



RAAA SUBMISSION

**DEPARTMENT OF INFRASTRUCTURE
AND REGIONAL DEVELOPMENT**

AIRPORT CURFEW ADMINISTRATION ARRANGEMENTS IN AUSTRALIA

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Serving regional aviation, and through it, the people and businesses of regional Australia

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29 April 2016

The Department of Infrastructure
and Regional Development
Aircraft Operations Section
GPO Box 594
CANBERRA ACT 2601

Dear Sir,

RAAA SUBMISSION

Department of Infrastructure and Regional Development Departmental Discussion Paper Airport Curfew Administration Arrangements in Australia

The RAAA is pleased to provide this submission in response to the Department of Infrastructure and Regional Development Departmental discussion paper on airport curfew administration arrangements in Australia.

I. RAAA Background

The RAAA and its Members

The Regional Aviation Association of Australia (RAAA) is a not-for-profit organisation formed in 1980 as the Regional Airlines Association of Australia to protect, represent and promote the combined interests of its regional airline members and regional aviation throughout Australia.

The Association changed its name in July 2001 to the Regional Aviation Association of Australia (RAAA) and widened its charter to include a range of membership, including regional airlines, charter and aerial work operators, and the businesses that support them.

The RAAA has 30 Ordinary Members (AOC holders) and 65 Associate/Affiliate Members. The RAAA's AOC members directly employ over 2,500 Australians, many in regional areas. On an annual basis, the RAAA's AOC members jointly turnover more than \$1.5b, carry well in excess of 2million passengers and move over 23 million kilograms of freight.

RAAA members operate in all States and Territories and include airlines, airports, freight companies, engineering and flight training companies, finance and insurance companies and government entities. Many of RAAA's members operate successful and growing businesses providing employment and economic sustainability within regional and remote areas of Australia.

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RAAA Charter

The RAAA's Charter is to promote a safe and viable regional aviation industry. To meet this goal the RAAA:

- promotes the regional aviation industry and its benefits to Australian transport, tourism and the economy among government and regulatory policy makers;
- lobbies on behalf of the regional aviation industry and its members;
- contributes to government and regulatory authority policy processes and formulation to enable its members to have input into policies and decisions that may affect their businesses;
- encourages high standards of professional conduct by its members; and
- provides a forum for formal and informal professional development and information sharing.

The RAAA provides wide representation for the regional aviation industry by direct lobbying of Ministers and senior officials, through parliamentary submissions, personal contact and by ongoing, active participation in a number of consultative forums.

II. RAAA Response to the Discussion Paper

The Regional Aviation Association of Australia (RAAA) provides the following responses to the discussion paper on airport curfew administration arrangements

3. Administration for current legislative and regulatory controls

3.1 Applications for curfew dispensations

- (a) Would streamlining of dispensation guidelines to improve consistency reduce administration for your business?

Yes.

- (b) Is there other information that would be useful and assist aircraft and airline operators to apply?

No.

- (c) Would applying this criteria to dispensation applications for Adelaide and Essendon Airports to improve consistency reduce administration for your business?

Yes. Knowing the criteria in advance would greatly assist in business planning.

- (d) Would further clarity around 'exceptional circumstances' be useful? How could it be improved?

Yes. Provided the facility to obtain real time verbal dispensations was not replaced. These requests for dispensations need to be available during curfew periods.

- (e) Would online (web-based) forms be a more effective and efficient for submitting applications?

Yes. Provided the facility to obtain real time verbal dispensations was not replaced. In some cases, access to online forms is not always available during curfew periods, therefore telephone access to the hotline becomes critical.

3.2 Permits for domestic passenger jet aircraft movements – Gold Coast

- (f) Are there other factors that should be taken into account in allocating permits/quotas to aircraft and airline operators?

Yes. Permits and quotas should be tested against aircraft noise – similar to Adelaide Airport and the 90/95 rule. Aircraft type and MTOW should not be considered.

- (g) Would guidance on the permit application process be useful?

Yes.

3.3 Applications to operate international passenger aircraft during curfew shoulder period - Adelaide and Sydney

- (h) Are there other factors that should be taken into account in approving applications for international passenger shoulder movements?

The RAAA does not purport to represent International passenger operators at this point.

- (i) Would guidance on this application process be useful?

The RAAA does not purport to represent International passenger operators at this point.

- (j) Would online (web-based) forms be a more effective and efficient for submitting applications?

The RAAA does not purport to represent International passenger operators at this point.

3.4 Monitor and manage compliance with airport curfews

- (k) Are there improvements the Department could make in responding to non-compliance?

No potential improvements have been identified.

- (l) Do you have any suggestions for promoting compliance among aircraft and airline operators?

No potential improvements have been identified.

4. Stakeholder engagement on airport curfew matters

4.1 Airport curfew information provided to stakeholders

- (m) Is currently available airport curfew information useful? How could it be improved?

The RAAA encourages closer working relationships between the Department and the domestic airfreight operators in considering the ongoing relevance of the current (and outdated) limitations of curfews.

4.2 Feedback to airline and freight operators

- (n) Would more feedback on airport curfew matters be useful? How could this be provided?

Feedback to operators is always welcome, however, renewed vigour in receiving feedback from operators would be appreciated.

4.3 Role of stakeholders in promoting awareness

- (o) Do you have any comments on the current level of awareness of airport curfew legislative and regulatory controls and/or administrative arrangements?

The level of awareness is satisfactory.

4.4 Approach to consultation

- (p) Are there other mechanisms that could be used to improve effectiveness and efficiency of consultation processes?

Yes. A more timely review of the legislation as technologies improve and business pressures expand.

5. Opportunities to improve industry productivity

5.1 ICAO noise level standards

- (q) Have current noise standards applied to aircraft movements during the curfew impacted on your business? If so, how?

No. They have been in place for so long now that newer aircraft easily exceed the noise requirements.

5.2 Maximum take-off weights

- (r) Have current maximum take-off weight requirements impacted on your business? If so, how?

Enormously. Industry have invested in modern aircraft that carry significantly increased payload and yet with a smaller noise footprint. The operators of these aircraft are still being penalised by not being able to operate within the curfew periods. Larger aircraft would mean fewer movements which would provide both increased efficiency for the operators, but more importantly a reduction in overall noise levels and number of movements for many city residents.

5.3 Specified aircraft types

- (s) Do current specified aircraft types have a positive or negative impact on your business? If so, how?

A negative impact. There appears to be no scientific correlation between the type of aircraft permitted to operate and the noise level. There is also no scientific correlation between the aircraft MTOW and the noise level.

5.4 Introduction of domestic passenger jet aircraft quota movements

- (t) Would a quota system for domestic passenger jet aircraft at other airports be administratively simpler?

That would depend entirely on the formulae applied to determine the quota. That is, the mix of International/Domestic passenger and freight movements.

- (u) What other changes could be made to the existing restrictions to achieve efficiencies and other productivity benefits?

Simply removing the MTOW and specific aircraft types permitted to operate within the curfew period. A more scientific and objective approach would be to permit aircraft to operate within the curfew period, based entirely on their sound signature.

III. CONCLUSION

The RAAA is grateful for the opportunity to provide our views for the Department of Infrastructure and Regional Development's Discussion Paper on Airport Curfew Administration Arrangements in Australia. If you would like further information about the items contained in this submission, or clarification on any of the points we make, the RAAA would be more than happy to assist.

Regards



Mike Higgins
Chief Executive Officer