calls for broad-ranging stakeholder collaboration and long-term government leadership and clarity of support. ABAA recommends the Jet Zero Council encourages "pathways for the testing and approval of new propulsion technologies and look to remove, where appropriate, regulatory boundaries to the introduction of newer, less carbon-emitting aircraft.	Australian Business Aviation Association (ABAA)
ExxonMobil suggests a well-designed, flexible, market based SAF policy in line with existing global standards can help the industry contribute to emissions reduction goals at the lowest cost to consumers. It is critical the fuels industry is well represented on the Jet Zero Council. Sound government policies and incentives will give industry the confidence needed to invest in delivering SAF to Australia, helping to reach a price point that will make large-scale adoption possible. Policy could support the broad use of SAF in Australia, provided it: • is technology-neutral – allowing all solutions which can contribute to reduction goals • is lifecycle-based – examining potential environmental benefits at all phases of fuel production and use • is market-based – leveraging market mechanisms like carbon credit trading • is flexible – to allow for developments in science and technology • provides an adequate carbon pricing mechanism – high enough and certain enough to support investment.	ExxonMobil Australia

*confidential submission

OFFICIAL: SENSITIVE

AAUS noted the importance of an ecosystem wide approach, not just aircraft (airspace and airport efficiency). Emerging aviation (drones,	Australian Association for
s45	
Improving Aircraft Operational Efficiency • Implementation of a modernised air traffic management system • Collaboration between industry and air safety authorities on efficiency, technology, accessibility and integration • Investment in low-carbon and renewable energy solutions as the manufacturing sector develops. Transitioning to Renewable Energy • Development of an Australian SAF industry • Government intervention to establish a sustainable and ethical SAF supply lines, including renewable and sustainable fuels, green hydrogen and renewable energy • Establishment of an Australian Jet Zero Council Utilising Advanced Technologies • Ensuring access to affordable and reliable renewable energy • Providing policy incentives for the electrification of aviation • Use of hydrogen to develop and scale SAF • Exploring the use of hydrogen as an energy carrier onboard aircraft. Full lifecycle assessments of emissions and non-CO2 emissions	

*confidential submission

OFFICIAL: SENSITIVE

Aviation has to play its part in net zero, SAF is the key emissions reduction measure. Airports need representation on the Jet Zero Council. Airports have an important role in the increased use of recycled/recovered materials in pavements, more energy and water efficient airport building and equipment and with on-site energy generation and storage. Given the alternative aviation fuels (hydrogen, electric, etc) are early in development, airports role in emissions reduction should be a priority.	Australian Airports Association
The AFAP supports the initiatives and positions of the International Federation of Airline Pilots' Association (IFALPA) related to aviation based emissions reduction including: • Intermediate goals to assure timely development and implementation • Safety as the overriding principle • Government support to facilitate transition within the set timeframe, especially SAFs • Adoption of international agreed aspirational goals into State Action Plans and legislation.	Australian Federation of Air Pilots (AFAP)
The ALAEA recommends future aviation policy: • recognises and supports Australia's research and manufacturing ability to be at the forefront of technological advancement in aviation to achieve net zero aviation whilst placing emphasis on CASA to work with the industry to achieve the policy goal. • acknowledge and reflect the social dimension of the transition towards sustainable aviation, to ensure the reskilling and upskilling of workers in the new technologies required for net zero aviation.	Australian Licenced Aircraft Engineers (ALAEA)
Melbourne Airport encourages consideration of an overall aspiration for SAF given existing commitments from airlines and the Jet Zero Council. It also suggests the benefits of SAF should be balanced against the practical costs and risks for the aviation sector. The bigger challenge is catalysing the Australian supply chain for SAF and incentivising its adoption, exploring the right policy mechanisms to encourage supply. Industry investment should be considered.	Melbourne Airport
Moorabbin Airport suggests the Government: recognise one size fits all policy solutions for aviation results in suboptimal outcomes, policy should specifically consider GA; create an industry knowledge hub to identify and distribute technology initiatives for GA businesses, metropolitan airports and the community; create a sustainability scorecard for metropolitan airports tracking airport sustainability; policy that supports identifying industry best airport design and infrastructure solutions for sustainable outcomes; adopt Circuit Booking Systems at training airports as a standard airspace management procedure (this initiative has reduced aircraft wait times for circuit training, airspace access to near zero and saving tens of thousands of litres of avgas at Moorabbin). Seeking policy change to support regulators to remain ahead of technology: certification of new aircraft and alternate fuels, inclusion of next gen sustainable aircraft in syllabus at all levels, increased recognition of training elements in simulators, and electric aircraft operations.	Moorabbin Airport

*confidential submission

Neste encourages use of biofuel mandates to decarbonise existing aircraft fleets without needing to change existing fuel infrastructure or aircraft powerplants. Encourage use of internationally recognised certification programmes e.g. EU's Renewable Energy Directive (EU-RED) and the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA). It is critical to have the right policy frameworks including obligations, mandates and/or incentives to increase production and availability and eventually reduce costs. Local production should be part of the long-term strategy. Without the right policies and incentives, local production capabilities to feed SAF into Australia within the next three to five years is unlikely.	Neste Asia Pacific
NSW Government recommends a whole of ecosystem approach to secure opportunities, e.g.: consistent and verifiable feedstock sources and the infrastructure to produce and transport feedstock are sustainable economically and environmentally; regulatory settings account for two-way traffic implications for international long-haul flights subject to SAF targets set by other jurisdictions. Climate change should be explicitly addressed in the ToRs, with the impact of natural disasters on critical infrastructure and role of drones/other assets in detection, surveillance and response efforts during and post natural disasters.	NSW Government
Perth Airport suggests adoption of SAF is a matter for airlines, airports will play a crucial role in providing appropriate infrastructure for the transition.	Perth Airport
Qantas suggests that building a domestic SAF industry is a significant opportunity for jobs and economic growth. Achieving these objectives will require partnership between government and industry, relying on the implementation of supportive policy settings and sector-wide initiatives, as seen overseas. Australia is lagging internationally and needs to move quickly. Zero emission technology like electric aircraft or green hydrogen are still a long way off. Qantas considered the four key levers of emissions reduction to be: technology-based efficiency gains from improvements in engine and aircraft technology (e.g. fleet modernisation, hydrogen/electric planes); operational efficiencies (e.g. flight path optimisation, air traffic management); deployment of SAF; and economic or market-based measures (i.e. carbon offsetting).	Qantas
The United Fire Fighters Union of Australia (UFUA) notes that the Western Sydney Aerodrome, when operational, must meet several environmental parameters, including net zero carbon emissions, and that to date, consultation with the Aviation Rescue Fire Fighters (ARFFS) has not occurred. They also note that technology is currently in its infancy and that any achievement towards the Airservices net zero goal is likely only achievable through emissions offsets.	United Fire Fighters Union of Australia (UFUA)

*confidential submission

s45

red tape without affecting standards, and improving financial benefits for organisations to remain in Australia is key to supporting manufacturing.	Association of Australia (RAAA)
Proposals: Research, development and seed capital for new opportunities and technologies. Funding for mass adoption at pace of sustainable and emerging technologies. Industry wide adoption of more sustainable technology and practices will need government incentives to encourage mass adoption, especially in smaller capacity aircraft, which in turn, will ultimately reduce the maintenance and replacement costs of new technologies.	Regional Development Australia, Darling Downs and South West Inc
The government should focus and prioritise investment in existing and proposed advanced manufacturing hubs that have strong links to the aviation industry, such as around Western Sydney Airport and in Melbourne. Advanced manufacturing and assembly processes, particularly for smaller and uncrewed aircraft, also present new opportunities for local advanced manufacturing. Emerging opportunities in drone delivery and advanced air mobility continue to be worth monitoring and supporting.	Business Council of Australia
Air NZ strongly encourages utilising technologies to improve the passenger experience and introduce efficiencies where possible. Take into account air cargo in responding to significant growth in forecast demand and address the acceleration and adoption of air cargo technology, safety and security.	Air New Zealand

*confidential submission

s45

GAAN suggests the review and support of better regulations and practices for the design, certification, manufacture and export of aeronautical products. The global nature of the aviation industry demands Australian-designed and made products are fully harmonised with those of intended markets. Additionally, targeted programs to support the development and early adoption of aviation technologies, so Australia's skilled workforce and organisations can participate globally in opportunities offered by new technology.	General Aviation Advisory Network (GAAN)
AAus call for the Government to recognise Drones/RPAS/AAM will continue to grow in number, size, and operational complexity. According to AAus, they are on track to be the largest sector of aviation, in time, contributing the same (if not more) triple bottom line value as the commercial aviation passenger and freight transport industry today. AAus called for pro-active industry engagement, strategic policy and planning to address a lack of vision, objectives and roadmap across Government. Policy should be whole-of-government, nationally coordinated and include more frequent industry engagement to keep up with innovation. AAus noted the importance of reviewing bilateral and international agreements (bi-directional type acceptance, validation of licenses, tariffs, trade controls etc) to enable Australian export opportunities.	Australian Association for Uncrewed Systems (AAus)
Proposals: • Crewed and uncrewed electric aviation will require access to specialist infrastructure and renewable energy, planning for this cannot occur in isolation and airports and vertiports construction will need to incorporate these. • Collaboration between universities and industry to develop new technologies and techniques • A coordinated and nationally consistent regulatory framework	Boeing Australia

*confidential submission

The AAA has indicated support for the rollout of OneSky and makes the following recommendations: • Ensuring CASA, Geoscience Australia, Airservices and the Department are resourced to implement the Satellite Based Augmentation System (SBAS). • The Infrastructure and Transport Ministers' Meeting (ITMM) endorse development of a regulatory regime to support the safe deployment of AAM systems in Australian skies The development of new National Airports Safeguarding Framework (NASF) guidelines on vertiports to provide guidance to all levels of government to plan the safe introduction and development for AAM take-off and landing infrastructure.	Australian Airports Association
Anticipated technology needs should not distract from current technology needs. There is too much focus on UAVs in CASA to the detriment of near-term issues, such as the reform to fatigue rules, cabin air quality and the long-term health effects, Airservices workforce planning. AFAP does not believe that automation (AI) will supersede the safety provided by well-trained pilots.	Australian Federation of Air Pilots (AFAP)
The ALAEA considers the Commonwealth has a direct interest in fostering investments in research and development and smart manufacturing. Future aviation policy should contain provisions for additional Commonwealth investment in aviation research and development and manufacturing. Policy needs to reflect CASA's role in the oversight and approval of new technologies and manufacturing and ensure that adequate resources (in both funds and expertise) are available to support the investment. CASA should take an active role in the safe growth of the industry. The ALAEA recommends future aviation policy recognises and supports Australia's research and manufacturing ability to be at the forefront of technological advancement in aviation to achieve net zero aviation, whilst placing emphasis on CASA to work with the industry to achieve the policy goal.	Australian Licenced Aircraft Engineers (ALAEA)
Aviation in the next ten years and beyond must include collaboration, investment and support from Government and other stakeholders such as Airports. For example including provisions for an increase of clean energy (*ground handling*) equipment in future planning. To achieve global goals Menzies believes sustainable procurement and supplier selection should be a key area of focus for governments and airports.	Menzies

