

BRISBANE AIRPORT CORPORATION

Preliminary Submission – Senate Committee into the Impact and Mitigation of Aircraft Noise

5 April 2024





Summary

Brisbane Airport Corporation (BAC) welcomes the Senate Rural and Regional Affairs and Transport Committee's Inquiry into the impacts of aircraft noise in Australia.

For Australians, aviation is an essential service.

Our country's sheer size, and our dispersed population, mean that aviation is very often the only viable means of connecting people and services across the country. This is especially the case for our regions.

Aviation is also the primary means of connecting Australia to the world, supporting our tourism, international education, and key export industries, amongst others.

Whilst these principles are simple ones, our industry is complex, with many hundreds of organisations, and thousands of people, playing vital roles in the delivery of aviation services every day – including government agencies.

The benefits of aviation are broad, benefiting all Australians economically and socially. And as a key piece of the nation's aviation infrastructure, Brisbane Airport is obligated to ensure that the public's demands for aviation services are met.

We must also support the interests of many stakeholder groups, often with competing interests. We work hard to ensure that we balance these interests.

But the burdens of aviation – most particularly noise – are borne very locally, around our nation's airports.

The challenge of aircraft noise is not unique to Australia. The pursuit of a better balance between the needs of people to travel as well as the demands of modern economies, and the resulting noise from aviation, challenges airlines, aircraft manufacturers, air traffic navigation providers and airports the world over.

Whilst this particular Inquiry is looking at this challenge in the Australian context, our submission will, necessarily, concentrate on the Brisbane Airport experience.

We recognise that for some people, aircraft noise is a genuine problem. We recognise too that the reduction of aircraft noise is complex and requires the commitment of airlines, airports, and government bodies - and that this can cause community frustration.

Ultimately, it is in the best interests of all for aircraft noise to be reduced.

Brisbane Airport (BNE) is a critical public infrastructure asset that connects Brisbane and Queensland to the rest of Australia and the world. It is Queensland's most important transport hub.

Currently, more than 20,000 people work on-site at BNE and more than 125,000 jobs state-wide are enabled by the airport's operations.

Construction of Brisbane's New Parallel Runway (NPR) commenced in 2014 in response to significant aviation demand growth at that time, and Queensland's rapidly growing population (set to grow 36% by 2041). The runway, and the growth capacity it enables, is central to support aviation into the future.

The addition of the new runway to Brisbane Airport's system required the design of new flight paths, and changes to some paths servicing the legacy parallel runway. This exposed some areas of Brisbane and surrounds to aircraft noise for the first time and reduced the noise burden on communities under legacy flight paths. Since the opening of the new runway in mid-2020, community members have expressed concern about the noise impact of Brisbane Airport and its future growth plans.

BAC has limited influence in reducing aircraft noise, however, throughout the runway development and construction process, has engaged openly and transparently with all stakeholders and the community. After the runway opened BAC also worked closely with the community and AsA and the community on initiatives to reduce noise impacts, including Flight Path Compliance initiatives with Virgin Australia, AsA's Post Implementation Review and the Brisbane Airport Community Airspace Advisory Board.



Nonetheless, there remains a belief within some parts of the community that the operation and growth of the airport should be curtailed through mechanisms such as movement caps and curfew. It is Brisbane Airport's view that caps and curfews are not necessarily the best policy tools to address aircraft noise, with the negative impacts of this approach on the broader community, and economy generally, outweighing any perceived benefits. There is a range of other options to address aircraft noise that should be prioritised.

BAC supports minimising the noise impacts of BNE operations on neighbouring communities, while balancing its obligations to support aviation and passenger movements in one of Australia's fastest growing regions. BAC is committed to working with regulators, industry and the community to investigate and prioritise options that balance its obligations.

Brisbane Airport's New Parallel Runway project

The opening of Brisbane's New Parallel Runway (NPR) in 2020 marked the completion of long-term planning for Brisbane Airport which commenced as early as 1971. From that point a wide-spaced parallel runway system (in a north-south alignment) has been a key feature of the ultimate development vision for Brisbane Airport.

The parallel system remained the central planning feature for future expansion in the period up to BAC's purchase of Brisbane Airport in 1997. BAC retained this planning vision, with some minor improvements, in its first two Master Plans 1998 and 2003 respectively (both approved by the then respective Ministers).

