



08th March 2023

Mr Jason Dymowski
Domestic Aviation White Paper group
Via email: DAP@infrastructure.gov.au

Dear Jason

RAAA Submission on the Aviation White Paper

The Regional Aviation Association of Australia (RAAA) welcomes this opportunity to make a submission to the Aviation White Paper (AWP) process.

The RAAA represents over 100 aviation organisations, from the larger regional airlines to flying schools. We also have a large number of organisations who are major suppliers to the aviation industry through the services they provide. We believe the RAAA is therefore in a very unique position at the heart of aviation in Australia.

Our members are those who suffered the most through Covid, most without government assistance and will be at the forefront of the drive to net zero by 2050. Our members are on board with the push to net zero but the constant question is how! We hope through the AWP process, the government will clearly outline how our small to medium sized (regionally based) businesses will be able to make this incredibly expensive transition. It cannot be understated how essential regional aviation is to the whole aviation ecosystem and most our members go about their work unnoticed by Canberra. Without support from Federal and State governments, this transition could be the straw that breaks the camel's back and Australia's regional aviation network could be severely diminished, further alienating our regional and remote communities.

I have prepared some comments around the Terms of Reference (ToRs) at this stage as advised and have also included previous submissions on the many consultation process over the years. I understand that this process will lead to a Green Paper for which further consultation will be done.

The RAAA looks forward to engaging with government through this process to ensure that regional aviation is not unfairly or disproportionately affected by future policies.

Best regards,

Steven Campbell

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Serving regional aviation, and through it, the people and businesses of regional Australia.

Aviation White Paper: Terms of Reference

Purpose:

The RAAA recognises the importance of a forward-looking White Paper, however, we are concerned that the focus as set out in the “Purpose” section does not articulate clearly the need to overcome current burdens on the industry. There is a need to understand where the industry is at today before you can assume what it will be tomorrow. The RAAA would like to see a statement that will ensure, through this process, that a snapshot of the health of the industry is undertaken to better understand what levers can be used to bridge the gap to what will be required in the years ahead.

Scope and themes:

- Aviation’s role in the economic development, trade and the visitor economy-general, domestic, regional and international aviation.

Whilst this is obviously an important metric to understand, work on understanding this ‘role’ of aviation has already been undertaken in the previous government’s paper on “The future of Australia’s aviation sector-flying to recover” in 2020. The paper opens with this statement:

“Aviation is central to Australia’s economy and quality of life. Aviation underpins Australian business: transporting workers, tourists and high value freight. The sector directly employed over 90,000 people and contributed \$20 billion to the economy before COVID-19. Furthermore, the sector indirectly enables the tourism, mining, manufacturing and higher education sectors.”

So the need for further deep dives into understanding the value of the aviation industry seems unnecessary and could possibly lead to distraction from the main value of the white paper in addressing policy issues the industry are facing now and into the future.

- how to maximise the aviation sector’s contribution to achieving net zero carbon emissions including through sustainable aviation fuel and emerging technologies;

The RAAA welcomes this focus on net zero for aviation as there is a lot of uncertainty amongst our members on the ‘how’ to get to net zero. Not all aviation organisations have the resources of the larger airlines, and it is imperative that this white paper provides regional aviation companies a clear pathway and understanding of the support the government will provide in attempting to reach net zero by 2050. It is also important to understand the government’s position on what measures will be in place for sectors of the industry that just can’t practical achieve those targets. This is very much a possibility when looking at the costs to achieve these targets with new aircraft/technology and of course the supply chain for SAF in our remotest parts of Australia.

It is not all about the aircraft though as much work still needs to be done to improve our Air Traffic Control system and to seek out further efficiency gains for things such as direct routing, flex tracks to make better use of winds and constant descent paths. Additional ADS-B ground stations would permit earlier identification of aircraft on departure at aerodromes outside capital cities (for example, the “Iron Triangle” in the Pilbara region of WA). This would permit ATC to provide track shortening, aircraft would be able to enter controlled airspace more efficiently (sometimes required to remain at lower altitude until identified) leading to reduced fuel burn.



- [changing aviation technologies and ways to position our policies, regulations and systems to encourage uptake and manufacturing of new, more efficient, transport technologies;](#)

It is essential that Australia becomes a country of choice for manufacturing organisations of future aviation technology. All too often we have to look overseas for manufacturing of aviation products. Already we are seeing growth in this sector for AAM as well as hydrogen/electric propulsion manufacturers. Reducing regulatory red tape without affecting standards as well as providing financial benefits for organisations to remain in Australia are key to elevating our record in manufacturing.

- [airport development planning processes and consultation mechanisms that consider the impact and changing nature of aircraft noise and related expectations on the role of noise sharing and noise mitigation;](#)

The RAAA hopes that this focus is also looking at the importance of maintaining the intent of the Airports Act in ensuring aviation activity at Federally Leased airports, in particular the GA airports. Master Plan and MDP processes need to be scrutinised to ensure that airport lessees are complying with this intent and whilst the RAAA understands the importance and value in non-aviation commercial leases, it cannot be at the expense of aviation. We have seen bad examples of GA airports ignoring the plight of aviation operators, such as Moorabbin Airport and the government needs to set clear policies on sustainable aviation operations. This is particularly so when the government is providing funding assistance for any projects at our airports, requiring the airports to show their plans for ensuring aviation activity is not detrimentally affected by any supported project.

