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Submission in response to the Aviation Policy Review Green Paper

RAWSA Response to the Aviation Green Paper on Aviation Policy to 2050

Community members represented by Residents Against Western Sydney Airport (RAWSA) make this submission to the Australian Government and Dept. of Infrastructure (DoI) outlining comments and advice as our response to; the Green Paper; to the further compiling of a White Paper and; the subsequent adoption of aviation policy.

RAWSA makes this submission in good faith and in the hope that policy (to 2050) truly reflects something other than a *'business as usual'* approach to aviation. The industry's sustainability hinges on more than just financial factors - it is imperative that adverse environmental and community impacts are also key factors in achieving a sustainable aviation industry, in a sustainable and liveable world.



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Note: - The format of this submission highlights Green Paper **headings and questions in green type and RAWSA responses in black type. Due to the way some questions overlap a number of topics, some RAWSA responses have been repeated.**

RAWSA comment on the Minister's Foreword

After reading the Green Paper content and what was omitted, it became apparent to RAWSA that the Minister's Foreword really did set the scene for the entire document, in that the Minister's comments lacked appropriate inclusion of aviation's intrusive nature and displayed scant regard for any balancing of the adverse impacts that the industry thrusts upon affected communities.

"A safe, efficient, sustainable, productive and competitive aviation sector is critical to the economy and the standard of living of all Australians". (Emphasis added)

*"An Aviation White Paper will enable long-term investment, and the maintenance and improvement of our internationally enviable safety record, and **articulate clear commitments to consumers and communities affected by aviation activity.**"* (Emphasis added)

It is alarming that these quotes from the Minister's Foreword do not illicit full appreciation of the following aspects, needed in future aviation policy:

1. Aviation benefits are not shared equally by all Australians,
2. Aviation's inevitable impacts are borne disproportionately by people who live near airports and under flight paths.
3. That '*clear commitments*' to communities affected by aviation activity, requires quantified, evidenced based and enforceable measures – well beyond broad and meaningless motherhood statements.
4. There is an unstated but clear message in the Green Paper that Government policy is only prepared to act on mitigating impacts, where these actions do not affect the profitability of airports and airlines.

RAWSA comment and advice on Green Paper topics

Re: 1. Sector overview

Re: 2. Likely future directions out to 2050

RAWSA Topic Overview

The Green Paper depicts the aviation industry in an unbalanced way and portrays past government philosophy of a light touch approach as being something to be applauded.

In the Green Paper this philosophy is highlighted where it states:

Having been "*at the forefront of international market deregulation and liberalisation*" over recent decades, Australia "*now has one of the most open aviation markets in the world*".

Rather than applauding this deregulation and liberalism, RAWSA considers this light-handed policy approach as an indictment, over decades, of government avoidance of responsibility which has led directly to the exponential growth of unsustainable noise, pollution and climate impacts on Australians.

The Green Paper:

- Highlights the benefits of aviation while excluding consideration of the associated costs; that are systematically transferred to the public purse; or are being borne by individuals living under flight paths. This misrepresents the net benefit in financial terms.

- Has a very narrow view of *aircraft safety* in terms people on an aircraft and does not contemplate the safety of people on the ground who are affected by the industry's noise and pollution.
- Incorporates no mention of setting meaningful evidence based maximum noise levels as is done in other industries. Noise limits should be based on known noise harms, not omitted under the guise of not being consistent with *operational matters* (as termed in AsA's Flight Path Design Principles).
- Acknowledges the inaccuracy/misconception of noise measuring forecast (e.g. ANEF) however, there is a clear reluctance of policy over many years, to replace noise forecasting methods with accurate contemporary evidenced based methodologies.
- Projects an inaccurate assumption that all the adverse impacts will be solved by better information and education of affected communities – a so-called improved consultation and engagement process.
- Espouses principles that Australian Aviation legislation and regulation must '*hang its hat*' on meeting UN based ICAO recommendations, but it does not give equal credence to UN based WHO (World Health Organisation) recommendations on limiting aircraft noise impacts on Australians.
- Continues with past actions and current attitudes, that will frame future aviation policy within a 1950s paradigm that largely ignores:
 - Climate impacts,
 - Growing community outrage, locally nationally and globally,
 - Sustainability having more dimensions than simply being about financial matters.