*confidential submission

Moorabbin Airport suggests schools, universities and training organisations should be required to include aviation sustainability in their curriculums to better inform the next generation. Government funding for aviation training programs and Visa requirements should preference sustainable aviation organisations. Suggested airspace policy proposals: - Mandatory requirement for aircraft transponders in controlled airspace. - 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. - Protect and expand existing off airport training areas to allow next generation aircraft to conduct advanced training elements over non-built up areas. Next generation aircraft take up will be led in metropolitan airport settings, given they are the highest GA clusters in the state and 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 public safety areas (PSAs) for new fuel type storage; and a roadmap to inform investment decisions for GA. Airports are investing and designing infrastructure under 20-year master plans. Policy needs to cover: runway, taxiway and apron requirements; electric battery performance capability and its impact on land use planning and airport design; fuel storage and surrounding protection zones; clarity on airport's ability to recover infrastructure investments when technology and aircraft types in common use change; upgrade Airservices' technical capabilities; remote active surveillance of flight training operations by CASA and ASA; and Master Plan requirements to include more comprehensive sustainability requirements.	Moorabbin Airport

*confidential submission

OFFICIAL: SENSITIVE

NSW Government suggests a whole of system vision is needed to encompass on-ground and in-air infrastructure and services connected to industry, R&D and technology priorities including manufacturing, SAF and robotics. The regulatory framework must be attractive and enabling to companies and R&D. Encourage explicit inclusion of drones in the ToRs and integrated view of the future aviation sector from a technology development and operations perspective incorporating smaller UAS or drones to larger scale capabilities e.g. eVTOLs and eCTOL for cargo and passengers. There is a need to develop integrated regulatory and operating systems allowing for safe use of airspace, particularly with the introduction of drones. The role of R&D should be explicitly included in the ToR (recognise the strength of Australian expertise and contain measures to attract R&D investment, partnerships and companies to Australia). Proposals: support research translation and commercialisation, and attract and build SME engagement in R&D. Test infrastructure for drones and the interface between drones and other craft. Proposal: Support establishment of critical testing and demonstration infrastructure and seed funding 'sandbox' proof of concept (POC) and Positioning and Orientation System (POS) trials would attract investment. Consider the significant economic implications of enabling autonomous drone use in civilian air space in metropolitan, regional and remote areas. The ToR should address the cost and price point impacts on a range of industries (e.g. long-haul road and rail transport, ports) and implications for forward investment decisions.	NSW Government
Western Australia recommends the ToR are expanded to include freight users and those reliant on aviation in the supply chain, and to reflect Australia's commitment to building local manufacturing capability.	WA Government
The UFUA noted that changing technologies, in particular future aviation fuel technology, will impact Aviation Rescue Fire Fighting Service (ARFFS) operations and service delivery, which until now, has been singularly focused on traditional aircraft design and their use of hydrocarbon fuels.	United Fire Fighters Union of Australia (UFUA)
Qantas suggests consideration of further economic and other incentives for new fleet technology (e.g. investment allowances and improved accelerated depreciation concessions). Challenges are presented in terms of airspace design, infrastructure planning and safety. A nationally harmonised airspace accounting for new airspace users will be required. Faster and more seamless border clearance of passengers and cargo is a key focus for the industry (e.g. increased uptake of biometric processing). Consider how to encourage the uptake of space-based technologies.	Qantas
The RFACA suggests the regulator and its government are not keeping pace with new technology, with rules replacing the planning, leading, organising and coordinating of aviation. Proposals: discussion on the fuel/power infrastructure for city and regional airports; understanding of changes from flight technology advances that will support GA as an alternative means of general transport to rail, road and regional airlines; and activity to ensure future pilot licence standards will blend with the new technology.	Royal Federation of Aero Clubs of Australia (RFACA)

*confidential submission

s45

particularly GA, at leased federal airports. Master Plan (MP) and Major Development Plan (MDP) processes need to be scrutinised to ensure they comply with this intent. Also concerned about the influence of anti-noise activists close to major airports and their impact on flight path planning. RAAA would like Government support of Airservices Australia's *Community engagement standard* on future flightpath planning. Do not support curfews, movement caps, or any legislation to reduce efficiency of airport operations.	Association of Australia (RAAA)
The ACT Government urges careful consideration of noise sharing issues, as Canberra is mostly protected from airport noise and should continue to be. The lack of curfew at Canberra Airport is a critical advantage, benefits of major transport infrastructure should be prioritised and receive thorough consideration in residential development decision making.	ACT Government
The Government should confirm its regulatory provisions for airports remain fit for purpose and assess what regulatory burden is being placed on Australia's airports. This should reflect the modern aviation industry and aircraft, taking into consideration reduced noise profiles of modern aircraft. The curfew free operation of Western Sydney Airport remains of paramount importance. The BCA do not support introduction of new operational restrictions such as a curfew or movement restrictions on Brisbane Airport following from the opening of the new runway in 2020. The BCA support reform of how movement restrictions imposed at Sydney Airport are operationalised and the development of a third runway at Melbourne Airport.	Business Council of Australia (BCA)
IPA argues that airport development and planning should be undertaken in a way to optimise existing and future land uses, noise and environmental impacts, and ensure curfews and other restrictions are avoided. IPA recommends the strategic importance of proposed projects such as the third runway for Melbourne Airport be included in the Aviation White Paper.	Infrastructure Partnerships Australia

*confidential submission

OFFICIAL: SENSITIVE

Canberra Airport is a strong advocate for a review of the current MDP threshold limits and consider the ToRs should include consideration of changes required to reduce the complexity and cost of MDPs for proponents. Canberra Airport continues to be concerned about the time lost and the costs incurred as a result of the lengthy and complex interactions between the two environment protection acts (the *Airports Act 1996* and the *Environment Protection and Biodiversity Conservation Act 1999)*.	Canberra Airport
BFPCA suggests amending the ToR to include airport, drone and air taxi flight path design, development planning processes and consultation mechanisms that effectively consider the: impact of aircraft noise and other aviation related pollution on local communities, and expectations regarding the responsibilities of airport, drone, air taxi, airline and aircraft operators to obtain and maintain a social licence to operate. The Alliance also seeks stronger and evidence-based consideration of the impacts of aircraft noise and other pollution on mental and physical health, and the role of strong regulation to achieve net aircraft noise pollution reductions. BFPCA emphasises the need for standard criteria across all capital and regional airports on the specification and adoption of curfews, movement caps, and airport capacity declarations as provided for under the *Airports Act 1996*, Section 195. The adoption of international best practice and genuine community engagement processes and impact reporting by independent experts across jurisdictions on planned and ongoing airport operations is also suggested.	Brisbane Flight Path Community Alliance (BFPCA)
The East Melbourne Group notes discontent with the Aircraft Noise Ombudsman as lacking powers to change decisions.	East Melbourne Group
ABAA argues the current curfew regulations are no longer fit-for-purpose and fail to consider a range of newer, more efficient aircraft generate less overall noise impact than that of previous generations of aircraft. ABAA recommends the airport noise and curfew	Australian Business Aviation Association

s45

*confidential submission

OFFICIAL: SENSITIVE

BAC supports work with government on improving community engagement and investigating noise mitigation options, and also wishes to co-develop with government frameworks that lead to greater transparency in airport operations/planning decisions and innovation in noise mitigation. BAC advocates for better mechanisms to coordinate transport infrastructure across all three levels of government, particularly ground transport and interactions off-airport. Without integrated planning, significant issues in planning on and off airport can arise, stifling growth, employment and future prosperity. BAC also calls for amending legislation to simplify obligations and expectation on airport operators in terms of the provision/integration of aviation security, and for allowing flexibility in legislation to allow for innovation.	Brisbane Airport Corporation (BAC)
AAus noted support for industry in effective engagement with community on noise concerns.	Australian Association for Uncrewed Systems (AAus)
The ANO observed complainants to the ANO often express confusion when trying to find out who is responsible for regulating aircraft noise and anger at what appears to be a general lack of regulation. The ANO considers: - The ANEF is inadequate – it should be updated and improved. ANEFs are of three types – short-range (5-20 year); +20-year traffic (commonly used for MP's) and Ultimate Practical Capacity. - Flight paths in MPs and MDPs are subject to varying degrees of community engagement and input. - A prominent aspect of the complaints about Brisbane's new runway were from residents who bought in areas previously unaffected by aircraft noise complaining that they received no notice of the future impact when they bought their residence. - In the EU and US, levies are charged to fund the adoption of newer, quieter models of aircraft, and insultation and noise abatement respectively. In Australia there was a Noise Amelioration Program for the 3rd KSA runway funded by a levy on aircraft landing at Sydney. - The Airports Act requirements for community engagement are passive methods of public exposure and fail to engage communities. The highly technical information in MPs and MDPs covering numerous aspects of airport development besides aircraft noise are extremely difficult for members of the public to assess. - The International Association for Public Participation (IAP2) provides a framework for best practice in community engagement, the Public Participation Spectrum (the Spectrum)	Aircraft Noise Ombudsman (ANO)

*confidential submission

OFFICIAL: SENSITIVE

A wider discussion of airport development planning processes should take place in the AWP, and include: • Consideration of increasing the size of the Major Development Plan threshold at Federally-leased airport • Improving airspace safeguarding regulations – including bringing forward the adoption of the NASF and its guidelines ahead of the 2027 target and add airport representation to NASAG • Streamlining interactions between the *Airports Act 1996* and the *Environmental Protection and Biodiversity Conservation Act 1999* which have complex interactions which are expensive and timely for airports to manage. Additionally, the AAA considers the Australian Government has a critical role in maintaining airports as infrastructure while managing community expectations with regards to noise. The gap between community expectation, government and industry response presents a challenge to the social license of the aviation industry to 2050.	Australian Airports Association (AAA)
Melbourne Airport recommends two further principles to the ToR: • Ensure roles and responsibilities relating to aircraft noise are clearly defined for all parties engaged in facilitating airspace structure, flight path design and flight operations. This should include consultation, engagement and community support mechanisms and objectives. • Promote a more strategic policy framework around development planning, as the current framework hasn't been reformed in more than 25 years. Modernising and streamlining planning requirements for development projects that have minimal community or stakeholder impact should be prioritised. Review of the current MDP threshold should also be considered.	Melbourne Airport
AFAP believes the ToR should include that aircraft operational safety is necessary. The failure to reform airport planning processes has caused a degradation of airports as key national infrastructure: • lack of coordination between levels of government • flawed adoption of national airport safeguarding frameworks • grandfathering of safety standards • unchecked non-aviation use of airport land • flawed airspace protection regulations • lack of transparency in airport master development plan consultation processes, and • inconsistency on applying safety standards and pursuing land use initiatives. AFAP supports establishing a public, independent inquiry to address these issues and achieve policy goals. AFAP has become concerned that Airservices is inappropriately prioritising politics related to aircraft noise over that of the legislated priority of the safety of air navigation. Community backlash against noise has led to compromised safety standards – examples given are increasing crosswind limitations at Sydney, and increased tailwind limits in Brisbane beyond international safety standards.	Australian Federation of Air Pilots (AFAP)

