BRISBANE FLIGHT PATH COMMUNITY ALLIANCE

BFPCA Submission to the 2024 Senate Inquiry into the Impact and Mitigation of Aircraft Noise

5 April 2024

(edit 14 April 2024: Some appendices in Part C have been replaced with web links.)

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About BFPCA

With the launch of Brisbane Airport's New Parallel Runway on 12 July 2020 came a new airspace design and flight paths that concentrate aircraft noise over densely populated residential areas.

Brisbane Airport and Airservices Australia sold this project to Brisbane communities suggesting the New Parallel Runway will enable them to prioritise "over water" operations that direct planes away from residential areas. The CEO Gert-Jan de Graaff is on the record saying, "the net effect of aircraft flying over the city will decrease."

Brisbane families and communities are suffering from excessive noise pollution and associated health and related impacts from Brisbane Airport's new flight paths launched in July 2020. The Aircraft Noise Ombudsman report, the Brisbane Airport PIR Advisory Forum (BAPAF) and flight path design consultants TRAX International have all confirmed that Brisbane communities were misled using flawed noise modelling, deceiving community engagement, and offered inadequate noise abatements.

Brisbane Flight Path Community Alliance (BFPCA) came together in 2020 to fight back on behalf of all Brisbane families and communities experiencing this noise pollution.

For more information about BFPCA and our community advocacy work, visit: https://bfpca.org.au/

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Executive Summary

Dear Senators

BFPCA is grateful for the opportunity to participate in this Senate Inquiry into the impact and mitigation of aircraft noise and the corrupt and unethical conduct of Airservices Australia. We ask that the inquiry's recommendations allow for the following community allegations against Airservices Australia and the Australian Government to be investigated.

Our submission is structured in three parts, each relating to the Terms of Reference as follows:

Section	Topic	Inquiry's ToR
Part A	**Evidence**	(a) the effect of aircraft noise on amenity, physical and mental wellbeing and everyday life of residents; (b) the effect of aircraft noise on small business;
Part B	**Objectives**	(c) any proposals for the mitigation and limitation of aircraft noise, including flight curfews, changes to flight paths and alternatives to air travel; (d) any barriers to the mitigation and limitation of aircraft noise; and
Part C	**Appendices**	(e) any other related matters.

Part A documents the top ten community allegations against Airservices Australia. They represent but 1/6 of the total pool of incriminating evidence that BFPCA has painstakingly and meticulously amassed through meticulous research and investigations since 2020. They entail:

1. **Stonewalling complaints:** Airservices' systematic obstruction of legitimate complaints, with staff trained to deliberately downplay or ignore issues raised by community members.
2. **Mental health impact:** More than 25,000 complaints since 2020 about Brisbane Airport have prompted Airservices to offer free mental health and suicide counselling to affected communities, highlighting the true toll of aircraft noise on communities and Queensland's health system .
3. **Tax reduction redundancies leading to unsafe skies:** The COVID-era Air Traffic Controller Retirement Incentive Scheme is under scrutiny, delivering enormous tax benefits to Airservices but leaving air-traffic control so shortstaffed flights are regularly canceled and airport operations limited to the most noise generating modes for communities.
4. **Technical incompetence:** Airservices delivered such a poor airspace design for Brisbane that it needed to be externally reviewed by aviation consultancy TRAX International after community pressure highlighted failings.
5. **Ministerial conditions go unmet:** Airservices Australia neglected ministerial EPBC conditions imposed on them, outsourcing their due diligence obligations to Brisbane Airport Corporation who stood to benefit most in an unethical conflict of interest.
6. **Bait-and-switch tactics:** Changes in noise reduction procedures, such as the removal of SODPROPS (over water operations), were implemented without community consultation, undermining the initial promises made during the 2007 MDP/EIS approval process in potential breach of the EPBC Act.
7. **Misleading noise data:** Airservices Australia endorses flawed noise forecast data and averages, artificially lowering noise figures and misleading communities about the actual impacts of flight paths at every airport in Australia.

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8. **Faux noise improvement trials:** Recent noise improvement trials run by Airservices in Brisbane were set up to fail from the outset, raising questions about the sincerity of their efforts to address community concerns.
9. **Capture by the aviation industry:** Leaked documents reveal Airservices Australia's alignment with aviation industry interests, jeopardising their commitment to impartial regulation and accountability to the communities they serve.
10. **Breach of the Air Services Act 1995:** BFPCA alleges that Airservices Australia prioritises commercial gains over community wellbeing, violating their mandate under the Air Services Act 1995.

In Part B of our submission, we have listed the community's objectives and desired outcomes and recommendations from this inquiry.

Part C comprises a detailed collection of appendices including all major submissions that BFPCA has prepared and written since 2020, the two reports of our community surveys 2021 and 2022, and an extensive health study commissioned by BFPCA and conducted by Dr Sean Foley.

Brisbane has more noise complaints than any other airport in Australia, and yet the government refuses to afford its citizens the same protections which were made available in other local government areas, and has broken its commitment to periodic reviews (signed by the current Prime Minister as part of the 2009 Aviation Policy White Paper) of the need of a curfew in Brisbane.

Largely unregulated noise from the 24/7 operation of Brisbane Airport (along with defence flights from Amberley Airbase, emergency flights plus GA flights from Archerfield aerodrome), affects a large area of Brisbane, with many thousands of residents having their life and sleep seriously disturbed. We estimate about 671,000 (26%) people are moderately afflicted and some 242,000 (9%) are severely afflicted.

This is orders of magnitude greater than predictions made by BAC in their 2007 MDP/EIS, and the subsequently unpublished and clearly flawed 2018 EA (EPBC 2005/2144), which Airservices Australia and the Australian Government accepted without question. And this regulatory failure through state capture is by no means the only instance in the aviation industry in Australia – but one which affects families and communities in 226+ suburbs across Greater Brisbane directly on an ongoing basis.

We expect that this Senate Inquiry will examine the evidence we table in this submission impartially and bring to bear a sense of **ethics and justice** in deciding how best to limit and reduce aircraft noise pollution and its associated impacts and harms, and how best to remove the barriers to the mitigation and limitation of aircraft noise pollution.

In light the recent The Hague court judgement regarding Schiphol Airport in Amsterdam (Figure 1), we implore Senators to adopt a comprehensive and community-centric approach for this Senate Inquiry so it will do **more than just offer band-aids** and can effectively address the harms and impacts of aircraft noise pollution across Australia. This includes recognising and rectifying the **systemic issues** within agencies like Airservices Australia, which have consistently prioritised aviation interests over the well-being of affected communities.

The **2024 landmark ruling by The Hague District Court** serves as a poignant reminder of the accountability governments bear in safeguarding the rights and health of their citizens in the face of aviation-related noise pollution. The court's decision underscores the obligation to prioritise the health and wellbeing of local residents over the vested interests of the aviation sector. Such legal precedents must inform the Senate Inquiry's deliberations and recommendations, urging a reevaluation of Australia's aviation policies to ensure they **align with both human rights obligations** and the **principles of environmental justice**. By considering the wider ramifications of unchecked aviation noise pollution and its disproportionate harms and impacts on communities, the Senate

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Inquiry must pave the way for meaningful reforms that prioritise public health, wellbeing, and environmental sustainability over corporate interests.

BFPCA acknowledges the importance of the aviation industry to the nation, but seeks aviation policy outcomes and strong regulation that protect the wider community from current harms caused by the aviation industry's unchecked operations.

BFPCA is happy to provide further input on various aspects of our submission should Senators wish our further input or clarification during this Inquiry and associated hearings.

Brisbane, 5 April 2024

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Schiphol: Court orders Dutch government to rein in noise pollution at busy Amsterdam airport

Published on 22/03/2024 - 16:00

By **Euronews Green** with **AP**

A Dutch court has ordered the government to do more to cut noise pollution at Amsterdam's Schiphol airport.

It said the government has systematically put the interests of the aviation sector above those of people who live near Schiphol Airport one of **Europe's busiest aviation hubs**.

The court added that the treatment of local residents amounts to a breach of Europe's human rights convention.

"The state has always prioritized the 'hub function' and the growth of Schiphol," The Hague District Court said, as it ordered authorities to do more to rein in noise pollution.

The fight to curb noise pollution at Schiphol Airport

The court ruling was the latest development in long-running efforts to rein in noise pollution and nuisance caused by the airport on the outskirts of Amsterdam.

Late last year, the government **shelved plans to cap flight numbers** following protests from countries including the United States and warnings that the move could breach European law and aviation agreements.

"The judge's decision is crystal clear: more attention must be paid to local residents and the reduction of noise pollution. That was already the government's commitment, and we will study the verdict," the Ministry for Infrastructure and Water said in a written response.

The national public health institute estimates that around 259,000 people in the Netherlands experience "serious nuisance" from aircraft flying over the densely populated country.

Wednesday's court ruling ordered the government to properly enforce existing noise pollution laws and regulations within a year and to provide

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"practical and effective legal protection for all people who experience serious inconvenience or sleep disturbance due to air traffic to and from Schiphol."

Campaign groups say this win 'sets a precedent'

The organization that brought the case, called The Right to Protection from Aircraft Nuisance, welcomed the ruling.

"The court ruled that the state did not properly weigh interests: economic interests have always been central, local residents were lowest in the pecking order. That is no longer allowed," it said, adding that the group and its lawyers were "extremely satisfied" with the decision.

Campaign network Stay Grounded also welcomed the ruling.

"This win at Schiphol sets a precedent for airports globally. If we want to take resident's health and the looming climate breakdown seriously, we have to cap flights at airports," said Magdalena Heuwieser, a spokesperson for the network.

"It is an illusion to believe that new technology and **fuel substitutes** are the main answer to **climate**, air quality and noise problems."

What is Schiphol doing to cut noise pollution?

Schiphol said in a statement that it is working toward reducing **noise pollution.**

"Like these local residents, we want aviation to cause less nuisance. At the same time, we want the Netherlands to remain connected to the rest of the world, but quieter, cleaner and better," the airport said in a written statement.

Among the measures the airport is proposing are closing at nighttime and banning the noisiest planes.

"This will lead to a reduction in the number of people experiencing noise nuisance. In the short term, it is in any case important to have legislation that gives clarity to both local residents and the aviation sector. That is also the judge's verdict today," Schiphol added.

Figure 1: Euronews. (2024, March 22). Schiphol: Court orders Dutch government to rein in noise pollution at busy Amsterdam airport. https://www.euronews.com/green/2024/03/22/schiphol-court-orders-dutch-government-to-rein-in-noise-pollution-at-busy-amsterdam-airpor

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Part A
Evidence

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1. Evidence

1.1 Complaints to Airservices go nowhere

Airservices Australia systematically stonewalls community members with legitimate complaints about aircraft noise.

Community complaints manuals obtained by BFPCA through Freedom of Information requests (Airservices FOI-21-24 and FOI-21-35) show how Airservices staff are instructed to **provide pre-scripted answers** designed to quash complaints and prevent them from progressing to investigation or referral to the Civil Aviation Safety Authority (CASA) or to the Department of Infrastructure and Transport.

Of the total 207 pages of staff training materials BFPCA obtained under FOI, just under half a page deals with "noise improvement investigations." The remaining pages instruct NCIS staff in how to **send boilerplate responses** arguing that complaints are unjustified and nothing can be done. Suggested replies include, "this cannot be changed," "investigations already conducted," "no investigation will be conducted," "no direct transfer to Department."

