



TASMANIA
PREMIER OF TASMANIA

Director, Aviation White Paper Project Office
Aviation White Paper
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
By email: aviationgreenpaper@infrastructure.gov.au

Dear Director

Tasmanian Government Submission to the Aviation Green Paper *Towards 2050*

The Tasmanian Government is pleased to provide the attached submission on the Aviation Green Paper *Towards 2050*

Yours sincerely

A handwritten signature in blue ink that reads "Michael Ferguson".

Michael Ferguson MP
Acting Premier

November 2023

Tasmanian Government

Aviation Green Paper Towards 2050

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Executive Summary

The Tasmanian Government welcomes the development of an Aviation White Paper to set policy direction for the aviation sector out to 2050. We appreciate the opportunity to provide this submission in response to the Green Paper Towards 2050.

Aviation has played a significant role in the development of our Commonwealth, supporting regular and safe movement of people across the country, and internationally, to support economic growth and community well-being. Australia has a well-deserved international reputation for aviation safety.

As an island state, Tasmania has been particularly reliant on the growth of air traffic to support our visitor economy, domestic and international trade and Antarctic Gateway. Over 80 per cent of visitors to Tasmania arrive by air. A competitive market is integral to building capacity, reducing barriers and costs and quality of service.

The growth of international markets is a key trade focus for Tasmania. Direct international services are integral to both the visitor economy and establishing efficient air freight links for high value perishable products. The Tasmanian Government continues to pursue opportunities in new markets and acknowledges the importance of close cooperation between private and public sector parties to achieve this.

Tasmania is a predominantly regional area for aviation services, and its island status, and dispersed population, pose particular challenges in linking communities to services. Aviation has a key role in enabling access for regional and remote communities.

The sustainability of regional and remote aviation is critical, particularly as we transition to a low-carbon future. The ability to maintain levels of service for regional airlines and airports remains a priority. This requires careful consideration by all levels of Government, and private sector interests, as to the best model to employ to ensure the future viability of services and infrastructure.

i. Tasmanian aviation sector - overview

As an island state, Tasmania is particularly reliant on air connections for the movement of people and time-sensitive freight. It is critical to tourism, trade, health, education and training, business and liveability for all Tasmanians.

A strong and competitive domestic aviation market – delivering affordable travel, choice and range of frequency and destination options across the day for Tasmanians and visitors is a key priority of the Tasmanian Government.

Tasmania has four airports on the main island that support regular interstate passenger services. These are Hobart, Launceston, Devonport and Burnie. One of these, Hobart Airport, supports a single direct international service to New Zealand.

The Council-owned airports at Currie on King Island and Whitemark on Flinders Island provide critical infrastructure for these island communities, supporting regular flights to the Tasmanian mainland and Victoria, as well as charter operations, Royal Flying Doctors and search and rescue.

Tasmania's two gateway airports, Hobart and Launceston make a significant economic contribution to the state.

Hobart Airport is Australia's ninth busiest airport and contributes directly and indirectly to the Tasmanian economy by enabling inbound tourism, exporting of Tasmania's outstanding fresh produce, and providing the aviation gateway for Australia and other countries' scientific endeavours in Antarctica and the Southern Ocean. The Airport's 2022 Masterplan forecasts its economic contribution to grow from \$145 million and 1,125 jobs in FY2018 to over \$412 million and 3,500 jobs by FY2042.

Passenger numbers are forecast to grow from 2.7 million in FY 2018 (2.3 million in 2023) to 5.5 million per year by FY 2042. It is critical that the airport develops terminal and ground transport infrastructure to provide the capacity to meet Tasmania's forecast needs.

Similarly, Launceston Airport is a significant economic hub for the north of the state.

As the main aviation hub for Northern Tasmania, Launceston Airport is the second-busiest airport in the state and contributes \$81 million annually to the Northern Tasmania economy with a further \$24 million in flow-on impacts. The airport has a workforce of more than 550 direct and indirect employees.

1.39 million passengers passed through Launceston Airport in financial year 2019. The number of passengers is forecast to grow to 1.9 million by 2028 and to 2.49 million by 2040 (Launceston Airport Masterplan 2020).

Beyond its aeronautical use Launceston Airport provides a range of facilities and office accommodation to ancillary non-aviation businesses attracted to the benefits of operating in an environment that has excellent connectivity and logistics links.

Aviation Infrastructure

Hobart and Launceston Airports operate under long-term leases with the Australian Government. Both have significant 10-year infrastructure development plans as part of their current Airport Masterplans. Both airports continue to deliver major airfield, terminal and nonaeronautical property developments.

Hobart Airport successfully secured \$60 million as part of the Federal Budget for strengthening works to the runway in 2022. The funding will ensure fully laden Code E aircraft can use the runway arriving from both domestic and international routes.

Hobart Airport has also announced plans for a doubling in size of its terminal by end of 2025, including upgrades to the international passenger processing facility.

Launceston Airport has embarked on a \$100 million 10-year infrastructure plan. Phase one of this project includes upgrades to the check-in hall, cargo facility, royal flying doctor service, arrivals hall and airfield lighting. Other important regional air fields and aerodromes include Cambridge, Smithton, Bridport and Barnbougle, St Helens, Strahan, Cape Barren Island, George Town and Lady Barron (Flinders Island). These support general aviation, charter, medical evacuation, and search and rescue operations.

Visitor economy

Tasmania received 1.28 million visitors who stayed 11.98 million visitor nights in the year ending June 2023, which was 61 per cent of the previous year and represents 97 per cent recovery of the same period for 2019.

The significance of aviation to the Tasmanian visitor economy is evidenced by the fact that 88 per cent of visitors to Tasmania travel by air. Of these, 67 per cent travel through Hobart Airport and 31 per cent through Launceston Airport, with the remainder arriving into regional airports.

Visitor expenditure in the year to June 2023 was \$3.85 billion, or six per cent of Tasmania's Gross State Product. Tourism directly and indirectly supports around 33,600 jobs in Tasmania or about 13.0 per cent of total Tasmanian employment - higher than the national average and the highest in the country.

The Tasmanian Government has developed the *T21 Tasmanian Visitor Economy Strategy* in partnership with the Tourism Industry Council Tasmania to promote responsible and sustainable tourism to the state as part of a strategy to rebuild the sector from the effects of COVID. This will result in greater numbers of visitors and increased pressures on vital infrastructure to accommodate this.

