

18 December 2024

Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594
CANBERRA ACT 2601

Dear Sir/Madam,

Aeronautical Information Publication flight priorities review

Sydney Airport (**SYD**) welcomes the opportunity to make a submission to the review of the Aeronautical Information Publication (**AIP**) prioritisation of flights.

SYD supports the proposed changes in the draft AIP. In particular, SYD strongly supports the proposed changes to prioritise long-haul international flights. These changes are essential for the safe and efficient management of air traffic in Australia and for addressing significant operational challenges currently posed by the existing 'first come, first served' approach to flight prioritisation for ultra long-haul (**ULR**) operations.

Under the current framework, when delays impact operations in Sydney, long-haul international flights are required to join a landing queue alongside short-haul domestic flights despite having flown further, longer, and without the ability to carry the fuel required for extensive holding. In these circumstances, the only way for long-haul international flights to gain landing priority is to declare a mayday. Given the seriousness of such a declaration (which involves the on-airfield deployment of Aviation Rescue and Fire Fighting appliances), it is more likely these flights will be diverted to another airport. This is undesirable for several reasons:

1. **Operational impact on airlines:** Diversions of international flights carry significant operational impacts for airlines. For example, a diverted domestic flight has greater flexibility to find a replacement crew or extend the hours of existing crew, and aircraft and schedules can be adjusted, this is not the case for long-haul international flights. In addition, by the time the aircraft arrives near Sydney Airport's airspace, it may already be operating at the range limit, forcing it into a divert situation instead of being able to go into a holding queue. Unnecessary diversions may add significant cost or increase the required fuel allowance which can impact the viability of ULR operations.
2. **Operational impact on ground operations:** Diversions of international flights also carry significant operational impacts for their new destination, especially at airports which do not usually facilitate international traffic. This includes deploying Australian Border Force officers to screen passengers, and securing fuelling and ground servicing equipment, all of which may not be readily available.
3. **Impact on passengers:** Finally, and most importantly, diversions are an extremely poor outcome for the impacted passengers who, having taken a long-haul flight, may find themselves stranded – perhaps overnight – in an unfamiliar city, without suitable transport arrangements onto their original destination.

This scenario occurred recently at Sydney Airport, with a long-haul international flight diverted to Canberra Airport as it did not have enough fuel to hold before arriving in Sydney. Despite the best efforts of the airline and Canberra Airport, the aircraft was not able to continue its journey, the passengers could not be accommodated on other flights and were required to catch a bus from Canberra to Sydney – adding hours to an already long journey. The airline subsequently advised the aircraft would be out of the network for the equivalent of three trips to its original destination and was eventually returned to its home port empty at significant cost to the airline.

Such incidents, while rare, not only undermine passenger confidence, but also damage Australia's reputation as a reliable destination for international airlines, with affected carriers expressing concern regarding the operational risks associated with Australia's current flight prioritisation.

The proposed changes in the draft AIP directly address these concerns by introducing a commonsense mechanism to prioritise long-haul international flights, limiting holding times to a maximum of 10 minutes (where practical) before



landing priority is granted. This will provide much-needed certainty for airlines, improve operational efficiency, prevent significant disruption for passengers, and enhance Australia's reputation in a competitive global aviation market.

SYD also supports the proposed changes in the draft AIP regarding prioritisation based on weather conditions. SYD considers this to be a pragmatic change, which recognises the operational reality faced by airports and airlines when weather conditions are poor and will make Sydney Airport more efficient as a result.

SYD commends the AIP Flight Priorities Working Group on its efforts to develop these draft changes and supports their swift implementation.

Yours sincerely,

Greg Hay
General Manager – Aviation Operations