The need for the construction of a second runway was evidenced with concerted public campaigns (e.g. #BNElateagain) to highlight continued delays at BNE. These delays were directly linked to congestion at Brisbane Airport because of insufficient runway capacity and highlighted the need to expand capacity to match the demands of a growing city and state.

Let fly with your complaints to Brisbane Airport Corporation on twitter using the hashtag #bnelateagain

BRISBANE Airport Corporation is learning the power of the angry tweet.





Source: The Courier Mail, 4 March 2013

Work on the site began in 2012 with the major stages of construction and commissioning completed in mid-2020, ready for the runway to be officially opened on Sunday 12 July 2020, mid-pandemic.

BAC published consistent information on the proposed operation of the NPR and the anticipated noise impacts on the community from its 1998 Master Plan to the opening of the NPR. BAC also published clear and accurate information in 2014 and 2020 that showed the noise impacts on communities, based on the best available noise modelling information.



The Aircraft Noise Ombudsman (ANO), in its investigation of Air Services Australia's (AsA) community engagement process (for airspace changes related to the new runway project), found BAC had delivered an extensive campaign to inform the public of the impacts prior to the runway opening. The ANO found no supporting evidence of misinformation in BAC's documentation or supporting public material, despite numerous claims from complainants to the contrary.

It has been estimated that by 2035 the new runway will lead to the creation of 7,800 new jobs and contribute an additional \$5 billion in annual economic benefit to the region. What's more, the NPR future proofs Brisbane's growth as BNE supports one the fastest growing regions in Australia.

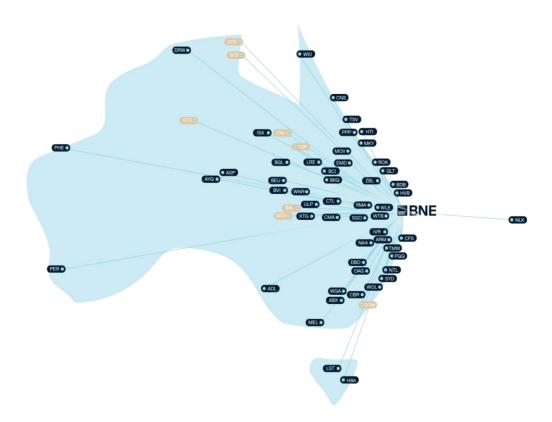
Brisbane airport is the most connected domestic airport in Australia, connecting regional Queensland with the world

The importance of 24/7 operations

Domestic Flights

BNE is the most connected domestic airport, servicing 61 domestic airports, 27 of them in regional QLD. In FY23, BNE facilitated the movement of:

- 44,043 average domestic passengers per day
- 407 total domestic aircraft movements per day; to
- 59 domestic ports across Queensland and Australia



Demand to move passengers through BNE is expected to grow considerably over the next two decades. This means by FY42, 15m passengers will pass through our International Terminal and another 34m passengers will transit our Domestic Terminal.

Growth is being driven by two major factors: QLD population growth (set to grow between 34-36% by 4045-46), and economic growth (estimated at 2.3% p.a.).



International flights

BNE is Queensland's major international gateway, facilitating services across 30 international ports, including major regional hubs such as Singapore, Hong Kong, Doha, Dubai, Auckland, Los Angeles, San Francisco, Vancouver and soon, Dallas. A bulk of travellers transiting BNE (over 70%) are leisure travellers (supporting Queensland's vital tourism industry) or travellers visiting family or relatives, underscoring the importance of BNE as a key infrastructure asset facilitating social connections. 24/7 operations are crucial to supporting international airline schedules, noting differing time zones and the need to connect to key international hubs.



Air Freight

BNE plays a crucial role as Queensland's primary gateway for air freight, and particularly the facilitation of international export cargo. Nearly 46,600 tonnes of freight were carried from BNE in FY23, with major export products including meat, seafood, fruit, vegetables and other perishable products. These products reached key Australian export markets, including Singapore, New Zealand, Hong Kong and the United Arab Emirates. Almost 10% of jobs at BNE are within the cargo, freight and logistics industry, with key sector leaders located on airport, including Australia Post, DHL and Team Global Express (formerly Toll). Key imports include pharmaceuticals, spare parts (particularly for heavy machinery) and electronics, underscoring the importance of air cargo for time sensitive freight.



