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**SUBMISSION TO COMMITTEE ON RURAL & REGIONAL AFFAIRS AND TRANSPORT:
INQUIRY INTO IMPACT AND MITIGATION OF AIRCRAFT NOISE**

The Tourism & Transport Forum (TTF) is the peak industry group for the aviation, tourism, transport, and related infrastructure sectors. TTF is a national, member-funded CEO forum, advocating for the public policy interests of our members. TTF represents a broad range of operators which include airports, airlines, tourism, attractions and travel operators, accommodation providers, major events, retail and hospitality businesses, and leading private & public transport operators with a state and national presence.

TTF is the leading industry voice and plays an important and active role in advocating for the policy interests of our members. We welcome the opportunity to provide a response to the Rural and Regional Affairs and Transport References Committee Inquiry into the impact and mitigation of aircraft noise. TTF would like to take this opportunity to thank our members for their valuable contributions in shaping our response.

TTF also would like to recognise the Department of Infrastructure, Transport, Regional Development, Communications and the Arts' Aviation White Paper process which is due to be released in mid-2024. The White Paper will set the long-term policy settings for the aviation industry through to 2050. Aircraft noise is a component of the White Paper.

Importance of Aviation to the Visitor Economy

We currently find ourselves in one of the most internationally competitive tourism environments ever seen, with states and countries actively making record investments into destination marketing and aviation reattraction. It has never been more important to make sure we have a prosperous aviation industry to support the recovery and growth of Australia's visitor economy. Australia faces unique challenges in our recovery efforts. We are a long-haul destination for the majority of countries and once here, visitors are faced with our wide regional dispersal across a large country geographically.

Tourism plays such an important role to the Australian economy and is one of the largest contributors to GDP. As of February 2024, an analysis of international travel statistics for Australia reveals a notable expansion, with an annual increase of 411,140 arrivals and 423,320 departures¹. China, New Zealand and the United States emerged as the predominant origins of inbound travellers. This resurgence in travel activity marks a significant recovery of Australia's tourism sector to 92.5% of pre-pandemic levels, considerably enhancing the national economy.

For the 2022-23 financial year, total tourism consumption was \$164.5 billion². This increase brought about a 77% increase in tourism GDP, 4.4% higher than it was pre-pandemic. Tourism-filled jobs also increased by 42% with working opportunities continuing to rise. As Australia's entire travel industry faced unprecedented downturns through three years of COVID-19 restrictions, TTF remains concerned that any restrictions on air travel would inhibit the recovery and successful growth of the industry.

- **Investment in the Aviation Industry**

To facilitate a successful recovery from the pandemic, State governments across the country (and other jurisdictions across the globe) recognised the critical importance of aviation capacity in the recovery from the pandemic, not just to the visitor economy but also the wider economy including freight capacity. Investments amounting to millions of dollars were directed towards re-igniting both international and domestic travel in Australia. Examples across the country include the Attracting Aviation Investment Fund, in which the Queensland Government in partnership with the private sector, dedicated \$200 million to ensure an increase in direct international flights to Queensland. This investment was a key strategic initiative to fast-track and rejuvenate the recovery of the state's international visitor economy.

¹Australian Bureau of Statistics (February 2024). [Overseas Arrivals and Departures, Australia](#), ABS Website, accessed 22 April 2024.

² Australian Trade and Investment Commission (2024). *National Tourism Satellite Account*.

It has increased aviation capacity and, in the process, improved tourism-related employment levels, strengthening overnight visitor spending and expanding the capacity for air freight³.

Another example domestically is the Northern Territory's \$20 million aviation attraction scheme which looked to encourage air travel from major airports such as Brisbane, Melbourne and Sydney to the Northern Territory, in a bid to promote connectivity to Darwin, Uluru and Alice Springs⁴.

Even though there have been significant efforts to boost aviation capacity, the industry is still not back to pre-pandemic levels. Data from February 2024 indicates that arrivals in Queensland have remained 15.5% below the pre-pandemic levels of 2019⁵ even despite the important initiatives in place to increase aviation capacity. Any restrictions being considered on aviation, would be detrimental to the recovery efforts.

- **Tourism Australia and Thrive 2030**

Another key initiative, THRIVE 2030, is Australia's national plan aimed at sustainably growing the visitor economy long-term. Industry-led and government-supported, this initiative aims to diversify Australian markets, modernise the workforce and build a strong relationship between industry and government⁶. THRIVE 2030 includes three phases. The current phase, *Recovery*, has been in action since 2022 and has always maintained a focus on rebuilding the visitor economy. By 2030, the *Acceleration* phase aims to accelerate growth on the back of over a decade of collaboration in Australia to regrow the visitor economy.