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

RAWSA response to posed topic questions

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

- The Productivity Commission Inquiry ToRs must include a comprehensive costing of :
 - Community health impacts from aviation noise and pollution emissions
 - Environmental and climatic impacts from aviation emissions and
 - Publicly funded Aviation support infrastructure such as roads, rail, and provision of essential services
- The Inquiry ToRs must also consider the benefits that new proposed technologies can contribute, such as propulsion methods using electric and hydrogen fuels.

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

- Yes – as would be an Advocate for communities, as was a clear recommendation in the 2010 Senate Report into Airservices.
- The ever evolving disclosure in contemporary News Articles clearly displays how corporate greed in the aviation industry has been allowed to occur by government's light touch regulation approach, to the point that the needs of customers and the wider community, have been ignored.

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 - This should be expanded to also incorporate a Bill of Rights for aviation affected communities.

Re: Chapter 5 – Maximising aviation’s contribution to net zero

RAWSA response to posed topic questions

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

- Firstly – Govt and industry must recognise that ‘*sustainability*’ has more than just a financial context and that sustainability has environmental, social and health components.
- Include a carrot and stick approach to the development and adoption of SAF.
- To ensure availability of and take up of SAF, the current fuel excise for aviation use should be progressively increased over the next 25 years.

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?

- Include a carrot and stick approach to achieve progressive emission reductions each year out to the 2050 net zero objective. This objective will not be achieved by a framework that relies upon the benevolence of the aviation industry to achieve net zero, by themselves.
- To ensure availability of and take up of SAF, the current fuel excise for aviation use should be progressively increased over the next 25 years. If international agreements can’t be negotiated to do this, then an SAF Levy on current fuels should be implemented on top of current fuel excise levels. This gives industry a fair opportunity to adapt and adopt over a period of time, while ensuring they will have to progressively meet emissions targets.

Tariff item	Description	From 1 July to 31 July 2023	From 1 Aug 2023
10.5 Unit: \$ per litre	Gasoline (other than for use as fuel in aircraft)	0.477	0.488
10.6 Unit: \$ per litre	Gasoline for use as fuel in aircraft	0.03556	0.03556
10.16 Unit: \$ per litre	Kerosene (other than for use as fuel in aircraft)	0.477	0.488
10.17 Unit: \$ per litre	Kerosene for use as fuel in aircraft	0.03556	0.03556

Chart extracts copied from Australian Taxation Office website

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

- Include a carrot and stick approach to the development, production and distribution of SAF
- To ensure availability of and take up of SAF, the current fuel excise for aviation use should be increased on an increasing basis over the next 25 years. If international agreements can't be negotiated to do this, then an SAF Levy on current fuels should be implemented on top of current fuel excise levels. This give industry time to adapt over a period of time while ensuring they will have to progressively meet emissions targets.

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

- Yes – but not without the industry footing a substantial majority of the funding. This is an industry created problem that requires an industry funded solution.
- Aviation fuel suppliers can be required to ensure SAF fuel development and distribution gradually increases to 2050, by Incremental increases in taxation on aviation fuel production which is not SAF.
- Consider impacts on food production and climate extremes of sustained use of biofuel production

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

- Provide research funding direct to Australian research centres/universities to collaborate with aviation industry locally and internationally for research and development phases of SAF. Do not fund the industry to do this.
- Subsequent investment in production and distribution phases should be funded by the industry – with the exception that some Govt. funding be used to offset fuel transportation charges within regional/rural/remote areas.