The RAAA is also concerned of the growing influence of anti-noise activists within certain electorates close to major airports and the impact they have on flight path planning. The RAAA would like to see the government support Airservices Australia's "Community Engagement Standard" on future flight path planning and ensure that future flight path planning remains safe and efficient without political interference.

The RAAA does not support curfews, movement caps or any other legislation that will reduce the efficiency of airport operations. See the first dot point on why aviation is so important to the nation's economy.

- [how to support and regenerate Australia's general aviation sector;](#)

Much work has already been done in this space and we hope that this work does not have to be replicated here again. The RAAA also appreciates CASA's efforts through their GA workplan, however the timing of outcomes seems to be uncertain, so we would like to see more resources put to this effort.

It is also important to understand how the move to net zero could affect GA in fuel and technological advances. All these new technologies come at a fairly hefty cost, something that we would like to understand how the government thinks GA can overcome these hurdles. Our current GA fleet cannot operate on SAF (mostly) and there is increasing uncertainty around the supply of AVGAS at regional airports. Focusing on future fuels without understanding the effect on transitioning from today's fuel could leave many regional airports without the type of fuel needed for the local aviation industry.



- [future industry workforce skills and training requirements;](#)

This should be a major focus of this AWP, but not just future workforce, we have to solve the problems of today's skills shortages to even start to contemplate what is needed in the future. Engineering shortages are critical and we would prefer to see answers to this rather than what engineers we will need for 2050!

It is time to rewrite engineer training and to bring in all the States who manage trade courses. As in our paper on LAME shortages, we need a national approach to streamline engineer training so that we don't lose young men and women who enter the system and then lose sight of their pathways. A National Aviation Academy will look to bring all that training under one system but still be able to be managed by the States. Aligning funding and licencing is also essential and we feel this can be achieved with this process.

We would also like to see modern training techniques such as Virtual Reality be welcomed with open arms rather than looks of distrust as is the case today. Saving time in the air or even in the classroom with realistic training will save time and money but importantly maintain standards.

- [appropriate consumer protections and access to services;](#)

The RAAA welcomes a focus on 'access to services' for regional communities and to see how the government can assist state and local governments in providing air services to smaller regional communities. Regional aviation suffers from the 'tyranny of distance' and the 'economy of scale', both working against it to secure feasible air services. Work was done by the Senate Committee Inquiry into regional air services many years ago which highlighted the many hurdles to regional air services that still exist today.

- [maintaining fit-for-purpose aviation safety, air navigation and aviation security systems and service delivery agencies;](#)

Our aviation agencies are all suffering from resource shortages, from CASA's service delivery delays to Airservices Australia's downgrading of airspace due to lack of sufficient air traffic controllers. The RAAA welcomes this focus however are concerned about how the government plans on 'maintaining' them.

Safety as with security are now national benefits that nearly all Australians enjoy. Smaller regional airlines and other aviation companies can ill afford higher costs to help 'maintain' these agencies. The RAAA wants to see a national approach which will ensure any future increase in funding can be managed nationally, this is definitely the case for airport security. The disproportionate costs to small regional airports can make some regional air services unviable. Estimates on security screening costs per passenger at major airports can be as low as a few cents, but this rises exponentially at regional airports where it can be up to \$40-\$50 per passenger. Passengers on Sydney to Melbourne flights are still benefitting from safe and secure regional aviation, they should help pay for it.

- [the role of airlines and airports in supporting regional economies;](#)

As with the very first dot point, work in this area has been done in depth previously. We all know the value for regional communities their local airport and the airlines that service them is. We cannot overlook other aviation services as well, such as charter companies, maintenance hangars and even flying schools. The white paper should not just focus on the airline aspect, as important as that is, but also the likes of charter companies who can connect people to towns or cities that the airline may not. Or even the flying school who train pilots who may go on to do crop dusting as an example. And obviously we need someone to service the aircraft. There is a whole system to look



at for regional towns which rely on aviation so much for connectivity to families, business, health care and of course tourism.

- [other significant issues raised during the consultation process.](#)

I have included with this letter a number of previous RAAA submissions on aviation reviews for your reference including;

- Aircraft Maintenance Engineers shortage-Crisis and Opportunity, Oct 2022
- Aerodrome Management Services-Regional airport feedback for white paper, Feb 2023
- TAAAF Policy Paper 2022
- ACCC consultation on airport monitoring, Nov 2022
- The future of Australia's Aviation sector 2020
- Senate Inquiry into the state of Australia's General Aviation industry, Aug 2020

The RAAA will review the results of the Green Paper to consider if further issues need to be raised.