Airservices confessed in Senate Estimates that they received 15,406 complaints relating to Brisbane operations for the period 12 July 2020 to 31 January 2023. This figure has by now increased to closer to 27,000 and is higher than all complaints for all other Australian airports combined. They were then asked, *how many noise improvement investigations has Airservices complaints team conducted anywhere in Australia for any airport annually since 2018?*

Answer: Nil

While the *Air Services Act* 1995 requires Airservices to protect communities from aircraft noise, we now have hard evidence that **Airservices prioritises 'air traffic management efficiencies'** instead. The government and aviation industry have created a dedicated team charged with purposefully stonewalling communities. It conveniently shields decision makers from hearing people suffering aviation noise pollution.

If complainants do not give up and submit further complaints, Airservices staff are instructed to treat this as "unreasonable behaviour." **The training manual suggests these 'difficult people' are to be put on a management plan.** This imposes access restrictions such as limiting phone calls or email contact "including deleting without reading submissions."

To top off Airservices' stonewalling tactics, BFPCA also found that noise complaints get **underreported** on purpose. Airservices only report on the number of complainants and issues raised each month – not the total number of complaints received. This hides the true impact of excessive noise pollution experienced by local communities.

The Government's latest "Statement of Expectations for Airservices Australia" only requires Airservices "to continue to improve the flow and quality of information to noise affected communities."

Further information: https://bfpca.org.au/54-stonewalling/

1.2 Airservices now offer free suicide counselling

Since 2020, we estimate that more than 27,000 complaints have been lodged with Airservices from Greater Brisbane communities alone. BFPCA has been copied into many of these complaints. This is more than for all other Australian airports combined. Airservices have not offered any real solution or compromise that would sacrifice the airport's capacity and introduce net noise reductions. Instead,

Airservices now offer free mental health and suicide counselling to affected communities. In Senate Estimates we hear that in severe cases, they instruct the Queensland Police Service to visit people's homes to **conduct welfare checks**. Airservices' community engagement framework is fraudulent as it has the claimed goal of reducing noise "impacts" without there being any metrics to evaluate actual net noise and thus harm reductions. The term "impacts" is used as a euphemism for **harms**, which they acknowledge only by way of their suicide counselling program. Moreover, Airservices have done no proper research into the effects of these impacts or the threshold of harm, nor have they planned any level of reduction to meet WHO-acceptable standards of care to the community. Despite Airservices' claiming great effort and cost, they have not in several years reduced noise harm overall, but instead merely moved noise pollution to different communities. This is unethical and divisive to the community who are essentially asked to participate in a "hunger game" style lottery to see who will be next.

> *"Aircraft noise can no longer be considered simply as an inconvenience to people's lives. Major studies have concluded that **aircraft noise is negatively affecting people's health** and quality of life. Exposure to aircraft noise can lead to short-term responses such as sleep disturbance, annoyance, and impairment of learning in children, and long-term exposure is associated with **increased risk of high blood pressure, heart disease, heart attack, stroke, dementia, and may contribute to long-term mental health issues**."*
>
> Aircraft Noise and Public Health: the evidence is loud and clear, AEF 2016

The BFPCA Community Surveys 2021 and 2022 (see Appendix) provide strong evidence that the exposure to excessive flight path noise pollution causes harm: families and community members are experiencing more interpersonal stress, having more tiffs and arguments than before, and at work, school, college or university, their performance and cognitive abilities are suffering. The cause being reported by survey respondents is excessive flight path noise caused by prolonged exposure. Some report that they have noticed that their children are not doing as well at school as before, their progress in learning new skills has slowed down, their test results are a bit lower than before. Again, the culprit is **prolonged noise exposure**, at home and school, to excessive aircraft noise.

It is now over three years since the great majority of Brisbane suburbs began to be hit with excessive aircraft noise pollution from Brisbane Airport's new flight path design. The well known and potential health impacts of this noise was glossed over in the Environmental Impact Statement (EIS) produced by Brisbane Airport Corporation (BAC). BAC **seriously minimised** the number of suburbs and schools that would be exposed, they deliberately ignored the wealth of international scientific data showing **aircraft noise pollution is a public health problem**. Since then state and federal governments in Australia have also ignored what is well known about this problem, done all they can to avoid to admitting it exists and addressing it.

In 2022, according to Airservices Australia, the government-owned service provider to the aviation industry, **families and communities in 226 suburbs across greater Brisbane have complained about being overflown by aircraft using Brisbane Airport**. Based on the 2021 census about 1.5 million people live in these suburbs. A preliminary estimate suggests a quarter of a million people (~16%) are subject to extreme noise levels – those closest to the airport and main flight paths suffering the most – and another million people are subject to excessive noise (~68%) from Brisbane Airport.

Impact on School Children

One of BFPCA's primary concerns has been the **effects of aircraft noise on school students** – there are some 50 schools under low level flight paths (< 3,000') that stretch right across Brisbane. Extensive research over the last two decades shows **excessive, prolonged aircraft noise slows children's cognitive development and reading skills** by some 10%, and may have negative life-long effects. This is a critical issue that should concern every parent in Brisbane. Second, slowing children's learning has financial impacts for families, if a child needs to repeat a course or year of

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study. With real annual costs in state schools of over $5,000 (many times this in private or independent schools) and over twelve years of schooling this 10% slowing of school performance can amount to an additional financial burden of some $6,000.

BFPCA Community Surveys

BFPCA conducted two **community surveys** in 2021 and 2022, over 4,000 respondents in total were asked how aircraft noise was affecting them personally and their family at home, at work and at school. Some 75% reported they were suffering mental health problems – from mild to serious, from stress to headaches to suicidal thoughts – directly associated with the impacts of prolonged exposure to aircraft noise pollution in their lives. These surveys were conducted when there were a lot fewer than the 2,200 overflights per week these days.

BFPCA's preliminary estimates are that at least 500,000 people in Brisbane – nearly a quarter of the city – are affected by excessive aircraft noise and other forms of aviation-related pollution (e.g. toxic ultra-fine particulates and dangerous gases). Long-term studies in Europe and the US show **aviation-related pollution is a significant factor in increased heart rate, blood pressure, and cardiovascular risks, diabetes, systemic inflammation and oxidative stress** – a long list (Figure 2). Noise and air pollution are now recognised as the most serious environmental risk factors, all known as major personal and public health issues.

Our state, federal and local governments have a 'duty of care' for citizens, so far they are refusing to accept any responsibility. BFPCA attempted to alert **Queensland Health** to the seriousness of the problem, but were ignored; **Commonwealth Health** said it was a state responsibility; **Brisbane City Council** avoided speaking up. BAC did not want to know, as it is focused on profit making and increasing the number of flights.

Brisbane residents can expect to see the statistics regarding this list of public health problems climb, as long as local, state and federal authorities and, of course, BAC, continue to refuse to take effective action minimising aircraft noise over Brisbane.

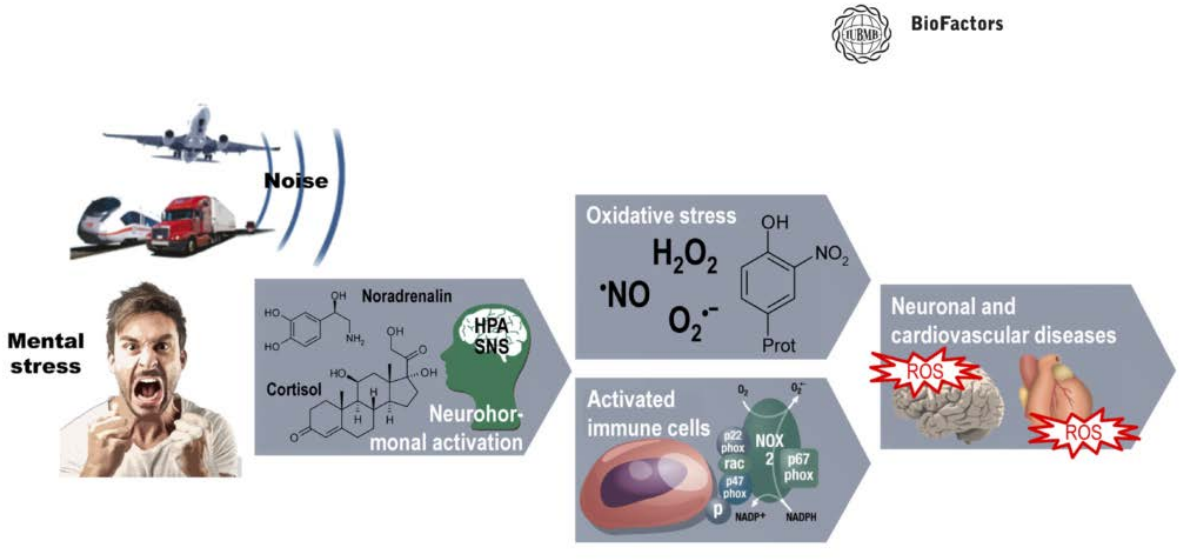

FIG 6 *The environmental risk factor noise exposure and mental stress cause a primary stress reaction that is mediated either by the HPA axis with subsequent cortisol release or by the activation of the SNS with subsequent catecholamine formation. These stress reactions activate inflammatory or oxidative stress pathways via damage-associated molecular patterns, Toll-like receptors, AT-II, and NADPH oxidase. Inflammation and oxidative stress pathways can activate each other and together with stress hormones, vasoconstrictors, and alterations of gene expression (including microRNAs) contribute to the classical risk factors such as hypertension and atherosclerosis leading to neuronal and cardiovascular (but also metabolic) diseases. Redrawn and modified from Münzel and Daiber Antioxid. Redox Signal.* ***2018*** *[93].*

Figure 2: Noise exposure triggering mental stress. Source: Daiber, A., et al. (2019). Environmental noise induces the release of stress hormones and inflammatory signaling molecules leading to oxidative stress and vascular dysfunction-Signatures of the internal exposome. BioFactors , 45(4), 495–506.

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In contrast to Europe or the US, little or no research has recently been done in Australia into the effects of aviation on human health and wellbeing. We almost totally depend on international research for our knowledge and insights about aviation. A useful source freely available for download is: "Aircraft Noise and Public Health – the evidence is loud and clear" by the Aviation Environment Federation, UK, 2016.

BFPCA Health Study 2023

- A new research report estimates upwards of 242,000 greater Brisbane residents are severely impacted by aircraft noise pollution from Brisbane Airport.
- Health and social costs are estimated at **$9,000 per person per year** based on a methodology from recent research on Brussels airport in Belgium.
- By 2032, Brisbane Airport's excessive aircraft noise problem will **drain $18.9 billion from Queensland's health budget**.
- Cardiovascular disease, negative impacts on children's learning, mental health disorders such as depression and anxiety, and productivity loss due to sleep disturbance caused by aircraft noise exposure are backed by strong scientific evidence, which the report cites.
- Airservices Australia now offer **free mental health counselling** services to Brisbane residents.

A new report by environmental scientist Dr Sean Foley has found a $2.1 billion health and social cost year on year to Queensland from aircraft noise from Brisbane Airport unless a curfew and flight cap are introduced. The findings estimate approximately 242,000 greater Brisbane residents are severely impacted by aircraft noise associated with Brisbane's airspace architecture and airport operations.

The cost findings are based on a methodology used by French aviation consultancy, ENVISA, who undertook similar research earlier this year on the health and social impacts of Brussels Airport's noise pollution. Dr Foley's research contextualised the methodology to South East Queensland, conservatively adjusting the cost projections down to account for differences in cost of living and incomes between Belgium and Australia.