In addition, the Tasmanian Government is refreshing its Population Strategy which will look at planning and managing expected future population growth, recognising this is a major driver of economic development and aviation services as a critical component to both business and liveability for the Tasmanian community. This will inevitably have implications for the growth and development of airports and the need to manage infrastructure to cope with an increase in population and therefore passenger numbers and flights.

T21 – Tasmania's 2030 Visitor Economy Strategy

Tasmania's 2030 *Visitor Economy Strategy* provides a collective longer-term vision through to 2030. The strategy is a plan for growth and a plan to manage growth sustainability, ensuring that the visitor economy continues to have a positive impact on our environment, economy and way of life.

Tasmania is an attractive destination, and we expect continued growth. We will proactively manage growth to protect and enhance Tasmania's brand, environment and community values. Over many decades, our visitor economy has created substantial value for Tasmania and Tasmanians.

Tasmania will continue to be a sought-after destination for visitors and popular with a growing population of Tasmanians wanting to explore their home state.

Our vision for Tasmania's visitor economy is that it maximises the good, minimises the harm, and shares the benefits broadly. This is what we mean by positive impact. This will require purposeful actions, informed by data and research, and governed by a strong commitment by industry and government to be connected to our long-term vision.

This strategy sets out eight key directions to grow and manage our visitor economy into the future:

1. We will be a leading destination for climate-conscious travel.
2. We will proactively manage growth to protect and enhance Tasmania's brand, environment and community values.
3. We will grow the contribution that visitors make to Tasmania and maximise overall benefit to our state and regional communities.
4. We will differentiate and build awareness of Tasmania to increase brand power and attract the visitors who will grow value over volume.
5. We will invest in and support a sustainable and successful events and business events sector, enhancing Tasmania's brand.
6. We will plan for and invest in infrastructure for the next decade to support future growth, benefitting locals and visitors.

7. We will attract a skilled workforce creating jobs for Tasmanians and meeting industry needs.
8. We will bring industry, state and local government together with local communities in managing destinations.

An important element of this strategy is to grow air and sea capacity. The T21 Strategy recognises that access is critical to promoting the visitor economy.

As an island, the supply of adequate air and sea services connecting Tasmania to the Australian mainland and the world is crucial for the growth and development of its economy and achieving a sustainable visitor economy.

In delivering this, the Tasmanian Government works with domestic and international carriers to grow capacity and demand as well as working to ensure the infrastructure necessary to meet the additional growth are developed throughout Tasmania as part of a 10-year visitor economy infrastructure plan.

Access 2030

The Tasmanian Government is undertaking development of *Access 2030*, a new 5-year aviation development plan with the aim of increasing domestic and international air and sea capacity and frequency to meet the growing needs of the state. The plan will improve seasonal demand, maximise low fare availability and increase international visitation through a small number of direct international flights.

Since 2019 Tasmania has secured direct aviation connections with every Australian state capital, except Darwin. Over 2021-22, Tasmania introduced connections between Hobart and Adelaide, Perth, Canberra and Gold Coast as well as between Launceston and Adelaide and Perth. Additional connections are expected, with Bonza looking to commence flights between Launceston and the Gold Coast in November 2023.

Retaining and growing frequency of these services to daily, year-round services is a key focus of *Access 2030*. Direct connections ensure travel times and costs are kept to a minimum, providing Tasmanians and visitors with more competitive choice.

Time sensitive freight

Aviation plays an important role in the movement of time sensitive freight intrastate, interstate and internationally, particularly for live seafood and horticultural products. Local producers rely on fast efficient delivery of goods ranging from seafood to fruits and vegetables that are susceptible to spoilage to customers interstate and lucrative international markets.

For exports, air freight is generally confined to high value, perishable products, such as live seafood, salmon and cherries. Considerable volumes of time sensitive freight, including processed seafood, meat, fruit and vegetables, are transported from Tasmania by sea to Melbourne and then transferred to international air services.

Air freight capacity from Tasmania is made up of dedicated air freighters, as well as belly space of passenger flights. The high number of passenger flights means, in normal circumstances, there is very strong connectivity between domestic and international air services.

International movements

Tasmania aspires to a one stop to the world international strategy.

Direct connection to Auckland allows for one stop to America, while a direct service to an Asian hub such as Singapore or Hong Kong would provide one stop to Europe and China. Direct services to Perth provide for one stop to the Middle East, however international connections via the main hubs of Sydney and Melbourne remains the main way international connections are made to Tasmania.

A new direct international service from Hobart to Auckland commenced in April 2021. Operated by Air New Zealand, the service is popular with both Tasmanians and New Zealanders, as well as around 6-8 per cent of passengers originating from the United States. It has recently been announced that this service will be paused in April 2024, due to operational constraints facing Air New Zealand in the short-term. However, the Tasmanian Government remains very confident in the viability of this route and expects to see a resumption of services at the earliest opportunity.

In 2017, the Hobart Airport runway was lengthened to allow for larger payloads and longer-range flights. Hobart Airport has also developed an Antarctic and freight precinct to support existing operations and opportunities for a future East Antarctic aviation network. Another forthcoming investment in the airport will be the strengthening of the runway which will support Antarctic aviation capability and will enable wide body aircraft with range for direct services to Asia as well as heavier cargo and more flights to deliver equipment and passengers to Antarctica.

As the Hobart Airport runway is upgraded, the Airport will provide increasing capability for Antarctic-bound aviation services. The strengthened runway will open the potential for one-stop international flights from country of origin via Hobart to East Antarctica, significantly streamline logistics arrangements for some countries, enhance the capabilities of Australia's Antarctic Program, and enhance Hobart's role as a key international Antarctic Gateway, aligned with the Tasmanian Antarctic Gateway Strategy.

Antarctic Gateway

Tasmania's geographic location means that it is one of the few places in the world that is a natural air gateway to Antarctica.

Aviation services are crucial to the Antarctic sector, connecting Australia with our Antarctic Territory.

Since 2008, intercontinental air services have operated from Hobart Airport to a blue-ice runway at Wilkins Aerodrome, near Casey station in Australia's Antarctic Territory, in support of the Australian Antarctic program.

Tasmania's strong scientific, policy, logistics, advanced manufacturing and technological capabilities, together with Hobart's port and airport logistics and supply infrastructure, makes Tasmania a natural hub of Antarctic activity and international engagement.

