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30 November 2023

Director, Aviation White Paper Project Office
Aviation White Paper
Department of Infrastructure, Transport, Regional Development, Communications and the
Arts
GPO Box 594
Canberra ACT 2601

by email aviationgreenpaper@infrastructure.gov.au.

Dear Sir / Madam

Whyalla City Council Administration is pleased to provide the attached commentary in response to a number of the questions raised in the Aviation Green Paper.

Whyalla City Council operates the Whyalla Airport, a tier two regional Airport currently servicing a population of 22,000 people. In the last 12 months, passenger numbers are slightly above 60,000 per annum, approximately 20,000 less than pre-Covid numbers.

The requirement to commence security screening measures at the Whyalla Airport in 2021 has placed significant cost pressures on the Council, and our primary feedback to the Department is in this regard.

In short, the Whyalla Council contends that security screening is an important necessity in the current global environment and for Australia's ongoing national security. All aircraft, no matter the number of passengers carried, should implement passenger and baggage screening. The costs of such an approach should then be set at a standard fee, charged across the entire network, to keep passengers, aircraft, airports and Australia safe. The fee should not vary from airport to airport, nor airline to airline. The fee should not be unfairly levied on smaller regional airports (largely owned by Councils), as is the case now.

Thank you for the opportunity to contribute to the Government's policy direction for the aviation sector out to 2050 via this submission to the Aviation Green Paper. We look forward to reading the Aviation White Paper when released.

Yours faithfully

Justin Commons
CHIEF EXECUTIVE OFFICER

Aviation Green Paper – Whyalla Council Submission

Chapter 2 - Likely future directions out to 2050

What emphasis should the Australian Government place on these trends to help guide the future of the sector? Are there any other trends the Australian Government could add?

We encourage an ongoing focus on aviation safety, however the Federal Government needs to be cognizant of the costs related to safety improvements or changes to airports, that such costs are not passed on to the regional airports owned and operated by Local Government Authorities, not without consultation and negotiated financial support. Many regional based Councils are still struggling from the unfunded costs incurred introducing and maintaining 'security screening' requirements.

Whyalla is transitioning to be one of the world's largest Green Hydrogen Hubs. Our heavy industry has a focus on the production, export and use of green hydrogen.

The Council's Strategic Economic Plan includes the greening of our local airport. Council encourages an ongoing focus on greening aviation and aviation assets. Especially in relation to zero emissions airports and zero emissions aircraft.

We would further welcome the Federal government and aviation authorities incentivising and supporting the introduction of eVSTOL flying 'taxi' aircraft and freight aircraft. This would include Federal Aviation law authorities keeping ahead of new aviation technologies and capabilities.

The current introduction of flying taxis and 'uncrewed aircraft' for freight delivery (and defence) is a paradigm shift of great benefit to regional and remote Australia. Reinforcing the value of regional and remote airports to regional city's such as Whyalla, in South Australia. This is especially in regards to daily freight needs, medical needs (bloods and tissues requiring urgent analysis), passenger movement between industry hubs such as Whyalla's Hydrogen Hub and like nearby industrial Hubs separated by sea. A two hour drive by road would be traversed by an air taxi in 15 minutes. Freight and mail that can take two days by road to Whyalla, could be delivered in 45 minutes.

Council supports the strengthening of consumer law, weighted more in favour of passengers, than airline carriers.

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

What types of data and analysis should the Australian Government produce to support aviation competition outcomes?

Data relating to airline carbon emissions should be measured and reported in company annual reports and a central aviation portal online to compare airlines efforts to 2030 zero carbon targets.

Another measure could be to record and report on airline arrival and departure times compared to communicated departure and arrival times.

Would the Australian Government's publication, in consultation with industry, of a decision-making framework and guide for short term cabotage dispensations support clarity of current processes to manage future decisions to implement longer-term cabotage arrangements?

Yes, certainly if productivity is to encourage competition to drive down airfare and air freight costs in regional air transport services.