Decades-long peer-reviewed scientific research on noise pollution has concluded that it worsens health outcomes for those chronically exposed, even if they are not consciously bothered by the noise. A 15-year Swiss study found there is a strong, measurable link between aircraft noise exposure and heart attack deaths, strokes and high blood pressure. The negative effects start as low as 40 decibels and worsen the louder and more frequent the noise exposure.

In the 2020 BFPCA community survey 68% of people reported mental distress from aircraft noise – this figure has jumped to over 74% in the latest survey as a result of the increased traffic at Brisbane Airport. Due to the severe mental distress experienced by Brisbane communities, Airservices Australia now offer free mental health counselling services available "to any community member who is feeling negatively affected by aircraft operations." Airservices have also admitted in Senate Estimates that they have started to **send the Queensland Police into people's homes to conduct welfare checks** as a result of the harm caused by the flight path noise pollution.

The World Health Organisation's 2022 recommendation for the maximum aircraft noise level exposure is 45 decibels during the day and 40 decibels at night. Suburbs in Brisbane regularly experience flights generating 70-85 decibels of aircraft noise. Some of the worst affected suburbs include Balmoral, Bulimba, Hamilton, New Farm and Tingalpa where there are between 89 and 100 flights per day with most exceeding 70 decibels and **some exceeding even 90 decibels**according to Airservices Australia's own noise monitors.

The problem is not confined to these suburbs, however, as Airservices Australia confirmed in Senate Estimates that residents of 226 suburbs across the greater Brisbane area (stretching well outside the

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Brisbane Local Government Area) have complained about aircraft noise. Suburbs as far away as Upper Brookfield, Samford Valley, and Redland Bay experience flights in excess of 60 decibels.

Children are at particular risk of negative impacts as noise pollution disturbance has been shown to disrupt learning outcomes. Reading scores fall below average when children are exposed to 55 decibels of aircraft noise, one meta-analysis of three studies found. A further German study found "impaired psychological health" in children who were exposed to aircraft noise from a relocated airport in Munich. The same ill effects were noted in the children's populations at the former airport location that resolved after the airport moved to impact a different community.

These negative effects from Brisbane Airport's excessive flight noise are what will cause a **$2.1 billion drain on Queensland's health budget per year**, equating to $18.9 billion to 2032. This is in contrast with Brisbane Airport Corporation's estimates that a proposed night-time curfew would negatively impact Queensland's economy, shrinking it by an estimated $2.8 billion by 2032, which represents just 0.08% of the state's $360 billion economy.

Air pollution

BFPCA continues to be concerned about the detrimental health and wellbeing impacts of and harms caused by the aviation industry's air pollution.

While the aviation industry rebuts health concerns relating to avgas used by planes with internal combustion engines by saying "but jets are clean," there is more to that story. **Ultra-fine particle air pollution** from all forms of aviation including jets is a growing concern due to its impact on both the environment and human health. These particles, which are less than 0.1 microns in size, are produced by all aircraft engines and can be inhaled deep into the lungs.

> *"PM2.5 (particles with a diameter of 2.5 micrometres or less): these particles are so small they can get deep into the lungs and into the bloodstream. There is sufficient evidence that exposure to PM2.5 over long periods (years) can cause adverse health effects."* (Source: NSW Health)

Exposure to ultra-fine particle air pollution from aviation, **particularly for those living near airports and under flight paths**, has been linked to various health implications and diseases. These can include:

i. **Respiratory diseases**: Ultra-fine particles can enter deep into the lungs and cause inflammation and damage, leading to conditions such as asthma, bronchitis, and chronic obstructive pulmonary disease (COPD).

ii. **Cardiovascular diseases**: Studies have shown a link between exposure to ultra-fine particles and increased risk of heart attacks, strokes, and other cardiovascular diseases.

iii. **Cancer**: Ultra-fine particles may contain carcinogens and have been linked to increased risk of lung cancer and other types of cancer.

iv. **Neurological effects**: Exposure to ultra-fine particles has been linked to cognitive decline and neurological disorders such as Alzheimer's disease.

v. **Reproductive and developmental effects**: Studies have shown that exposure to ultra-fine particles can have negative effects on fetal growth and development, and may also affect fertility.

The full extent of the health implications of ultra-fine particle air pollution from aviation is still being studied, and more research is needed to fully understand the impact on human health. However, **there is growing evidence of the negative effects on health, particularly for those living near airports and under flight paths**. We have compiled a selection of scientific research papers in the Appendix.

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Avgas

Avgas, short for aviation gasoline, is a specialised type of fuel used in piston-engine aircraft. It is distinct from the jet fuel used in turbine-powered aircraft. Avgas is designed to meet the specific requirements of piston engines. One of the key components of avgas is **tetraethyl lead** (TEL), which is added to increase the fuel's octane rating. This allows piston engines to operate efficiently without experiencing knock or detonation, which can damage the engine. While TEL has been phased out of automotive gasoline due to its toxic properties, **it remains in use in avgas** because of the unique requirements of piston aircraft engines.

However, the use of leaded avgas has raised concerns about its environmental and health impacts and harms. When burned in aircraft engines, **TEL emits lead particles into the atmosphere**, contributing to air pollution. These lead particles can settle on the ground, contaminating soil and water sources including tank water. Communities living near airports or under flight paths are particularly vulnerable to lead exposure from avgas emissions.

Figure 3: Avgas fuelled Turbo Commander from 1973 still being operated by GAM Group in Brisbane exposing thousands of residents to toxic lead particles on a daily basis. Source.

Lead is a potent neurotoxin, especially harmful to children and pregnant women. Even low levels of lead exposure can lead to developmental delays, learning disabilities, and other health problems. The toxic effects of lead from avgas emissions pose a significant public health risk to communities living near airports and aviation facilities.

BFPCA argues that urgently transitioning away from leaded avgas is crucial not only for reducing environmental pollution but also for protecting the health and wellbeing of Brisbane communities affected by aviation activities including flights operated by the GAM Group (Figure 3). The 1973

avgas fuelled Turbo Commander is still being operated by GAM Group in Brisbane exposing thousands of residents to toxic lead particles on a daily basis. Residents report GAM planes in areas such as Samford Valley and Upper Brookfield (some 30-40km away from Brisbane Airport), flying on average as low as 2,000 to 3,000 feet above sea level, which means **as low as 500 feet** for some mountainous communities. These low altitudes are a result of the "dirty flight path" design (see Section 1.4) that cause a sandwich-type layering of aviation traffic from Brisbane Airport. With the traffic from Archerfield Airport increasing, too, BFPCA argues that this is simply not sustainable for communities reliant on tank water as well as organic farmers in those area. We note that these communities – including local schools – rely on tank water for their everyday water supplies, which is being poisoned by toxic lead exposure from the GAM Group's planes.

In Senate Estimates (12 Feb 2024, source: Hansard, p. 70-71), the Department, CASA and Airservices were again all passing the buck to each other without any of them taking any responsibility for knowingly allowing the health of Australian communities to be harmed:

> **"Senator RICE:** I want to move on to leaded fuel being used at Brisbane and Archerfield airports. The General Aviation Maintenance Group operates three planes: a Turbo Commander, a Grand Commander AC680 and a Shrike Commander AC500S. I understand that they were manufactured in 1973, use leaded fuel and are still allowed to operate on a daily basis in Australia over heavily populated areas.
>
> **Mr Harfield:** That's a matter for CASA or the department. What fuel can be utilised in an aircraft is well beyond our jurisdiction.
>
> **Senator RICE:** In a previous question on notice, I asked about the number of aircraft flying over Brisbane using leaded fuel, and I got the response that the Department of Infrastructure, Transport, Regional Development, Communications and the Arts does not collect the data needed to respond to that question. You're saying that Airservices doesn't have anything to do with this data.
>
> **Mr Harfield:** We don't collect information about what fuel is used in aircraft. We'll collect information on the aircraft themselves. If it's a registration issue, that's a matter for CASA.
>
> **Senator RICE:** But does your remit cover harm caused by aeroplanes, or is that purely CASA?
>
> **Mr Harfield:** The specifications of aircraft are a matter for CASA and not Airservices.
>
> **Senator RICE:** But in terms of the harm that air traffic is causing.
>
> **Mr Harfield:** In performing our function, the safety of air navigation is our most important consideration. After that, we ensure that, under the act, as far as is reasonably practicable, the environment is protected from the effect of the operation and use of the aircraft and the effects associated with the operation and use of the aircraft. We don't know what fuel is being utilised by particular—
>
> **Senator RICE:** But if it's in your remit to protect the environment and people from the use of aircraft, I would have thought that having data on or paying attention to the use of leaded fuel over a heavily populated area should be something that was within your remit. Leaded fuel was phased out in motor vehicles decades and decades ago because of the health impacts of lead.
>
> **Mr Harfield:** The specifications of what an aircraft uses are a matter for CASA. We will then manage the effects, but we don't know whether—.
>
> **Senator RICE:** But you're not collecting the data. I can ask CASA whether they are collecting the data, but it's not something that has crossed your desk.
>
> **Mr Harfield:** No.

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Senator RICE: You haven't seen it as an issue that you have any reason to be concerned about.

Mr Harfield: It hasn't passed the desk; nor would I expect it to, because what fuel is being utilised by an aircraft is beyond our jurisdiction.

Senator RICE: But if your jurisdiction is to be concerned about harm and protecting the environment, I would have thought that having a fuel that contains lead, which has known health impacts on people, should be something that you were concerned about, in the same way that you're concerned about noise.

Mr Harfield: It's the use and operation of the aircraft, not what the aircraft uses. I refer you to CASA because—

Senator RICE: I will go to CASA, but I'd ask you to consider that the fuel that the aircraft is using is intricately connected with the use and operation of that aircraft, in the same way that the level of noise that a particular aircraft makes is a particular characteristic that you are concerned with, aren't you?

Mr Harfield: Yes; the effects of."

What about tank water?

The link between ultra-fine particle air pollution from the aviation industry and its impact on ground and tank water is due to the deposition of these particles onto surfaces, including rooftops and the ground. When it rains, these particles can be washed off these surfaces and into the soil or water sources such as rivers, lakes, and rainwater tanks.

The presence of ultra-fine particles in water can have several negative impacts on human health and the environment. These particles can contain **harmful chemicals and heavy metals**, which can be toxic to aquatic life and can also pose a risk to human health if ingested through contaminated water. In addition, ultra-fine particles can accumulate in water tanks over time, leading to reduced water quality and the need for more frequent cleaning and maintenance.

For those who rely on rainwater harvesting and water tanks, the impact of ultra-fine particle air pollution from aviation can be particularly significant. Without access to other water sources, any contamination of their tank water can pose a **significant risk to their health and wellbeing**.

