

AVIATION GREEN PAPER RESPONSE

Summary

The development of the aviation industry in Australia is important but it needs to be effectively managed with well defined policy and regulation.

Currently there is next to no regulation of the Australian aviation industry and this is having a significant impact on resident's health and well-being, and the environment.

The Australia Government must bring Australia's Aviation industry back in line with other first world countries by:

1. **Appointing an independent regulator.** Airservices is NOT a regulator it is a partner of the aviation industry. **When the regulator is paid by the industry it is regulating, it is no longer a regulator.**
2. **Giving real power to the Aircraft Noise Ombudsman (ANO).**
3. **Implementing aviation noise and emissions regulations /targets in line with other first world countries and the World Health Organisation (WHO).**
4. **Providing some real policy on achieving Net Zero.** Technology will not save you! It will not be implemented at the rate required to counter the growth you are proposing for Australia's aviation industry.
5. **Addressing the true costs of the aviation industry not just the benefits, and actually implementing strategies that work to deal with the negative impacts of aviation such as aircraft noise.** Your current strategies to minimise the impact of aircraft noise are NOT WORKING!
6. **Identifying and taking into consideration ambient noise levels when developing flight paths.**
7. **Imposing additional constraints on airports such as movement caps and curfews.**
8. **Legislating that aircraft with leaded fuel be removed from Australian residential areas, such as Archerfield airport, and limited to flying over uninhabited areas.**
9. **Ensuring an EIS covers the actual flight paths not just the area around the airport.**
10. **Creating clearly defined aircraft noise strategies that:**
 - **Prevent aircraft stacking over communities**
 - **Prevent overlapping of airspace for GA and major airports** eg: Archerfield and Brisbane airspace must be separated.
 - **Ensure all residents get respite and reprieves – even 30km from the airport.**
 - **Ensure quiet rural areas aren't targeted with all aircraft noise while residents next to the airport get nothing.**

- **Prevent concentration of all aircraft noise over a single community more than 10km from the airport. This must prevent all jets and non-jets flying over single highly concentrated paths.**
- **Ensure adequate flight path separation between all paths.**
- **Prevent the dive bombing or circling of residential homes as a form of harassment.**
- **Restrict the number of night-time flights over a single community.**

NOT A POLICY DOCUMENT

The Aviation Green Paper is NOT a policy document, it is a marketing campaign for the aviation industry. A true policy document would acknowledge the impacts, costs and issues associated with the aviation industry and make the tough decisions to actually address the negative aspects of aviation. The Australian government needs to step-up and take control back from Qantas and Airservices.

THE ACTUAL HEALTH COSTS TO AUSTRALIAN RESIDENTS

The Aviation Green Paper focuses solely on the benefits of aviation and totally negates any real impacts of aircraft noise or emissions on residents or the environment. The federal government is being extremely negligent in its assessment of these impacts.

Aviation policy failure has resulted in private and foreign companies making millions at the expense of resident's health and well-being,

Other developed countries around the world are starting to address the actual costs of aviation on resident's health and the environment. Where is Australia's commitment?

“More than 1 billion euros in health damage due to aircraft noise around Brussels Airport”

“36,000 euros in health damage per night flight”

“These figures come as no surprise to Marc Goethals, cardiologist at Onze-Lieve-Vrouw Hospital in Aalst. “Our body reacts autonomously to noise, day and night, because our body subconsciously associates noise with danger. As a result, our body goes into a state of defence, the so-called ‘fight-or-flight response’. This leads to an increase in blood pressure, a faster heartbeat and the release of stress hormones.”

The World Health Organization has been warning for years about the enormous health damage experienced by people living near airports. Epidemiological research shows that we are also extra sensitive to noise at night. Cardiologist Marc Goethals explains: “Repeated exposure to night noise disrupts essential functions of our sleep, even without us consciously waking up. This leads to reduced immunity against infections and cancer, slower physical recovery and it affects our memory functions and our mental health.”

ENV-ISA has calculated that sleep disturbance, blood pressure problems and heart disease cost our society at least 1 billion euros on an annual basis. This means an average of 36,000 euros in health damage per night flight. This is still an underestimate since the costs of medication and

hospitalisation are not included.” (Source: <https://www.aviation24.be/airports/brussels-airport-bru/more-than-1-billion-euros-in-health-damage-due-to-aircraft-noise-around-brussels-airport-environmental-group-says/>)

“Aviation is the main source of ozone, a respiratory health hazard, causing an **estimated 6,800 premature deaths per year**” (Source: Wikipedia)

And yet the Australian and Queensland governments are boasting about Brisbane’s 24/7 airport. How is flying an aircraft over residents, 1000 times louder than the ambient noise level, all through the night, a win for residents of Brisbane?

