

Productivity Commission-Economic Regulation of Airports Public Hearing in Sydney 26th March 2019

Submission by

Australian Business Aviation Association Inc. ABN 32 082 750 492

Background

The ABAA is one of 14 Business Aviation Associations in the world, who are members of the International Business Aviation Council, Montreal, Canada. Business Aviation plays a vital transportation role throughout the world, with in excess of 35,000 turbine powered aircraft in service.

ABAA members operate over 120 business jets based in Australia. Also, several turbo-prop aircraft and helicopters are operated by our members.

Our submission to the 2011/12 Productivity Commission enquiry into Economic Regulations of Airports concentrated on the requirement for larger business jets to operate at primary capital city airports, due to the need for longer runways and other infrastructure. It is pleasing to report that in general, business jets are now welcome at these airports.

Also, the ABAA has achieved improved access to Australian airspace for our members and visiting business jets from overseas. Operations into primary capital city airports improved in 2016 with an amendment to the Airservices Australia Assessment of Priorities, Aeronautical Information Publication (AIP). Now, if a business jet is off blocks on time and has a landing slot if required, the aircraft will be accommodated in the air traffic flow. This also improves safety.

Item 1.

The ABAA requests a study be undertaken to compare charges incurred by business jet operators at Primary Capital City Airports, which include Sydney, Brisbane, Melbourne, Essendon, Perth, Adelaide and Canberra. These airports are owned by the Commonwealth and leased to publicly listed companies and privately owned airport operators.

Airport charges include take-off and landing fees, aircraft parking fees, security fees and ground handling fees in some cases. We are particularly concerned with the very high level of fees at Canberra Airport.

The following airport fees have been advised by ABAA member companies, operating Global Express business jets at Canberra and Sydney airports.

Canberra Airport

Domestic operation, first example

Same day domestic arrival and departure	3,421.03
Aircraft parking one calendar day or part thereof	<u>2,916.05</u>
Total	<u>\$6,337.08</u> plus GST

The aircraft was parked at the RAAF Fairbairn tarmac.
Ground handling was provided by a 3rd party at extra cost.

Domestic operation, second example

Apron development levy \$260.70 per movement	521.40
Apron access/security levy \$440.00 per day	880.00
Landing fee per visit (\$35.43 per MTOW tonne)	1,732.43
Aircraft parking fee \$1,310.44 (\$26.80 per MTOW tonne) per calendar day or part thereof	<u>2,620.88</u>
	<u>\$5,754.71</u> plus GST

International operation

Apron development levy \$260.70 per movement	521.40
Apron access/security levy \$440.00 per day	880.00
Landing fee per visit (\$76.96 per MTOW tonne)	3,763.13
Aircraft parking fee \$3,207.66 (\$65.60 per MTOW tonne) per calendar day or part thereof	6,415.32
	<u>\$11,579.85</u> plus GST

Also, an aircraft arriving or departing Canberra internationally can continue to be charged at the international parking rates for the entire stay even if previous or future sectors are domestic.

Sydney Airport

International operation

FBO arrival movement fee	390.00
FBO departure movement fee	390.00
Airport landing fee	274.98
Airport departure fee	274.98
Airport Security fee	21.76
Aircraft parking fee	280.00
	<u>\$1,631.72</u> plus GST

Item 2.

Recommendation that Sydney Airport Curfew Regulations 1995 be amended to allow business jet aircraft, which are certified to ICAO Chapter IV noise standards and also certified to carry a maximum of 19 passengers, to be permitted to operate at Sydney Airport during the curfew from 2300 to 0600 local time.

This recommendation is supported by the International Business Aviation Council, Montreal, Canada. Also, several Business Aviation Associations including National Business Aviation Association (USA); Asian Business Aviation Association (China and SE Asia); Japan Business Aviation Association; Canadian Business Aviation Association; Business Aircraft Operators Association (India); Associacao Brasileira de Aviacao Geral; Middle East and North Africa Business Aviation Association; African Business Aviation Association; European Business Aviation Association and the British Business and General Aviation Association support the recommendation.