*confidential submission

s45

[REDACTED]

community of the aviation sector, along with an acknowledgement that there will always be an impact on some parts of the community from aviation operations. Review of the current MDP process by raising the current financial trigger and reducing the consultation process for projects with no impact on aircraft noise or flight paths should be considered under the ToR.	
The UFUA is concerned about the ongoing provision of Water Rescue Services by ARFFS, particularly at regional aerodromes. They recommend that where possible, and to mitigate aircraft noise, aircraft movements are encouraged to occur over bodies of water.	United Fire Fighters Union of Australia (UFUA)
Qantas suggests appropriate and transparent consultation on airport development as it relates to significant investment in infrastructure and long-term planning. Too often noise concerns and mitigations result in inefficient flight paths and operating procedures that result in higher fuel burn. Consider the role of newer aircraft in reducing noise, and Government should consider how to incentivise the industry to invest in quieter and cleaner aircraft (including a noise dividend). There continues to be untapped benefits of Required Navigation Performance arrivals for noise outcomes with flight paths over non-populated areas. A comprehensive review of the Sydney Basin flight paths would deliver significant operational benefits, improve fuel efficiency and reduce related emissions. Periodic updates of regulations for permitted critical overnight freighter operations to reflect modern aircraft. Consideration should be given to the transitional arrangements for moving freight operations to Western Sydney Airport.	Qantas
RAWSA suggests incorporating policy accountabilities e.g. defined, quantifiable and enforceable parameters to reflect real impacts on affected natural environments and communities. The accountabilities must be robust enough to be publicly reportable performance measures. Incorporate meaningful engagement and consultation processes that treat affected communities as genuine stakeholders. Integrate environmental and community focused outcomes that do not exist in the Flight Path Design Principles document or National Aviation Safeguarding Framework. Review processes resulting in inaccurate Environmental Impact Statements. Support the true independence of the Aviation Noise Ombudsman by removing roles and functions from Airservices and transferring the responsibilities to the office of the Commonwealth Ombudsman administration.	Residents Against Western Sydney Airport (RAWSA)

s45

[REDACTED]

*confidential submission

s45

fuels could leave regional airports without fuel for the local aviation industry.	(RAAA)
Air NZ suggests the number of portfolio responsibilities for the aviation sector results in a piece meal approach, making it challenging to run an airline in Australia and difficult to plan for the future with inconsistent policy outcomes. Proposal: More streamlined, long-term approach to aviation policy, through a comprehensive and coherent framework that improves aviation governance and industry consultation.	Air New Zealand
BFPCA suggests adding the provision of addressing climate change and lack of social licence to the ToR. In addition, eliminating regulator capture through transparent and credible regulatory oversight that addresses a wider set of contemporary issues than the current focus on operation safety and operational efficiency. BFPCA also suggests encapsulating review and amendment of current legislative and regulatory frameworks pertaining to the design, development and operation of airports, drone and air taxis, and aircraft to achieve a standard suite of requirements. This could include curfews and flight movement caps applicable to all capital city and regional airports that prioritise safety, as well as minimisation of environmental and community impact, ahead of operator efficiency and profitability.	Brisbane Flight Path Community Alliance (BFPCA)
ABAA recommends a review of the GAAN's *A New Strategy for the Australian General Aviation Sector* be undertaken.	Australian Business Aviation Association (ABAA)
Government should implement a strategic workforce development plan for aviation, centred on an aviation engineering centre of excellence, whose role would be to analyse workforce development needs, map existing skills within industry and identify gaps in knowledge. This would also have a role collaborating with the aviation industry to identify supply chains that service the industry. The Aviation Engineering Centre of Excellence (AECE) would be a central training infrastructure body, providing state of the art facilities, to design and integrate nationally recognised qualifications, skills pathways and training products.	Australian Manufacturing Workers' Union (AMWU)

*confidential submission

s45

Proposal: policy that ensures the operation of these airports is subject to the independent scrutiny of the ACCC. In addition, a wide-ranging, independent review of the Airports Act and the master planning approval process applicable to metropolitan secondary airports. Proposal: monitor the economic health of the GA sector and its contribution to the national economy through ongoing economic statistical studies and review.	
AAus called for recognition of the vital importance of GA and value to Commonwealth, recognise the development and growth requirements and opportunities to provide a sustainable and vibrant aviation industry, support to modernise, and cross aviation sector opportunities.	Australian Association for Uncrewed Systems (AAus)
The AAA notes the same issues faces the sector as at the previous AWP, notability, tensions between aeronautical and non-aeronautical development at airports, access to airspace, ageing GA fleet and safety compliance. A solution should be developed by Government but must not come at the expense of the ability of federally leased airports meeting their obligations.	Australian Airports Association
A structured career path for pilots. Airlines are not carefully managing and planning retirement and after years of not recruiting are now recruiting heavily. GA operators are being impacted by reduced pilot supply. Attempts to attract overseas pilots via Visa programs do not work and are bad for the industry. The solution is a more structured career path and training pipeline for pilots: Proposal: Government establish a tripartite body to oversee the pilot training pipeline. This body should be made up of representatives from the AFAP, the Regional Aviation Association of Australia (RAAA) as the peak body for GA and regional operators, and Government.	Australian Federation of Air Pilots (AFAP)
The ALAEA recommends future aviation policy supports the regeneration of the general aviation sector by assigning a responsible Commonwealth department to plan, implement and oversee improvements in training, licencing and the regulatory framework.	Australian Licenced Aircraft Engineers (ALAEA)

*confidential submission

OFFICIAL: SENSITIVE

Moorabbin Airport suggests policy should recognise GA includes a large number of small businesses and may lack experience in understanding: business planning and commercial processes; key touchpoints for safety, planning and collaborative forums; and the true cost of providing and maintaining airport network infrastructure and supporting services and fair pricing to recover these costs. Regulator and stakeholder input is necessary in greater data sharing of basic GA industry KPIs and greater involvement in community forums. Red tape minimisation: reviewing the need for Aviation Security Identification Cards (ASICs) at metro and regional airports; exclusion of metro airports from ACCC monitoring; reduced hurdles on international supply chains; and certification of roles within small business.	Moorabbin Airport
Perth Airport notes capacity is a major challenge for major airports. GA has grown significantly at Perth Airport with airlines servicing the resources sector, increasingly upgrading to larger aircraft but still wishing to operate from the GA area.	Perth Airport

s45

6. Future industry workforce skills and training requirements	
The NT Government suggests Australia needs to continuously invest and develop aviation related vocational education and training, including availability of financial assistance for these courses. Collaboration between the Australian Government and industry will help understand the areas facing, or forecast to face, the most severe skill shortage to optimise initiatives.	NT Government
Ensuring adequate resourcing at key government agencies now and into the future, along with a demonstrated training pipeline to replace an ageing workforce will be critical to maximising the efficiency and safety of air travel in Australia into the future.	Virgin Australia
Future industry workforce skills and training requirements should be a major focus in the AWP. Engineering shortages are critical, and answers are needed now. A national approach to streamline engineering training is needed. Rewrite engineer training to bring in all the states that manage trade courses. A national aviation academy would bring all training under one system managed by the states.	Regional Aviation Association of Australia (RAAA)
The ACT Government recommends anticipating the future workforce required to support growth of the industry and investment in training pathways required to transition the industry to more sustainable models of aviation and to meet future demand. This includes the VET sector and opportunities for government, the aviation industry and employer co-investment in training and skills development of the workforce.	ACT Government
There should be engagement with the Migration Review process underway to ensure that where needed, there is ability to access overseas talent on a basis attractive to prospective employees (e.g. temporary visas having longer terms with the ability to transition to permanency).	Business Council of Australia

*confidential submission

OFFICIAL: SENSITIVE

The ASU notes aviation industry employers have relied on aggressive industrial relations to reduce job security, pay and conditions for the workforce. Employers have also attempted to replace long-term permanent staff with employees of low-wage subsidiaries or outsourcing work to labour hire or ground handling contractors. ASU members wish to see secure jobs, good wages and conditions, safe workplaces and a commitment to investment in training and career development. The Government needs to urgently intervene and regulate labour hire and supply chain behaviour in the aviation industry by establishing a Safe and Secure Skies Commission and a Fair Jobs Code for aviation workers. There is urgent need for structural reform as airlines continue to post large profits whilst hindering unions and their workforce from achieving reasonable wages and conditions.	Australian Services Union (ASU)
s45	
GAAN considers ineffective training pathways for aircraft maintenance personnel as the highest priority. GAAN members are concerned about continued failure of agencies to achieve alignment between course requirements of the Australian Skills Quality Authority (ASQA) and required qualifications for licensing by CASA. Non-alignment of CASA's requirements with the US FAA means highly experienced maintenance personnel are denied CASA recognition. Proposal: streamline pathways for aviation maintenance personnel to gain initial and continuing training and education.	General Aviation Advisory Network (GAAN)
AMWU suggests Government should implement a strategic workforce development plan for aviation, centred on an aviation engineering centre of excellence, whose role would be to analyse workforce development needs, map existing skills within industry and identify gaps in knowledge. This would also have a role collaborating with the aviation industry to identify supply chains that service the industry. The Aviation Engineering Centre of Excellence (AECE) would be a central training infrastructure body, providing state of the art facilities, to design and integrate nationally recognised qualifications, skills pathways and training products.	Australian Manufacturing Workers' Union (AMWU)