Further readings on this topic:

- UECNA webinar on ultra-fine particle pollution, March 2023.
- Australia's air pollution hotspots hit disadvantaged people harder, The Guardian, 04/05/2023
- Pollutionwatch – concerns over ultrafine particles from aircraft, The Guardian, 11/02/2022
- Pollutionwatch – fine particles affect lungs of those near airports, The Guardian, 01/01/2021
- Activists push back against rising air pollution from Sea-Tac Airport
- UK government will not commit to immediate lowering of air pollution levels to WHO limits
- Airport pollution linked to acute health effects among people with asthma in Los Angeles
- Planes' exhaust could be harming communities up to 10 miles from LAX
- Ultrafine particles in the vicinity of Schiphol Airport affect health

Examples of peer-reviewed academic studies:

- Bendtsen, K. M., et al. (2021). A review of health effects associated with exposure to jet engine emissions in and around airports. *Environmental Health*, *20*(1), 10. https://doi.org/10.1186/s12940-020-00690-y

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- Zhang, X., et al. (2019). A number-based inventory of size-resolved black carbon particle emissions by global civil aviation. *Nature Communications*, *10*(1), 534. https://doi.org/10.1038/s41467-019-08491-9
- Habre, R., et al. (2018). Short-term effects of airport-associated ultrafine particle exposure on lung function and inflammation in adults with asthma. *Environment International*, *118*, 48–59. https://doi.org/10.1016/j.envint.2018.05.031
- Keuken, M. P., et al. (2015). Total and size-resolved particle number and black carbon concentrations in urban areas near Schiphol airport (the Netherlands). *Atmospheric Environment*, *104*, 132–142. https://doi.org/10.1016/j.atmosenv.2015.01.015

We have compiled a selection of further scientific research papers in the Appendix.

Further information: https://bfpca.org.au/20-mental-health/, https://bfpca.org.au/38-air-pollution/ and https://bfpca.org.au/health-study/

1.3 Airservices' ATC Retirement Incentive Scheme leading to unsafe skies

The Courier Mail reported that Civil Air Australia, the air traffic controllers' union, estimates it **could take years to implement the PIR flight path changes due to chronic staff shortages** in the Brisbane control tower. Why are there chronic staff shortages we asked. This is why:

During COVID Airservices executive management decided to cut costs by reducing staffing numbers. They offered a **Retirement Incentive Scheme** (RIS) to Air Traffic Controllers over the age of 56 who were expected to retire within the next three years. (**ATCs can retire at 55 anyway!**) They got a private tax ruling from the ATO that it could be treated tax-wise as a redundancy. Between Oct 2021 and Dec 2022, 486 staff left Airservices, of those **184 were Air Traffic Controllers**, and of those 144 took advantage of the RIS who got between $300,000 – $400,000 each to walk away. So the total cost of the RIS was **$58 million**.

They were warned by staff and the Civil Air union that they would not have enough ATCs when traffic picked up. This has now materialised to the extent that Minister Catherine King MP had to intervene. Airservices reported in Senate Estimates that 132 positions have been re-hired through their training pipelines but we also heard that it takes in excess of two years for a recruit to complete their ATC training.

How can this be legal under Australian tax laws to give "redundancies" whilst recruiting to fill the same positions? Why "bring forward" the retirements of those who were about to retire anyway at great cost whilst at the same time recruiting to replace the same people?

The Australian Financial Review reported 19 Feb 2023 that Air Traffic Controllers in Australia are taking unplanned leave at a rate 44% higher than pre-pandemic levels, causing disruptions to travel operations and flight delays. Airservices has seen a **significant increase in absenteeism**, resulting in frustration for airlines, airports, and passengers. The rise in unplanned leave has reached approximately 20,000 days per year on a rolling 12-month average. Airservices' airspace services boss, Rodney Sciortino, called it an "unsustainable trend" and urged staff to propose ideas for improving attendance. The shortage of air traffic controllers has led to limitations on plane movements, extended ground delays, and **flight rerouting**.

The Australian reported on 5 April 2023 that, after **denying staff shortages for months**, Airservices Australia is now undertaking a recruitment drive for air traffic controllers to address the pressure on "hot spots." Chief Service Delivery Officer Michelle Bennetts acknowledged the resourcing challenges faced by employees and outlined plans to alleviate the pressure. The recruitment campaign aims to add 80 additional air traffic controllers by July 2024 on average annual earnings of $215,000.

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Transport Minister Catherine King also raised concerns privately with Airservices' chairman John Weber, and sought assurances the issues would be addressed. Although her office **declined to comment**, letters from Ms King to Airlines for Australia and New Zealand and the Australian Airports Association confirmed her intervention.

Leaked reports reveal **Australia's busiest airport Sydney is frequently operating without a manager in charge**. Airservices Australia reports show at least 70 instances of staff shortages from late July to late November 2022 at Sydney Airport. Documents obtained by The Australian show the Sydney Terminal Control Unit for aircraft approaches being **without a manager for periods of up to eight hours**.

Abysmally bad employee reviews

The Civil Air union welcomed the campaign, highlighting the international shortage of controllers. However, while the salary is nice, this will still be a challenging recruitment task considering the **abysmally bad reviews of Airservices as an employer** on Glassdoor. Here is a selection:

> *"No responsibility taken by executives for **toxic culture**"*
>
> *"Everything gets held up by red tape and managers who **actively road block**"*
>
> *"**poor culture**"*
>
> *"**Old boys club** where people get promoted for who they know and not on merit"*
>
> *"The simplest projects cannot be delivered in this company. I have never worked for a company that is so out of touch with their own project delivery team and other internal stakeholders. Some areas are supportive but most are **disruptive and go out of their way to deroad your project**. If you are a high performer and like to actually deliver projects this is not the company for you. Another restructure around the corner!"*
>
> *"**Management are completely useless and cause more headaches than anything**. Running the business into the ground to the point that there's no other option but to go to market to outsource."*
>
> *"It is truly hilarious watching the **bumbling antics of the management trying to appease the incompetent CEO they're all terrified of, while trying to maintain the illusion the company is any good at what it does**. Genuine comedy gold. There is nowhere else you can experience third world attitudes and management culture, while being paid a first world salary. Each day presents a more incredible and improbable scenario than the last – the writers of The Office couldn't script the stuff that happens. It's been a real lesson in the level of **bald faced lies that can be told to the media without apparent consequences**."*
>
> *"It's going to fall apart one day when the professionalism of the Air Traffic Controllers can no longer balance the **bungling incompetence and lack of regard for safety of the upper management team**. At that point, **people die**. And that's scary."*

And this comes three years AFTER Airservices was in the news for a systemic **sexual harassment and bullying scandal** that led to an intervention by the Australian Senate (see the report here).

Airservices' CEO, Board and entire executive team need to be removed, held to account, and the entire organisation brought back under public control as a statutory authority. The corporatisation experiment has failed.

Further information: https://bfpca.org.au/23-atc-shortages/

1.4 Airservices are technically incompetent

In Senate Estimates 22 March 2021, Airservices' CEO Jason Harfield referred to flight path design as their "bread and butter." We argue that Airservices are technically incompetent due to years of cost

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cutting and not adequately investing in the professional development of their staff as well as the type of advanced technology commonly used overseas such as flight path modelling using AI on supercomputers. Airservices created and launched a new airspace architecture for Brisbane on 12 July 2020. They worked on this continuously from the 2006/2007 MDP/EIS to the launch in 2020 – some 13 years! In 2021, the Australian Government engaged UK-based Trax International as a specialist advisory firm to review Airservices' fligth path design and airspace architecture. It took Trax only three months (and over half a million dollars in consultancy fees) to identify 49 ways Airservices' handiwork can be improved. This is the result of Airservices optimising the airspace design for their mates in the aviation industry to maximise their profits whilst throwing communities under the Airbus. Furthermore, pilots refer to "dirty" flight paths in Brisbane, because they are lower than what they should be and what they are at other airports.

It's our bread and butter

BFPCA's early community advocacy and pressure throughout 2020/2021 led to then Transport Minister Barnaby Joyce MP giving in to our demands for an independent review of Airservices' dodgy handiwork.

In Senate Estimates 22 March 2021, Airservices' CEO Jason Harfield referred to flight path design as their **"bread and butter."**

We beg to differ in that assessment, and whistle blowers who contacted us and our own technical advisors, too. They argue that Airservices have cut costs and have thus **not adequately invested in the professional development of their staff** as well as the type of advanced technology commonly used overseas such as flight path modelling using AI running on supercomputers.

What is worse, **Airservices let go of 184 senior Air Traffic Controllers** (some with up to 52 years of experience) between 1 Oct 2021 and 8 Dec 2022 – 144 of them due to a Retirement Incentive Scheme, which cost **$58 million**.

Barnaby Joyce made Airservices engage UK-based Trax International as a specialist advisory firm on 20 December 2021. Trax brought significant international experience having delivered similar airspace change initiatives at some of the world's busiest airports, including London's Heathrow Airport. The initial value of the contract totalled **$590,450 + GST** for 4 months of work (Jan – April 2022).

Early April 2022, the Trax interim report was first leaked and then properly released. **It listed:**

49 improvement recommendations!

Australia's national flight path design agency Airservices created and launched a new airspace architecture for Brisbane on 12 July 2020. They worked on this continuously from the 2006/2007 MDP/EIS to the launch in 2020 – some **13 years**!

It took Trax only three months (and over half a million dollars in consultancy fees) **to identify 49 ways Airservices' handiwork can be improved.** So much for "flight path design is our bread and butter" – yes, when you optimise all design options for the corporate benefit of Brisbane Airport Corporation while neglecting to protect communities in the local host city as obligated in the legislation (s9 Manner in which AA must perform its functions, *Air Services Act* 1995).

In a number of the Airservices-organised community workshops, the Trax representatives suggested on multiple occasions that the Brisbane flight path architecture is **so flawed** that if it were to be lodged in the UK it would have been challenged by a judicial review and "called in" by the courts before it could proceed any further.

Airservices Australia advised on 31 August 2022 that they "will adopt all recommendations in the recently released Brisbane New Parallel Runway Flight Paths Post Implementation Review (PIR) Independent Review Final Report by Trax International." In Senate Estimates they also advised that they have "initially allocated **$15 million** to the project as part of Airservices investment program."

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Airservices were also asked, why did they fail to implement ANY of the 49 TRAX recommendations for noise mitigation and abatements ON THEIR OWN when the new airspace was launched on 12 July 2020?

> "Given that Trax was appointed after the opening of the new runway its recommendations were unable to be considered in the airspace design and commissioning of the new parallel runway at Brisbane Airport in 2020."

Airservices are not just incapable of implementing international best practice noise abatements due to their **capture by the aviation industry**, they are also **unrepentant and arrogant**.

Dirty flight paths

The new flight paths were designed to be lower than they are at other airports. What happened?

Airservices have confirmed in Senate Estimates that they have not only received thousands of complaints from people living across 226 suburbs (there are only 190 suburbs total!). They have also received complaints from **AIRLINES** angry that they are forced to waste fuel and thus money in Brisbane. Why? Planes here are required to fly arrival paths that are lower and slower and thus **noisier, dirtier and less fuel efficient**. Pilots refer to Brisbane's "dirty" flight paths:

The forced lower arrival altitudes cause **3 x more noise** than at other airports. Here is why:

1. The airspace Airservices designed (their *"bread & butter "* as they say in Senate Estimates) requires pilots to level down sooner and come lower. Lower means **MORE NOISE x 1**.
2. In order to do that they need to slow down, and to do that they need to extend their "flaps" on the wings earlier (see video below), which creates more thrust but also yet again **MORE NOISE x 2**.
3. It also creates more drag so the engines are higher powered to keep the plane in the air so that's **MORE NOISE x 3**: because the engines are louder – and use more fuel.

How did this come about? With normal arrival paths elsewhere in the world, planes often use a continuous glide path. But not in Brisbane. Here the arrival paths are lower overall, because the Airservices flight path designers did not bother redesigning the higher altitude airspace. This was one of the first issues the TRAX International team from the UK picked up and identified as a major flaw of the Brisbane airspace design. As a result the arrival paths (aka STARs) were simply squeezed into the existing flight path spaghetti that already existed. In order to avoid mid-air collisions, the new arrival paths are BELOW existing paths. Airservices says this is due to required safety separations. While that is true, it is not the actual reason: The actual reason is **Airservices' failure to do a holistic airspace redesign** as would be standard practice for an airspace as complex as Brisbane's.