Re: 6. Airport development planning processes and consultation mechanisms

RAWSA Topic Overview

It is apparent to RAWSA and communities affected by aviation that, the reluctance of successive Australian Governments to adequately regulate aviation impacts, has led the current situation where aviation policy development has been effectively captured by the aviation industry.

This is demonstrated by community outrage associated with aviation expansion at major airports around the nation, where the government's light touch approach to regulation, continues to ignore the fundamental responsibilities governments have to protect the health and well-being of their citizens.

RAWSA response to posed topic questions

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?

- Restructure current framework to build in community protections – a National Airports and Community Safety Framework.

- The NASF principles of preventing inappropriate noise sensitive development within specified areas should:
 - Not be based on a dubious ANEF methodology,
 - Be geographically expanded and be based on accurate decibel estimates, and
 - Be committed to by the 3 levels of government,
- The NASF principles of preventing inappropriate noise sensitive development within specified areas should also be applied:
 - As a fair and consistent approach to preventing approval of aviation expansion plans, where the expansion would create noise impacts on noise sensitive urban development that already exists.

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

- Remove the ANO position from AsA and place ANO under the administration of the office of the Commonwealth Ombudsman - make it truly independent and give it legislative teeth to solve aircraft noise.
- A prime issue that the Government and Department must address is that you can't expect improvements if you continue to do the same things. Aviation policy ignores the similar issue raised in the 2010 Senate Inquiry Report into Airservices¹, which recommended:

“6.28 The committee recommends that the Aircraft Noise Ombudsman must be established independently of Airservices Australia and report publicly and directly to the Minister for Infrastructure, Transport, Regional Development and Local Government and to the Australian Parliament.”

- Remove the Noise Complaints Information Service from AsA administration and place NCIS under the administration of the independent ANO position

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?

- By mandatory regulation requiring assessment of new and amended flight paths incorporate robust, comprehensive, accurate and evidenced based assessment of health and environmental impacts.

How can the flight path design principles be improved?

- Apply safety principles first; apply community/environment impact principles second and; put airport/airline efficiency (DoI termed *operational matters*) as a last priority and conditional upon not impacting either safety or community impacts.
- By putting the design of flight paths as a pre-requisite of any aviation expansion plans, instead of the current practice of being the last component.

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?

- By mandatory regulation requiring assessment of flight paths, associated with MDP incorporate robust, comprehensive, accurate and evidenced based assessment of health and environmental impacts.
- By ensuring flight path and airspace architecture design is finalised and available to public scrutiny well before Govt. commences its approval process for an MDP.

¹ The Senate Rural and Regional Affairs and Transport References Committee, “The effectiveness of Airservices Australia’s management of aircraft noise”, Canberra, ACT, June 2010.

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

- No! Master planning is inherently about increasing aviation activity and this in itself automatically adds to aviation emissions levels that significantly contribute to climatic extremes and risk.
- Unless significant changes actually occur in reducing Aviation emissions through adoption of technology improvements such as SAF or non-fossil fuel propulsion, the previous dot pot will be a valid concern.
- The Green Paper contains statements purporting to represent reduction in climate risks by aircraft being permitted to reduce flight time and flight distance, when clearly these are measures more concerned with improving airport and airline profitability, at the expense of increased noise impacts over urban areas.

Do not interpret this to mean that reducing noise exposure is more important than reducing climate risks, as has been the case in the past. It simply infers that if Government is serious about reducing climate risks from aviation, then it must adopt policy measures to reduce the number of flights, until such time as aircraft emission risks to the climate, are substantially reduced from current levels, by the use of propulsion systems such as SAF

- The Green Paper provisions on reducing climate risks are framed around a dubious assumption that net zero will actually be achieved by 2050 through the benevolence of the industry. If Government policy relies on the industries' displayed corporate ethics and profit focus, then we will at arrive at 2050 with no discernible progress of net-zero being achieved. This is no better demonstrated than evaluating the corporate ethics that have transformed our once proud national carrier, into a national disgrace!