*confidential submission

The FAAA notes that pandemic support required no obligation for airlines to ensure the retention of Australian based jobs. Post-pandemic, the cabin crew industry has experienced further offshoring of cabin crew work and stalling of career progression as long term experienced and skilled crew are passed over for senior roles which go to offshore or labour hire workers, who are cheaper and generally less skilled/experienced. Company based training, casualisation, targeted redundancies, work intensity, inflexible rostering systems and the airlines restrictive *Flexible Workplace Agreement* practices continue to have a negative and disproportionate impact on women in the industry. Experienced crew are leaving the industry, creating a skills gap. Proposals: explore training being recognised as service; consider cabin crew training and award pay rates; include recommendations regarding casualisation and outsourcing; and consider issues of gender equity and rostering.	Flight Attendants' Association of Australia (FAAA)
AAus identified a need to start provisioning for future workforce requirements now e.g., vertiports, remote operators, ground crew, LAMEs, etc. recognising the changing needs. AAus also noted the need for greater diversity and inclusion; an early workforce training and licensing approach that builds resilience in workforce, is aligned to future needs and creates attractive and rewarding career paths; universities to be more responsive to the changing skill needs of industry; and the alignment of the ASQA qualification and regulatory licensing frameworks.	Australian Association for Uncrewed Systems (AAus)
Boeing has noted skills shortages: • National Skills Commissions highlighted skills shortages in the aviation industry (engineers, maintenance personnel, air crew, ground crew). • Boeing anticipates increased demand for pilots, cabin crew, engineers, technicians, ground support and air traffic control (ATC) in the medium term. • There will be additional demand for technicians in the defence sector which current pathways are not expected to meet, which risks Australian Defence Force (ADF) capability. Boeing recommends: • regions be empowered to provide skills and qualifications routes • consideration of development of specific policy to ensure a sustainable pipeline of workers from both skilled migration and through the education and skills system. • training colleges be developed to create programs which train future technologies to ensure workers are future ready.	Boeing Australia

*confidential submission

The aviation industry has suffered a skill drain as a result of the pandemic. While Government invested heavily to support airlines retain workers, this wasn't reflected in the airports sector and the skills base has suffered, especially in safety and security roles. Skilled migration is unlikely to address the issue due to ASIC requirements. Consider development of legible airport career pathways, increased First Nations participation and improved female participation to address gaps. Proposals: • Commission an inquiry into airport specific skills needs • Ensure aviation is a specific industry skills cluster as part of any Government reform to vocational education and training. • Improve the skills and expertise of aviation regulators (Airservices, CASA, Home Affairs, Infrastructure) to allow them meet the current and emerging regulator challenges facing the sector.	Australian Airports Association
The AFAP suggests the Government adopt a policy to train and retain our own skilled aviation workforce and support this policy with viable and well-funded pilot training programs. Proposal: Government adopt a policy to develop and establish a program similar to the Bonded Medical Program (BMP) to address the shortages in regional, rural and remote areas of Australia for pilots. The program would need to address: • Pilots operating in the program would gain debt relief from the VET Fee Help • the pilot complete at least 12 months of employment service with an approved operator in the program, • Operators in the program would need to meet entry and review requirements. The AFAP believes a professional development program is necessary to prepare pilots for technological advancements and changes in the aviation industry. Government to support the program which consists of technical and non-technical workshops, virtual simulator scenarios, and mentoring/coaching	Australian Federation of Air Pilots (AFAP)

*confidential submission

OFFICIAL: SENSITIVE

With an average age of 52, the number of Australian Licenced Aircraft Maintenance Engineers (LAMEs) moving towards retirement in the next decade will be sizeable. However, a failure to adequately train sufficient replacement apprentices over the past 30 years, combined with the closure of multiple major maintenance facilities has created a skills shortage. The timeframe to properly train an engineer will take around 8 – 10 years.	Australian Licenced Aircraft Engineers (ALAEA)
The importance of a "just transition" to a net zero aviation sector is paramount. No worker should be left behind and future aviation policy should reflect these principles and enable the reskilling and upskilling of the existing workforce to the new technologies required to achieve net zero aviation.	
Currently, the aviation maintenance sector training requirements are bludgeoned with regulatory and interdepartmental inertia. There is no Commonwealth minister who takes responsibility when there are conflicts and issues across the multitude of departments and states.	

- CASA sets the "standard" for civilian licenced aircraft maintenance engineer training in safety regulation. (DITRDCA Portfolio)
- Defence sets the standards for defence maintenance training under the Department of Defence portfolio.
- The vocational training package is "developed" by an Industry skills body, overseen by the Australian Skills Quality Authority (ASQA) (DEWR Portfolio)
- Skilled migration and associated standards are covered by Immigration, Citizenship and Multicultural Affairs.
- The individual states are responsible for the end training product, including the funding and regulation of the training organisations and apprenticeships.

Proposals:

- recognise the potential export market for aviation training products and support the industry to maximise trade returns and augment visitor growth.
- recognise that aviation is a Commonwealth responsibility and assign a responsible department and minister to oversee and fund aviation training standards and connect interdepartmental silos.
- embed the importance of introducing new workers into the industry to address the shrinking and aging workforce by ensuring secure work principles are adopted by airlines and airports, and by supporting aviation apprenticeships.
- acknowledge and reflect the social dimension of the transition towards sustainable aviation, to ensure the reskilling and upskilling of workers in the new technologies required for net zero aviation.

s45

*confidential submission

OFFICIAL: SENSITIVE

Melbourne Airport would welcome the promotion of critically in demand aviation roles remaining a priority on the National Skills List and for the new Jobs and Skills Australia agency. Attracting and retaining skills across the airport precinct will be particularly important for Melbourne Airport over the next five year, with a pipeline of infrastructure projects to be implemented.	Melbourne Airport
Moorabbin Airport suggests greater encouragement and accessibility for young people to join the aviation sector by: developing pathways and promoting aviation in schools; reducing complex loan structures (streamline VET to remove delay in payments to cash-flow dependent schools); reviewing training syllabus; greater use of simulators; removing complexity of maintenance training (LAME qualifications are restrictive and non-transferable outside aviation or internationally); reducing costs and providing incentives for manufacturers and schools to adopt sustainable aircraft and systems; making airspace accessible (improved sharing of airspace not currently available to GA); and improving alignment of regulations to international standards where possible.	Moorabbin Airport
NUW suggests the involvement of the university sector is essential to support and regenerate Australia's aviation sector and future proof the industry. Aviation teaching and research programs will be critical to driving refocusing of aviation within the broader economy to meet emerging opportunities and challenges.	NUW Alliance
The UFUA noted decisions by Airservices during COVID has placed continued staffing and resourcing pressure on ARFFS. They also shared concerns around revised internal parameters for industry reporting requirements set by Airservices which don't accurately share the extent of understaffing and its impact on service provision. The UFUA advised that extensive recruiting, including by direct and lateral intakes, of new Aviation Rescue Fire Fighters, is urgently needed, and greater investment is required to address a regression in many areas of ARFFS skills development. They also note that the ARFFS training grounds around Australia are contaminated by Per- and Polyfluorinated Substances (PFAS) and Total Petroleum Hydrocarbon (TPH) groups of chemicals, and that remediation undertaken has not eliminated or sufficiently reduced the risk to workers and local communities.	United Fire Fighters Union of Australia (UFUA)
Qantas notes the pandemic accelerated digitalisation, big data and the migration to online services. Meeting fast-growing demand for these roles in the sector will depend on attracting and retaining skilled professionals. Encourage the expansion of funding for training for training allowances for employers to train and upskill the industry. Investment by industry needs to accompany appropriate settings for skilled migration. Recommend continuing the Women in Aviation Industry Initiative until 2026, scholarships for female students to support certification through pilot training programs, scholarships for female students to support studies and formal qualifications in aviation related disciplines, and a coordinated approach to aviation engineering apprenticeship programs.	Qantas

s45

7. Appropriate consumer protections and access to services

*confidential submission

Despite the large spike in contacts in 2020 due to the pandemic, contacts were also trending up in the years prior to 2020, and have been trending up since travel restrictions and lockdowns were lifted. The ACCC considers there needs to be greater incentives for airlines to invest in their customer service and dispute resolution processes. With respect to external dispute resolution, the ACCC considers a new system is clearly required in the airline industry. External dispute resolution is an essential escalation pathway for consumers. The Airline Consumer Advocate is generally ineffective in this role.	ACCC
CHOICE's research found there are a number of key problems in the aviation sector including: consumers being unaware of the consumer protections available to them and finding it hard to obtain information on their rights to receive a remedy, rights and remedies available to consumers are inconsistent and often unsatisfactory, consumers lack protection when companies become insolvent. Issues with redeeming credits. Proposal: implement minimum consumer protections that make it easier for consumers to receive a refund, mandate minimum requirements for travel vouchers/ credits, introduce a mandatory industry code of practice, establish a new travel and tourism industry ombudsman and mandate information standards providing key information to consumers at point of purchase	CHOICE and Consumers' Federation of Australia
The Queensland Consumers Association (QCA) does not support the stated aim of promoting "an efficient, safe, sustainable and competitive Australian aviation sector". It is far too industry focused and fails to recognise the importance of fairness as an aim and that it cannot be guaranteed to result from the achievement of the present aims. QCA considers the term "consumer protection" does not sufficiently indicate the importance of, and need for, consumer empowerment. Proposals: • The Airline Consumer Advocate be replaced with a free, mandatory, independent, ombudsman scheme to handle unresolved customer complaints and with power to make binding determinations. • Australian based airlines (and ideally all airlines operating within and out of Australia) be required to comply with legislated consumer protections when flights are cancelled or delayed due to reasons within the airline's control. • An inquiry be undertaken into airline charges for services such as for minor changes to bookings. • On time performance and cancellation information be published for routes currently excluded from the published reports.	Queensland Consumers Association
The AAA do not support the findings of the ACCC seeking to increase its role in the regulation of airports, pointing to Productivity Commission (PC) reports 'which concluded the market power of airports is balanced by the countervailing power of airlines'. They further note the work of airports in exceeding disability standards, and opportunities for the sector to improve the passenger experience and to further improve accessibility. Proposals: • matters relating to economic regulation of airports continue to rest with the PC and its 5-year reviews. • the AWP acknowledge the existing role of the ACCC in monitoring of airports, which would help the ACCC focus on "long-term oversight of airline competition, pricing of airfares and other consumer matters"	Australian Airports Association

*confidential submission

OFFICIAL: SENSITIVE

The AFAP identifies current delays and cancellations are partially a product of worker shortages – including pilot shortages. • A large part of the solution is in establishing the correct number of pilots employed and ensuring stable and sustainable rosters. Working pilots beyond reasonable hours will increase fatigue and sick leave and result in increased delays, cancellations and reductions in safety margins.	Australian Federation of Air Pilots (AFAP)
s45 continue to sit with the Productivity Commission's 5-year review.	
Perth Airport suggests consideration of how the Government can take account of requirements of passengers with special needs when drafting or formalising regulations around the operations of airports. E.g. recent major changes to security screening regulations have had a significant impact on some passengers such as breast cancer survivors.	Perth Airport
The UFUA notes the aviation industry has had to navigate unprecedented ARFFS service provision changes which has resulted in a substantial increase in the use of 'Notice to Air Men' (NOTAM), which can impact aircraft movements in preparation of flight plans and nomination of appropriately serviced contingency aerodromes. Proposal: Adoption of the gender-neutral term 'Notice to Air Missions'.	United Fire Fighters Union of Australia (UFUA)
Consumer protection: Qantas recommends considering support and consumer guarantees that already exist in legislation and are offered by airlines; incentives for airlines to minimise cancellation and delays; the cost, network and service consequences of adopting a compensation model for consumers on delays and cancellations. Access to services: Qantas recommends considering existing forums for engaging with people with a disability to better understand their experiences and concerns; end to end processing relating to wheelchair assistance and the carriage of mobility aids; the cost, network and services consequences of recommended changes; the role of airports in ensuring a more seamless experience; and developing a uniform national approach to the accreditation and carriage of service dogs.	Qantas