Top 10 Exports from BNE CY23

CY23 Rank	Nation	CY23 Tonnes	Major Commodities Summary		
1	New Zealand	7,661	Vegetables, fruit, paper products, machinery & mechanical appliances, pharmaceuticals		
2	Singapore	7,237	Beef, pork, fruit, metal products (eg: Tube & pipe fittings)		
3	Hong Kong	3,522	Beef, pork, fruit, vegetables, fish, vitamins		
4	USA	3,436	Beef, fish, fruit, mining and construction equipment, machinery & parts, metal products (eg: Tube & pipe fittings), plastics		
5	Japan	3,168	Beef, fish, fruit, vegetables, edible offal, Clay and mineral products		
6	Papua New Guinea	2,512	Mining equipment, machinery & parts, car parts, mechanical appliances, fruit, dairy products, alloy steel, metal products, paper products		
7	United Arab Emirates	1,709	Beef, fruit		
8	South Korea	1,439	Beef, fruit Juice, fruit, Provitamins and vitamins		
9	Vietnam	1,308	Beef, fruit (mostly grapes), edible offal, leather		
10	Taiwan	1,275	Beef, lamb, clothing, fish		
	Others	13,271			
	Total	46,539			

BNE is arguably the best-connected airport in Australia with direct links to major domestic air, land and sea ports and key road linkages including Airport Link and Legacy Way (west) and the Pacific (south) and Bruce Highways (north). The Gateway Motorway and bridges provide direct links to the Port of Brisbane and the Brisbane Multimodal Terminal.

By operating 24/7, BNE offers exporters more than 300 weekly departing international services and a choice of 23 international carriers (including dedicated freighters). These carriers operate scheduled non-stop flights to 29 international destinations across Asia, North America, the South Pacific and the Middle East. This significantly benefits local Queensland producers and farmers, allowing them to transport perishable freight overnight, avoiding potential air traffic delays and maintaining flexibility in reaching international destinations at suitable times.

The facilitation of cargo services - particularly in passenger aircraft holding areas - contributes to the profitability and sustainability of passenger services, with international services providing the largest opportunities for growth. This is due to the higher carrying capacity of wide body aircraft, and the potential provided by growing international markets (e.g. Vietnam, India, South Korea).

The economic and social contribution of BNE

BNE's operations are a key driver in the long-term growth for Queensland, generating jobs, investment and economic opportunity.

In 2022-23, BNE directly contributed \$2.9 billion towards Queensland's economy and indirectly through its substantial supply chain and employee expenditure another \$1.6 billion in flow on benefits. By 2045-46, these estimates are expected to rise to \$7.5 billion and \$4.2 billion respectively.

In respect to employment, BNE's 599 businesses employ 19,610 persons (representing the largest employment clustering in Queensland outside of central business districts) and indirectly through its supply chain and employee expenditure provide another 14,339 Queensland jobs. By 2045-46, BNE's direct workforce is anticipated to increase to 51,520 and will increase to 37,694 indirect Queensland jobs created.



As a consequence of BNE's role in enabling regional trade, tourism, international education, resources and business sectors, the Brisbane Airport is forecast to enable \$10.8 billion in economic activity through the movement of persons, goods and services enabling 123,874 jobs.

Through BNE's enabled economic activity, 66,158 regional jobs are forecast to be created in 2025-26 rising to 79,358 jobs in 2031-32 and 101,898 jobs by 2041-42. Without BNE as a cornerstone, the 30.4 per cent (1,621,099 persons) of Queenslanders who live outside of Southeast Queensland would not have the same economic and social opportunities as they do currently. Quite simply both SEQ and Queensland's regions rely on BNE's operations for their social and economic sustainability.