What should the Australian Government take into account in designing the terms of reference for the proposed Productivity Commission Inquiry?

Productivity improvements should have a focus on encouraging competition to drive down costs in regional air transport services.

Productivity improvements should have a focus on developing and using new technologies rather than requiring additional human resources to be employed at a regional airport. Suitably qualified human resources for regional airports are a challenge to attract to regional airports in remote locations.

Should the Australian Government look to revise current consumer protection arrangements and, if so, through existing or new mechanisms?

Yes.

Airline passengers should be protected, using as a standard guide the 'European Union Airline Passenger Rights'.

Flight delays and flight cancellations for a remote regional airport such as Whyalla can have serious unintended consequences, often unrelated to aviation. Not an uncommon occurrence.

The City of Whyalla is currently only served by one commercial airline carrier, connecting the regional city to the State capitol of Adelaide.

Delays or cancellations can result in costly;

- Missed connecting international and interstate flights.
- Missed business meetings that in turn can mean business losses.
- Missed medical appointments.
- Delays in medical supplies.
- Freight delays.
- Loss of recreational time when taking short holiday breaks.
- Inconvenience for locals needing to access services (especially medical and health) in Adelaide, not available in the local region.
- Adverse impacts on the pipeline of investment committed to major local infrastructure projects, in particular in relation to, the State government Hydrogen Jobs Plan. (Regional Airports will play an important support role in the delivery and success of major local hydrogen projects).

Would an expanded remit for the Airline Customer Advocate to educate customers on their legal entitlements be useful?

However, passengers understanding airline passenger (their) legal entitlements should not be the sole responsibility of the passenger. The airline should have a legal responsibility to protect their passengers and provide independent legal counselling and education for their passengers.

Further, legal entitlements should not be written in 'legal speak', nor should such do's and don'ts, should not be communicated in micro, small print to passengers.

Simply put, it should be the responsibility of the airline to ensure their passengers understand their rights as a flying passenger.

Previous consultation processes have explored options to refine the passenger liability and insurance framework under the *Civil Aviation (Carriers' Liability) Act 1959* – do stakeholders still consider amendments to this framework are needed?

Rather than refine, it is recommended the passenger liability and insurance framework under the *Civil Aviation (Carriers' Liability) Act 1959* be simplified. And legislation overseas should be reviewed as a guide to best practice.

Would policies pursued in other jurisdictions – such as a Passenger Bill of Rights or a stronger ombudsman model – deliver benefits to Australia's aviation sector?

Yes. However, let's not reinvent the wheel. Use existing models used overseas (EU) with a proven track record.

What further improvements can be made to the Disability Standards for Accessible Public Transport to accommodate the unique requirements of air travel?

Recommend a close liaison with the National Disability Insurance Scheme (NDIA/NDiS) to tap into their participant focus groups thoughts and experiences

What improvements can be made to aviation accessibility that are outside the scope of the Disability Standards for Accessible Public Transport?

Recommend a close liaison with the National Disability Insurance Scheme (NDIA/NDiS) to tap into their participant focus groups to gain knowledge of lived disability experiences.

What are the specific challenges faced by people with disability wishing to travel by air in regional and remote areas?

Recommend a close liaison with the National Disability Insurance Scheme (NDIA/NDiS) to tap into their participant focus groups and their lived experience.

As an airport owner, the efficient and safe, comfortable transition of people with disability through an airport, waiting and moving to and from an aircraft will mean a qualified human resource is critical and from a sourcing and cost perspective, it is challenging for a regional or remote airport to employ such human resources. Assisting with facilitating and supporting passengers with a disability (with appropriate skills training and qualifications), availability of such 'qualified' resources and a need to be able to source such staff with a flexible approach to their employment, in a regional community.

Employment conditions that require airport staff to be casually employed to attend only when aircraft are arriving or departing is not the ideal employment scenario for the employer or employee. Flexible employment conditions need to be supported by industrial laws.

How can Disability Access Facilitation Plans by airlines and airports be improved?
How should the Aviation Access Forum (AAF) be restructured to be more effective and better able to drive and enforce change to address issues faced by travellers living with disability?