Hobart Airport is home to Australia's Antarctic aviation program. The Australian Antarctic Division operates flights from Hobart to the Wilkins runway and charters its aircraft to international Antarctic Programs for flights to the American McMurdo runway in Antarctica. Flights from these runways provide further access into the continent to facilitate field campaigns and connect Antarctic stations as needed. International Antarctic Programs may access these flights through collaborative agreements.

The operation of intercontinental air services to Antarctica has delivered significant benefits for Australia's capabilities in Antarctica. The savings in time generated by air travel, as compared with sea, provide Australia's Antarctic program with new possibilities for logistical and scientific activities. Air travel also provides flexibility in movement of personnel and freight, creating considerable efficiencies.

Regional aviation

Aviation also provides access to essential services for many Tasmanians living in isolated regions, such as King Island and the Furneaux Islands Group. In recognition of this, the Tasmanian Government provides a number of programs to assist residents access health and education facilities via flights where there are no alternative services available to be accessed by road.

Airports play a vital role in facilitating access to Tasmania – particularly in relation to accessing regional and remote locations. Many regional airports are owned and operated by Councils.

ii Comments on Green Paper

Comments are provided by exception, with section number retained from the Green Paper for ease of reference.

3. Airlines, airports, and passengers – competition, consumer protection and disability access

3.1 A competitive aviation sector.

The Australian Government is considering the recommendation of the Senate Rural and Regional Affairs and Transport References Committee that the Productivity Commission undertake a public inquiry into the determinants of domestic airfares on routes to and between regional centres in Australia.

There are a comparatively small number of routes in Australia capable of supporting direct competition between airlines. Small population catchments and long-distances mean many routes are only marginally viable on a commercial basis; some are simply uncommercial, regardless of their importance to communities.

Tasmania has only a small number of intrastate regional services, supporting the Bass Strait Islands. These markets are fortunate in supporting multiple operators, providing competition and consumer choice from both Tasmania and Victoria. Tasmania does not have a legislative framework comparable to Queensland or Western Australia for regulating regular passenger transport services and/or capping fares.

The Tasmanian Government supports greater transparency in relation to pricing of routes and in relation to routes servicing remote and regional areas. It would further extend this to consider how infrastructure and operating costs of airports, which are critical assets, are most appropriately recovered in small markets.

3.2. Consumer protections

The Australian Government wants to improve complaint handling processes and strengthen consumer protections in the airline sector. The Australian Government is interested in stakeholder views on options to improve the effectiveness of the Airline Consumer Advocate and benefits consumer protection policies pursued in other jurisdictions could deliver for Australia's aviation sector.

The experience of Covid-19 lockdowns highlighted the importance to our community and economy of free movement of people between population centres. The reality in a country the size of Australia is that movement between jurisdictions will be heavily reliant on air travel. This is particularly the case for Tasmania.

It is therefore critical that the travelling public have confidence in the industry and that their interests and needs are managed and protected. Issues will always arise, and it is recognised that inconvenience-free air travel is simply not always achievable.

The Tasmanian Government endorses the Australian Government's desire to improve complaint handling process and strengthen consumer protection in the airline sector. The Tasmanian Government considers that it would be appropriate to consider policies pursued in other jurisdictions, in particular whether the ombudsman model, which has been successfully introduced across a number of Australian industry sectors, could assist in resolving problems. However, the need to resort to such mechanisms should always be the exception. Any model of consumer protection is therefore only as strong as the consumer framework employed by airlines themselves to resolve passenger issues in the first instance. This warrants further consideration as to how to support a more robust and responsive system.

3.3. Disability access

The Australian Government is committed to retaining a voice for travellers living with disability about how they can be better served in their interaction with the aviation sector. This Green Paper is testing ideas about how this can best be achieved.

In common with state and territory governments, and transport providers, the aviation sector is working to implement the Disability Standards for Accessible Public Transport (the Transport Standards). The White Paper notes the reform process that is underway to modernise the Transport Standards.

The current standards have been effective in changing the way governments and public transport operators deliver accessible services. However, previous public reviews have also highlighted that the Transport Standards require modernisation, and that compliance is often difficult due to their prescriptive nature, meaning that elements are often impractical to implement in public transport environments.

The Tasmanian Government is committed to providing safe, efficient, and equitable public transport across the state. Accordingly, the Tasmanian Government fully supports modernisation of the Transport Standards to ensure that they are meeting the current and future needs of people with disability in a way that is achievable for operators and providers, particularly in challenging geographic and modal spaces.

A part of this is ensuring responsibility for actions under the Transport Standards are clearly delineated, and identified gaps addressed. The Green Paper identifies the need to ensure there is appropriate delineation of responsibilities between airlines and airports to ensure passengers experience seamless transition at interfaces between providers.

3.4. Economic regulation of Australian airports

Under the Commonwealth's long-term policy of 'light-touch' economic regulation of airports, investment at airports around Australia has increased over the previous decades. The Australian Government considers a review of Aeronautical Pricing Principles and how their implementation could be improved may be worthwhile.

The Productivity Commission has identified that over 100 airports in Australia offer regular public transport (RPT) services.¹

The Productivity Commission has previously identified natural monopoly characteristics of airports, including the high investment requirements, and sunk costs, particularly for runways, specialised aviation equipment and land, and the indivisibility of that investment.²

It is noted that there are only four airports in Australia subject to price monitoring by the ACCC. These airports – Melbourne, Sydney, Brisbane and Perth – are understood to have accounted for 72 per cent of Australia's international and domestic RPT passenger movements in 2017. Covid-19 has increased the trend for increasing centralisation of international flights, particularly through Sydney.

Hobart Airport, common with other second-tier airports is subject to a self-administered monitoring regime. This involves publication of information on aeronautical charges, car parking, service quality and complaint handling procedures.³

In considering economic regulation, it is important to consider how these different market characteristics influence the negotiating position of parties.