Thousands of aircraft noise complaints in relation to Brisbane’s aircraft noise, over 200 suburbs impacted and zero acknowledgement there is a problem. And as flight numbers increase, the percentage of flights over the bay is dropping at an alarming rate. Where is the accountability?

NO REGULATION OF THE AVIATION INDUSTRY

There is no regulation of the aviation industry in Australia. It is not regulated by the government or by Airservices. Your “light touch” approach IS NOT WORKING!

Airservices Australia does not work for the residents of Australia, it works to maximise profits of privately owned airlines and airports, many of which are foreign owned.

When the regulator is paid by the industry it is regulating, it is no longer a regulator. It is a partner.

CASA is in the same boat. In any other industry, payments or gifts to a regulator or government minister would be considered corruption. The aviation regulator, like any other industry regulator, must not be able to accept gifts or funds from those it regulates including Chairman’s Lounge or Club Memberships.

The aviation industry needs an **independent regulator** that is government run and does not receive any funds from the aviation industry. It must be at arms length from airlines and airports to be a true independent regulator.

Airservices is captured by the airlines and aviation industry. It must not be the regulator. Airservices should manage operations only, including Air Traffic Control (ATC), and a separate independent regulatory body must be established.

ANO

The ANO **must be granted real power.**

Currently, the Aircraft Noise Ombudsman (ANO) has absolutely no powers and is completely toothless. It is the only ombudsman that is entirely powerless to do anything to alleviate or address what it is actually assigned to do, address aircraft noise. The sole role of the ANO is to oversee Airservices’ noise complaints and community consultation processes. Both of these Airservices process only exist to stonewall residents and ensure no real action so the ANO basically has no real purpose.

MAXIMISING AVIATION'S CONTRIBUTION TO NET ZERO

This Green Paper solely focuses on benefits of the aviation industry and NEVER ADDRESSES THE COSTS! Every industry has costs including the aviation industry. You must implement strategies that actually and realistically address aircraft noise and emissions.

How can the Australian Government do a cost benefit analysis of aviation projects when they only assess benefits and monetary outlays?

The government backed growth of Australia's aviation industry will significantly outstrip the implementation of any new technologies that assist with moving to Net Zero. In addition, there is absolutely no incentive for the aviation industry to reduce emissions because it is completely exempt from any noise or emissions pollution. It is the only industry in Australia with these exemptions.

This legislation should be revoked and reasonable aviation noise and emissions regulations implemented in line with other first world countries and WHO. For example, why is Australia still allowing aircraft with leaded fuel to fly over schools and residential homes at low altitudes? We are worse than a third world country.

“Overall emissions have risen as the volume of air travel has increased. By 2020, aviation emissions were 70% higher than in 2005 and they could **grow by 300%** if nothing is done.” (Source: Deloitte <https://www2.deloitte.com/fr/fr/pages/energie-et-ressources/articles/green-aviation.html>)

Ignoring this is criminal!

You can not grow an industry from 3 million aircraft movements to 8 or 9 million movements with zero cost. You MUST take into account the true social and environmental costs.

Leaving this up to Airservices is negligent. Their only concern is to maximise aircraft throughput and corporate profits. Isn't this a huge conflict of interest?

The Dutch are trying to address the problem while Australia is 50 years behind the rest of the developed world, trying its best to destroy the environment. Where is our government's true commitment to Net Zero?

“The plan to cap the number of flights at Schiphol, one of Europe's busiest hubs, at around 450,000 flights, or 10% below 2019 levels, had been primarily driven by the desire to cut noise pollution. It had also been cheered by environmentalists as needed to reduce carbon dioxide and nitrogen emissions.”

Technology is NOT going to solve the problem.

Most of these technologies may never be properly developed or ever come to market. And why would the aviation industry implement them in Australia if they have no limits on noise or emissions? This whole thing is a complete joke!

What is the backup plan Australian Government? Just let the aviation continue to do as it pleases and endlessly pollute. What you are saying is that the corporate dollar is worth more than residents and the environment. I hope its worth it when you are sitting in your Chairman's Lounge!