By 2030, this initiative aims to ensure Australia has enhanced its service quality and increased visitation by capitalising on previous investments. This initiative represents a key commitment to ensure Australia gets the most out of its visitor economy, particularly in time for the Brisbane Olympics in 2032.

Industry Leading the Way to Mitigate Concerns Around Aircraft Noise

Industry is actively working to mitigate any concerns around aircraft noise through several measures. The industry is committed to transparency with operational plans shared openly via thorough community engagement. Australian airlines and airports are collaboratively and actively working together to mitigate any concerns with noise from aircraft.

³ Department of Tourism and Sport. (2024). *Attracting Aviation Investment Fund*. Retrieved from Queensland Government: <https://www.dts.qld.gov.au/tourism/aviation>

⁴ Routes Online. (2023). *NT government launches \$20m Territory Aviation Attraction Scheme in bid to boost flights*.

⁵ Australian Bureau of Statistics (February 2024). *Overseas Arrivals and Departures, Australia*, ABS Website, accessed 22 April 2024.

⁶ Australian Trade and Investment Commission. (2024). *THRIVE 2030 strategy*. Retrieved from Australian Government: <https://www.austrade.gov.au/en/how-we-can-help-you/programs-and-services/thrive-2030-strategy>

Across the board, airlines and airports have supported mitigation methods that aim to attend to local noise concerns, some of these measures include:

- **Fleet efficiencies & renewal**

TTF, alongside Australian airports and airlines, supports the developments in innovation with aircraft manufacturers, which are paving the way for quieter air travel. Globally recognised as the most effective strategy for reducing aircraft noise, the continued renewal of aircraft fleet types and technologies stands as the prioritised method for airlines and airports as they strive to move the aviation industry forward.

With improvements to engine and airframe technologies, over the past fifty years, aircraft engine noise has been reduced by 75%⁷. Noise reduction at the source, as a mitigation method, has been studied extensively with promising results internationally including replacing high-noise aircraft such as B737-800 with low-noise aircraft like the A320-232. This can decrease noise levels and exposure to area and population by 17.90% and 26.61%, respectively⁸. In Australia, an aircraft such as the A320-73N has been identified as 83% quieter than its predecessor, the B707-100B.

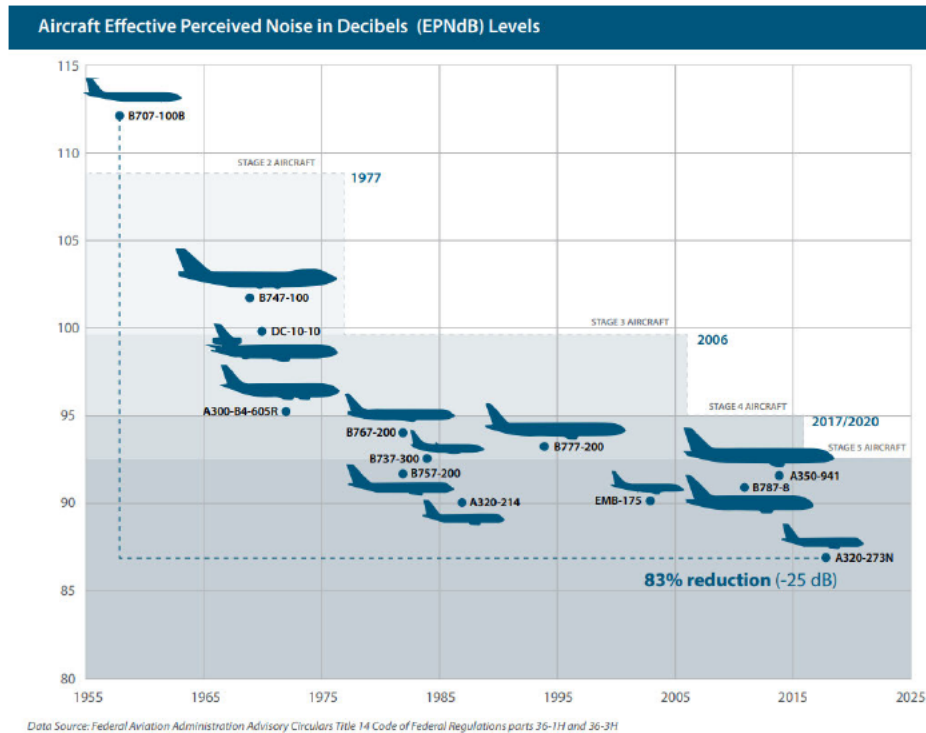
New aircraft are prioritising noise reduction, with the A320neo, 737-Max and A223, all operating substantially below the ICAO approved standard on noise, whilst having the greatest capacity for maximum take-off weight⁹. This marks the future of air travel, where aircraft can maximise efficiency but operate at the lowest possible noise level, cost and environmental burden.