In its 2019 Report, the Productivity Commission observed that, *"even if an airport operator has market power, it is not always able, or incentivised, to use it. Constraints on the exercise of market power include:*

- *countervailing power, along with other forms of bargaining power, that enables a customer to prevent or at least mitigate the ability of an airport operator to exercise its market power*
- *a level of demand for airport services that means the average cost of running an airport is higher than what passengers and airlines are willing to pay (Frontier Economics, trans., p. 456). This is the case at some regional airports."*⁴

The Productivity Commission found that none of the airports that currently participate in the second-tier voluntary monitoring regime have significant market power. There is limited scope for modal substitution for passengers travelling to or from Adelaide, Cairns, Darwin, Gold Coast and Hobart airports but their

¹ Productivity Commission (2019) *Inquiry Report: Economic Regulation of Airports*, retrieved from <https://www.pc.gov.au/inquiries/completed/airports-2019/report> 30 October 2023

² Productivity Commission (2002), *Price Regulation of Airport Services*, retrieved from <https://www.pc.gov.au/inquiries/completed/airports-2002>, 30 October 2023

³ Productivity Commission (2019) *Inquiry Report: Economic Regulation of Airports*, retrieved from <https://www.pc.gov.au/inquiries/completed/airports-2019/report> 30 October 2023

⁴ Productivity Commission (2019) *Inquiry Report: Economic Regulation of Airports*, retrieved from <https://www.pc.gov.au/inquiries/completed/airports-2019/report> 30 October 2023

market power is constrained because they have a relatively high proportion of leisure passengers who are responsive to changes in price.⁵

The small number of participants in the aviation sector limits the extent to which competition between providers, for either airport services or airline services, occurs. The market is further complicated by the different scale of operators in each market. For airports, ownership can range from major international investors to small regional councils and private owners. While an airport may hold a monopoly in many instances, due to geographic isolation, its capacity to exercise monopoly power is limited where airlines hold significant market share and market power. In this environment, where each player has limited alternatives available, commercial negotiation can be very challenging.

Ultimately, an airline may choose to continue to operate a sector or withdraw and reallocate resources elsewhere in its network. Regional and remote airports do not have this option and securing reliable air services is integral to delivery of services to the communities the airports serve.

Commercial disputes over pricing pose risks to broader economic stability and development. The Tasmanian Government strongly supports a framework that provides airlines and airports with an equitable and transparent means of successfully concluding negotiations. Where airports and airlines are unable to reach agreement, this creates uncertainty in the market and stifles investment.

The Tasmanian Government agrees that a review of the Aeronautical Pricing Principles may be warranted. However, the Tasmanian Government would question the extent to which current dispute resolution mechanisms available, including litigation, are an incentive to parties seeking commercial outcomes. This assumes both parties have equal capacity to pursue and fund legal disputes. For regional and remote airports, owned by councils, this is unlikely to be the case.

4. Regional and remote aviation services

4.1 The role of airlines and airports in supporting regional economies

The Australian Government recognises the vital role aviation plays in servicing the needs of regional and remote communities including providing access to essential services and helping to address many Closing the Gap targets. The Australian Government also recognises the transition to net zero presents unique challenges and opportunities for Australia's regions.

In addition to being physically separated from the mainland of Australia, Tasmania is characterised by a dispersed population in low density settlements and has the highest proportion of the population residing outside of its greater capital city (58 per cent) of any state.⁶

⁵ Productivity Commission (2019) *Inquiry Report: Economic Regulation of Airports*, retrieved from <https://www.pc.gov.au/inquiries/completed/airports-2019/report> 30 October 2023

⁶[https://www.rdatasmania.org.au/client-assets/documents/documents-and-reports/RDA%20Tasmania%20Regional%20Plan_2017%20-%202019%20\(FINAL\).pdf](https://www.rdatasmania.org.au/client-assets/documents/documents-and-reports/RDA%20Tasmania%20Regional%20Plan_2017%20-%202019%20(FINAL).pdf)

The Government is committed to providing support and assistance wherever possible to promote economic growth in regional areas. In 2015, the Tasmanian Government introduced a Population Growth Strategy which seeks to increase the Tasmanian population to 650,000 by 2050. This will be undertaken by concentrating on three areas:

- Job creation and workforce development
- Migration
- Liveability

A vital aspect of this initiative is to ensure that there is a robust infrastructure that can accommodate increases in population and promote viable commercial transport services in a competitive manner. Furthermore, the Tasmanian Government recognises the importance of dispersing growth evenly throughout the State.

By targeting both population growth and improving access to regional areas and stimulating economic growth, the Tasmanian Government has developed strategies to improve the status of regional areas. Economies of scale given low density population centres make the provision of essential services challenging.

Beyond the urban communities, population decline in regional and remote areas has put pressure on the viability of service provision such as education and infrastructure.

In terms of infrastructure, regional airports offer strategic connections for remote communities to essential services as well as access points for tourists to stimulate economic growth.

The Tasmanian Government recognises the importance of maintaining commercially viable air services to Tasmania and to its regional areas. The Tasmanian Government strongly supports exploring ways to lower airfares with commercial airlines and infrastructure providers and sees a role for the Australian Government in this area.

The high costs of regulatory compliance can be challenging for smaller airlines, and differences in requirements between Regulated Passenger Transport Operators and Charter Operators as defined under CASA regulations may create uneven regulatory burdens for commercial operators. Costs of meeting regulatory compliance that are passed on to passengers should be clearly identified.

There are a number of programmes, subsidies and concessions provided by both the Australian Government and the Tasmanian Government that support air connections for rural, regional and remote communities in Tasmania, particularly for King Island and the Furneaux Islands Group. The Tasmanian Government is also committed to promoting a thriving economy in these areas, best served by maintaining necessary aviation infrastructure to facilitate access for tourism and other commercial enterprises.

Tasmanian Government support for regional access

Tasmania's smaller regional air services and airports provide essential services to their local communities and enable visitor dispersal around the state. Burnie Airport is a key link to King Island, as Launceston Airport is to Flinders Island. These connections are important for maintaining access for those local communities and the businesses that support them. Burnie and Devonport Airports are equally important to the North-West region of Tasmania with important daily connections to Melbourne.

The Tasmanian Visitors' Survey shows Burnie Airport carries mostly business and visiting friends and relatives traffic, while Devonport Airport has a more even split of business, visiting friends and relatives and holiday passengers.

The core Launceston-Burnie-King Island and Launceston-Flinders Island services remain substantially commercial operations, noting the Australian Government contributions described below.

Tasmania has a number of remote airstrips, including areas of West, North-West and North-East Tasmania. These areas are served by road connections, and there are no commercial air routes within the main island of Tasmania, although there are a number of privately-owned charter and tourism services that rely on aerodromes throughout the State. Additionally, emergency services need access to safe and reliable airports in these areas.