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

- It is not clear to RAWSA if current master planning processes support all airport users – it is very clear however, that the processes systematically exclude adequate consideration of community impacts. Aviation expansion is the only thing that counts and nothing else seems to matter as far as the industry and government are concerned.

Re: 6.1 Noise

RAWSA Topic Overview

For decades there has been deficiencies between forecasted noise impacts and the actual noise impacts that communities living under flight paths, are subsequently exposed to. Examples of these discrepancies manifest themselves in community outrage that has occurred with the Sydney Airport 3rd Runway and more recently in relation to aviation changes at Gold Coast, Sunshine Coast, Brisbane, Perth and Hobart Airports. It is likely that the same manifestations will be experienced with the Western Sydney Airport and Melbourne Airport projects.

Aircraft noise results in noise complaints which are contributed to by the difference between;

- a) What the aviation industry and government expects the affected community to tolerate,
- b) What the affected communities expect of the industry and government to adequately moderate.

Much of this difference is caused by planning estimates that do not accurately reflect the reality of aircraft noise impacts that communities are subsequently exposed to.

Methodologies used (in environmental assessments for airport development/expansion plans) to forecast noise impacts, do not adequately account for health impacts; are technologically outdated; incorporate unrealistic and largely untested assumptions and; lead to inappropriate conclusions upon which critical decisions are based.

The Government and its agencies like AsA ,then try to manage the community *fall out* by instituting piece-meal strategies such as CACGs, Aviation Advisory Boards, overhauling consultation processes, information sessions and mechanisms etc. – all without addressing the underlying problem – aviation generates noise!

It is therefore critical that the White Paper include specific detail on how to minimise the aviation sector's impact on human health and environmental sustainability. This priority must consider contemporary health research on noise impacts and include regulatory mechanisms to adequately protect communities and environments potentially affected by aircraft operations.

RAWSA response to posed topic questions

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

- The NCIS exists to serve AsA operations and has little value to balancing community impacts from aviation.
- Transfer the NCIS to the administration of the ANO who is also removed from AsA admin structure to integrate both groups - independently of AsA and under the administration of the office of the Commonwealth Ombudsman.
- Include regulation that not only identifies the problem but requires an implemented solution.
- Expand permanent noise monitoring facilities to areas well beyond the immediate locations of airports.

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

- The ANEF and derived ANEC should only be used for land use planning and should be removed from all processes that estimating aircraft noise actually received on ground receptors.
- Develop new set of metrics and methodology that actually reflect the true, accurate and geographic extent of noise impacts. The current ANEF is outdated, does not comprehensively cover all areas affected by aircraft noise and the derived contours are meaningless as they give the impression that outside of the contours there is no noise heard. Contours should be included in new system that shows radiating $L_{A_{Max}}$ noise levels starting from 40dBa thru to 100+ dBa in 10dBa increments.
- These contours should be shown thematically in all planning documents. No sensitive development should be allowed within area exposed to levels above 45dBa². Likewise no airport expansion or development should be permitted if such development would result in existing urban development, experiencing aircraft noise at a level greater than 45dBa.

²See World Health Organisation guidelines on aircraft noise exposure

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

New metrics should be developed that:

1. Are anchored in contemporary scientific, evidenced based research on human and environmental health impacts.
2. Incorporate modern techniques and validated (clearly stated) assumptions.
3. The dBa metric was meant to align with the sensory action of the human ear. However, the dBc metric gives a more accurate estimate of energy generated by machinery. As a consequence the perceived noise is a mixture of loudness and tone. Therefore there is a need to define if dBa or dBc measurements are the best units for expressing impacts on human hearing. The use maximum (not averaged) noise unit levels is imperative as the human ear does not have the capacity to hear in a '*noise averaged mode*'.
4. Define a maximum decibel limit, beyond which, human and natural environments should not be exposed.
5. Use computer modelling parameters that are based upon and truth tested by, field studies of actual single event noise levels received by ground receptors up to 75 klms from airports³
6. Expand the N factor (number of events above certain noise levels) metrics to show N40 and N50 metrics not simply disclosing N60 and N70+ factors.
7. Quantify the difference between received noise and ambient noise levels for city centres (noisy), urban areas (quieter) and rural areas bushland (quieter still).
8. Quantify the additional increase of noise levels for ground receptors, due to weather conditions – not just a broad unquantified comment as is the practice now.

