

## Australian Business Aircraft Association Inc.

ABN 32 082 750 492

9 Guthrie Ave

Cremorne NSW 2090

Phone 02 9953 0363

Website [www.abaa.com.au](http://www.abaa.com.au)

7<sup>th</sup> November 2011

Economic Regulation of Airport Services  
Productivity Commission  
GPO Box 1428  
Canberra City ACT 2601

Dear Madam/Sir,

### **Productivity Commission - Economic Regulation of Airport Services Public Hearing in Canberra 5<sup>th</sup> October - Transcript received 23<sup>rd</sup> October**

The Australian Business Aircraft Association Inc. (ABAA) submits the following comments and additional information concerning the presentation by Mr Peter Fitzgerald, Sydney Airport Community Forum, regarding aircraft noise.

The approved list of low noise jet aircraft permitted to operate at Sydney Airport during the curfew has not been updated since 2005 and the approved list for Adelaide Airport has not been updated since 2000. All of the jets on these approved lists have been certified to ICAO Chapter 3 requirements - i.e. they are all considered to be low noise.

A summary of progress regarding reduction of aircraft noise is included in ICAO Annex 16 of the Convention on International Civil Aviation. The following is an extract from the ICAO website:

QUOTE The first generation of jet-powered aeroplanes was not covered by Annex 16 and these are consequently referred to as non-noise certificated (NNC) aeroplanes (e.g. Boeing 707 and Douglas DC-8). The initial standards for jet-powered aircraft designed before 1977 were included in Chapter 2 of Annex 16. The Boeing 727 and the Douglas DC-9 are examples of aircraft covered by Chapter 2. Subsequently, newer aircraft were required to meet the stricter standards contained in Chapter 3 of the Annex. The Boeing 737-300/400, Boeing 767 and Airbus A319 are examples of "Chapter 3" aircraft types. In June 2001, on the basis of recommendations made by the fifth meeting of the Committee on Aviation Environmental Protection (CAEP/5), the Council adopted a new Chapter 4 noise standard, more stringent than that contained in Chapter 3. Starting 1 January 2006, the new standard became applicable to newly certificated aeroplanes and to Chapter 3 aeroplanes for which re-certification to Chapter 4 is requested. Most recently, CAEP/8 in February 2010 requested the noise technical group to review and analyze certification noise levels for subsonic jet and heavy propeller driven aeroplanes and, based on the analysis, develop a range of increased stringency options. This analysis will be considered at the CAEP/9 meeting in 2013.END QUOTE

The point we wish to make is that airframe and engine manufacturers have been working together for many years to reduce noise and emission levels. Chapter 4 noise requirements have resulted in even lower noise levels for aircraft certified since 2006. It is important to acknowledge that business jets certified since 2006 have met Chapter 4 requirements.

At the public hearing, Mr Fitzgerald stated that:

QUOTE The quietest aircraft that operated for a number of years - jet aircraft I'm talking about, not propeller aircraft - into and out of Sydney was the BAE-146, and they were even allowed to land on the Docklands in London because they were a quiet aircraft. But because of other reasons it's no longer a viable aircraft. It had some other technical issues that relate to it. It's a quiet aircraft. But I'm not aware of any other significantly quieter aircraft. When you're talking about noise levels of somewhere between 70 and 100 decibels, to remove two or three decibels, it's not possible, and where the engineers are working now is marginally in the engines, the nacelles that go round the engines and the air frames themselves. But their targets are for one decibel and two decibels, that's their target for their design projections as time goes on. They're spending significantly more time with engines and getting fuel efficiency but the airframe makers are talking about really small - - END QUOTE

The issue of the BAe146 (max take-off weight 38,102 kgs) raised by Mr Fitzgerald is relevant and the fact that it is approved to operate into London City Airport is also relevant. Many business jets are also approved to operate into London City Airport, including several, which have been certified since 2006.

Amendments to the approved lists of low noise jet aircraft permitted to operate at Sydney and Adelaide airports during the curfew are overdue. Also, the maximum take-off weight of 34,000kgs (set in 1995) should no longer be considered to be reasonable as heavier and quieter business jets have been introduced to the market over the past 10 years or so.

Thank you.

Yours faithfully

David Bell  
Executive Director  
7<sup>th</sup> November 2011