*confidential submission

s45

8. Maintaining fit for purpose aviation safety, air navigation and aviation security systems and service delivery agencies	
CASA and Airservices suffer from resource shortages, delaying service delivery and downgrading airspace. Regional aviation cannot afford greater costs to maintain these agencies. Funding should be managed nationally, including airport security. Passengers on Sydney to Melbourne benefit from safe and secure regional aviation and should pay for it.	Regional Aviation Association of Australia (RAAA)
Recent regulatory changes from CASA (the MOS 139 reforms) have added significant compliance costs to airports, while Airservices' consolidation of the air traffic management system has disrupted and degraded the capacity of the network to operate at its full capacity. In aviation security, the rapid evolution and broadening of responses to security threats in recent years from a 'traditional' counter-terrorism lens to one increasingly made up of cybersecurity and 'all hazards' threats and staff shortages, both within the regulator and in the security staffing environment, has placed increased pressure on all elements of the system. Canberra Airport is concerned about the suggestion that Airservices is considering including a community engagement function in respect of operational changes occurring out of hours at curfew free airports. They believe the scope and role of Airservices in such circumstances should be included as part of the overall review of the function of the organisation.	Canberra Airport
The ABAA argues CASA and Airservices Australia "are failing to meet the demand of the aviation community". ABAA recommends a review to examine their ability to manage future regulatory and airspace management demands. ABAA proposes a staged national funding model to bolster capabilities and support the development and maintenance of technologies, skills and resources needed in future. • In relation to CASA, ABAA encourages the agency to engage further with the general and business aviation sector in the design and application of future regulation and encourages cooperative regulation principles in the surveillance of current regulations. ABAA notes the GA sector is "suffering under the burden of protracted response times, inconsistent guidance material and a lack of knowledgeable support and timely surveillance". • In relation to Airservices Australia, ABAA supports initiatives to continue to improve air traffic management and advocates for more ADS-B fitment and ground stations, continued removal of outdated navaids, funding of additional controllers, policy improvements to enable the approval of direct tracking for aircraft whose performance enables them to fly at higher levels, thereby improving operational fuel efficiency.	Australian Business Aviation Association (ABAA)

*confidential submission

OFFICIAL: SENSITIVE

Brisbane Airport Corporation supports a review of the aviation functions of all federal agencies to ensure they are requisitely delivering a calibre of service appropriate to the prominence of aviation in Australia to ensure agencies remain fit for purpose and are based on global best practice and continuous improvement. BAC calls for better coordination of resources, policy and planning/implementation to address increasingly complex issues and a single dedicated and sufficiently resourced aviation authority with capability to address aviation matters to ensure aviation perspectives are coordinated and embedded within whole of government decision making. Better accountability and transparency in decision making should be monitored at key agencies to have a better view of fairness with which government approaches the industry and builds confidence in public administration.	Brisbane Airport Corporation (BAC)
The GAAN suggests CASA's staff resourcing, skills and service standard must continue to be prioritised for improvement, with requirements for demonstrated outcomes and substantial improvement in its engagement with the GA sector. In addition, technological advances, including the emergence of Advanced Air Mobility, demand review and ongoing attention to ensure the interests of operational safety, efficiency, national security and equity of access to airspace resources for all Australians are maintained.	General Aviation Advisory Network (GAAN)
AAus views this ToR as a priority. Part 101 of the Civil Aviation Safety Regulations (CASR) shows how influential this is, enabling the Australian RPAS industry to be world leading, but competitive edge has now been eroded as regulatory framework and oversight no longer meeting industry needs. It is the single greatest inhibitor to industry advancement. AAus believe appropriate resourcing to modernise and meet growing industry needs is critical for timely services and quality of services. As crewed aircraft become the minority, there will be a need to balance access, but not constrain the growth of aviation industry by perpetuating old and inefficient concepts and technologies. Proposal: a national airspace operational concept, roadmap and plans that provision for a far more complex and heavily utilised airspace than today.	Australian Association for Uncrewed Systems (AAus)
Melbourne Airport recommends focus on the need for more strategic partnership in the approach between service delivery agencies and airports, particularly in relation to treating and mitigating ongoing security risks through compliance and enforcement. Collaboration and partnering ahead of implementing stringent regulatory requirements are fundamental. Airports seek minimal disruption to passengers, requiring significant planning and collaboration with Government service delivery agencies.	Melbourne Airport

*confidential submission

OFFICIAL: SENSITIVE

Boeing recommends the following: • Government develop a comprehensive vision and roadmap for aviation, in consultation with industry, as a matter of priority to provide a consistent view of the aviation ecosystem, and outline how this vision will continue to meet safety, sustainability, capacity and social expectations, outline the challenges and how they will be met. • A regulatory ecosystem that fosters innovation and prioritises safety, efficiency and sustainability, noting the aerospace industry is undergoing significant transformation • Additional resourcing for CASA to keep pace with the rapidly growing demand for regulatory services • Critical infrastructure (ATM, communication, navigation, surveillance, airports) must evolve to meet new challenges, including net zero • The current siloed approach to investment (OneSky, FIMS, Drone Detection Network, etc) is not sustainable. • Regulation would benefit from government and industry data sharing • International regulations be aligned for manufacturers, flight skills and maintenance service providers. • Industry engagement will be essential to Government implementing this ecosystem. • Significant and ongoing reform will be required to ensure the safe and timely realisation of emerging technologies. • Additional resourcing for regulatory services (including Airservices Australia) to design and field longer-term infrastructure to integrate new users. • A technology integration plan that ensures coordinated and industry investment in critical digital enablers. • A data-sharing blueprint, developed by Government in association with industry, to take advantage of a digital and well-connected industry, particularly for safety data sharing. • Continued Government advocacy for international regulatory alignment, especially in the context of allowing leadership in emerging sectors. • Adoption of a whole-of-government, national approach to policy development, co-developed with meaningful industry engagement. • Government review the current industry engagement framework to ensure more proactive and substantive consultation.	Boeing Australia
The broad regulatory, service delivery and security frameworks have been in place for decades, the pandemic has exposed weaknesses in these structures. CASA MOS 139 reforms have added significant additional compliance for airports, and Airservices' consolidation of Air Traffic Management (ATM) has degraded its capacity. Emerging technologies threaten to disrupt existing funding models (fuel excise). Security Threats are evolving to a cybersecurity and 'all hazards' approach at the same time as upgrades to aviation security infrastructure and service delivery. There are challenges to attract and retain staff with the right mix of skills and abilities. The AAA recommends the level and composition of funding for bodies regulating the sector (Airservices Australia, CASA, Home Affairs, Infrastructure) be examined to ensure staff with the necessary skills and expertise to meet the current demands of capital and operational investment cycles and emerging regulatory challenges from new aviation technology.	Australian Airports Association

*confidential submission

OFFICIAL: SENSITIVE

Airservices: The AFAP believes Airservices is not operating in a manner fit for purpose. Of concern is that Airservices has reduced their workforce resources to the point that many services are simply not being provided on an alarming number of occasions. Proposal: Government adopt a policy to better align Airservices conduct to the service needs of the aviation community, including more stringent means of accountability and transparency. CASA: The AFAP recommends several reforms to CASA, its structure, and governance, as well as associated regulations, including the need for better governance and accountability, adequate resourcing for the regulator, appropriate composition of the CASA Board and Aviation Safety Advisory Panel, and genuine outcomes-based regulations. Proposal: Government adopt policies to conclude the inquiry into the GA industry and adequately resource the regulator to respond and implement certain reform requirements. Aviation Security: To reduce delays and inefficiencies caused by current passenger security processing. Proposal: An expedited crew access system for aircrew members based on their trusted status as known individuals Australian Transport Safety Bureau: Regarding investigations, AFAP believe there needs to be a focus upon the systemic aspects involved in safety events. The use of MOUs between Government aviation agencies does help for better inter-agency coordination. The ATSB appears reluctant to criticise or even mention concern of the influence of the other Government agencies upon safety events and occurrences. Proposal: Revision of the MOUs between the Government aviation agencies with an aim to ensure all relevant facts are presented, including where potential conflict exists between agencies. The Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA): DITRDCA is crucial in delivering policy goals. Given that so many of the 2009 White Paper policy goals remain unactioned, partially completed or in some circumstances, the issue has worsened, AFAP suggest that there needs to be a greater degree of accountability and responsibility for actions placed upon the Department by elected office holders. Proposal: Government review and enhance aviation related expertise and resources in the Department with a view to being able to effectively deliver on the other aviation White Paper policy goals. There is a widespread view that there is an insufficient level of expertise within the Department.	Australian Federation of Air Pilots (AFAP)
The UFUA recommend an ARFFS service is re-established at all registered aerodromes to bring Australia into line with international standards, and service delivery agencies responsible for aviation safety and associated services should be under greater scrutiny and supervision from the Department.	United Fire Fighters Union of Australia (UFUA)

*confidential submission

OFFICIAL: SENSITIVE

Air safety: Qantas suggests industry needs to continue collaborating on safety issues of common interest. Advancements in technology will require extensive consultation between government and industry. This should seek to leverage existing consultation arrangements. Air navigation: Qantas considers CASA and Airservices should minimise any modification to global standards for airspace classification and procedures to subjectively account for Australian conditions. Consider the opportunity to improve safety outcomes through remodelling the designation of airspace where surveillance exists through Automatic Dependent Surveillance-Broadcast (ADS-B) and/or Secondary Surveillance Radar. Consider ways to transition to an airspace model dependent on ADS-B. Recommend monitoring the OneSky program to ensure it remains on budget and schedule, delivering the promised benefits. Reinvigorate the program to build capability of digital control towers, including the necessary updates to the Civil Aviation Safety Regulations. Aviation security: Qantas notes that where regional airports do not have sufficient demand to cover their running costs, the cessation of the Regional Airport Screening Infrastructure program will result in a significant increase in charges and market distortion if the screened air services continues to include the 40-seat threshold. Consider introducing a standard definition of a 'mandated security charge' and greater transparency. Consider options to work towards 'one-stop security' arrangements with equivalency of security measures at the point of origin on a country, airport or aircraft operator basis.	Qantas
s45	
works at strategic community aerodromes, extension beyond Round 9 will be important for the NT. International attraction to regional airports: important to retain air services agreements that support the dispersal of aviation routes to less mainstream cities (e.g. Darwin). Cabotage can provide flexibility in the event a non-Australian airline wishes to operate an unserved domestic route as a consecutive-cabotage.	
The RDA proposes Government provide ongoing funding to regional airport operators to ensure the ongoing availability of these valuable infrastructure resources.	Regional Development Australia (RDA) Darling Downs and South West Inc
The ASU suggests regional aviation needs federal funding into council-owned airports and aerodromes to ensure ongoing viability.	Australian Services Union (ASU)