You are putting corporate profits ahead of residents – above children being about to get a good nights sleep and focus at school, above people being productive at work because they've had uninterrupted sleep, above being able to focus as you drive, above enjoying a quiet night at home, and above the quality of the air we breathe and the environment we live in.

AIRPORT DEVELOPMENT PLANNING PROCESSES AND CONSULTATION MECHANISMS

It is agreed that the ANEF is insufficient and must be replaced with a better option.

Ambient noise levels MUST be identified and taken into consideration when developing flight paths. In the case of Brisbane Airport's NPR flight paths, aircraft noise is regularly 1000 times louder than the ambient noise level 30km from the airport but is considered acceptable because it is below the 65dB contour.

When Brisbane Airport's New Parallel Runway (NPR) was approved, the government, businesses and residents were told that 90% of flights would go over the bay. We now have less than 50% of flights over the bay with over 50% flying over residents. As a result, the impact of the NPR on Brisbane residents has been significant.

Where is the accountability regarding the approval of these planning processes?

CAPS AND CURFEWS

The Australian Government MUST consider imposing additional constraints on airports such as movement caps and curfews.

Why is the corporate dollar so much more important to this government than resident's health and the environment?

Sydney hasn't suffered with caps and curfews even through the Olympics. It has flourished. Stop throwing residents under the Airbus and wake up to the lies and deceit of the airport and aviation executives. Continual growth is not sustainable. Productivity improvements should be mandated.

GENERAL AVIATION (GA)

The health impacts of lead exposure are well documented. Imagine having it in the drinking water at your children's school.

The Australian Government must legislate that aircraft with leaded fuel be removed from Australian residential areas and limited to flying over uninhabited areas.

Archerfield airport regularly fly low altitude aircraft with leaded fuel over schools and residents reliant on tank water. As a result, and thanks to new Brisbane flight paths forcing these aircraft lower, our only source of water (tank water) is now contaminated with lead. We are not far from the local state school so their tank water and playground would also be contaminated.

ROLE OF GOVERNMENT AND AGENCIES

The role of the Australian Government should be to protect it's residents not private corporations.

If the core focus of the Australian Government includes "environmental sustainability" then why isn't there one single environmental constraint on the aviation industry? In fact, the aviation industry is the only industry in Australia completely exempt from noise and environmental pollution. Other countries are addressing climate change and the impact of aviation on resident's health. Why isn't Australia?

AIRSPACE REGULATION AND MANAGEMENT'

Airservices' Airspace Management is completely INEFFECTIVE.

Airservices is paid by the aviation industry not the government. Why would they care about residents on the ground? Why would they design flight paths that limit impact on residents? They are not accountable to the general public or the government. They do as the aviation industry commands.

Our home is 30km from the airport and we have three levels of aircraft stacking directly over our home while there is 20+km of unused airspace between Mr Coot-tha and the airport. This is NOT effective airspace management. It is dangerous!