The economic implications of caps and curfews for Queensland would be substantial

In 2023 the Greens transport spokesperson and Federal MP for Ryan, Elizabeth Watson-Brown, introduced *The Brisbane Airport Curfew and Demand Management Bill 2023 (Cth)*. The Bill proposed the introduction of a curfew on Brisbane Airport from 10pm to 6am, and an hourly movement cap of 45 flights per hour at BNE. The Bill also proposed the introduction of a Long-Term Operating Plan to move more flights over Moreton Bay, a distribution of flight traffic across suburbs, and overall reduction in flight noise.

Whilst the imposition of caps and curfews at Brisbane Airport is proposed to address the interests of some Brisbane residents, it would disproportionately affect the interests of communities across Queensland, most particularly small and large regional towns.

At present, there is an even spread of flights across morning and evening peaks. At curfewed airports airlines tend to prioritise larger aircraft in periods adjacent to closure times, to maximise passenger throughput and revenue. This means smaller aircraft, which generally support regional flights, have reduced access to runway slots.

Modelling by respected economist Nick Behrens of Queensland Economic Advocacy Solutions (QEAS) analysed the impact this loss of connectivity would have on Queensland communities reliant on Brisbane Airport for tourism, essential deliveries and the exports of goods. As is outlined in the table below, caps and curfews would have direct impacts on regional flights arriving at BNE, with a correlating reduction in passenger numbers. The dramatic reduction in passenger numbers would, in turn, lead to less economic activity in Brisbane, Queensland and the rest of Australia, culminating in an economic loss of over \$2b annually in 2031-32. The reduction in economic activity would have a corresponding impact on jobs, with a reduction in over 24,500 in the same period.

¹ Behrens, Nick, 2023, *The Economic Impacts of Caps and Curfews on Regional Queensland – Stage 1*, Queensland Economic Advocacy Solutions, Brisbane.



Reduced Flights and Passengers - Number					
	2018-19	2025-26	2031-32	2041-42	
Flights	10,010	16,104	35,885	88,062	
Passengers	189,006	880,591	3,424,386	11,031,379	

Reduced Gross State Product \$millions (CVM)						
	2018-19	2025-26	2031-32	2041-42		
Direct – QLD	\$124.5	\$203.3	\$396.4	\$935.6		
Indirect – QLD	\$65.5	\$106.9	\$208.4	\$491.9		
Indirect – Rest of AUS	\$17.1	\$27.9	\$54.5	\$128.5		
Enabled – QLD & AUS	\$518.4	\$846.2	\$1,650.1	\$3,894.5		
Total	\$725.5	\$1,184.3	\$2,309.4	\$5,450.5		

Reduced Employment - Number						
	2018-19	2025-26	2031-32	2041-42		
Direct – QLD	1,122	1,831	3,570	8,426		
Indirect – QLD	523	854	1,665	3,931		
Indirect – Rest of AUS	137	223	435	1,026		
Enabled – QLD & AUS	5,928	9,677	18,871	44,539		
Total	7,710	12,585	24,542	57,922		

Regional impacts

Brisbane Airport currently supports flights to 27 regional destinations across Queensland. Key ports include Miles, Roma, Charleville, Longreach, Mt Isa, Cloncurry, Emerald, Moranbah, Proserpine, Hamilton Island, Gladstone, Hervey Bay and Bundaberg.

Analysis confirms that a curfew and hourly flight capping (to 45 movements) would stifle regional economic growth as a result of a substantial loss of regional passenger and freight flights that in turn costs tourism, businesses, jobs, exports, and impacts to the broader community.

Cairns, Townsville, Mackay and Rockhampton would be the most affected economically, given the importance of the agriculture, resources and tourism industries to these cities, and their underlying population densities.

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The reduction in regional Queensland employment is forecast at:

- 3,525 regional jobs by 2025-26;
- 6,905 jobs by 2031-32; and
- 16,414 regional jobs by 2041-42.

Fourteen regional Queensland communities do not have any substitute for the services provided by Brisbane Airport. These include Barcaldine, Blackall, Cloncurry, Charleville, Emerald, Longreach, Roma, Weipa and Miles.