Further information: https://bfpca.org.au/29-bread-n-butter/ and https://bfpca.org.au/45-dirty-flight-paths/

1.5 Airservices failed to meet ministerial conditions

Major Development Proposals (MDP) such as the New Parallel Runway **require ministerial approvals** from both the Infrastructure Minister under the *Airport Act* 1996 and from the Environment Minister (for the EIS component) under the *Environment Protection and Biodiversity Conservation (EPBC) Act* 1999. Brisbane Airport Corporation received those approvals for the runway itself. However, **Airservices was also required to obtain their own approval from the Environment Minister for the new airspace and flight path design.**

BFPCA has meticulously pieced together information based on data in the 2021 ANO report and multiple FOI requests. Here is what happened:

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27/05/2005

In compliance with s160 of the *EPBC Act* 1999 Airservices wrote to the Minister for the Environment notifying that airspace management associated with Brisbane Airport's proposed new runway was **likely to have a significant impact on the environment** (referral number EPBC 2005/2144).

13/09/2007

Following Airservices' referral, the Environment Minister Malcolm Turnbull (in John Howard's government) issued his approval (Figure 4) subject to a key condition that is crucial for us:

> *"**Airservices Australia should take account of the options to mitigate noise impacts** outlined in the draft Environmental Impact Statement and supplement, and **require validation of the uncertainties** inherent in the forecasts when conducting the safety case and environmental assessment of the proposal, prior to operation of the New Parallel Runway."*
>
> Source: Dep. Environment FOI LEX 26466

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Document 1
LEX-26466

Page 1 of 1

Original Sent from Minister's Office

Minister for the Environment and Water Resources

13 SEP 2007

s. 47F(1)
Manager, Airport Relations
Airservices Australia
GPO Box 367
CANBERRA ACT 2601

Dear s. 47F(1)

Brisbane Airport Corporation Pty Ltd – New Parallel Runway (EPBC 2005/2144)

On 27 May 2005 the above proposal was referred to the Department of the Environment and Water Resources, under Section 160 of the *Environment Protection and Biodiversity Conservation Act 1999* (*EPBC Act*) for assessment and advice on the environmental impacts associated with the proposal. The action was assessed by joint environmental impact statement / major development plan.

As the Minister for the Environment and Water Resources and in accordance with Section 163 of the *EPBC Act*, I have now completed my consideration of the proposed action. The environmental impacts of the New Parallel Runway have been considered under this assessment and it is recommended that the following issues should be considered further by the Commonwealth Government:

- The impact of activities within the Obstacle Limitation Surface is a significant safety issue for the operation of the Airport, and the management of such risks should be reviewed by Airservices Australia prior to operation of the New Parallel Runway.
- Airservices Australia should take account of the options to mitigate noise impacts outlined in the draft Environmental Impact Statement and supplement, and require validation of the uncertainties inherent in the forecasts when conducting the safetycase and environmental assessment of the proposal, prior to operation of the New Parallel Runway.

Yours sincerely

Malcolm Turnbull

Parliament House, Canberra ACT 2600 Tel 02 6277 7640 Fax 02 6273 6101

Figure 4: Malcolm Turnbull's letter advising Airservices of ministerial conditions attached to EPBC 2005/2144. Source: Document 1, Dep. Environment FOI LEX 26466

07/05/2018

What did Airservices do? They rang up their mates at BAC and asked them to do the job for them.

Airservices worked closely with BAC during the design of the flight paths. We learnt from the 2021 ANO report that in 2018, BAC commissioned consultants to carry out a Noise Footprint Comparison of the flight path designs with those proposed in the 2007 EIS. Airservices advised that it participated in this assessment through a series of workshops. The report of this exercise found no significant differences between the two. The report appears to have been completed in the first half of the year, as Airservices agreed with the conclusions of the report in a letter to BAC on 07/05/2018, saying there was "no material difference" between the flight paths as then designed and those in the 2007 EIS. The letter noted a "comprehensive and detailed review" was conducted by Airservices and its "noise and environmental specialists" agreed with the conclusions. **There was, however, no documentation of Airservices' own assessment of environmental impact at this stage.**

Source: Airservices FOI-22-04

09/08/2018

Airservices wrote to the Department of Environment (with Minister Josh Frydenberg at the time) on 09/08/2018 **attaching BAC's Noise Footprint Comparison report** and advising that it had taken account of options to minimise noise impacts and **considered its obligations under the Minister to be satisfied**. It endorsed the conclusions of the BAC Noise Footprint Comparison to the effect that there was no material difference between the flight paths proposed at that time compared to those in the 2007 EIS. **However, Airservices own environmental assessment was not concluded until 21/12/2018.**

Source: Dep. Infrastructure FOI 22-146

21/12/2018

Airservices had already sent their letter to the Environment Minister, yet their own environmental assessment was not finalised until 21/12/2018. However, **this assessment did not conduct a direct comparison of the flight paths between 2007 and 2018 either**. It extracted a map from the 2007 EIS, applied its internal criteria for "significant" impact at 60dB(A), imposed the N60 contour onto and, since it substantially fitted within the map, determined that the significant environmental impact on the area with the map, and any requirements under the EPBC Act, had been approved under by the 2007 EIS.

The flight paths themselves had yet to be finalised and consequently the projected numbers of flights and their altitudes over particular suburbs was also not final. **Airservices did not finalise their flight path design including flight numbers until April 2020.**

So. Did Airservices take account of the options to mitigate noise impacts and validate any uncertainties in the 2007 MDP/EIS?

The proof is in the pudding: Of course they did not. **WE WOULD NOT BE HERE IF THEY HAD DONE THEIR JOB PROPERLY.**

Further information: https://bfpca.org.au/4-epbc/

1.6 Bait-and-switch removal of SODPROPS

The ministerial approval of Brisbane's New Parallel Runway and associated flight paths by the Australian Government in 2007 was based on the Brisbane Airport MDP/EIS, which stipulates that SODPROPS (over water operations) are to be, "the preferred mode as it offers the greatest noise abatement." (page D3-33). However, Airservices quietly removed SODPROPS as the priority mode during the day from the Brisbane Noise Abatement Procedures.

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Removal of SODPROPS

SODPROPS stands for Simultaneous Opposite Direction Parallel Runway Operations. This refers to a mode where one runway is used for departures over water and the other runway for arrivals over water. This is how the project was sold to us, and it is mentioned prominently in the 2007 Environmental Impact Statement (EIS) and in the community engagement "talking points" issued by Airservices to BAC. The Aircraft Noise Ombudsman confirmed in his 2021 report:

> *"Many complainants assert they were assured significant numbers of flights would occur over Moreton Bay…" (item 6.9)*
>
> *"BAC's role in taking the lead on the provision of noise information suited Airservices' then lack of capacity in effective community engagement." (item 7.20)*

Already back in 2020, BFPCA traced the mention of SODPROPS. It shows how Airservices first amended and then finally **entirely removed any mention of SODPROPS** from day-time operations at Brisbane Airport (Figure 5; Figure 6). BFPCA have called for SODPROPS to be re-instated as the number 1 priority mode and even tabled amended Noise Abatement Procedures together with an ATC performance expectation guide as part of our detailed PIR submission (see Appendix). These have been ignored by Airservices.

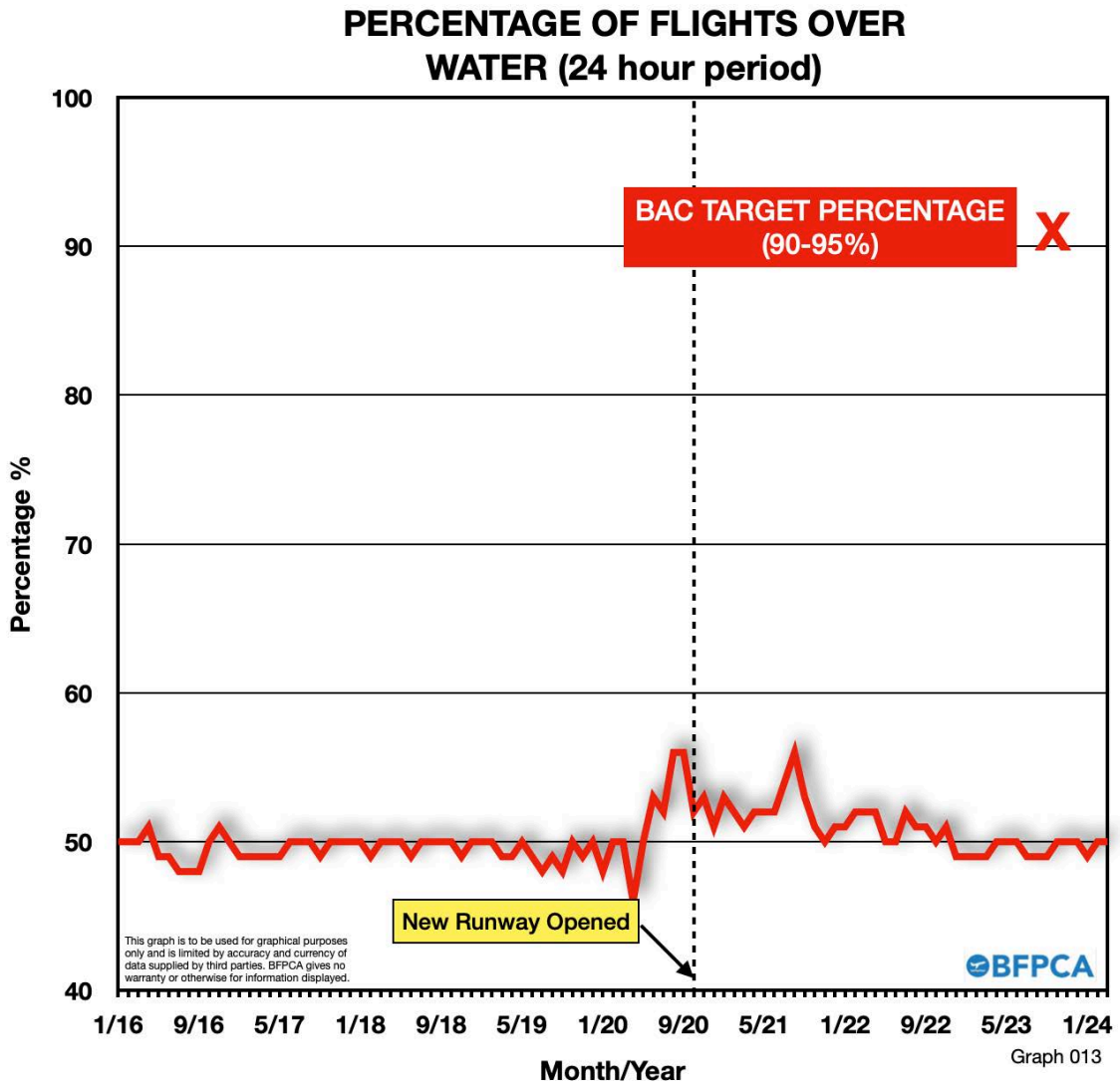

Figure 5: Percentage of flights over water (24 hours). Data source.