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

- No! - Use advice from studies (totally independent of governments and the aviation industry) to assess levels of aircraft noise annoyance and the relevant impacts on health, wellbeing, sleep and area amenity.
- Improvement must be achieved by applying recommendations⁴ of the World Health Organisation (WHO) about the health impacts of aircraft noise on human receptors.

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

- Avoid flying over urban areas even if this results in extra flight distance and fuel costs.
- Accept the reality that there are ever decreasing *use-by dates* for the current location of many Major and GA airports.
- Provide long term sustainability for aviation, the relocation of many airports is becoming mandatory. Medium and long term planning for relocating airports outside areas that won't be affected by future aviation operations. This will require governments at Federal, State and Local level, to collaborate and legislate more effectively on identifying:
 - suitable locations,
 - areas that will be affected by future flightpath noise and pollution,
 - quarantining designated flight path areas well beyond airports from noise sensitive developments,

³ This is the distance from airports that AirServices website acknowledges as being affected by aircraft noise

⁴ *Environmental noise. In: Compendium of WHO and other UN guidance on health and environment, 2022 update. Geneva: World Health Organization; 2022 (WHO/HEP/ECH/EHD/22.01).*

- No-fly zones in which no future flight noise impacts will be experienced for noise sensitive developments.

Note: The planning of Tullamarine and more recently Western Sydney Airport was good in theory - but lacked the acknowledgement that earlier quarantining of flight path land was focused too much on the airport's immediate surround and ignored the wider impact of new flight paths on already established urban areas.

Re: 6.2 Community consultation mechanisms

RAWSA Topic Overview

As a new facility there is no CACG for Western Sydney Airport (WSA). However we have a Forum on Western Sydney Airport (FOWSA), the structure and operation of which, displays an inability and desire; to have community impact concerns influence the design, building and operation of this new airport. This assessment is validated by FOWSA:

- Operating in a manner, so as to prevent public scrutiny;
- Operating as a secret society, repeatedly refusing to allow ordinary members of the public to attend meetings as observers. Of the 21 FOWSA meetings held to date only 3 have allowed public participation/observance and these were controlled performances, the purpose of which, were 'tick the box' responses to community outrage;
- Frequent practice that undisclosed out of session answers are given to critical issues of public concern and inquiry;
- Adopting a practice that meeting notes/actions are not reported publicly for up to 4 months;
- Membership being dominated by people representing; the Aviation industry;, Government agencies; Chambers of Commerce; and people whose political affiliations, invalidates any claim of representing community views and concerns.

Due to ineffective FOWSA operations, members of the public and RAWSA have had to attend SACF (Sydney Airport Community Forum) meetings as observers, to obtain any useful information about WSA development, flight paths and impacts. This practice continued up until SACF found that WSA public questions and inquiries were dominating SACF proceedings. (An understandable reaction).

If a WSA CACG does get established in the future, communities affected by WSA operations will be very wary of any group that resembles, the structure, composition and outcomes of the current FOWSA organisation.

RAWSA interacts with community based groups around the nation who are involved with local CACGs and so answers to the posed Green Paper questions on CACGs are influenced by the experiences of these other groups, which collectively make the following observations:

The entire CACG structure and mode of operation is ineffective. It does not produce outcomes that deliver practical alleviation of community concerns. CACGs are only required to go through a process and are not required to produce outcomes or solutions. They are heavily dominated by the aviation industry and do not have regulation to meet any community concerns. CACGs are simply a window dressing methodology that tries to absolve Government from its responsibilities to the Australian community.