*confidential submission

OFFICIAL: SENSITIVE

GAAN suggests local governments charged with the stewardship of regional airports do not have the financial capacity to cover recurrent costs of maintaining airports, or contribute capital that would support the growth of aviation industries at the airports. This has resulted in the Government stepping in with grants and programs ad-hoc. Proposal: a forward-looking innovative approach to revitalise the nation's regional airports, to ensure a sustainable model is deployed across the country to protect and grow regional economies.	General Aviation Advisory Network (GAAN)
s45	
The ABAA encourages the expansion of scope of the AWP ToR to recognise that whilst airlines and airports play an important role in supporting regional economics, so too do other users at regional airports.	Australian Business Aviation Association (ABAA)
Regional airports play vital roles in sustaining regional economies and communities by: • enabling access to specialist health, education, commercial and recreational facilities and maintain social connections • facilitating domestic and international tourism, which is a significant economic driver for many economic communities • supporting efficient development of Australia's natural resources, through Fly-In/Fly-Out workers • providing lifesaving services (medical evacuation, firefighting, search and rescue). Airports have been experiencing challenges in keeping up with maintenance cost which has been exacerbated by the pandemic, and coincided with the ending of the Regional Airports Program (RAP) and Remote Airstrip Upgrade Programs (RAUP). The AAA recommends Government: • reinstate RAP and RAUP in the short term • in the medium term, replace these with an ongoing 'Regional Aviation Infrastructure Fund' to provide certainty of funding • establish a mid-size airport grant funding program to recognise the diverse range of ownership models and activity levels at mid-sized airports can restrict them from accessing existing programs or access long-term capital for investment.	Australian Airports Association (AAA)
The shift towards a more commercially focused model creates challenges for both airlines and airports in supporting regional economies, leaving many regional airports reliant on government welfare interventions. Regional airports are typically owned and operated by local shire councils, which struggle to maintain ageing infrastructure and attract skilled personnel. • The AFAP recommends future aviation policy recognise the pressures on local governments, coordinate government efforts more effectively, and address the lack of specialised skills through DITRDCA • The AFAP suggests the lack of certain specialised skills in some aerodrome occupational categories should be addressed by transferring these responsibilities from airport operators into the DITRDCA.	Australian Federation of Air Pilots (AFAP)
s45	

*confidential submission

OFFICIAL: SENSITIVE

Melbourne Airport suggests consideration of any major domestic and international gateway needing to balance the access for regional air services against the significant economic impact that flights operated by larger aircraft can potentially deliver to the broader economy.	Melbourne Airport
An opportunity exists for Williamtown Special Activation Precinct as a gateway for emerging defence and aerospace industry which will support economic development and job creation in regional NSW.	NUW Alliance
Perth Airport notes that most regional airports run at a significant operating financial loss each year, usually carried by the broader community through increased rates where the airport is run by local government. The economics of regional aviation to ensure regional airports can generate a return sufficient to provide for the ongoing maintenance and operations of the airport should be addressed, as well as the need to invest in future capacity where required.	Perth Airport
The Western Australian Local Government Association (WALGA) recommends the White Paper consider the long-term sustainability of regional airstrips managed by Local Governments, including funding, maintenance, expansion and operation; and the sustainability, affordability, frequency and reach of regional air services for the social and economic wellbeing of local communities.	Western Australian Local Government Association (WALGA)
The WA Government supports inclusion of the role of airlines and airports in supporting regional economies, and recommends this ToR is expanded to better address aviation policy settings to regional and international prosperity, including regional airfares, freight and supply chain logistics. The WA Government also recommends the ToR specifically reflect: • Affordability of air services as a key factor contributing to the liveability of regional Australia - Access to affordable airfares is central to the liveability of our regional towns. Regional air services help reduce isolation, are essential to health services, and key in supporting growth, economic development and job creation in the regions. • Fit for purpose airport infrastructure and access to air services that meet the needs of remote communities in Australia - These are critical to the liveability of many remote communities across Australia. Air services are the only reliable means of transport for remote communities when road access is cut during the tropical wet season and in times of emergency.	WA Government
Qantas notes that the cost of regional operations on a per seat kilometre basis is ~50 per cent higher than mainline domestic operations and ~125 per cent higher than international operations. Consider the impact of any proposal in its review on the cost, network and service consequences for regional Australia and proposals emerging from this ToR. A domestic SAF industry would further accelerate job growth potential, particularly in regional communities.	Qantas

*confidential submission

OFFICIAL: SENSITIVE

RDA AFK note the social and economic importance of remote Australian airports, particularly in an island setting, cannot be underestimated. Remote airports require a Commonwealth program to subsidise airlines to provide minimum public transport service levels. The ownership and operation of Kangaroo Island (Kingscote) Airport incurs a significant deficit to the Kangaroo Island Council, with concerns about the lack of funding options for future airport maintenance upgrades, including to facilitate larger aircraft. The Council and industry stakeholders are concerned about the sustainability of airport operations through COVID-19 recovery. Proposals: relaunch funding programs for regional airports and remote airstrips, full government funding for Remote Airstrip Upgrade Program and Regional Airports Program, and deliver a program to drive greenhouse gas emission reductions at airports.	Regional Development Australia – Adelaide Hills, Fleurieu and Kangaroo Island (RDA AFK
s45	
s45	
costs. Evaluate the feasibility of: • A tiered passenger volume eligibility mechanism to recognise medium sized airports, and link to sliding scale subsidy. • Cap the SSC and subsidise excess costs, or • Supply all Australian Government mandated safety and security hardware. Passenger Movement Charge (PMC): PMC is a fixed rate and impact to international departures from Darwin is larger due to lower airfare components. Proposal: Australian Government review the PMC structure for a variable matrix, e.g. UK's 'Air Passenger Duty' matrix where quantum of fees is determined with reference to distance and cabin class of travel. Recommends transparency in disbursement of PMC revenues to help industries understand PMC's contribution to deliverable goals.	

*confidential submission

OFFICIAL: SENSITIVE

Competitiveness Australian airports are monopoly assets and face a lack of competition and regulation. There is a significant concentration of ownership among leased federal airports. Proposal: amend the *Airport Regulations 1997* and implement existing independent expert recommendations on reform (e.g. ACCC and Future of Aviation Reference Panel). *Efficiency* Lack of transparency in negotiations between airports and airlines, creating disputes. Airports continue to reject proposals to increase transparency. Proposals: Building Block Model (BBM) to ensure efficient pricing, efficiency of capital and operational expenditure, and appropriate quality of services (ICAO provides guidance on BBM for setting airport user charges). Expand reporting requirements for monitored airports. Implement the ACCC recommendation to improve the operation of Airport Pricing Principles in commercial negotiations. Implement an efficient mechanism for independent dispute resolution. Prescribe a voluntary aviation industry code of conduct. Improve the interface the sector has with Government under a more coherent policy framework. Airlines and airports struggling with the increased expenditure due to the Government's enhanced security screening measures. COVID-19 era Government support programs helped. Proposal: ongoing support for security upgrades, develop a framework for accountability and transparency in security charging practices across the aviation industry. Proposal: Streamline the Trans-Tasman travel experience, more 'domestic-like'.	Airlines for Australia and New Zealand (A4ANZ)
Competition The domestic airline industry is at a critical point from a competition perspective. The Government should consider policy measures to further assist in the promotion of new competition. This includes implementing reforms to the operation of the demand management scheme at Sydney Airport, most relevantly with respect to the way that take-off and landing slots are allocated to airlines. Removing restrictions on air cabotage could potentially promote competition on some domestic routes. Major airports in Australian have significant market power, particularly in the provision of aeronautical services, because they do not face much, if any, competition from other airports. A further direction to the ACCC to monitor domestic air services would help deter airlines from engaging in anti-competitive behaviour and inform the government about the state of competition in the industry.	ACCC

*confidential submission

Private investment in airports To continue aviation's positive impact on the community and economic activity of the Canberra region, alignment of local, regional and national policy settings will support Canberra Airport to expand its aviation network and enabling transport systems, including roads. *Freight and critical transport links* Realise the freight potential of Canberra Airport as a 24-hour curfew free international transport hub. Continued and coordinated investment in the road networks surrounding the airport will enable efficient movement of goods, increase access to markets and enable private sector investment in supply chain and logistics infrastructure. *Sydney Airport slot reform* The cap of 80 movements per hour at Sydney Airport restricts aviation movement beyond available infrastructure. Review the historic precedence to retain slots. This prevents access of new entrants to the market, or for any airline without historic precedence to obtain sufficient access for viable operations.	ACT Government
Freight and Regional development The White Paper should explore long term demand in both freight and passenger segments, and the aviation system as a whole, to ensure the national network operates efficiently. There would be value in examining the network of regional airports and developing a ten-year regional airport capacity plan that links to regional economic development capacity. *Access to capital* The Government should review and potentially revise any barriers to the access of capital in the aviation industry. This includes foreign ownership restrictions currently in place for some parts of the industry. *Competitive tax and regulatory settings* International tax reform being led by the OECD could fundamentally change the tax settings for Australian aviation. Other charges, such as the Passenger Movement Charge, are levied on passengers departing Australia. Its flat fee design and high cost internationally serve as a deterrent to price sensitive travellers. The Government should consider how these charges impact the attractiveness of Australia as a destination. *Efficient management of people and freight* The Business Council has been a consistent advocate for streamlining and modernising our trading system by simplifying and digitising processes, reducing touch points that trading businesses need to interact with, and ensuring the smoothest possible movement of people in and out of the country, without compromising on security. The work of the Simplified Trade System Taskforce is essential in this regard and the Business Council wishes to see this work prioritised.	Business Council of Australia