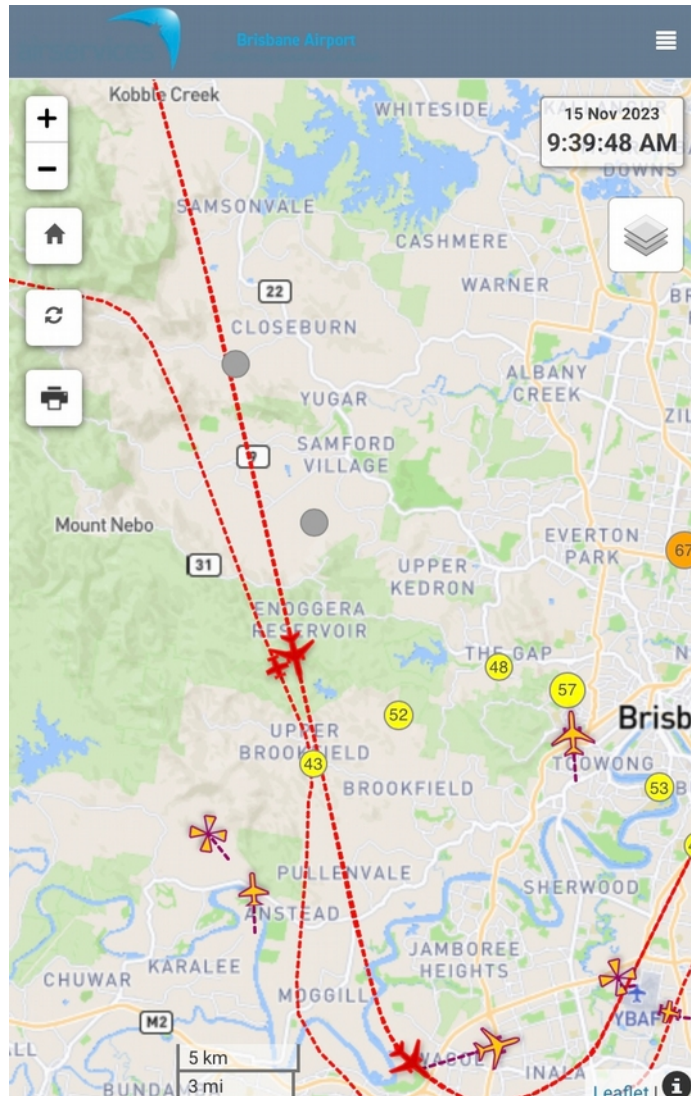


Illustration 1: How is this effective airspace management? Its dangerous!

AIRCRAFT NOISE

Aircraft Noise must be managed through clearly defined strategies that:

- **Prevent aircraft stacking over communities**
- **Prevent overlapping of airspace for GA and major airports** eg: Archerfield and Brisbane airspace must be separated.

Airservices is currently stacking Archerfield aircraft under Brisbane aircraft. It is not taking Archerfield traffic into account when designing flight paths. This is ineffective airspace management. Its ridiculous!

- **Ensure all residents get respite and reprieves.**

Our community has had aircraft noise 24/7 for 3 years without one single day of respite. We even have a path that is used when aircraft are flying in over the bay. Airservices continues

to target our community with 13 different flight paths. How has this been allowed to happen when we are 30km from the airport.

- **Ensure quiet rural areas aren't targeted with all aircraft noise while residents who have chosen to live next to the airport get nothing.**
- **Prevent concentration of all jets and non-jets over a single community or along a single highly concentrated path more than 10km from the airport.**

There is only one super concentrated incoming path to Brisbane's NPR (ILS Star) with zero noise sharing 30km from the airport. The RNP is used less than 5% of the time and never at night.

This level of concentration of aircraft noise over residents is horrendous. Aircraft can be less than 1 minute apart. While residents next to the airport get no aircraft noise ever. Where is the effective airspace management?

- **Ensure adequate flight path separation between all paths.** Currently Brisbane's NPR incoming and outgoing paths almost meet 30km from the airport and cross at Samford. Why isn't there adequate separation between these paths so far from the airport? Why does our community have 13 different paths overlapping our homes when there is unused airspace next to the airport?

On p105 it mentions "Noise Regulations". What noise regulations?

Currently we have to endure:

- 24/7 aircraft noise with no aircraft maximums. Is it OK to send 100 flights over a resident at 1am, again at 2am and every hour through the night? Currently there is no regulation to prevent this.
- No limits on aircraft noise
- No restrictions on aircraft stacking
- No limits on the number of aircraft over a community within a given time
- No limits on aircraft concentration
- No restriction on aircraft circling or dive bombing a residents home thousands of times in order to harass. This is totally legal and OK by CASA. You would NEVER be allowed to rev your car outside someones home in order to harass them yet it is perfectly legal to dive bomb someones house every morning at 7am with absolutely no ramifications. You can circle and harass a resident all day everyday with no problems in Australia. There is absolutely nothing stopping you. And helicopters can be well below 500ft and this is perfectly fine under the current regulations.

WHERE ARE THE REGULATIONS THAT PROTECT RESIDENTS? There is none!

SATELLITE BASE TECHNOLOGIES

Satellite Based Technologies may be used for safety but they also result in highly concentrated paths with limited variation. Airservices currently concentrates all incoming aircraft to the NPR over a single highly concentrated path. These technologies ensure residents never have any reprieve or respite. Airservices must use multiple incoming and outgoing paths and use them equally. Concentrating over 100 aircraft a day over a precise path, 30km from the airport, is cruel.

COMPLAINTS HANDLING

The only role that Airservices has done well is the stone-walling of residents that complain.

NOT ONE ACTION HAS COME FROM AIRSERVICES' COMPLAINTS HANDLING PROCESS.

Airservices' Complaints Handling Process is an information service only. Nothing more. And the ANO's only role is to support this useless process.

Give the ANO some real power and allow staff to actually monitor, investigate and assess:

- the actions of Airservices, airports and airlines;
- the impacts of aviation noise on residents;
- flight path designs and changes; and
- environmental impacts of aviation such as contamination of drinking water.