Historically, Tasmania supported a small network of intra-state air services, linking the main population centres, as well as the Tasmanian west coast. However, the Tasmanian Government has generally not subsidised intra-state air services. The exception to this has been during the period of Covid-19 lockdowns, where it was necessary for the Tasmanian Government to intervene to secure essential air services to the Bass Strait Islands. The Tasmanian Government has also recently worked with commercial operators to test market viability for new services- linking Hobart and Tasmania's west coast and Hobart and the Bass Strait Islands. None of these routes proved commercially viable and have ceased.

The Tasmanian Government offsets the cost of travel for identified classes of passengers needing travel between remote and regional centres. These are:

- School students and teaching staff
- Concession card holders
- Patients requiring access to specialist medical services.

The value of the subsidy varies between programs from 50 to 100 per cent of a standard economy air fare. Eligibility for travel subsidies for services is restricted to the Bass Strait islands.

Australian Government Initiatives

Regional Aviation Access Programme

The Australian Government provides targeted support for aerodrome infrastructure and for air services to remote areas where they are not commercially viable. This funding is provided through the Regional Aviation Access Programme (RAAP).⁷

The RAAP provides support for remote aviation where it is not commercially viable but is essential for the social and economic wellbeing of the communities they serve. The Tasmanian Government commends the Australian Government for these initiatives that are providing valuable assistance to the provision of vital air links to the Bass Strait Islands, whether it be through maintenance of essential infrastructure or ensuring that commercial services are maintained through subsidies.

⁷ <https://infrastructure.gov.au/aviation/regional/>

The Tasmanian Government notes the support provided through the Airservices Australia Enroute Charges Payment Scheme, and the Remote Air Services Subsidy Scheme, both of which benefit that Bass Strait islands.

The Remote Air Services Subsidy Scheme is particularly important in maintaining a route between Cape Barren Island and Launceston that could not otherwise be sustained at the current frequency on a commercial basis. This complements other schemes administered by the Tasmanian Government to provide support, including a regular shipping service and funding to maintain road infrastructure.

Airport funding model

The Tasmanian Government also recognises the essential support provided by the Australian Government through its Regional Aviation Access Programme and its Building Better Regions initiative.

The Tasmanian Government supports further assistance from the Australian Government for airports already operating under challenging economic circumstances to cope with additional expenses required to comply with national standards.

The Tasmanian Government commends the Regional Airport Assistance program provided by the Australian Government for providing essential assistance to regional airports in Tasmania and calls for the continuance of the Remote Airstrip Upgrade Programme which has provided valuable assistance in ensuring aviation infrastructure is safe.

Airports are essential to facilitate access to essential services and encouraging economic growth. The maintenance and upgrade of airports to nationally identified safety standards is therefore essential. Many regional airports are operated by local councils and appropriate funding to upgrade and maintain the infrastructure is often a challenge.

Australian Government infrastructure programs are critical to supporting ongoing access for remote and regional communities across Australia. The Tasmanian Government acknowledges the role of the Australian Government in enabling remote and regional airport owners to make necessary investments in their infrastructure.

A review of the successful RAAP applications by Tasmanian airports highlights one of the central concerns for viability of airports, which is the need for grant funding to undertake periodic maintenance and upgrades to support current and anticipated air traffic. The calls on these programs reflect the observations of the Productivity Commission, that *the average cost of running an airport is higher than what passengers and airlines are willing to pay*. This is a structural issue that the current competitive grants program assists to alleviate, but cannot resolve in its current form.

It is reasonable to expect that an asset owner develops an asset management plan that provides for preventative and periodic maintenance, and replacement of the asset, funded through revenue secured from customers utilising that asset. It is evident that this is a model that does not work in regional and remote Australia.

The current cost contribution requirements do not take into account the ability of the market serviced by the airport to pay for that contribution (recognising it is ultimately airlines and passengers that are asked to meet these costs). Where funding is applied to (necessary) capital upgrades, the airport owner is faced with an increased depreciation and maintenance costs, again without any change to their income stream. The opportunities to increase market size or share are generally limited. This creates a cycle of dependence, complicated by the uncertainty of the competitive grants model currently applied. It is not

possible to meet maintenance and upgrade schedule, where funding is contingent on an uncertain outcome.

These considerations are likely to be magnified by the extremes of conditions posed by a changing climate.

The Tasmanian Government endorses the intent described in the Green Paper that place-based decision making, drawing on experience of local communities, should guide investment in our regions.

Emerging technologies and decarbonisation

The Green Paper correctly identifies the dual nature of emerging technologies for regional and remote communities – providing potential opportunities in the form of more efficient transport and infrastructure provision, but significant transition costs to replace existing assets. It is noted that the Australian Government’s Transport and Infrastructure Net Zero Roadmap and Action Plan will consider the specific challenges the regional aviation sector.⁸

In planning for a transition, it is important that service capacity and continuity is maintained. The Green Paper notes the changing aircraft market that may make certain categories of aircraft more difficult to replace on a like-for-like basis. Higher capital replacement costs coupled with lower seating capacity may not be offset by operational cost savings. These will be important considerations for regional airlines as they develop future investment plans. This will inevitably place more pressure on the economics of regional and remote air routes.

5. Maximising aviation’s contribution to net zero

5.1 Opportunities and challenges in decarbonising aviation

The Australian Government is determined to work with industry to ensure a strong and sustainable aviation sector that supports emissions reduction targets on the path to net zero by 2050, while growing jobs and innovation. The Australian Government is clear that all emitters in the aviation industry will need to contribute to net zero commitments.

Aviation is a comparatively small contributor to Tasmania’s total greenhouse gas emissions. The contribution is less than one per cent of total energy emissions in the state, and less than one per cent of Australia’s domestic aviation emissions. This is due to the limited refuelling that takes place in Tasmania, as emissions are broadly calculated on fuel consumption at refuelling location. Most flights operating in and out of Tasmania refuel at mainland airports.

The Green Paper notes that airports are potentially vulnerable to climate change impacts and the ability to adapt will depend on several factors, including improved climate risk information to airport operators. The Tasmanian Climate Change Office is leading the development of a draft state-wide climate change risk assessment, which will assist the Tasmanian Government to prioritise adaption actions. The transport sector, including aviation, forms part of this risk assessment. A Transport Emissions Reduction and Resilience Plan is also under development by the Office.