This contention is validated by the Green Paper's admission of a deliberate light touch approach by the Australian Government to aviation policy.

RAWSA response to posed topic questions

Are Community Aviation Consultation Groups (CACG) working for the community?

- No – the majority of CACGs are not working for community! The operation and outcomes of these fora have mutated into a 'window dressing' exercise, that does not address root cause issues nor do they meet community expectations. Summary example of RAWSA experience with CACG like operation of FOWSA being:
 - Unrepresentative - dominated by aviation interests, people with business interests and people with political affiliations.
 - Too few ordinary community members
 - Meets in secret - refuses attendance of public observers
 - Structured and operates to prevent any public scrutiny or oversight.

In regard to CACGs -What are good aspects, and what can be improved?

- The concept of CACGs is theoretically good.
- The structure of CACGs and the way they operate needs to be improved by:
 - Not allowing the 'fox to be put in charge of the hen house'.
 - Not allowing CACG operations to be dominated by aviation interests and obfuscation by government officials.
 - Mandating that minutes of CACG meetings are distributed to all CACG members and available to communities within 7 days of the last meeting.
 - Mandating that responses (from supporting agencies) to questions posed at a meeting are distributed to all CACG members, within 21 days of the meeting, at which the enquiry was made.
 - The Sydney Airport Community Forum (SACF) functions as Sydney Airport's CACG, but is limited to the discussion of aircraft noise and the Sydney Airport long-term operating plan (LTOP).

While the structure of SACF has too many political focused representatives and too few community representatives, it is a much more regulated and effective mechanism than the CACGs. The restructure and revised operation of CACGs is an essential must, for inclusion in the White Paper. It is imperative that this restructure and revised mode of operation framework is influenced by ordinary community representatives who are affected by aviation activities.

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?

- Clarify what the govt/department define as *consultation and engagement* – because there is an obvious disconnect with community understanding.
 - Is process all about telling communities about what has been decided?
 - Is it a *tick the box* process all about giving the public a chance to have a say, but no control over the outcome?
- Involve ordinary community members in the development of proposals, standards and requirements, right from the start.

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

- Firstly, the Government and Dept. of Infrastructure need to adopt attitudes and policy parameters which acknowledge that inherently, aviation is an intrusive industry, both in terms of generating noise and pollution emissions.
- Secondly, while aviation is an important transportation industry, the Government and DoI must adopt a balanced approach between catering to aviation wants and responsibilities to affected communities.
- Eliminate or at least vastly improve the creation of noise and emissions – at the source.

Re: Chapter 7 – General Aviation

- Do policy and regulatory settings adequately facilitate the General Aviation sector's evolving role in Australian aviation?
 - No – due in a major part, to ignorance by aviation and government administrators of growing GA impacts on communities, the sustainability and future growth of the GA sector is compromised and threatened.
- 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?
 - Changes to policy and regulatory settings are needed to acknowledge and rectify the unsustainable situation of residents being impacted by 500 to 1000 light aircraft training flyovers at low altitudes, each and every day.
- Are existing consultation mechanisms, including the General Aviation Advisory Network (GAAN) and CASA-led Aviation Safety Advisory Panel (ASAP) and Technical Working Groups (TWG), appropriate?
 - No! – Again these mechanisms exclude the involvement of ordinary people to represent community concerns and impacts, thereby preventing aviation *group think* to permeate through consultation frameworks and ideology.

Re: Chapter 8 – Fit-for-purpose agencies and regulations

- Do you have concerns with current arrangements of roles and responsibilities within the Australian Government? Are there opportunities to improve these arrangements?
 - The White Paper and subsequent Aviation Policy must acknowledge that provisions within the Environmental Protection & Biodiversity Act need to be overhauled to:
 - Actually provide specified protections and quantified limits for aircraft noise exposure on ground based receptors (residents).
 - Detail more specific explanation of protections for both human and natural environments to which the Act applies.
 - The White Paper and subsequent Aviation Policy must:
 - Remove the Aircraft Noise Ombudsman position and the Noise Complaints Information Service from the AirServices administrative structure, to ensure true independence of these roles and functions.