It is recommended the Forum include representatives from NDIA/NDIS with disability lived experiences as a flying passenger.

What measures should be taken to ensure Australian aviation markets operate efficiently, improve competition settings, and deliver optimal consumer outcomes?

Key to Australian aviation markets operating efficiently is genuine competition and consistency of regulations.

As experienced by the City of Whyalla (and many other regional and remote airports) suffer the dichotomy of passenger aircraft screenings standards not being standard.

Aviation security screening of passengers and baggage before boarding or loading an aircraft is an important security layer and is the responsibility of the local government authorities owning and managing a local regional airport.

in the case of the City of Whyalla's airport QANTAS aircraft security screening of passengers and their baggage before boarding or loading, is required, the cost paid by Council. A fee charged to QANTAS. However smaller REX regional aircraft are exempted from security screening of passengers and their baggage before boarding or loading. BUT when Council, out of a sense of equity wanted to charge REX the same fee as QANTAS. REX wanted to keep their competitive advantage over QANTAS and eventually discontinued flying the Adelaide – Whyalla route.

The City of Whyalla contend security screening is an important necessity in the current global destabilisation of east and west countries. All aircraft, no matter the number of passenger carried, should implement passenger and baggage screening. And a standard fee required to cover screening costs should be charged to all airline operators, to keep passengers, aircraft and airports safe. This fee should not vary from airport to airport, nor airline to airline.

Are the Aeronautical Pricing Principles fit-for-purpose? How could they be improved?

Yes. Pricing should be consistent and passengers should not be taken advantage of through airline monopolies on regional routes, and prices should not be variable and increased due to high demand.

Should the Australian Government mandate use of the Aeronautical Pricing Principles? Why or why not?

Yes. If to only bring about consistency and standardisation.

Chapter 4 – Regional and remote aviation services

Where should the Australian Government focus its engagement in regional and remote aviation, including helping achieve Closing the Gap outcomes, noting established state, territory and local government responsibilities and programs?

The transfer of Commonwealth aerodrome/airport assets to local government authorities, was in hindsight a long term strategic mistake. The true running costs of a regional airport crippling some municipality finances.

Traditionally, subsidies for intra-state aviation services have been carried by state and territory governments. Does this remain the best structure?

No.

The Federal government should be the principal funding entity. The Federal government raft of taxes, fees and charges on regional business activities are considerable and a proportion should be reinvested in regional and remote airports to support the aviation needs of the regional businesses and residents.

What opportunities do emerging aviation technologies present for regional and remote Australia?

The current introduction of 'flying taxis' and uncrewed aircraft to carry freight is a paradigm shift of great benefit to regional Australia. Reinforcing the value of regional airports to regional city's such as Whyalla. Especially in regards to freight by air of parcels (supporting digital online sales and delivery for local online purchasers and local SME sales), medical needs such as urgent 'bloods', passenger movement between industry hubs such as Whyalla's Hydrogen Hub and other nearby industrial Hubs separated by sea (Upper Spencer Gulf). A two hour drive by road would be traversed by an air taxi in 15 minutes. Freight and mail that can take two days by road to Whyalla, could be delivered in 90 minutes.

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?

Incentivising suppliers to regional airports and supporting airport user and airlines to switch to non-fossil fuels, (electric or hydrogen) for aircraft and ground vehicles operating within the airport grounds will be essential to zero emissions airports. To realise this objective Federal government support funding for regional/remote airports will be essential and it should not be expected of Councils to meet such costs.

What opportunities are there to develop domestic bioenergy feedstock production and collection in Australia's regions, and what policy settings from Government would support this?

Significant potential requiring incentives to support and encourage development of domestic bioenergy feedstock production and collection in regional Australia.

What are the challenges faced by regional and remote aviation and airports posed by our changing climate?