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High quality carbon credits are identified as a tool in the report to assist in the challenge of decarbonisation in the aviation sector. However, emissions reduction actions, such as flight changes, and less carbon intensive fuels, should be the priority and carbon credits are then used to offset remaining emissions.

Tasmania's net zero emissions status, investment in renewable energy and short flight distances positions the state as an attractive location for trials or pilot programs of hydrogen or electric planes, both for tourism and commercial aviation. Tasmania also has the potential for SAF and e-fuel production as it becomes commercially viable, with HIF planning to open a e-fuel facility near Burnie by 2026.

6. Airport development planning processes and consultation mechanisms

6.1. Noise

The Australian Government wishes to further explore the opportunities to better manage noise around our airports.

Noise generated by aircraft and airports remains a sensitive and contentious issues in Australian communities, evidenced by the proportion of submissions to the White Paper process concerned with noise. The challenge this poses to social licence is well captured by the Australian Airports Association in its submission.⁹

Airports and air services are critical to Australia's economic prosperity. Restrictions on operations that limit the number of services or times of operation hamper free movement of people and goods. To minimise restrictions, it is essential that communities are engaged, and have confidence, in the decision-making process around flight paths, in particular.

While the Green Paper notes that land use planning is the most effective way to manage impacts of aircraft noise, in areas with dispersed settlement patterns, such as Tasmania, historic land-use decisions may conflict with flight path revisions not foreseeable at the time of the original planning decision.

The development of a *Community Engagement Standard* for flight path and airspace design changes is welcomed. The introduction of, and commitment to, such a standard will assist in providing confidence for affected communities, and an understanding of what can be expected from an engagement process.

The outcomes from the *Hobart Airspace Design Review* are an important example of the challenges we face in balancing the interests of residents with the need for safe and efficient air travel.¹⁰ The considerable interest, and concerns, from those communities that can be affected by flight path noise some distance from an airport are a reminder that the impacts of noise are not restricted to those near an airport.

The work of Airservices Australia to ensure wide community consultation with respect to the Hobart Airspace Design Review is acknowledged. Noting the decision not to proceed with the noise abatement trial and the reasons for that decision,¹¹ it is important that Airservices Australia continue to engage with

⁹ Australian Airports Association, Submission to Aviation White Paper Terms of Reference, retrieved from <https://www.infrastructure.gov.au/sites/default/files/documents/awptor2023-submission-a13-australian-airports-association.pdf> on 30 October 2023

¹⁰ <https://engage.airservicesaustralia.com/hobart>

¹¹ <https://engage.airservicesaustralia.com/hobart>

the community on implementation of the remaining recommendations from the Post Implementation Review.¹²

Background for Tasmania planning system

Strategic Land Use Planning can identify areas where use should be promoted or constrained. In Tasmania strategic outcomes are delivered on the ground through the Tasmanian Planning Scheme (TPS). The TPS consists of the State Planning Provisions (SPPs) and the Local Provisions Schedules (LPSs). The SPPs express the rules for the zones and codes and the LPSs express where the zones and codes are applied.

The arrangement of zones in an LPS must also further the outcomes in state policies, Regional Land Use Strategies and the Tasmanian Planning Policies when they come into effect. The LPS cannot be in contravention of any of these policies. Some state policies require that agricultural uses on agricultural land are not to be constrained or limited. Typically land around airports is agricultural land.

The effect of the complete planning system in operation is that land surrounding airports has very few options about what zones can be applied, meaning there is little variation in the 'rules' on land surrounding airports. Typically, the SPP codes are not designed to manage use of land, which is addressing through zoning decisions.

Development applications are assessed against the SPP and LPS contents that are relevant to the site of the application.

The SPPs are structured with provisions based on the following:

1. Exemptions –they are measurable in their expression,
2. Acceptable solutions – expressed in a measurable form, i.e., set measurements/sizes
3. Performance criteria – expressed in a form that allows professional judgement to be made through giving discretion
4. General provisions – covering matters of a broad nature
5. Use tables – sets out which 'use' of land is “No permit required”, “Permitted”, “Discretionary” or “Prohibited”.

The SPPs are structured for the following decisions to be:

1. Exempt – no need for a permit
2. No Permit required – if the Use Table classifies as this and all the relevant acceptable solutions are met
3. Permitted - if the Use Table classifies this and all the relevant acceptable solutions are met
4. Discretionary – if the use Table classifies this or an application needs to be assessed under a performance criterion
5. Prohibited – if the use table classifies this, or a relevant standard cannot be met.

¹² <https://engage.airservicesaustralia.com/46094/widgets/319381/documents/245468>

National Airports Safeguarding Framework (NASF) Guideline A – Aircraft Noise

The Tasmanian Government is not aware of any complaints about the noise contours that are mapped in the LPSs around the state.

The locations of the Australian Noise Exposure Forecast (ANEF) noise contours are implemented in Tasmania through the LPSs and the SPP *Safeguarding Airports Code* (the Code) provides the rules for how decisions are made with respect to managing the impacts from aircraft noise.

The Code is not structured to acknowledge the different ANEF/N contours, but instead takes the most conservative approach by recognising the noise contour that is furthest from the relevant airport.

The Code establishes three types of planning decisions in relation to a sensitive use within the area mapped 'N contours'. That is : (i) exempt from the Code, (ii) an acceptable solution containing measurable elements and (iii) a performance criterion that relies on a judgement-based decision.

Currently, the Code does not contain any exemptions for this issue or any measurable elements for the acceptable solution.

The current approach could be improved by provision of advice to decision makers in relation to matters that could be exempt from the Code, or providing advice around the types of matters that can be measured and placed into the acceptable solution. An example might be a building for a sensitive use is built to reduce outside noise to a certain level that is expressed by a measurement. An example for an exemption could be a shed that is appurtenant to a sensitive use. These could also be expressed relative to the mapped ANEF contour, for example building requirements increase with proximity to the airport.

What can be done to facilitate increased adoption and implementation of the National Airports Safeguarding Framework principles of land planning to optimise land use activity and reduce community impacts?

The Tasmanian Government supports, and participates in, the National Airports Safeguarding Advisory Group, and endorses, in principle, the implements of the *National Airports Safeguarding Framework*. The Tasmanian Government recognises the concern expressed in the Green Paper at the inconsistent implementation of NASF across jurisdictions.