- Do you have any suggestions to improve current reform processes?
 - The White Paper and subsequent policy must induce Government Ministers and departmental officials to ensure:
 - Acknowledgement that inherently, aviation is an intrusive industry which requires policy reforms to protect affected communities and natural environments.
 - Aviation emissions have significant adverse impacts on climatic conditions and damaging weather extremes. This demands a cross-portfolio approach between Infrastructure, Health and Environment Ministers so that there is consistent policy objectives, across all portfolios.
 - More balanced attitudes toward their responsibilities to communities,
 - Ensure that aviation policy is not *captured* by industry influence to the detriment of impacted communities and the environment.

Chapter 10 – Future industry workforce

- How can government policy enable industry to support the net zero economy and the future skills, training, and workforce needs that entails (including future fuels)?
 - Increasingly, many corporate entities (outside the aviation industry) are adopting investment policies to support their own *Social Licence* standing within the wider Australian community. These corporations acknowledge the global climatic extremes we are all affected by and recognise the imperative for rectifying actions. These corporations can be encouraged to invest in the development of workforce skills, training and SAF development that support the emerging net zero economy (such as SAF development and distribution). This involvement can be encouraged by Govt. providing some taxation relief for research and development, specifically focused on time limited achievement of appropriate outcomes.

RAWSA Conclusions Summary

While the Green Paper incorporates acknowledgement of some community concerns with policy development, the paper addresses these matters with broad motherhood statements that do not encompass defined, quantified or enforceable measures to protect the health, amenity or liveability of people affected by aviation activity.

Documents that underpin aviation policy such as AsA 2020 Flight Path Design Principles and the National Airport Safeguarding Framework etc., systematically corral community and environmental impacts into the category of unimportance.

The Green Paper continues to formulate policy development that relies on outdated, inaccurate, un-validated assumptions and aviation industry biased reference criteria.

Following is a summary of the main inputs RAWSA contributed in its submission on formulating the Green Paper.

Policy review Inclusion – The Policy Review process must incorporate a comprehensive cost to benefit analysis of the aviation industry which, includes accurate details of both benefits derived and an assessment of all the real hidden costs associated with the industry’s operation.

Policy review Inclusion – The Policy Review process must incorporate meaningful engagement and consultation processes that treat affected communities as genuine Stakeholders with the same status and opportunity for real influence, as aviation industry Stakeholders.

Policy review Inclusion – The Policy Review process must incorporate policy accountabilities such as defined, quantifiable and enforceable parameters to reflect real impacts on affected natural environments and communities. These accountabilities must be robust enough to be publicly reportable performance measures.

Policy review Inclusion – The Policy Review process must integrate environmental and community focused outcomes that do not exist in the 2020/21 Policy document relating to Flight Path Design Principles.

Policy review Inclusion – The Policy Review process must integrate environmental and community focused outcomes that do not exist in the current National Aviation Safeguarding Framework.

Policy review Inclusion. – The Policy Review process must integrate environmental and community focused outcomes on aviation noise impacts that over decades have continued to produce inaccurate predictions within inadequate Environmental Impact Statements around the Nation.

Policy review Inclusion – The Policy Review process must ensure and support the true independence of the Aviation Noise Ombudsman by removing the roles and functions from Airservices Australia administration and transferring these responsibilities to the office of the Commonwealth Ombudsman administration.

With the exception of the ANO's independence, it is difficult to see how; any of these inputs have been properly considered within the consultation and engagement process; or have influenced the Green Paper content.

The White Paper and subsequent Aviation Policy to 2050 must address these community concerns if the *Social Licence* and *sustainability* (in all its contexts) are to be maintained.