Australian airlines are investing record amounts of funding into fleet renewal to alleviate concerns raised around aircraft noise. Qantas currently has its biggest fleet renewal in history underway through a multi-billion-dollar investment. This involves the delivery of 194 new aircraft, or one new aircraft every three weeks over the next few years. Virgin Australia is also undergoing a multi-million-dollar fleet-wide aircraft upgrade which includes over 30 new, more fuel-efficient and quieter aircraft.

⁷ Sustainable Aviation. (2024) *QUIETER*, retrieved from [Quieter | Sustainable Aviation](#)

⁸ Xie J, Z. L. (2023). Aircraft Noise Reduction Strategies and Analysis of the Effects. . *International Journal of Environmental Research and Public Health*

⁹ Information provided by Brisbane airport



- **Noise abatement procedures**

Airlines in Australia have trialled and implemented a range of operational abatement procedures which can assist in reducing aircraft noise. Some of these procedures include departure procedures where noise is minimised by utilising runway directions and aircraft tracking in specific directions over the ground after take-off¹⁰. Another measure is the abatement approach of *Continuous Descent Operations*, where an aircraft will descend towards the runway at a quieter power setting. Additional methods include reduced thrust take-off, reduced reverse thrust after landing and Single Engine Taxi In – where the craft is taxied to the airport terminal using one engine only. These are methods in use at airports around the world and could be used in Australia with some regulation change.

- **Flight paths**

Airservices Australia currently has responsibility for the design of flight paths in Australia. The Australian aviation industry supports improving Flight Path Design Principles (FPDP). FPDPs consider key principles such as safety, noise and community⁴. Many factors are taken into consideration when designing flight paths including environmental and operational concerns.

Changes to flight paths can have direct impacts on the environment. Given the aviation industry's objective is to progress towards net-zero carbon emissions by 2050, there are

¹⁰ QANTAS Group. (2023). *QANTAS Group Submission to Aviation Green Paper 2023*

genuine environmental concerns that must be considered when determining flight paths. Flight paths are designed to maximise operational efficiency, meaning that any changes would likely increase route lengths and fuel burn. Ultimately, this would increase the carbon footprint of flights in Australia, creating further challenges for the industry's goals of reducing emissions. The extended flight times would also significantly impact airlines and airport scheduling, increasing labour costs and reducing the utilisation efficiency of aircraft.

Aviation, Connectivity and Regional Communities

A major aspect of aviation is the connectivity to regional communities across the country. Enhancing access to these areas ensures that essential services such as health care, education and government resources are accessible. A notable example is Queensland, where over a quarter of Brisbane Airport's domestic flights are intrastate routes serving regional communities¹¹. Across the country, regional communities rely on major airports to ensure that connectivity. This level of access is helping to:

- Boost local economies by supporting tourism, stimulating investment and facilitating the movement of goods and services.
- Enhance social cohesion by enabling travel that helps maintain strong community networks, especially during challenging times.
- Ensure vital emergency responses during crises, such as natural disasters.

Given the wide dispersal of the Australian population across the country, aviation connectivity is essential but not just for our citizens but also critically for the movement of essential freight. The Australian aviation industry plays a key role in the movement of perishable and specialist goods and services across the nation and internationally. Regional sectors within Australia such as the resources, manufacturing and agriculture sectors are dominated by small-scale businesses that are globally recognised, competitive and accessible because of their ability to utilise Australian airport freight and logistics networks.

Australia's air freight industry accounted for over 300 million tonne-kilometres of freight in 2022-2023 and nearly 60,000 air transport jobs¹². This industry is constantly evolving, with 103% projected growth in air freight volume expected between 2020 and 2050.

Air freight is a particularly important factor in the transportation supply chain for regional supply and demand of time-critical goods which include fresh produce, live fish and medical supplies. The capacity to swiftly transport goods via air with minimal restrictions on time and availability, is in many cases, the only way in which small and regional businesses can flourish. With Australia's growing competitive markets, businesses need to be assured of the on-time arrival capacity of fresh produce and specialist parts to meet urgent demands.