The Department of Premier and Cabinet's State Planning Office has a key role in implementing the NASF Guidelines into the state's planning system. The new Tasmanian Planning Scheme (now in place in 24 of the 29 Tasmanian Councils) provides for a standardised implementation of many of the current NASF guidelines.

Greater implementation of the NASF guidelines across the country can lead to better reductions in impacts to communities from aircraft operations and also provide greater certainty to landowners who wish to develop their land. The greater certainty can then lead to more optimal use and development of land near airports. There are three key themes that could be implemented across all of the NASF guidelines to improve recognition of the NASF guidelines into planning systems across the country.

These are:

1. Matching the guidance categories to the different types of local decisions made through their planning systems
2. Obstacle Limitation Surfaces (OLS) mapping requirements to recognise local terrain
3. Enabling airport master plans to respond to local circumstances.

These key themes are discussed in detail below, followed by detailed comments in relation to each of the NASF guidelines.

Comments

At a high level, most of the detail in the NASF guidelines can be made applicable – the content presents challenges in translating into a local planning system. If the NASF guidance information was reorganised and expressed in a manner to support the types of decisions in the above categories, this may assist implementation nationally.

Practical application of the OLS framework to improve administrative efficiency

The other key point is the impracticality of the OLS and Procedures for Air Navigations Services – Aircraft Operations (PANS-OPS) surface maps. As in some cases, following the OLS methodology prescribed by Australian Government regulations, the OLS ends up underground near both of Tasmania's key airports. This creates the scenario where somebody wanting to build an in-ground swimming pool must refer it to the airport operator for approval to proceed. In the Tasmanian planning system, a swimming pool is a structure and a structure is a building. Any building above the OLS requires referral and Australian Government approval.

Also, administering the OLS through the planning system can require referrals to airports for matters that are lower to the ground than the surrounding trees, which diminishes community perceptions of the system. Technically, this includes the letterboxes on the front fence because a letterbox falls under the definition of development.

Mapping of the OLS to recognise and respond to local terrain would address this issue. It is understood that this issue is not unique to Tasmania as it exists in other parts of Australia. Alternatively, the listing of practical exceptions (that are lawful) to the OLS rule, would make the requirements simpler to implement.

In terms of the OLS, it is suggested that any development up to 10 metres above the natural ground level should not impact on aircraft safety, except within the areas covered by NASF Guideline B (windshear), Guideline I (Public Safety areas) and the final approach areas for landing covered by the PANS-OPS surfaces.

The PANS-OPS surfaces extend up to 60 kilometres from the airport and can reach a height of over 1000 metres above the ground level at these distances. The guideline instructs implementing the PANS-OPS surface in full into the planning system. It is acknowledged that this is extremely important for approach, landing and take-off, but the practicalities of a surface 1000 metres above the ground 60 kilometres from an airport are questionable.

However, in practice in Tasmania, most buildings are less than 20 metres high. Effectively, this establishes an overlay that is not required, in a planning sense, and again potentially diminishes community perception of the importance of protecting airport access. For information purposes, in the

Tasmanian Planning System, the PANS-OPS surface is shown as an overlay. Any property underneath an overlay is subject to the relevant requirements of the planning scheme. Discovery is generally done through an electronic enquiry system – which indicates to the landowner that the overlay applies to them. The landowner then must work through the Code to discover that there is no additional requirement of them.

The planning system should have the flexibility to be able to only apply the sections of the PANS-OPS surfaces that will have work to do in a real-world planning sense. The PANS-OPS requirements could be reviewed to enable a reduced scope of PANS-OPS surfaces to apply in the planning system. Naturally, where local terrain gets close to the PANS-OPS surface then that area of the PANS-OPS surface should apply in the planning system. An example of this is near the summit of Mt Arthur, northeast of Launceston, which is only about 70 metres below the PANS-OPS surface for the Launceston airport (which is approximately 30 kilometres away). The local airport master plans could have the flexibility to address this issue in this manner.

6.2 Community consultation mechanisms

The Australian Government wants to work with stakeholders to evaluate the effectiveness of existing consultation arrangements and identify how best to improve the framework.

The Tasmanian Government participates in the Community Aviation Consultation Groups (CACG) for Launceston and Hobart Airports. These are important forums for the Tasmanian Government to hear different perspectives on current aviation issues and join with interested parties in discussing concerns and opportunities in the aviation sector.

The Tasmanian Government supports the CACG model and consider that their operation in Tasmania provides a good example of an effective consultation forum.

6.3 Land use planning on-site at airports

The Australian Government considers there may be opportunities to modernise the regulatory framework for the 22 LFAs under the Airports Act and notes the importance of ensuring regulatory arrangements promote productivity, investment and efficiency.

The Tasmanian Government considers that the Master Planning process applied to leased federal airports is an important mechanism through which all stakeholders, including all levels of government, can formally engage with airport operators in considering future development objectives and needs for an airport.

Commonwealth land the subject of lease with an airport is not subject to state and local planning provisions, while any freehold land outside of the lease area is subject to state and local planning provisions. However, an airport Master Plan must demonstrate consistency with relevant state and local provisions, or provide justification for any inconsistencies. In this way, the Master Plan provides the key strategic link between the different regulatory frameworks applicable to an airport.

The interaction of planning decisions on leased airport sites and the surrounding areas is an important consideration, particularly for commercial developments unrelated to airport operations. Electricity, storm water, water supply and sewage are all basic points of interface with local service infrastructure.

In addition to facilitating broader economic activity, airports are themselves significant drivers of local economic activity around the airport site. Supporting safe and efficient movement of people and goods

between production and population centres and airports is an important transport planning matter for state governments. The Tasmanian Government has supported implementation of the *National Freight Supply Chain Strategy* and is engaged in the current review of that strategy.

Looking forward, and reflecting comments on the application of the NASF, Airport Master Plans provide an opportunity for airports to take account of local features around the airport (that are not on airport land). Airport Master Plans could recognise these local features and express the matters that are important for the safe operation of aircraft around that airport.

Airports could be permitted to express the NASF guideline matters in their master plans that are of concern to them in the local area. This would allow and encourage local planning authorities to engage more closely with the matters expressed in the Master Plan.

7. General aviation

7.1 A growing general aviation sector

The Australian Government identifies opportunities for growth and regeneration of the GA sector, especially in the context of new and emerging technologies. New technologies may also offer opportunities for the GA sector to decarbonise.

