

From: [Bonson Lam](#)
To: [Aviation Green Paper](#)
Subject: Green Paper Response - Chapter 4 and 5 - Regional Air Services, Sustainability
Date: Thursday, 30 November 2023 4:50:56 PM

Thank you for the opportunity to respond to the Aviation Green Paper

Japan Travel Aviation Consulting has worked closely with sustainable aviation, airport and tourism marketing, however for the purposes of the green paper, would like to provide some comments in relation to regional aviation and sustainability (Chapters 4 and 5 of the white paper)

Chapter 4 – Regional and remote aviation services

- What are specific issues experienced by the regional and remote aviation sector in the context of decarbonisation? What elements should the Transport and Infrastructure Net Zero Roadmap and Action Plan include to recognise the specific circumstances of the regional and remote aviation sector?

Comment

Due to a higher cost to serve associated with population density and distance, many regional and remote areas face higher electricity network costs compared to capital cities, for example, supply, usage and demand charges for large customer (>100 or >160 MWh p.a) connections. These charges, particularly maximum demand charges, can be significant where electric aircraft need to be fast charged.

One possible solution is the concept of “swap and go” batteries, where a fleet of these batteries can be slow charged, and possibly paired with solar generation. Swap and go batteries are charged independently of the aircraft, which allow faster turnaround of aircraft at the airport. This technology may not be feasible in the short term as the current focus is on retrofitting existing aircraft rather than building new electric aircraft from scratch, however it could be used on airport assets (e.g. tugs or buses), or for certain kinds of general aviation aircraft where utilisation rates are low enough to allow slow charging (which will minimise demand charges and optimise the use of existing infrastructure)

Chapter 5 – Maximising aviation’s contribution to net zero.

- What are the current and future challenges in developing an Australian SAF production industry, including challenges associated with growing, refining and consuming feedstocks?

Comment

1. SAF production that is based on agricultural byproducts (e.g., sugar cane) may not be available all year. Given sugar cane is generally harvested in Autumn, then these products may not be available in other seasons.
2. SAF production from landfill may be suboptimal, unless households are educated on what products can go to landfill and which cannot. Hence community and local government involvement is critical to SAF production at lower costs.

I look forward to seeing the next steps from the Green Paper and would welcome any opportunity to clarify any information above, as well as participating in future discussions.

Yours sincerely

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