Industry impacts

The industry sectors that would suffer the most significant economic losses from a loss of connectivity are aviation, freight and logistics, tourism, exporters and the resource sector. Similarly, the four industry sectors with the most significant job losses would be aviation, freight and logistics, tourism and exporters. The impacts of caps and curfews would have practical implications for key economic sectors, including:

- Decreased export opportunity to key export markets, particularly for our agricultural sector
- Resource sector disruption (particularly with fly in/fly out workforces)
- Decreased tourism flowing from reduced flight and passenger movements with tourism employing 1 in 15 Queenslanders.
- Decreased ability to send freight overnight (particularly to regional areas)
- Decreased productivity and increased business costs
- Compromised business travel.

Impacts on Queenslanders

Reduced connectivity to Regional Queensland: BNE plays a critical role in connecting regional Queensland. BNE's role as a regional connector is significant and rapidly expanding. BNE's unrestricted operations remain central to its role as a major regional dispersal airport.

Reduced access to medical care: BNE is integral to the provision of health care for regional Queenslanders, with thousands of patients requiring access to Brisbane for urgent treatment, plus the flow of specialists into regional and remote communities. Cancer drugs, blood products and vaccinations also rely on time-critical air delivery.

Removed services and cancelled flights: BNE operates in a global aviation network and has minimal flexibility in international flight times. BNE's 24-hour operations are critical to enabling certain flights to connect with key network hubs, such as Dubai and Singapore.

Inconvenient domestic flight times: the imposition of a curfew and 45 flights per hour cap will lead to rescheduling of flights. This will lead to flights being rescheduled with sub-optimal travelling times and degrade connectivity for same-day travel during Daylight Saving.

Flight delays: there are already significant operational constraints in the post 6am morning peak. A curfew and flight cap will exacerbate these challenges. If restrictions are implemented, it is likely that any rescheduled flights will be moved into periods when the airport is already running at or near capacity, resulting in delays.

Increased cost of airfares: Restricted operations have the potential to decrease the number of seats available and increasing operating costs on specific routes that airlines inevitably pass on to consumers through higher airfares.



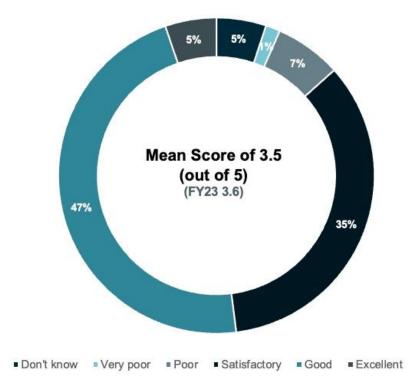
Traveller inconvenience: re-scheduling flights to outside curfew hours would lead to congestion and delays for arriving international passengers at immigration, baggage collection and border protection.

Brisbane Airport enjoys a positive reputation with the broader community

BAC places a high value on its social contract with the community. We understand that to operate a major infrastructure asset in one of Australia's fastest growing regions, we must conduct our operations in a manner that supports the region while minimising impacts wherever possible. Our approach is supported by consistently high levels of positive community perception, as reflected in our Community Reputation Index. The Index is calculated via an annual survey (by Enhance Research) of residents across Greater Brisbane.

Our 2024 Community Reputation Index is currently infield, but preliminary results from the first three weeks of survey are below. Finalised data will be provided in our Supplementary Submission to the Inquiry in the coming weeks.

General Community view of BNE's reputation



As is highlighted in our most recent results (27 March 2024, above), the general community view of Brisbane Airport's reputation is that of 'good' or 'excellent'. This result highlights consistency in community perception, noting the opening of the NPR in FY21. Residents also reflected a high level of agreement that BNE (a) benefits tourism, (b) is essential for freight and cargo, and (c) is a good thing for Queensland (see below).



90%

80%

100%

LEVEL OF AGREEMENT: Benefits of Brisbane Airport

Q Denotes top 3 FY24 responses

Denotes top 3 FY23 responses



Residents were also supportive of BNE's future growth, with 71% of respondents indicating they would be "happy to see flight numbers and passenger numbers at Brisbane Airport grow over the coming years."