Climate change is already adversely impacting airport and aircraft operations. Extreme weather events severely disrupt airline schedules, and threaten aviation safety. Regional airport more often than not, do not have the technology to measure and communicate to approaching or departing aircraft the micro weather of the local regional, remote airport. This technology can operate remotely and all regional, remote airports, aerodromes should have this technology in situ.

Climate change is already the primary cause of severe weather events culminating in increased natural disasters.

More regional and remote airports need to be identified and resourced to receive, service and dispatch emergency response aircraft, fixed wing and rotary. For many regional and remote airports this may require;

- Sealing, strengthening and Lengthening of runways for heavy, faster, big fire-fighting jets, landing pads ad lighting for rotary firefighting aircraft.
- Appropriate fuel supplies on site, stored in infrastructure that can easily be attached to aircraft for re-refuelling
- Pilot and crew accommodation.
- Telecommunications that can move and store big data.
- Meeting room facilities connected with optical fibre and appropriately furnished to act as a remote control centre for emergency responders, dealing with bush fires, floods, storm damage.
- Water or chemical fire suppression supplies stored in suitable tanks for easy aircraft access.(fixed wing and rotary)

How do local governments and aerodrome operators consider climate resilience when managing their aviation assets?

The installation of solar panels for green power, the planting and maintenance of green grass on either sides of runways, cools the micro climate and reduces the cost of aircraft take-offs. The collection of water to be recycled for use around the airport is critical and connection to desalination sources is ideal to counter drought and prolonged severe drought.

Recycled water needs to be sourced and used around the airport and within the terminal.

Aviation fuel types need to be given 'green' consideration. Provision of hydrogen fuel will be a staple supply at airports for aircraft and possibly airport service vehicles and support vehicles such as taxi and Uber.

Planting of appropriate trees on the airport perimeter to provide shelter from prevailing winds. And planting of trees near to terminals and hangars to provide shade for airport workers and cool the airports micro climate.

With the real potential of increased day time temperatures, regional remote airports are exploring alternate materials and designs for runways, taxi ways and tarmacs to ensure the assets can serve more frequent arrival and departure of bigger heavier aircraft.

Chapter 5 – Maximising aviation's contribution to net zero

How can Government work with industry to ensure a strong and sustainable aviation sector that supports emissions reduction targets while growing jobs and innovation?

Support an Annual Aviation Industry Summit that includes the Federal Cabinet.

Given there are a number of measures that industry and Government could pursue to help achieve net zero by 2050 in aviation, are there specific measures that more emphasis and support should be given to?

Recommend the 2050 target year be brought forward to 2030 following recent warnings from the U.N. chief issued a stark warning on climate change "The era of global warming has ended; the era of global boiling has arrived," António Guterres declared in a recent news briefing, as scientists confirmed that July 2023 was the Earth's hottest month on record.

The Federal Government is encouraged to support and incentivise the development and growth of hydrogen fuelled and electric aircraft.

Airliners should be required to report annually to the Federal government their aircraft emissions and on ground emissions from supporting assets of the business.

What should be included in relation to aviation in the Australian Government's Transport and Infrastructure Net Zero Roadmap and Action Plan (including for sectors such as GA and airports)?

The leadership adage remains true, you can't manage what you don't measure. As a minimum all airports and airlines must measure and report their carbon footprint.

Transition to hydrogen and electric regional passenger aircraft and 'green' general aviation.

Encourage and incentivise the use of eVSTOL aircraft for short regional trips in regional and remote regions. This would include 'flying taxis'.

How can the Australian Government ensure all emitters in the aviation sector play a role in meeting Australia's emissions reduction targets?

Measure and reporting annually the carbon footprint of airline aircraft, aircraft owners aircraft and airports and this data should be incorporated, mandated inclusion in company Annual Reports and reported to CASA and Air Services Australia (Failure to comply may result in deregistration of aircraft.)

What types of arrangements are necessary to support industry confidence in the quality standards and sustainability certification of SAF?

Standardisation with international quality standards and sustainability certifications of Sustainable Aviation Fuel.