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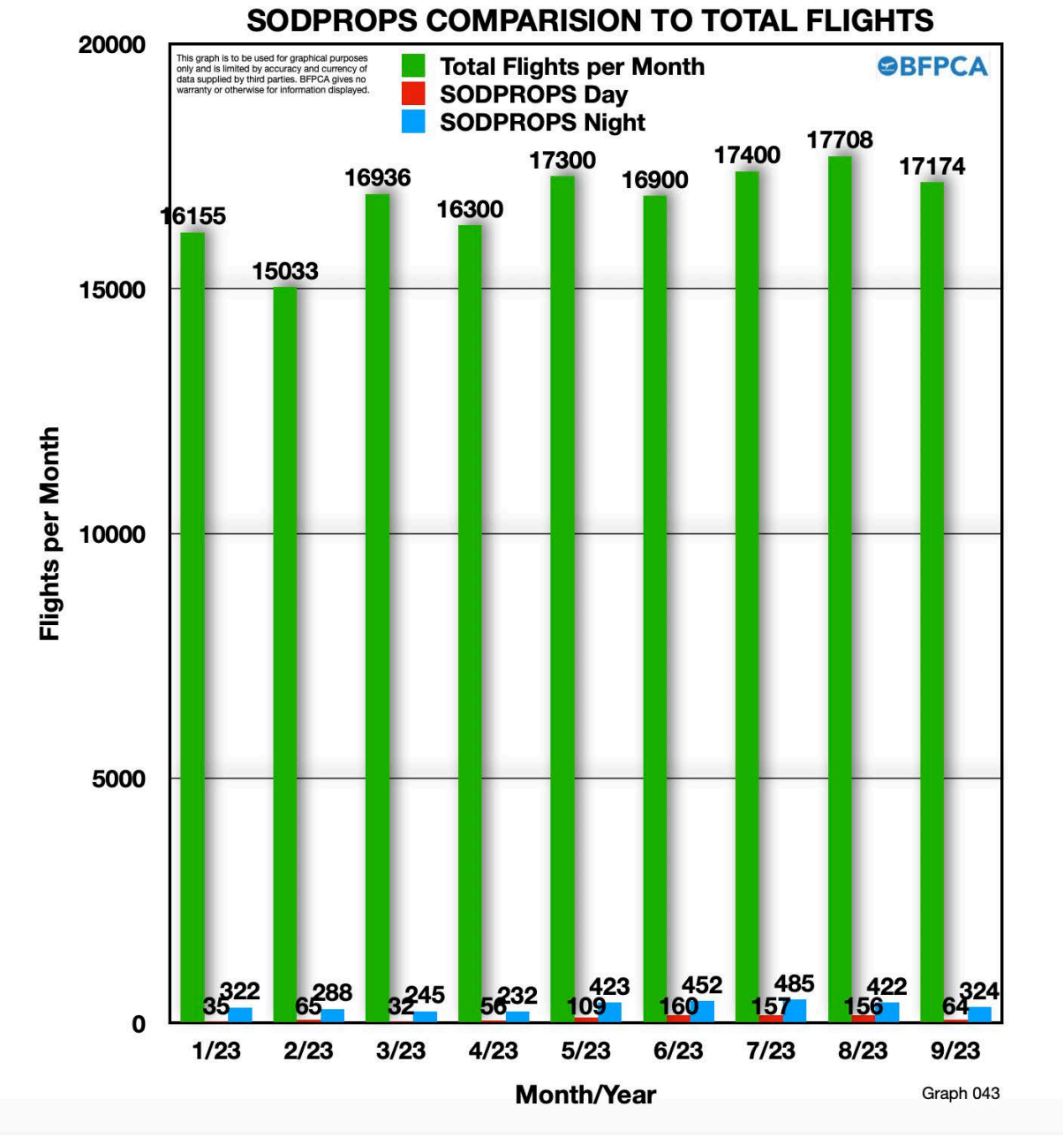

Figure 6: SODPROPS (red and blue) comparison to total flights (green). Data source.

Bait-and-Switch

In Budget Supplementary Estimates 2021 / 2022 (25 Oct 2021), Senator Larissa Waters asked Airservices: **Why was SODPROPS dropped for daytime operations?**

> *"SODPROPS changed from a day to a night time preferred mode during final flight path design in 2018 when a range of operational factors were considered."*

Has Airservices considered whether this represents a "significant impact" change that should be referred to the Minister for the Environment for advice? If advice was not sought, why not?

> *"This change was **not** considered a "significant impact" criteria under the Environment Protection and Biodiversity Conservation Act 1999 (the EPBC Act)."*

What community consultation was undertaken to inform local communities of this major change?

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*"As the change was **not** considered a "significant impact" no formal consultation was undertaken."*

BFPCA argues that the removal of SODPROPS from daytime operations of the Brisbane Noise Abatement Procedures was indeed a "significant impact" change. The proof is in the pudding and confirms that the removal of SODPROPS from daytime operations was a major change with a significant impact. Approx. 27,000+ complaints have been lodged. Three independent reports – by the ANO, BAPAF, and Trax International – have confirmed flaws in both the flight path design and community engagement. Runway usage data confirms that Brisbane Airport Corporations' promise to route the majority of flights over water and away from residents has been broken.

Airservices' own guidelines (Figure 7) reqire that:

"Any proposal that results in an EPBC Act assessment finding of potential 'significant impact', shall be referred, by the EGM ANS to the Commonwealth Environment Portfolio Minister (the Environment Minister) for advice."

4.4 Proposals with potential 'significant impact'

Any proposal that results in an EPBC Act assessment finding of potential **'significant impact'**, shall be referred, by the EGM ANS to the Commonwealth Environment Portfolio Minister (the Environment Minister) for advice, (unless the Accountable ANS Manager decides not to proceed with the proposal).

Once advice is received from the Environment Minister:

- the Environment Minister's advice shall be considered by the CEO; and
- the action taken (e.g. in relation to implementation of the proposal) shall be recorded, and if the Minister's advice was not given effect, the reasons why shall be documented and forwarded to the Environment Minister by the CEO, in accordance with the EPBC Act.

Refer to Section 6.3 for further information regarding EPBC Act referral assessment requirements.

Figure 7: Airservices: Environmental Management of Changes to Aircraft Operations AA-NOS-ENV-2.100 Version 13, effective 7 August 2018, Section 4.4 – Proposals with potential 'significant impact', p. 6. EGM ANS = Executive General Manager Airservices Air Navigation Services Group

A data visualisation (Figure 8) provided by Airservices in their presentation to BAPAF members on 25 Oct 2021 obtained through FOI 22-161 (Dep. of Infrastructure and Transport) shows "Brisbane Airport SODPROPS Conditions." This graph lists a 24 hour time period on the X axis, which proves that SODPROPS can occur between 30 – 50% of the time even with the current tail wind limitations of < 5 knots (green shared area).

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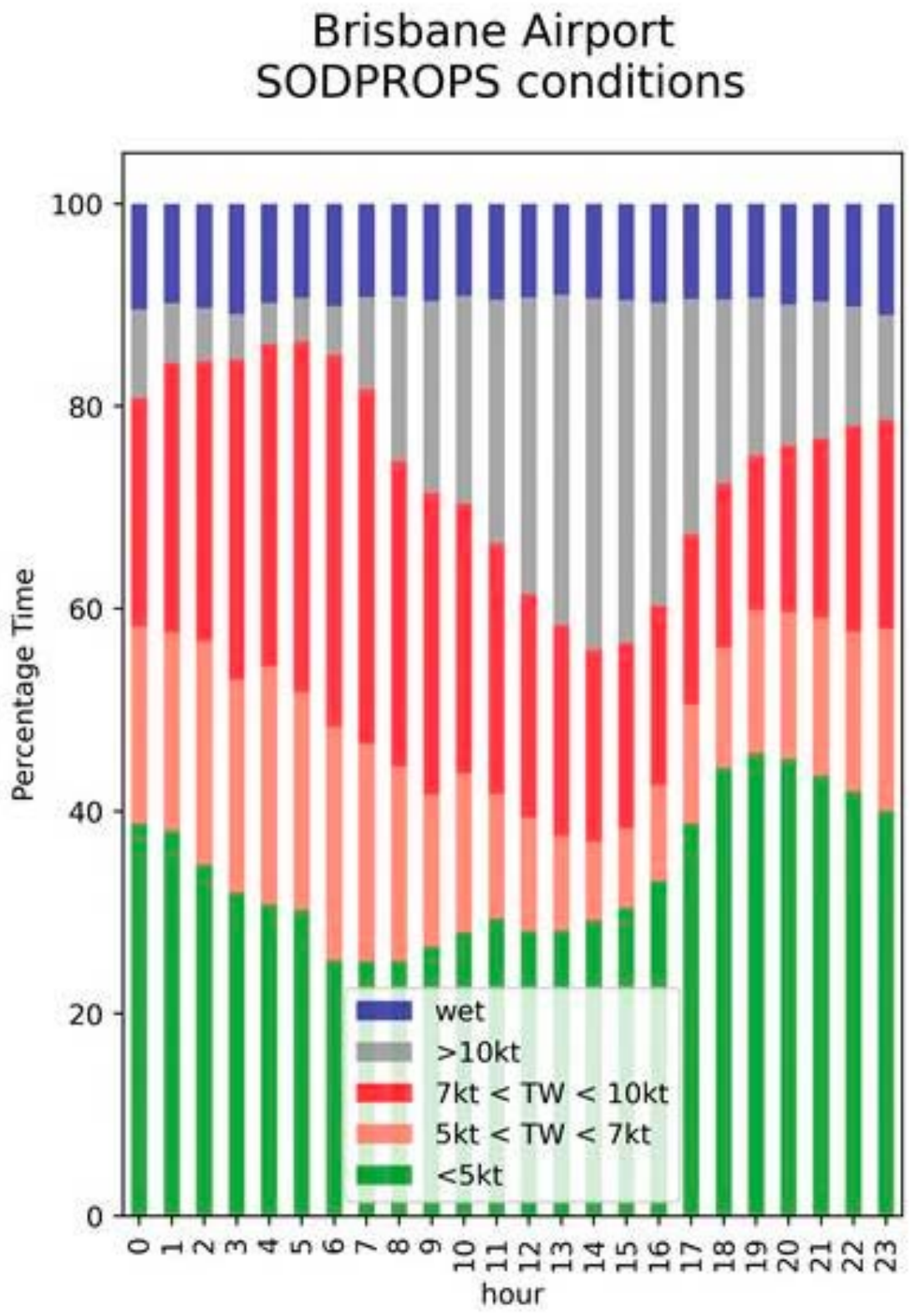

Figure 8: Brisbane Airport SODPROPS Conditions, Airservices Australia. Source: Document 2, Department of Infrastructure and Transport FOI 22-161, p. 14

Further information: https://bfpca.org.au/7-bait-and-switch/ and https://bfpca.org.au/60-sodprops/

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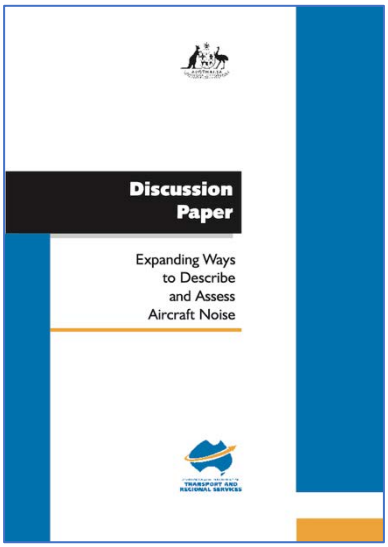
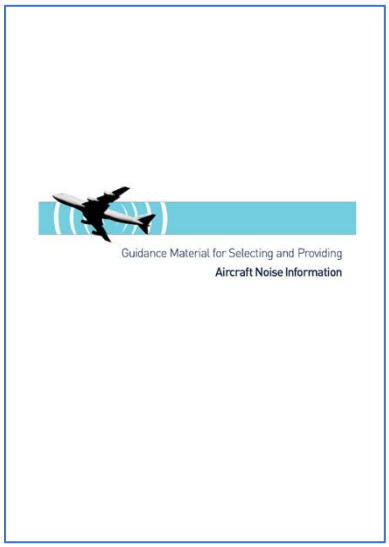
1.7 Airservices' misleading noise data

