

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.

Dear Director,

Please find below feedback on the aviation green paper.

As a 'Green Paper' it is incredibly disingenuous to suggest; The Australian Government is not considering imposing any additional constraints on airports such as curfews or movement caps (p83). What's the purpose of asking for public comment or feedback when the aviation 'options' have already been decided? This is further reinforced in the Ministers forward "These aviation services need to be reliable, competitive and affordable, supported by a robust consumer rights framework". Absolutely nothing about being a good neighbour to residents. Government need to ask themselves, why do Sydney, Adelaide, Brisbane have curfews. It's because of public concern over flight noise. How can this not be an option into the future?

How is it that when KNOWING Airservices has to provide their 'Assistance Program' (free mental health counselling for sleep concerns. etc) that mental health and wellbeing are NOT EVEN DISCUSSED in the Green paper. Waking an entire city at 3:00am is not OK, but tripling aircraft volume is simply white washed as 'a challenge'(p79). Why is Mental Health and wellbeing completely absent from this paper (as opposed to the papers biased focus on 'aviation growth')? There is bound to be significant public health cost (in terms of pollution, lead fuel, noise, sleep, days lost of work etc) and no part of this paper wants to consider this or obtain evidence of this fact?

The aviation green paper is further biased. For example, (p 7) suggests the onus of mitigation is 'The best tool to manage aircraft noise is through effective land-use planning'.

Unfortunately Brisbane was established well before the airport and dual runway in 2020. Current issue for Brisbane is that no consideration has been given that as a sub-tropical climate it's lightweight timber dwellings and outdoor living are completely unsuitable in 'noise mitigation'. No amount of 'noise insulation' or 'property acquisition' (p84) will be a sufficient remedy or make Brisbane 'liveable'. It's unreal to say aviation is a Federally lead but blame state planning? For example, the paper suggests (p80) 'all three levels of government to play in mitigating the impact of aircraft noise' and that 'The Australian, state and local governments can ensure appropriate land-use planning occurs around airports to minimise residential and sensitive development close to them. This is again a falsehood. Any approach to state M.Ps., results in a standard response: "Brisbane airport is subject to the Australian Governments airport planning framework and approvals under the Commonwealth Airports Act 1996...etc. etc.,, it would be appropriate for petitioners to raise their concerns with the Australian government". My point being, the fact that the paper suggest a co-contribution by levels of government is false and misleading as State government are clearly intentionally not becoming involved at ANY level.

If curfews have been pre-decided (p83) as not an option, why does the green paper suggest (p81) “For aviation to continue to grow, airports, airlines and Airservices Australia must actively foster the social licence for airport and aviation activity, which will always need to be the subject of an ongoing conversation, **otherwise there may be restrictions on aviation activity and growth**”? Again this is a falsehood. There is no qualification on what ‘social license’ is or how it could be measured. These are misleading words of propaganda. For an example, for consideration of ‘social license’ (p90) suggests Airservices conduct community engagement for flight paths. How impartial do you think Air Services actions are (corporatised by the government) as our regulator when they are funded by the airline industry? How confident are we with Airservices when you know the Aircraft Noise Ombudsman (ANO) report from August 2021 found the initial Brisbane airspace design put forward in the 2007 EIS was altered a number of times between 2015-2019 without seeking further approval from the Minister for Transport under the Environment Protection and Biodiversity Conservation Act, (a requirement if significant changes are needed.) How ethical is it that Brisbane Airport Corporation have **entirely removed any mention of SODPROPS** from day-time operations at Brisbane Airport when the ministerial approval of the New Parallel Runway and associated flight paths by the Australian Government in 2007 was based on the 2006 Brisbane Airport MDP/EIS, which stipulates that SODPROPS (over water operations) are to be, “the preferred mode as it offers the greatest noise abatement.”? Is this the social licence that is currently acceptable?

The Green paper then (p92) proposes further questions to ‘better manage noise’. These are inane: for example “What else can airlines and airports do to support better management of aircraft noise?” or “How can the flight path design principles be improved?” These are alarmingly condescending. Should not these be exactly what a green paper should be considering? It is noteworthy NONE of these ‘further explorations of opportunities to better manage noise around our airports’ consider **concrete** improvements to people’s lives like a curfew of cap which of course are the only solutions.

The current Green paper is a poorly constructed incredibly biased paper and a maladministration of justice toward consideration of fair and equitable treatment for all by the aviation industry. What we really need is a Royal Commission.

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Kind regards

Rob Symon