Should policy and regulatory settings be refined to support development of domestic SAF production capability and industry take-up of SAF?

Yes, though the word refined recommended change to simplify.

SAF is already processed and used in Australia. The Federal government is encouraged to support research, development and commercialisation local sustainable aviation fuel production.

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

The Australian Defence Force Review has recommended Defence aircraft are to transition to sustainable Fuels. This may be the key to accelerate the research, development and introduction of sustainable aviation fuel in commercial and general aviation.

It is recommended the ADF work with the local aviation stakeholders, the CSIRO and representatives of aviation fuel suppliers, airlines and aircraft owners to develop and build an Australian sustainable aviation fuel industry.

How can policy and regulatory settings support research and development and subsequent investment in emerging low and zero emission technologies and related infrastructure?

The Federal government ideally should incentivise and invest with the private sector in, as a key stakeholder, the research, development and introduction of an Australian sustainable aviation fuel industry.

What information and guidance is needed to support regional aviation's net zero transition in the context of these emerging technologies?

Identification of current research and development in this SAF space. The sharing of what is already being used and developed? Exploration of international collaboration opportunities. Explore opportunities to set up 'skunk works' teams with aircraft manufacturers and sustainable fuel producers to develop new SAF products.

Chapter 6 – Airport development planning processes and consultation mechanisms

Do you have comments on how the operation and effectiveness of the Noise Complaints Information Service could be improved?

This is a service that could transition to the use of AI to measure, collect and report noise data to the appropriate aviation and local government authority, negating the need for the public to report any aircraft movements (in the air or on the ground) that may be a noise breach of standards for individual airports.

How could the Australian Noise Exposure Forecast, and use of the ANEF in Government planning processes, be improved?

Adapt standards to allow and encourage new generation aircraft engines, drones, crewless aircraft and use of sustainable aviation fuels such as electric green hydrogen powered aircraft, using new generation rotors.

What are appropriate, modern noise metrics that should be used to communicate aircraft noise impacts?

Develop international noise standards for aircraft to open new runway approach and departure routes for 21st century aircraft engines and drones/crewless aircraft, that are setting new standards in reduced noise over built up areas around airports. Such standards of very low noise can permit 24/7 operations at reginal and remote airports.

Such metrics should be incorporated in local government authority and State government Planning regulations.

The new low noise standards should be signed posted near roads and in residential zones that are beneath runway approach ad departure routes, indicating aircraft emitting such low noise are permitted to fly 24/7.

How can governments better communicate with potential purchasers of properties which will be affected by aircraft noise in the future?

Local government and State government Planning and Development Plans need to ensure new housing and industry, sport and recreation zones are very clearly delineated as being below a flight path designated for use by arriving and departing aircraft of a nearby aerodrome/airport. Such planning information needs to be clearly communicated in writing and diagrams within Development Application approvals, granted by a State government or Local government authority.

How can new and different types of noise impacts from projected growth in drone use best be managed?

Designated corridors be established to fly between locations, avoiding when possible residential zones. In collaboration with the drone/air taxis/ uncrewed aircraft industry and government a marketing communications campaign be conducted at a local level pointing out how quiet he new generation fan blades and engines (running hydrogen/electric engines)are on drone/air taxis/ uncrewed aircraft, compared to conventional aircraft propellors and jet engines.

Do these processes provide sufficient opportunity for impacts on the community to be identified and taken into account? How can they be improved?

Commission tertiary research and studies to measure noise levels around airports/aerodromes being use by drone/air taxis/ uncrewed aircraft.

All airports should monitor aircraft related noise and report noise level in real time online.

What can be done to proactively mitigate noise impacts by better informing residents and land-use planners?

Work closely with residential developers and local government and home building construction authorities to improve building construction code standards to apply for home built near airports, to utilise technologies to reduce aircraft noise entering a home e.g. insulation, double glazed windows.

What else can airlines and airports do to support better management of aircraft noise?