*confidential submission

OFFICIAL: SENSITIVE

Freight IPA recommends the Aviation White Paper develop Australia's long-term vision of the importance and performance of airfreight and supply chains to lift productivity, increase efficiency and expand export opportunities. IPA recommends drawing upon the existing research on freight and supply chains that evaluate Australia's performance against agreed national urban freight planning principles as well as work IPA is intending to release later in 2023. *Airport caps and curfews* IPA calls for a review of the suitability of airport caps and curfews, noting technology has advanced, demand has grown and expectations of passengers and other airport users have evolved.	Infrastructure Partnerships Australia
Regional Approach (NZ and Pacific) Air New Zealand notes the importance of taking a regional aviation approach to the White Paper given the interdependency of the Australian, New Zealand and Pacific aviation systems through passenger movements, airport linkages, fuel security, strategic interests and a shared commitment to decarbonisation. The regional aviation sector is interdependent, e.g. capacity constraints at Australia's key hub airports impact the broader Pacific and NZ network, as there is no opportunity to hold departures when travel sectors are faster due to weather, requiring destination airports to invest, construct and provide additional capacity to accommodate early arrivals from Australia's hub airports. *Efficiency and competitiveness* Air NZ suggests the way airports are regulated has allowed them to prioritise economic return for shareholders over planning for and investment in critical airport infrastructure. Airports are not required to account for strategic national policy considerations. A more regionally focussed strategic approach to airport planning processes would help realise the considerable productivity benefits of an efficient air network.	Air New Zealand
Airfreight Canberra Airport believes airfreight and ground handling services should be included in the Terms of Reference. *Ground handling services* This is a crucial piece of operational activity at airports which can significantly affect service viability and efficiency and as such is worth of consideration under the White Paper. *Bilateral agreements* Canberra Airport suggests bilateral arrangements should be included in the Terms of Reference.	Canberra Airport
Economic regulation of the airports and airlines commercial relationship BARA suggests needs to be a form of arbitration available (separate to the courts) to intervene and set parameters on what is 'reasonable' when parties cannot agree. The current regulatory regime has resulted in negotiations that favour the major monitored airports.	Board of Airline Representatives of Australia (BARA)

*confidential submission

Regulatory independence The BFPCA suggests legislative and regulatory overhaul of the *Airservices Act 1995* to achieve true regulatory independence and eliminate actual, possible or perceived regulatory/state capture.	Brisbane Flight Path Community Alliance (BFPCA)
Community impacts East Melbourne Group suggests the ToRs need to be broadened to recognise that the aviation industry needs to embrace the social licence to operate, including amelioration of human impacts of the industry. The ToRs are skewed to economic benefits of aviation without balancing community impacts in the industry's operation. Consider how the industry should address and minimise health risks on communities under commercial aircraft flight paths. East Melbourne Group is also seeking the inclusion of best practice decision making processes, including review processes.	East Melbourne Group
Legislative review Review the *Civil Aviation Act* to ensure it remains fit for purpose as the legislative backbone of industry regulation.	General Aviation Advisory Network (GAAN)
Future pandemics and border control BAC strongly calls for greater consistency and clarity in advice and policy settings on border openings, vaccination and quarantine in preparation for future international health emergencies. *Capital investment in airports* As above in "Aviation's role in economic development", BAC calls for "the right regulatory framework in place to attract capital, meet market demand and provide investment certainty for the long term". *Reduction of red tape* Improve efficacy of regulation and reduce burden by moving to more risk-based regulatory approaches across the industry. This can balance the need to maintain regulatory oversight by allowing effective investment.	Brisbane Airport Corporation (BAC)

*confidential submission

OFFICIAL: SENSITIVE

Airline retailing Airline retailing technology is evolving rapidly and the role of intermediaries in the travel sector should be considered as a contributing factor to Australia's tourism and aviation development. *Integration into transport system* IATA suggests greater integration with other transport modes, such as rail and road, to enable more efficient journeys and remove overall emissions. *Efficiency and competitiveness* IATA stresses the importance of covering the economic regulation of airports. A fit for purpose regulatory framework will ensure airports are operated efficiently to deliver the required level of service and airlines can remain competitive. *Freight* IATA suggests air cargo should have its own section given its significance in ensuring continuity of supply chains. Covering elements such as the acceleration and adoption of air cargo technology, the digitisation of processes, and to address security and safety that includes the carriage of dangerous goods.	International Air Transport Association (IATA)
Fatigue regulations The FAAA notes longer flight duration is likely to increase in future (e.g. non-stop New York/Sydney) and managing cabin crew fatigue is already evidenced by a lack of regulation, inadequate application of airline fatigue risk management standards, work intensification, downward pressure on wages, loss of critical industry skill and experience, casualisation and outsourcing. Creation of regulated fatigue s45	Flight Attendant's Association of Australia (FAAA)

*confidential submission

The AAA bring attention to the following significant issues: • The role of Government in aviation, particularly the 'extensive and often overlapping regulatory environment' and recommends the Department examines the role of Government and its role in improving the long-term viability of the sector. • The AAA recommends examining how to best integrate air freight into policy/planning investment into airports and the broader national freight transport network • The effects of climate change on airport operations from sea level rise and increased extreme weather events • How recommendations of the *Defence Strategic Review* may affect airfields in northern Australia. • How Australia's aviation sector can support capability building in the regions • The potential for climate change-related protests and security threats to aviation's social license (such as flight shaming through to the blocking of terminals or aircraft) • Consideration should be given to Australia's negotiating stance for ICAO's Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) to ensure our access to the global aviation network is not impeded. Legislative Reform – there is a need for re-assessment of the efficacy of the *Airports Act 1996*, particularly the ability of airports to exercise their option for early lease renewal.	Australian Airports Association (AAA)
Legislation reform Melbourne Airport suggests supporting more dialogue around medium-term reform, particularly a wholesale assessment of the efficacy of the *Airports Act 1996* and associated regulations. E.g. drafting of the Head Lease and the *Airports Act 1996* is more than 25 years old and does not reflect the practical challenges that have emerged since the pandemic.	Melbourne Airport
• *Airport role clarity:* Clear definition of the roles and functions of metropolitan, secondary and regional airports, as well as the airport services and infrastructure specific to those roles. • *Airport planning and development:* Strengthen the requirements for offsite development building activity and regulatory change to allow cost recovery or outsource for airports, as the present system for airports to process controlled activity applications is unsustainable, costly and time consuming. • *Transport network integration:* network infrastructure improvements on airport to off airport, public transport creation, Fly Friendly programmes, suburban rail loop. • *Head leases:* amended to allow immediate exercise of option terms to provide investment certainty for airports and customers. • Clear direction on ex-gratia land tax and council rates. • *PFAS resolution:* provide clear pathway and timelines. • Centralised information sharing and reporting for hazards and risks faced by the sector. • Greater support for financial debt management for operators and airports.	Moorabbin Airport

*confidential submission

OFFICIAL: SENSITIVE

Economic regulation of airports Perth Airport considers economic regulation is adequately covered through periodic reviews by the Productivity Commission. Stricter forms of airport economic regulation are largely about a transfer of money away from airports to airlines while increasing the riskiness of investments in airport infrastructure. It also opens the way for 'regulatory gaming' by airlines, potentially distorting airport investment towards airlines with the resources to effectively lobby for outcomes that serve their interests over rival airlines. Perth Airport urges prevention of some airlines and industry bodies attempting to turn the White Paper process into another review of economic regulation of airports. *Environmental regulations* Consider the lack of timeliness, transparency and consistency in environmental approvals applied to airport projects because they are located on Federal land. The MDP process is both lengthy and costly. Consideration must be given to ensuring environmental requirements remain consistent over that process and are not subjected to changed interpretations as the airport works through the approvals process. Proposal: timelines for departmental responses should also be inserted within the *Environmental Protection and Biodiversity Conservation Act 1999* with 'deemed approval' clauses.	Perth Airport
Airport regulation Qantas believes airport regulatory reform should be its own ToR, with detailed consideration given to the policy options that may assist the efficient and timely resolution of commercial disputes in this part of the sector. The current regulatory regime provides no constraint on monopoly behaviour or providing incentives to lower costs or improve quality. Cross ownership between major airports continues to increase. Aeronautical pricing principles were drafted but have never been formally enshrined. Failure to address this will continue to hamper growth opportunities, constrain the establishment of new routes and fail to realise economic opportunities for the broader economy. Proposals: a tailored dispute resolution mechanism, including recourse to independent expert determination; expanding scope of the Airports Regulations to cover each of the leased federal airports that service RPT flights to improve transparency through enhanced ACCC monitoring; amend the Airports Regulations to embed the Aeronautical Pricing Principles; and prescribe a Voluntary Aviation Industry Code of Conduct.	Qantas
Airports and local communities Consideration of the impacts of commercial and retail development within airport estates on surrounding centres and businesses, and the impact this has on the availability of services to surrounding communities. In addition, the impact this type of development can have on surrounding infrastructure (i.e. transport network). *Airport development planning processes* The expansion of the ToR to consider other potential impacts to/from communities including but not limited to commercial/retail development, protected airspace, public safety areas and other matters as reflected within the National Airports Safeguarding Framework.	WA Government

*confidential submission

The UFUA shared concerns about the stewardship of Airservices Executive Leadership and the negative influence industry and economics have on safety. The UFUA "encourage the introduction of a 'Safe and Secure Skies' Division of the Fair Work Commission to independently oversee and scrutinise the entire aviation industry and ensures a workable balance between safety and profit."	United Fire Fighters Union of Australia (UFUA)
Airport tenure	Royal Federation of Aero

s45

*confidential submission

MS23-003315

![Australian Coat of Arms] **Australian Government** **Department of Infrastructure, Transport,** **Regional Development, Communications and the Arts**	s47C

To: The Hon Catherine King MP, Minister for Infrastructure, Transport, Regional Development and Local Government (for information)

Subject: Overview of stakeholder views on Aviation White Paper Terms of Reference and progress of Green Paper development

s47C

Recommendations:

1.   That you **note** stakeholder feedback from the Aviation White Paper roundtable consultations

Noted / **Please Discuss**

s47C

The Hon Catherine King MP   Date: 8·June 23

s47C

Key Points:

Roundtable consultations on the Terms of Reference   s47C

s47C

1.   Following the release of the Aviation White Paper Terms of Reference **(Attachment B)**, the Department undertook stakeholder roundtables and individual consultations in March 2023 across Sydney, Melbourne, Brisbane, Perth, Darwin and virtually. These consultations were attended by 142 individuals from 97 organisations and sought stakeholder views on issues and priority actions out to 2050.

2.   Attendees represented a cross-section of the aviation sector, including airlines, airports, unions, General Aviation (GA), training organisations, manufacturers, emerging technology developers, state government agencies and community representatives.

s47C

1

MS23-003315

s47C

4. As key feedback, stakeholders:
   a. expect the White Paper to articulate key objectives for the industry as well as intermediate actions to progress towards long-term goals.
   b. are interested in exploring what role Australian industry should play in the global aviation market, including in which areas it should be positioned as a leader.
   c. are engaged in discussion around the transition to net zero and decarbonisation, and are looking to government for clear policy and investment signals to spur action.
   d. called for a more connected, integrated user experience of government and regulation, noting various distinct touchpoints with different agencies and levels of government.
   e. want to see the White Paper address the importance of all parts of the aviation ecosystem, including the role of regional/remote aviation in connecting communities and supporting access to services.