The community protests at Sydney Airport in the mid 90s led not only to the introduction of a curfew, movement cap, and Long-Term Operating Plan, they also caused various inquiries and reports to be produced assessing how to learn from the mistakes made back then. Did Brisbane Airport Corporation and Airservices Australia learn their lesson at the time? No, they did not. Here is why:

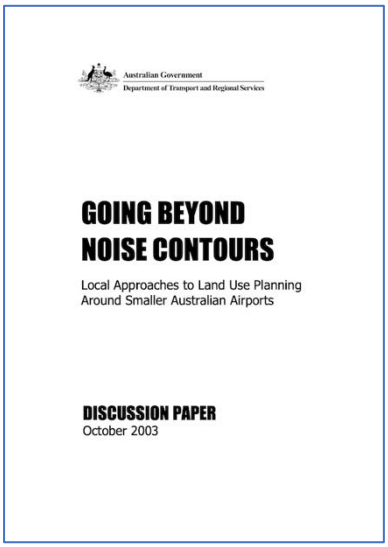
Three Commonwealth Government reports stand out when it comes to identifying ways to improve how aircraft noise data is presented to communities:



(i) March 2000 – Expanding Ways to Describe and Assess Aircraft Noise



(ii) July 2003 – Guidance Material for Selecting and Providing Aircraft Noise Information



(iii) October 2003 – Discussion Paper: Going Beyond Noise Contours

Figure 9: Three Australian Government reports (March 2000, July 2003, Octover 2003) identifying ways to improve how aircraft noise data is presented to communities

Some notable quotes:

> *"The generation of an **'anti airport' resident as a result of a perception of misleading information** can arise in a number of ways. In particular, from data issued during the environmental assessment process for a new project (eg new runways or flight path arrangements) or from advice given to a person moving into a new house which is in an area where there is existing audible aircraft noise.*
>
> *The circumstances surrounding the EIS for the third runway at Sydney Airport are a prime example of the first case. Many people claim that **they did not object during the EIS process because the ANEF information led them to believe that they would not be affected by the project**. […] If they then decide to proceed with the house move, but armed with full information, experience is that they are **less likely to become an 'anti airport activist'** if they subsequently hear aircraft noise after they have moved in to the new home."*
>
> Expanding Ways to Describe and Assess Aircraft Noise, March 2000, pp. 48-49

> *"Polluters have a responsibility to monitor and report on the pollution they are generating and the public has a right to know environmental pollution levels. It is self evident that **if pollution levels are reported in a manner that is unintelligible to the non-expert there has not been effective disclosure of what is happening**.*

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Our experience in recent years has shown that if a meaningful picture is to be painted of aircraft noise exposure patterns around an airport a person needs, at the least, to have access to the following information:

- *where the flight paths are;*
- *at what times aircraft use a flight path (in particular sensitive times – night/early morning, evenings and weekends);*
- *how often aircraft use the flight path;*
- *variations in activity levels from hour to hour, day to day, week to week, etc; and noise levels from individual flights.*

It is considered best practice that every citizen has a 'right to know' this information if they so wish.

It is important that this information be made available in a disaggregated form and that, as far as possible, it be left unadjusted. That is, ***the detail should not be buried in an average day noise contour*** *nor should information on what happens at sensitive times be hidden by the use of weightings. It is also important that the information cover areas which* ***extend far beyond the 20 ANEF contour****."*

Guidance Material for Selecting and Providing Aircraft Noise Information, July 2003, p. 5

Despite these government reports and guidelines being published well before the 2007 EIS/MDP was written and submitted by Brisbane Airport Corporation and Airservices Australia, their noise forecast data continued to be flawed and misleading (Figure 10; Figure 11; Figure 12).

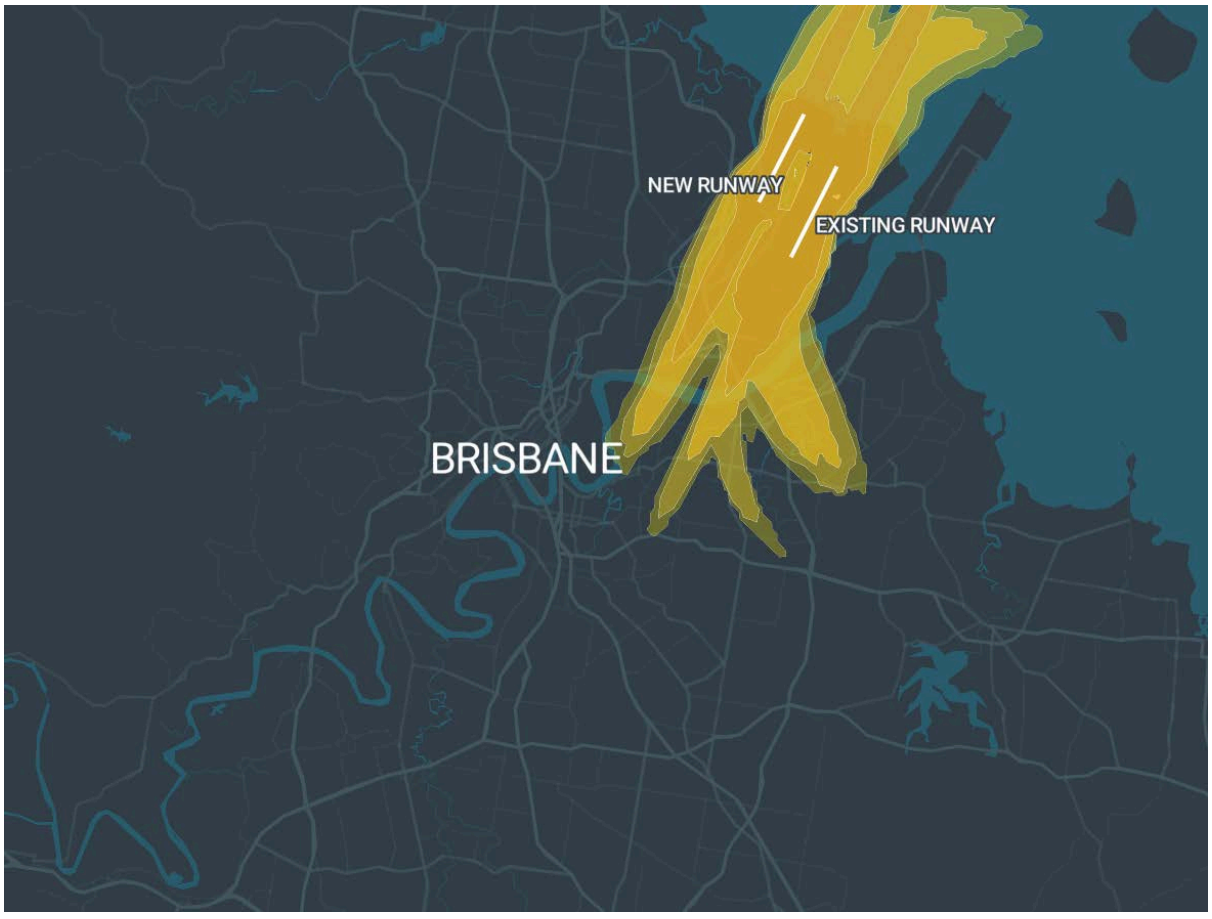

Figure 10: BAC's misleading Flight Path Tool showing Brisbane largely unaffected by aircraft noise pollution

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Figure 11: ExPlane data points showing location of citizen scientists recording significant aircraft noise pollution outside the predicted noise contours provided by Brisbane Airport Corporation

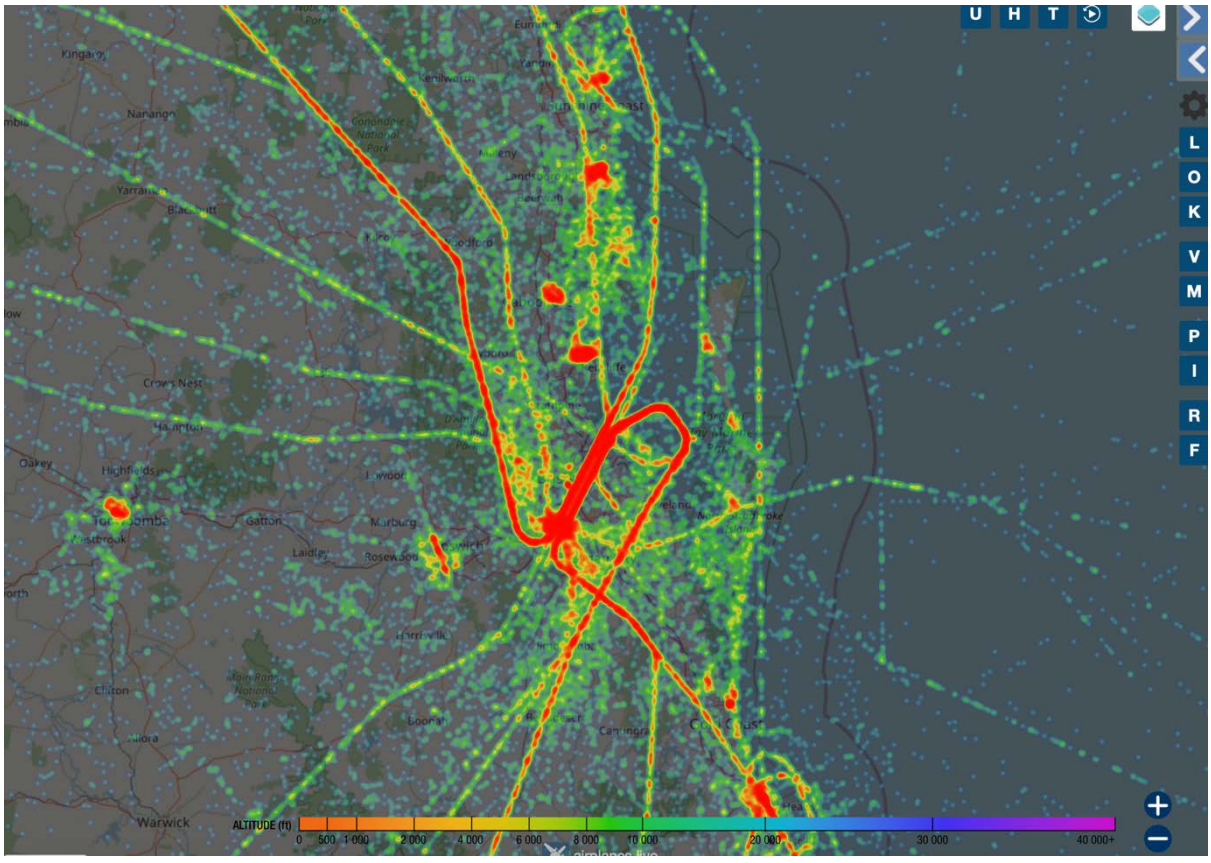

Figure 12: Heatmap of flights being tracked above Brisbane over a 48 hour period (3rd and 4th April 2024). Source.