Noise level of the aircraft airlines intend to own and operate, should be a major criteria when determining what aircraft they want to purchase and operate. The airline should also liaise with the airport owner/operator the new aircraft will operate from to determine any noise issues. Avoid a repeat of the new Western Sydney Airport new runway troubles with residents living under the new flightpath of the new runway.

Strictly monitor aircraft use of corridors to keep aircraft from straying away from agreed flight path corridors.

Avoid breaking curfews and avoid late night, early morning departures of aircraft.

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

Regular training and development online workshops with Local and State government planner professionals. Organise for State based Planning Institutes to include National Airports Safeguarding Framework principles within Planners Professional Development.

Could governance arrangements for the Aircraft Noise Ombudsman be improved to provide greater independence, including publishing its findings and reports?

Yes.

Such findings and reports should be tabled with the airport Consultative Committees.

Are there opportunities to improve transparency by publishing information about other decisions made by CASA, Airservices or airports around flight paths, and how aircraft approach and depart airports?

Yes.

Aircraft technologies and capabilities are advancing at such a fast pace. Accepting and approving the change is often a challenge for CASA and AirServices Australia to keep ahead. CASA and Air Services Australia could work closely with international peers to adopt what is approved in the US or UK for use in Australia.

How can the flight path design principles be improved? A stronger focus on adverse impacts on people and businesses below flight paths or potential flight paths.

Flight paths should be protected from residential and commercial development, especially as regional centres grow.

Some latitude could be extended for the operation of flying taxis and eVSTOL aircraft powered by batteries and or hydrogen, using new technology propellor blades.

How can the existing consultation framework be improved to facilitate efficient planning and development, while preventing environmental harm and ensuring continued access for aviation users?

All Airports/Aerodromes should run an Airport Consultation Committee to engage with local communities surrounding the airport running a range of open committee meetings and six monthly forums.

Principally, the Airport Consultation Committee, should consist of local community representatives and key local Government and regulatory stakeholders, to discuss any issue relating to the operations of the airport and potential effects on the local community. This includes issues such as aircraft noise, car parking, traffic access, landscaping, bike path access and commercial developments.

Are Community Aviation Consultation Groups (CACG) working for the community? What are good aspects, and what can be improved?

Community Airport Consultation Groups should hold open meetings and table meeting minutes with the local government authority for reading and endorsement.

How could the Australian Government improve regulation to facilitate efficient planning and development while preventing environmental harm and protecting airports for aviation use?

Work far more collaboratively with local government authorities.

Is a monetary threshold still an appropriate mechanism for determining a 'major airport development' requiring a Major Development Plan (MDP)? What other significance tests could the Australian Government consider?

Aircraft movements, freight movement, passenger statistics, potential growth of airport activity.

Do current master planning processes adequately account for climate risks and if not, how could they be improved?

A template of minimum requirements for a detailed Airport Masterplan should be developed and set as a standard minimum requirement.

Do the current master planning processes support all airport users, including general aviation?

Really depends on who is undertaking the masterplan and the criteria set for the masterplan and the budget allocated for the masterplan. Remote and regional airports can struggle to have an adequate budget allocation for masterplanning.

Chapter 7 – General Aviation

Are there any changes to policy and regulatory settings that might facilitate the GA sector's evolving role in Australian aviation including through protections at GA airports and supporting the transition to a sustainable, net zero GA sector?

Policy and regulatory changes require thought to the financial implications for airport operators and general aviation stakeholders.

Chapter 8 – Fit-for-purpose agencies and regulations

Do you support the Australian Government introducing enhanced security obligations?

Air Safety in a less secure global environment should never be compromised. requires enhanced security. However the costs of adoption, implementation and maintenance of enhanced security, should not be passed on to the airport, the airline owners, nor local government authorities. If passed on to passengers such costs should be identified as an aviation safety levy and the levy should be applied equitably across all passenger airlines.

Do you have any comments about current security screening arrangements?

The inequity of security screening costs only being passed on to passengers flying in an aircraft of a certain larger size aircraft, had the unintentional consequences of giving a competitive advantage to the smaller aircraft operators.