10%

■FY22 Final ■FY23 Final ■FY24 Week 2

30%

20%

40%

50%

60%

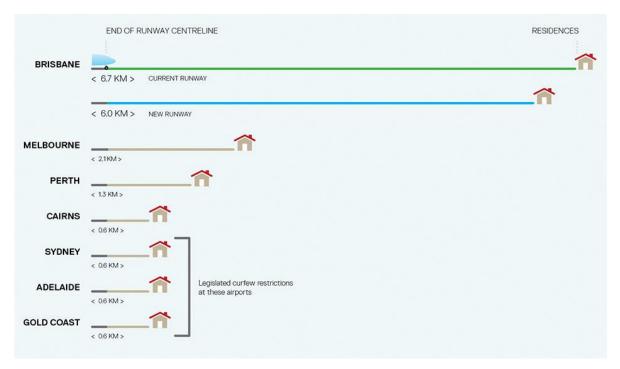
70%

Brisbane Airport has the largest noise buffer zone of any capital city airport in Australia

Around 2,359,000 people live within a 50km radius of the airport. On average Brisbane Airport facilitates 565 aircraft movements in a 24-hour period. By comparison, even with its hourly movement cap and overnight curfew, Sydney Airport averages 850 movements a day.

The people of Brisbane benefit from the largest Airport buffer zone of any capital city airport in Australia. Drawing a straight line from the end of the legacy runway at Brisbane Airport, the nearest residence is 6.7km away. Using the same straight-line approach, the distance from the end of the new parallel runway to the nearest residence is 6km. Australian airports with a curfew (Sydney, Adelaide and Gold Coast) have a much smaller buffer zone, in some cases measuring just 600m from the nearest residences.





Roles and responsibilities of aviation organisations

There is understandable confusion within the community and media on the roles and responsibilities of the various organisations in the aviation industry in relation to aircraft noise. This can lead to community frustration. BAC encourages broad communication of the following information.

Responsibility for airspace design, management navigation and air traffic control primarily sits with **Air Services Australia (AsA)**, a government owned service delivery agency established under the *Air Services Act 1995* (Cth). AsA's legislated function is the provision of air traffic management and air navigation support to airlines and pilots, including the development and management of flight paths. AsA also manages the national Noise Complaints and Information Service (NCIS), the Australian aviation industry's main interface with the community in aircraft noise and related issues. It is important to note that BAC does not have a commercial relationship with AsA – AsA is the sole provider of these services as legislated by government.

Flight path design and development by AsA are undertaken in line with strict rules and guidelines overseen by the aviation safety regulator, the **Civil Aviation Safety Authority (CASA).** CASA is also the safety regulator for all Australian-based aircraft and airport operators.

The **Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA)** is the agency charged with overall responsibility for aviation in Australia, including liaison with AsA and CASA. The Minister for Transport sets aviation policy and regulation on advice of DITRDCA, based on International Civil Aviation Organisation (ICAO) models and best practice from around the world. The Department is the primary regulator for Airport operators, with responsibility for airport leases and the *Airports Act 1997* (Cth).

The **Aircraft Noise Ombudsman** is responsible for investigating noise complaints from the public which cannot be, or have not been, resolved by AsA (or Defence, in the case of RAAF air bases).

Within this framework, **Airport Operators** have no direct role in formulating or administering aviation policy, nor do they develop or manage flight paths, although they will engage with and support AsA in the design of flight paths and airspace operations suitable to the physical airport infrastructure. The primary responsibility of Airport Operators under the aviation framework is building, maintaining and operating airport infrastructure and managing growth in line with lease obligations and the *Airports Act 1997* (Cth).

BAC has sought to work closely with all the above participants in the aviation ecosystem to address noise impacts on the community (as outlined below).



BAC supports the community's advocacy for noise minimisation

Together with AsA and our airline partners, BAC has supposed the development and implementation of noise abatement programs aimed at delivering benefits as quickly as possible to the community. BAC will continue to work with aviation industry participants to investigate further initiatives that balance growth with community needs. For example:

- The Brisbane Airport Flight Path Changes Post Implementation Review (PIR) was completed by AsA (via Trax International) in August 2022. BAC participated in community consultation following the release of the PIR report and is part of a joint AsA/BAC team to implement its recommendations.
- Very noisy aircraft that operate at BNE are charged significantly increased operating fees. BAC has
 developed an initial framework to extend this fee structure to other types of aircraft subject to
 consultation with aircraft operators.
- BAC made representations to AsA which saw an official NOTAM (Notice to Airmen) update to ATC
 operations recognising that Brisbane's legacy runway should be prioritised from 10pm–6am. The
 only exceptions to this are in cases of emergency, the loss of infrastructure (such as the closure or
 maintenance of the legacy runway) or extreme weather conditions.
- BAC is an active member of the Noise Action Plan for Brisbane led by AsA. BAC is regularly
 contributing to the NAP including at most Community Engagement sessions for Aircraft noise.
- In addition to supporting two AsA applications to CASA for an increased tailwind allowance for SODPROPS mode, BAC led and submitted a third application to support higher tailwind thresholds for landing. BAC's application represented our public commitment to the community to realise the benefits of the SODPROPS mode of operation and directing more flights over Moreton Bay.
- BAC has been engaging with airlines that operate overnight to consider using their Standard
 Operating Procedures to accept a higher departure tailwind where safe to do so, to enable more
 flights to be conducted over the waters of Moreton Bay. We have seen increases in over the Bay
 operations at night, and are continuing to work with our airline partners to enable further
 improvements.
- BAC strongly encourages the introduction by airlines of new aircraft technologies and types to reduce emissions and noise impacts. Currently, 56% of international movements at BNE meet the strict ICAO Chapter 14 criteria. This will increase to 70% by the early 2030s.
- BAC is part of the Hydrogen Flight Alliance which is supporting the trial of quieter and cleaner air transport using hydrogen electric aircraft. Skytrans, a Queensland based airline and air charter operator, is in line to be the first customer.

Complaints relating to aircraft noise

Whilst the official national aircraft noise complaints service is provided by Airservices Australia, BAC also accepts and responds to aircraft noise complaints. In 2023, BAC received 5,903 aircraft noise related complaints from 249 complainants. Two complainants were responsible for 85% of all complaint submissions (with one resident accounting for 4,054 submissions and another resident accounting for 1,000 submissions).

Data from AsA reflects a similar picture to BNE where total complaints are driven by a small number of complainants.



BAC Received Noise Complaints					
	2020	2021	2022	2023	2024 YTD
Total complaints	1,137	3,271	1,539	5,903	1,425
Total complainants	998	1,044	221	249	72

Air Services Australia Received Noise Complaints						
	2020	2021	2022	2023	2024 YTD	
Total complaints	4,002	5,346	5,892	11,290	2,136	
Total complainants	1,142	1,231	1,440	1,741	455	

BAC supports investigating more options to improve noise outcomes

BAC remains committed to working with government on a variety of tools to address aircraft noise. We believe that with the right calibration of policy, regulatory and commercial levers, the aviation industry will have the settings to balance aviation growth with community amenity. At a high level, BAC recommends investigating the following options across government and the sector:

National Level

- Changes in legislation restricting certain aircraft types during night hours (ICAO Chapter 14 –
 Balanced Approach to Aircraft Noise Management). Including these requirements into legislation will
 ensure that noise reduction technology is incorporated into day-to-day operational procedures
- Develop a framework for noise and emission trade-offs that can be consistently applied by Airlines and AsA
- Revise the ANEF scheme to provide better noise protection for public buildings and private dwellings
- Legislate a 'joint responsibility model' between AsA and airports to manage flight path design and noise complaints, noting the legislated role of AsA in flight path design and community engagement
- Increase capabilities of regulators and service delivery agencies to operate with more flexibility, including the ability to resource appropriately and develop more dynamic decision-making procedures.

State Level

- Legislate or mandate engagement with State and local planning authorities at flight path design stage, to minimise noise impacts on residential areas
- Revise planning requirements for the insulation of public buildings and private dwellings (noting the need for a revised ANEF scheme as mentioned above)
- Consider State-led noise management forums (at the planning level) to discuss the balance between economic growth and community impact.

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Airport Level

- Consider the introduction of voluntary overnight noise quotas and transparent reporting
- Introduce annual noise forecasting and noise modelling with transparent reporting systems
- Investigate the introduction of noise incentives into commercial aeronautical agreements with airlines to promote the use of newer, more noise efficient aircraft.

We hope the above is of assistance to this Inquiry. BAC will also make a more detailed, Supplementary Submission prior to the 30 April deadline, incorporating any additional areas of interest raised by Senators during its Hearing on 15 April 2024.