

## Capacity Optimisation Group’s Submission on the Sydney Airport Demand Management Amendment Bill 2024

The Capacity Optimisation Group (COG) welcomes the amendments to the Sydney Airport Demand Management Act that further align with the Worldwide Airport Slot Guidelines (WASG), which encourages the efficient use of the available capacity at Sydney Airport.

COG would welcome additional guidance to support the changes in the Act. This includes documents outlining the Compliance Committee processes, and specificity of eligibility for exemptions to slot use, including a policy on Justified Non-Utilisation of Slots.

COG will not be commenting on the recovery period as this is a process that will occur outside the Slot Manager’s purview. Otherwise, we have reviewed the amendments to the Act and have the below comments:

Reference	Act	COG Comments
Division 4: 15 (3)	(3) Subsection (1) does not apply if the *Slot Manager has agreed in 2 writing, at the time of allocating the slot, to the *operator not using 3 the *gate movement for the aircraft.	We would suggest reviewing the wording as exemptions by the Slot Manager are historically provided after the slot is allocated.
Division 4: 20 (d)	(d)the airline does not return the slots to the *Slot Manager, or 25 transfer the slots to another person who holds slots under the 26 Slot Management Scheme: 27 (i) in the case of subparagraph (c)(i)— within 14 days after 28 making the decision; or 29 (ii) in the case of subparagraph (c)(ii)— within 14 days after 30 becoming aware of the other circumstances.	This would be difficult to track and enforce for the Slot Manager and differs from the global standard.  Firstly, it would be tough to know when the airline has decided on a slot’s utilisation, and therefore difficult to enforce the 14-day rule.  Secondly, The WASG has deadlines in the allocation process that allows for airlines to handback slots that they are not planning to use and penalise airlines for holding onto slots. These are called the Series Return Deadline (SRD) and the Historic Baseline Date (HBD). These deadlines allow airlines to handback slots they no longer wish to operate, whilst allowing the Slot Manager to reallocate slots to airlines waiting for slot improvements. This date encourages airlines to handback their slots in a timely fashion to assist with the effective coordination of a scheduling season. These deadlines also allow the airport to plan their infrastructure utilisation for the upcoming season in a timely manner.



**CAPACITY OPTIMISATION GROUP**

ABN: 16 082 075 901

Level 3, Suite 1297, International Terminal (T1)

Sydney International Airport, NSW 2020 Australia

T +61 2 9313 5469 E [slots@airportcoordination.org](mailto:slots@airportcoordination.org)

Division 5:  
66

Compliance Committee Membership

In order to align with global recommended practice, we would encourage the inclusion of airline representatives into the Compliance Committee.