Submissions against the Terms of Reference

5. The Department received 192 submissions on the issues raised in the Terms of Reference. A list of submissions made by organisations is at **Attachment C**, an overview of key themes from all submissions is at **Attachment D** and a summary of 53 submissions made by organisations is at **Attachment E**.

6. Submissions, excluding confidential submissions, are now publicly available on the Department's website.

7. Roughly forty per cent of the submissions come from individuals, many impacted by noise and connected with community groups.

8. Stakeholders frequently raised decarbonisation (47 per cent of submissions) and aircraft noise (44 per cent). More than 70 per cent of the submissions addressing aircraft noise came from the general public.

s47C

Financial impacts: N/A

Legal/Legislative impacts: N/A

OFFICIAL

MS23-003315

Stakeholder Implications: Stakeholders are keen to see how their input will be considered through the Green Paper. Stakeholders have significant interest in post-Green Paper consultation.

Consultation: International Aviation, Technology and Services Division; CASA; Airservices Australia

Media Opportunities: N/A

Attachments:
s47C

Attachment B: Aviation White Paper Terms of Reference
Attachment C: List of submissions against the Terms of Reference made by organisations
s47C

Cleared By: Clarke McNamara
Position: Assistant Secretary
Division: Aviation White Paper & Reform,
Domestic Aviation & Reform Division
Mob: s22(1)(a)(ii)
Cleared Date: 15 May 2023

Contact Officer: s22(1)(a)(ii)
Section: Aviation White Paper Project
Office
Ph: s22(1)(a)(ii)

Instructions for MPS: Nil

Responsible Adviser: s22(1)(a)(ii)

PDMS Distribution List: Jim Betts, Marisa Purvis-Smith, Stephanie Werner, Richard Wood, Jason Dymowski, Clarke McNamara

OFFICIAL

3

MS23-003675

s47C

Australian Government

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

To: The Hon Catherine King MP, Minister for Infrastructure, Transport, Regional Development and Local Government (for information)

Subject: Australian Competition and Consumer Commission's (ACCC) final quarterly report on airline competition in Australia – June 2023

s47C

Recommendation:

1. That you **note** this update on the ACCC's final *Airline competition in Australia* report (at **Attachment A**).

Noted / Please Discuss

The Hon Catherine King MP   Date: 20 June 23

Comments:

Key Points:

1. The ACCC has provided you and the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (the Department) with an advance copy of their 12th quarterly report on prices, costs and profits relating to the supply of domestic air passenger transport services. The Report is under embargo until it is publicly released by the Treasurer on 5 June 2023, and is likely to attract media attention when it is released.

2. Key issues raised in the Report include:

   a. Domestic airfares have fallen significantly in 2023 as demand for travel has eased and the price of jet fuel declined. However, average revenue per passenger and discounted economy airfares remain higher than pre-pandemic levels, even after adjusting for inflation.

   b. Domestic passenger and capacity figures have not managed to reach pre-pandemic levels. 4.6 million passengers flew in April 2023, 92% of April 2019 levels. The Qantas Group reached 101% of its pre-pandemic domestic capacity in April 2023, compared to 96% for Virgin Australia and 85% for Jetstar. Qantas further expects capacity to increase to 108% of pre-pandemic domestic capacity between July– December 2023.

   c. Cancellation and delay rates have worsened in this period with industry performance remaining poor compared to long-term averages. 3.9% of flights were cancelled in

OFFICIAL

MS23-003675

April 2023, compared to the industry long-term average of 2.1%. Jetstar reported notably worse cancellation rates than other airlines.

    d. Performance on routes to and from Sydney continues to be especially poor. In April 2023 the industry cancelled 9.2 % of flights between Sydney and Melbourne, 8.8% of flights between Sydney and Canberra, and 5.7% of flights between Sydney and Brisbane. The airlines have reported that air traffic control staff absences have impacted these figures. As the busiest and most connected hub, delays at Sydney Airport have flow on effects on other routes.

    e. Despite a substantial improvement of on-time performance in January, on-time arrival rates have declined to April, only 71.8% of flights arrived, compared to the industry long-term average of 81.5%.

3. The expansion of Rex and the entry of Bonza have created the opportunity for a more competitive industry. However, both airlines would need to grow significantly to become more meaningful competitors to Qantas Group and Virgin Australia. The ACCC will continue to watch how airlines respond to emerging competition from Rex and Bonza and will investigate where they consider there has been a potential contravention of the competition law.

4. The state of competition in Australia's domestic airline industry remains of concern to the ACCC:

    a. The report indicates that half of all domestic trips in April 2023 took place on routes with 2 competing airlines, and that on each of these routes Regional Express or Virgin Australia were competing with Qantas Group;

    b. Over the last 12 months Australia's 2 largest airline groups, Qantas and Virgin Australia, consistently accounted for 95% of the domestic passenger market. In April 2023 their market share comprised 60.8% and 37.7% respectively.

    c. The report suggests the Australian Government could promote competition by implementing reforms to help new and expanding airlines obtain slots at Sydney Airport.

5. The ACCC holds the view that a lack of effective competition over the last decade has resulted in underwhelming outcomes for consumers in terms of airfares, reliability of services and customer service. Consistent with their submission to the Terms of Reference for the Aviation White Paper, the ACCC has identified a range of options that the Australian Government could consider to incentivise airlines to invest in their customer service. Including:

    a. Introducing a new system for resolving disputes between airlines and consumers. The current industry-based scheme, the Airline Customer Advocate, is considered an ineffective mechanism and could be replaced with a truly independent ombuds scheme with the ability to make binding decisions;

    b. Introducing specific consumer compensation entitlements for delayed or cancelled flights;

    c. Reforming Australian Consumer Law (ACL) to make it a contravention for businesses to fail to provide a remedy for consumer guarantees failures.

6. While the Australian Government's direction to monitor airline competition is expiring, the ACCC will continue to investigate a number of issues that consumers have raised about Qantas, and whether these issues raise concerns under the ACL.

OFFICIAL

7. On 15 March 2023, the ACCC provided a submission in response to the terms of reference for the Australian Government's Aviation White Paper. This included suggestions for legislative and policy changes to promote the level of competition in the domestic airline industry and deliver better outcomes for consumers (see **Attachment B**).

This will be the ACCC's last quarterly report into airline competition in Australia

8. The ACCC has produced this series of monitoring reports on a quarterly basis for 3 years since the June 2020 direction from the former Treasurer. Further advice and background on this issue is included under Additional Information.

9. The ACCC's reporting has covered key drivers impacting competition, airfares, service levels and consumer choice as the industry navigated and emerged from the pandemic; and, it has identified opportunities to stimulate competition, such as improving the slot management scheme at Sydney Airport.

10. The ACCC, now informed through the experience of this direction, will continue to have an active role in watching how airlines compete for and treat consumers and, where necessary, act to ensure compliance with the Competition and Consumer Act 2010 (Cth).

Stakeholder Implications:
The Report's publication is likely to attract media attention in respect of airfare prices, record airline profits and dissatisfaction with current customer service levels. As the last report, it is possible that there will be stakeholders seeking for the monitoring direction to continue.

Consultation: n/a

Attachments:
A - ACCC Airline Competition in Australia – June 2023 - under embargo
B – Aviation White Paper - ACCC submission in response to the terms of reference

Name: Ben Vincent
Position: Assistant Secretary
Division: Domestic Aviation & Reform
Branch: Domestic Policy and Programs
Ph: 02 6274 8281
Mob: s22(1)(a)(ii)
Date: 2 June 2023

Contact Officer: s22(1)(a)(ii)
Section: Domestic Policy & Women in Aviation
Ph: 02 s22(1)(a)(ii)
Mob: s22(1)(a)(ii)

Instructions for MPS: Nil

Responsible Adviser: s22(1)(a)(ii)

PDMS Distribution List: Jim Betts, Marisa Purvis-Smith, Jason Dymowski, Ben Vincent

Additional Information:

ACCC quarterly reporting into airline competition in Australia – background and cessation

- On 19 June 2020, the then Treasurer, the Hon Josh Frydenberg MP, directed the ACCC to monitor domestic air passenger services for a period of three years:

  - The direction came in the wake of Virgin entering voluntary administration (April 2020) as COVID-19 forced border closures and the grounding of air services.

  - The then Treasurer's media release made clear that "ACCC monitoring will assist in protecting competition in the domestic passenger airline market, for the benefit of all Australian airline travellers"

- Until now, the ACCC has published 11 quarterly reports on airline competition in Australia. The last report was published in March 2023, attracting widespread media attention in respect of its analysis of airfare prices and customer service.

- Over that time, the ACCC reporting has been valuable:

  - The ACCC's quarterly reporting cycle has provided Government and the broader community with ongoing insight into competition in the aviation market across the pandemic, at a time when border closures threatened the viability of the sector and many routes were only viable due to the Government's COVID-19 aviation support measures. ACCC scrutiny also helps to deter incumbents from predatory behaviour.

  - The importance of competition for Australian passengers and the broader economy can be seen in airline pricing behaviour on intercity routes where Rex has entered. In March 2022, the ACCC reported that for Melbourne–Sydney, Gold Coast–Melbourne, Gold Coast–Sydney and Adelaide–Melbourne routes, the combined revenue per passenger (a proxy for average price) for Qantas, Jetstar, Virgin and Rex was 25% lower seven weeks after Rex's entry.

- The economic conditions that preceded the then Treasurer's direction have now improved, with COVID-19 restrictions now lifted and demand for travel again strong and the sector settling in to more business as usual dynamics.

- Beyond cessation of these reports in June 2023, the ACCC will continue to monitor prices, costs, profits and quality of domestic aeronautical, car parking and landside access services at Australia's major airports (Sydney – Kingsford Smith, Melbourne – Tullamarine, Brisbane, and Perth). This does not extend to the activities of airlines.

  - Airports may argue that airlines should continue to be subject to ACCC scrutiny, however, it is worth noting that the ACCC has been clear in its view that "the major airports exhibit strong natural monopoly characteristics and therefore face very little competition in the supply of aeronautical services. As recognised by the Productivity Commission, this provides them with strong market power. Based on the ACCC's experience from its regulation across the infrastructure sector, unconstrained monopolies that possess market power will use that power" (Source: ACCC March 2019 submission in response to the Productivity Commission Inquiry into the Economic Regulation of Airports draft inquiry report)

- The Aviation White Paper will be progressed over coming months as well, providing a mechanism for identifying and addressing any policy concerns that may emerge following the conclusion of the ACCC's quarterly reporting into airline competition.
- Should there be signs of anti-competitive conduct in the aviation sector, resulting in inflated airfares, the Treasurer could consider directing the ACCC to resume the reporting arrangements.

MS23-003675

- The Bureau of Infrastructure and Transport Research Economics (BITRE) will continue to publish regular statistics on aviation activity, including on domestic air fares and domestic on-time performance.