¹¹ Information provided by Brisbane Airport

¹² Australian Government, D. o. (2023). *Air*. Retrieved from NFDf: <https://datahub.freightaustralia.gov.au/explore/air>

Through regional air connectivity, regional goods reach broader markets interstate and internationally. This further allows small businesses to access global supply chains, boosting their avenues to grow and expand. The flow-on effect is extremely valuable as broader development stems from the expansion of these small businesses, which provide so many tourism and wider job opportunities.

- **Alternatives to air travel**

TTF supports a range of modal offerings in the transport sector including fast rail. The reality is that Australia has a widely dispersed population and simply does not have the density levels seen in other parts of the world, like Europe. With the absence of transport alternatives such as the frequently running international trains found in European nations, air travel is the sole practical choice for both domestic and international journeys. Furthermore, Australia's air freight industry plays a pivotal role in the country's economy, handling trade volumes of approximately 1.2 million metric tons with a maintained trade value of around 110 billion Australian dollars a year¹³. This underlines the industry's critical importance not only in facilitating passenger movement but also in sustaining the flow of high-value goods across borders. Both air travel and freight represent indispensable roles within Australia's unique geographic and economic landscape. As a result, there should be an even greater emphasis on ensuring the viability and efficiency of these services.

Aviation and Regulatory Frameworks

Whilst industry is actively working to mitigate concerns raised with aircraft noise, there are regulatory measures that can be taken to assist in reducing aircraft noise. Airports, airlines and the wider industry want to work closely with the government and regulators to ensure the best outcomes for all stakeholders, are achieved.

- **Complaints Management Systems and National Regulations**

The process of managing aircraft noise would be significantly improved by the implementation of an effective noise complaint system, centred on identifying the key factors attracting complaints such as:

- noise intensity
- time of day
- frequency of occurrence

¹³ Hughes, C. (2024, January 10). *Air Freight in Australia - statistics & facts*. Retrieved from Statista: <https://www.statista.com/topics/5809/air-freight-in-australia/#topicOverview>

Airports are concerned that the current Noise Complaints and Information Service (NCIS) is overly generic and does not provide the necessary information to effectively prioritise and address noise complaints. For example, in 2023, there were 5903 aircraft noise-related complaints in relation to Brisbane Airport. Two complainants made up 84% of all complaints to Brisbane Airport (4,045 from one resident and 1000 from another⁵).

For complaints to be managed and registered, better measures need to be implemented within the NCIS to ensure that:

- Complaints are progressed by an actionable date.
- Key complaints are prioritised and addressed with transparency.
- Complaints can be responded to individually.
- Reporting of complaints for Australia's major airports be conducted fairly in regard to number of complainants and differences in the mitigating factors for specific complaints.

- **National Review of Australian Noise Exposure Forecast (ANEF)**

To establish and foster better modelling and reporting of aircraft noise and a nationally applicable standard for noise modelling, industry has called for a review of the ANEF's metrics and their application.

Noise modelling in Australia should meet global standards and be formatted with the intention of unifying standards for all airports in Australia. To achieve this, the current reliance on complex metrics should be streamlined.

- **Developing a National Framework**

TTF supports proposals for a national framework aimed at harmonising the objectives for noise control and sustainability. This national framework would emphasise the need for, and the role of, community engagement. Additionally, this framework would highlight the importance of effective communication between government bodies, community and industry.

Conclusion

In summary, the Tourism & Transport (TTF) strongly supports prosperous aviation and tourism industries with a thriving wider visitor economy. Still in recovery mode from the pandemic and being in one of the most competitive tourism markets to date, aviation capacity is crucial to recovery efforts. Aviation is also critical in providing access to Australia's unique attractions from natural wonders, wildlife and our rich cultural heritage to major events and culinary experiences in the city and our great regions.

As we near the Brisbane 2032 Olympic Games, unrestricted air travel will be pivotal in showcasing our nation, as Australia looks to maintain its reputation as a world-class travel destination.

The industry's proactive steps in investing in quieter and more efficient aircraft progressively over many years demonstrate a commitment to mitigating the impacts of noise. Air travel continues to play an essential role in preserving Australia's tourism industry and the connectivity of its citizens.

TTF supports a balanced approach to mitigating aircraft noise that prioritises technological solutions to noise management, a more effective complaints system with better globally benchmarked modelling capacity, appropriate regulation amendment and recognition of industries commitment and investment in new fleet and community consultation.

Australia must continue to thrive as a premier long-haul destination, with a strong reputation for accessibility, and domestic and international connectivity.

Yours sincerely

Margy Osmond

Chief Executive

Tourism & Transport Forum