The Green Paper correctly identifies the changing face of general aviation in Australia. General aviation continues to make valuable contributions to the Australian economy and community well-being, through services such as the Royal Flying Doctors and search and rescue. In Tasmania, the general aviation sector provide niche services in movement of time-sensitive pharmaceuticals and health products, as well as a variety of services and attractions enhancing Tasmania's visitor economy.

The Tasmanian Government notes comments by the General Aviation Advisory Network, in its submission that the regulatory service performance and posture of the Civil Aviation Safety Authority in relation to general aviation, acknowledging both recent improvements and a current positive trajectory under its current leadership¹³

The Tasmanian Government also notes the average age of aircraft engaged in general aviation and the likely high investment costs in transitioning to new propulsion technologies. The Tasmanian Government shares industry concerns expressed in submissions as to the capacity of the sector to transition to net zero on current industry trends.

8. Fit-for-purpose agencies and regulations

8.5. 'All hazards' regulatory approach

To ensure Australia's aviation systems are secure, it is appropriate to consider a wider range of threats including espionage, foreign interference, cyber security attacks and climate change under an 'all hazards' approach. The Australian Government is considering the introduction of enhanced security

¹³ <https://www.infrastructure.gov.au/sites/default/files/documents/awptor2023-submission-a41-general-aviation-advisory-network.pdf>

obligations to manage risks arising from physical, personnel and supply chain threats and natural hazards.

The Tasmanian Government endorses an all-hazards approach to security, recognising the wide range of threats that can impact on infrastructure and service provision. In seeking to align the aviation sector with the approach provided under the national Critical Infrastructure Framework, it is essential that obligations and standards remain proportional to both threats and capacity of infrastructure owners to implement any enhanced security requirements.

8.6 Security screening

The Australian Government is committed to ensuring that security regulations are proportionate to threats and risks, to ensure the ongoing security of Australian aviation. Any future decisions to change security settings will be evidence-based and will be in consultation with stakeholders.

The Tasmanian Government recognises the importance of establishing consistent security measures within airports. There is a risk, however, that increased security screening requirements for smaller domestic airports are further burdening already vulnerable infrastructure owners with higher costs – for capital and operating expenditure. Increasing landing charges to fund enhanced security procedures may jeopardise continued services to the airport, or, if airlines choose to pass this cost on to the passengers, the costs of essential travel for local residents may become prohibitive and tourists may choose to go elsewhere. Additionally, these airports would need to consider screening arriving passengers from smaller feeder airports unless those feeder airports match the security standards. The Tasmanian Government supports a proportionate risk-based approach to security rather than a one-size fits all approach.

The Tasmanian Government recognises the importance of ensuring the highest standard for safety and security in the aviation industry and calls for a proportionate response to enhanced security requirements for regional airports. It also supports further assistance from the Australian Government for airports already operating under challenging economic circumstances to cope with additional expenses required to comply with national standards.

11. International aviation

11.4 International airport designation and development

The Tasmanian Government acknowledges the need for a structured process through which introduction of international services to airports where no border services are currently provided. The Tasmanian Government also acknowledges that the costs of infrastructure provision required to support international services are the responsibility of airport owners.

The delivery of infrastructure capable of supporting both international aircraft, and processing of international passengers, are considerable investment decisions for airports seeking to extend into international markets. These decisions may also involve financial commitments by one or both of state and Australian governments. The Hobart Airport runway strengthening is an example of the private/public funding commitments required to provide suitable facilities.

International markets are highly competitive and subject to change based on fluctuating economic conditions and market trends. Investment in a strategy oriented towards international markets must accept and plan for such eventualities.

Noting these risks, and costs, decisions to secure international services are therefore likely to be of direct interest to more than an airport owner and the relevant Australian Government agencies, and have a significant lead time. This needs to be reflected in the Australian Government's *New and Redeveloping International Ports Framework*.

The Tasmanian Government holds discussions with domestic and international airlines on a regular basis. Most recently we have seen Cathay Pacific operate a small number of services on a Hobart-Melbourne-Hong Kong route in December 2022 in response to strong peak season freight demand. Hobart Airport currently supports a service operating between Hobart and Auckland

New Zealand and Singapore are Tourism Tasmania's tier one international visitor markets in terms of prioritization. USA and China (Tasmania's largest visitor markets) along with UK and Hong Kong are tier 2 markets. Tourism Tasmania's international marketing resources are spread across these tiers.

Direct international flights to and from Hobart are an important element in the development of Tasmania's tourism, Trade, Antarctic Gateway and freight markets. While it is recognised that international visitors will still predominantly enter Tasmania through mainland international gateways, direct access offers distinct market opportunities. The Tasmanian Government seeks to establish a south-east Asian gateway through which one-stop access to Tasmania can be secured for the valuable Asian tourism and freight markets within the next 3 - 5 years.

The *Tasmanian Trade Strategy 2019-25* notes that the Tasmanian food and agribusiness sector excels across a diverse range of product categories, many aimed at premium niche markets both nationally and overseas. Efficient air connections are critical to extending the global reach for high-value, time-sensitive freight such as dairy, red meat, aquaculture and wild fisheries, fruit and vegetables. This capacity will most economically be delivered in conjunction with passenger air services.

A goal of the *Tasmanian Antarctic Gateway Strategy 2022-27* is to invest in Tasmania's strategic Antarctic gateway infrastructure. This goal recognises that Tasmania's ports and the Hobart International Airport provide crucial infrastructure for our Antarctic gateway's future success. This infrastructure supports both Australian and international Antarctic programs.

The Australian Antarctic Division currently make Antarctic passenger aircraft available to other National Antarctic Programs when available. Many of these flights have operated outside of Australia, but the number of charter flights to Antarctica operating through Hobart Airport, for example to the US McMurdo Station, are generally trending upward. Expeditioner movement through Hobart is a positive contributor to Tasmania's economy.

Critical international connections through Hobart to the Antarctic (including international Antarctic bases) would increase pressure on border force and biosecurity arrangements in Hobart, and this paper presents an opportunity to propose a policy or procedures to establish border force and biosecurity support in Tasmania.

Several National Antarctic Programs have expressed interest in collaborative logistics arrangements through Hobart to Antarctica, which would further increase Antarctic traffic through Hobart Airport.

Australian aircraft occasionally undertake medical evacuations from Australian and international Antarctic stations. Some of these flights are operated through the Hobart airport, making it an essential link for the safety of Antarctic expeditioners.



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