Also, several aircraft manufacturers including Bombardier, Gulfstream and Embraer support the recommendation, as the current regulations discriminate against business jets with a Maximum Take-Off Weight (MTOW) of more than 34,000kg. These quiet, fuel efficient long range aircraft are certified to the latest ICAO Chapter IV noise standards and are also certified with no more than 19 passenger seats.

Background

Business jet operations during the curfew at Sydney Airport have been important for overseas visitors and many Australian business jet operators since the 1970s.

Several submissions during recent years by the ABAA, to the Department of Infrastructure, Transport and Regional Development, have included the recommendation that the MTOW limitation of 34,000kg, established in 1995 for low noise jet aircraft permitted to operate during the curfew, be amended to reflect the latest ICAO Chapter IV noise standards for all business jet aircraft certified since 2006. These include business jets with an MTOW above 34,000 kg and with maximum certified seating for nineteen passengers, which is recognised worldwide as the benchmark for business jet operations.

In 1995, the MTOW of 34,000 kg was based on the Gulfstream GIV, the largest business jet in general use throughout the world at that time, with an MTOW of 33,800 kg. This was very short sighted as logic would say that this should have been amended several years ago to enable newer, quieter and more fuel efficient long range business jets to operate during the curfew.

We acknowledge that the MTOW of 34,000 kg can only be deleted or increased if both the House of Representatives and Senate agree to a change.

Economic case for change

There has been a worldwide trend in the past decade for business jets to be increasingly capable of long range international operations. Unfortunately, current Sydney Airport Curfew Regulations disqualify newer, quieter, more fuel efficient long range business jets. Operators of these larger aircraft are discriminated against. Removal of the weight restriction would lead to an increase in economic activity for Sydney, NSW and Australia. It would also enable new aircraft on order to operate at Sydney during the curfew, as replacements for noisier, less efficient business jets.

Low noise, not weight

Business jet operations during the curfew should be based on noise, not weight. This position was supported by Deputy Prime Minister Warren Truss when he was also Minister for Infrastructure, Transport and Regional Development from 2013 to 2016. Noise, not weight is also supported by Sydney Airport Corporation Limited and by the aviation industry.

Under the current interpretation of the regulations by government agencies, it is permissible to operate a Global Express (with a flight manual supplement) from Nadi to Sydney and land during the curfew, but not from airports of departure further afield, such as Honolulu. This interpretation serves no practical purpose as the low noise footprint on arrival over Botany Bay will be the same in both cases.

Departures and arrivals over Botany Bay

We agree with the requirement for low noise jet aircraft to take off from runway 16R during the curfew, with the take off roll commencing south of the intersection with taxiway G and for landings to be on runway 34L. Runway 16R/34L is the longest runway at Sydney Airport. Should a downwind component be present, the flight crew could either elect to carry out the landing or divert to another airport.

Departures: The requirement to take off from runway 16R results in virtually no noise to surrounding suburbs as the track is over Botany Bay and then over sand dunes and out over the Pacific Ocean. This is known as the KAMPI Standard Instrument Departure (SID).

Arrivals: The requirement to land on runway 34L currently results in the aircraft approaching from the south, over the Pacific Ocean, parallel to the coast and then over Kurnell before landing. Apart from Kurnell, the noise impact on surrounding airport suburbs is close to zero.

The ABAA has requested Airservices Australia prepare a Standard Instrument Approach (STAR) utilising the reverse track of the KAMPI SID. We have been advised this should be feasible, with the new STAR being over the Pacific Ocean, sand dunes and then west of Kurnell prior to landing on runway 34L.

Aviation Sunsetting

Senior offices of the Department of Infrastructure, Regional Development and Cities have been reviewing Australian airport-related regulations through the sunset process over the past year or so, with a decision made last year to extend the sunset date of ten Aviation and Airports Division instruments including the sunsetting of the Sydney Airport Curfew Regulations until 1st April 2024. This would facilitate a “thematic” review of these ten instruments.

The ABAA has requested the review of Sydney Airport Curfew Regulations 1995 be carried out as a priority.

David Bell OAM

Chief Executive Officer

Australian Business Aviation Association Inc.

W www.abaa.com.au

No Plane No Gain