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Decibels

Decibels (dB) are a unit used to measure the intensity or loudness of sound. Noise perception varies subjectively among individuals due to factors like personal sensitivity and context. Relying solely on decibels to convey noise pollution has flaws because it fails to capture the full range of human reactions and sensitivities to different noise volumes and the frequency of noise events. Additionally, the decibel scale is logarithmic. For example, an increase from 60 dB to 70 dB represents a **tenfold increase in intensity**.

The limitations of the noise modelling software

Integrated Noise Model (INM) was an aircraft noise modelling software package produced by the US Federal Aviation Administration. The first version of INM was developed in the late 1970s. As per page D5-158, the noise pollution impacts in the 2007 EIS/MDP were calculated using INM based on preset aircraft operational data such as preliminary flight paths (flight paths were not finalised until 2019/2020), aircraft types, runway modes (yet, SODPROPS mode was later removed from 6am – 10pm), etc. to compute noise contours (e.g., ANEF and N70) for areas surrounding airports.

INM had several flaws, including **outdated algorithms and limitations in accurately modelling complex airport configurations** such as the Brisbane aerodrome. The software assumes a **flat earth** environment and **failed to account for real-world conditions**, such as varying atmospheric conditions and **topography**(e.g., Upper Brookfield and Samford Valley). Consequently, it often **underestimated** the actual noise impact experienced by communities surrounding airports. As a result of these flaws, INM has been phased out and replaced by more advanced tools like the FAA's Aviation Environmental Design Tool (AEDT). AEDT addresses the shortcomings of INM by incorporating improved modelling techniques, enhanced data sources, and considering various operational factors to provide more accurate noise assessments.

Using averages to artificially lower the noise forecasts

The 2007 MDP/EIS uses "Mean Measured LA Maximum Noise Levels" (see Volumes D4 and D5). What does that mean? This data refers to the **average** of the highest noise levels measured over a specific period of time, as per the INM user's guide:

> *"INM is not designed for single-event noise prediction, but rather for estimating long-term **average noise levels** using **average input data**. Comparisons between measured data and INM calculations must be considered in this context."*
>
> Integrated Noise Model (INM) Version 7.0 User's Guide, Report No. FAA-AEE-07-04, US Department of Transportation, Federal Aviation Administration, Office of Environment and Energy, Washington DC, 2007, p. 13

The Community Aviation Alliance Australia (CAAA) explains that, "the true value of such contours in informing the community as to the full extent of any adverse noise impact may be **significantly understated**" (p. 45). CAAA offer the following graph (Figure 13), which illustrates the **true maximum noise level** that results from a single over-flight.

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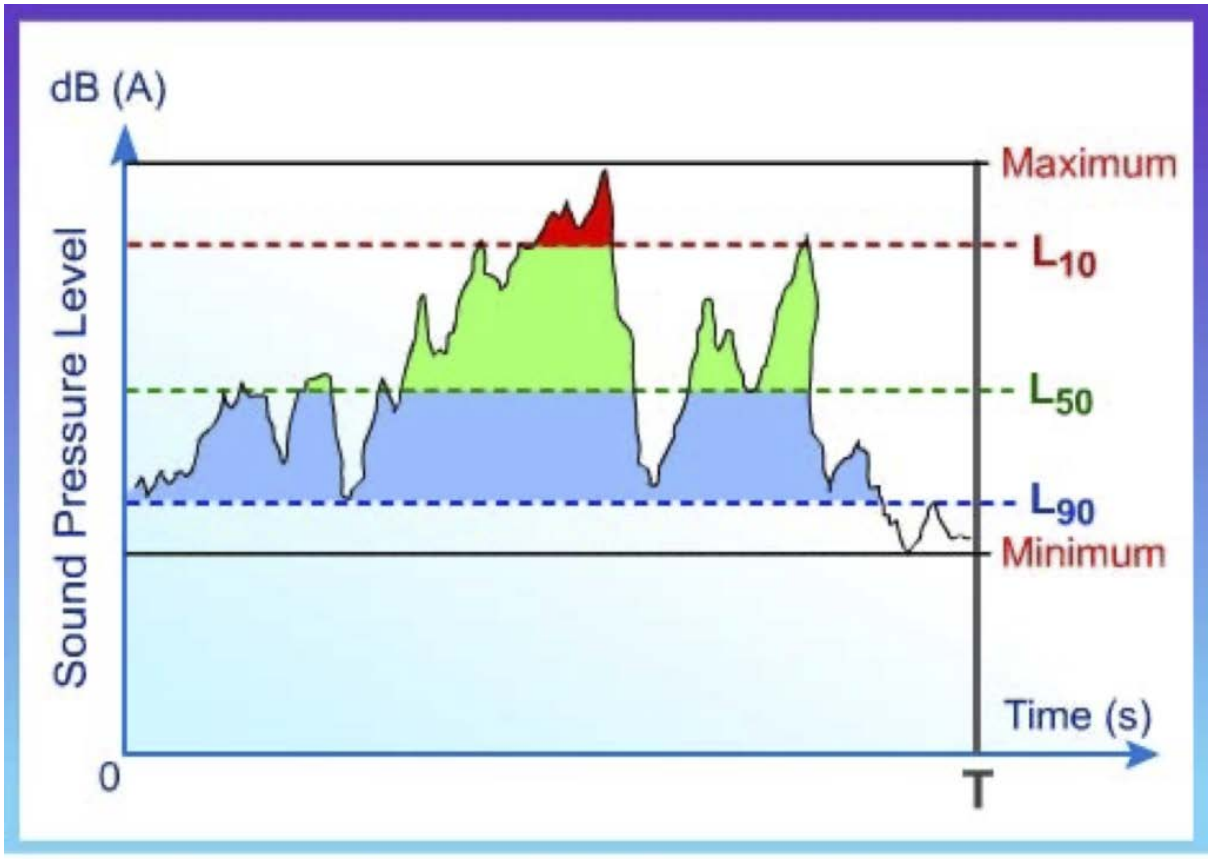

Figure 13: Short Term Noise Event (Over-flight or Pass-by), CAAA, p. 46

CAAA explain that, *"the true range of maxima is shown by the red shaded area. The horizontal dotted line described as L_{10} shows the average but not the highest individual value. That value is the true L_{Amax} resulting from the over-flight (or similar event)"* (p. 46).

The flaws with ANEFs – Aircraft Noise Exposure Forecasts

BAC's Master Plan and noise information pamphlets still largely rely on ANEF contours. BFPCA argues that using the flawed and outdated "Aircraft Noise Exposure Forecast" (ANEF) approach to model noise contours – while required under the *Airports Act* 1996 – is not sufficient to inform the community of what is in store for them, and this has been known since 2003:

> *"… these [ANEF] contours do not normally show a picture of current or near-term noise exposure patterns around an airport. Experience has shown these contours, which are based on logarithmically averaged 'annual average day' aircraft noise energy, do not portray noise in a way that the non-expert can readily relate to. Given the above, land use planning contours such as* ***ANEFs are not considered suitable for use as an aircraft noise information tool****."*
>
> Guidance Material for Selecting and Providing Aircraft Noise Information, July 2003, p. 7

Residential development is only deemed "acceptable" outside the ANEF 20 contour, which represents an average noise exposure level of 20 aircraft noise events per day. Residential developments located within or near the ANEF 20 contour are typically subject to additional planning assessments and mitigation measures to manage the potential noise impacts on future residents. For example, near the proposed Western Sydney Airport new residential developments will not be permitted where the ANEF exceeds 20. However, the term "acceptable" itself is questionable as this quote explains:

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> *In the first instance it is considered important that the wording 'acceptable' and 'unacceptable' in the [ANEF] Standard be replaced by more objective terms such as 'no building restrictions' or 'building not permitted/recommended.' As discussed at a number of points in this paper, what is considered to be 'acceptable' by the Standard is not necessarily 'acceptable' to the individual.*
>
> Expanding Ways to Describe and Assess Aircraft Noise, March 2000, p. 55

The Australia Government in its 2016 National Airports Safeguarding Framework suggested again that the ANEF approach is flawed:

> *"Experience has shown a **range of problems** with relying solely on the ANEF as a noise information tool as there are limitations in using the ANEF to describe aircraft noise exposure to laypeople.*
>
> *While the populations with the highest aircraft noise exposure often live within the 20 ANEF contour, experience shows the **majority of noise complaints that are received come from residents living outside the 20 ANEF contour**. Traditionally the residents of these areas have been given **little information** on aircraft noise through the ANEF system other than that the area is considered 'acceptable' for housing. Some people living outside the 20 ANEF contour have been given an expectation of receiving little or indeed no aircraft noise and as a consequence find the levels of noise actually experienced to be **unacceptable**.*
>
> *[…] land use planning could be improved through recognition that **aircraft noise does not suddenly stop at the 20 ANEF contour**."*
>
> National Airports Safeguarding Framework, Guideline A: Measures for Managing Impacts of Aircraft Noise, Attachment 1 – Supplementary Aircraft Noise Metrics, 2016, p. 1

Yet, land use planning policies in states and territories as well as the current "manner of endorsement" of ANEFs approved by the Minister of Infrastructure and Transport in April 2017 do not take the government's **own** advice into account.

The experience with Brisbane Airport's flawed noise modelling in the 2007 MDP/EIS and since then has shown that:

- Communities are not easily able to translate decibel noise levels provided in an ANEF contour into a lived experience, and the comparisons are often flawed, e.g. "70 db = Passenger car at 60 km/h and 7m distance."
- The level of noise nuisance is also impacted by the frequency of overhead flights, the topography, the difference between experienced ambient noise levels in residential areas and flight events, and whether any respite – if at all – is being afforded to residents. Brisbane Airport and Airservices have created an aviation super highway above Brisbane that provides for no respite whatsoever.
- Lay people do not easily understand the logarithmic units of the decibel measure.

BFPCA asks that all future airport master plans also include N65 and N60 contours as per the recommendations in the guidelines of the National Airports Safeguarding Framework 2016. We further ask that the real noise impacts and harms beyond the limited area indicated by the ANEF noise contours are being properly assessed and communicated to the community as the discrepancy between modelled noise forecasts and the lived experience is vast.

Further information: https://bfpca.org.au/14-noise/

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1.8 Airservices' faux Noise Improvement Trials

A recommendation stemming from the Brisbane Airport PIR Advisory Forum (BAPAF) included short-term noise improvement measures, specifically:

i. A trial requiring all aircraft to use the full length of the runway (NPR) on departures over the city, and;

ii. Extending the time period when SODPROPS operations may be attempted to included 6am to 8am on Saturday and Sunday mornings and 8pm to 10pm on Saturday evenings, when weather conditions allow.

Restriction on intersection departures

From when the runway opened, aircraft were allowed to take off at different intersections on the runway resulting in **aircraft remaining lower and therefore noisier over the communities** than if they'd used the full length of the runway.

The trial entailed restricting intersection departures. One might wonder why it took BAPAF to identify this noise improvement option and how it was not implemented as part of Noise Abatement Procedures when the runway first opened. Given that the runway was built directly pointing at some of Australia's most densely populated areas, one would expect that all noise abatement measures should have been utilised. Airservices have now removed the requirement for aircraft to take off from the full length of the runway. BFPCA argues that under no circumstances (except in an emergency) should intersection departures be allowed for Southerly departures on either runway.

Airservices conducted a trial that was not really a trial and was set to fail from the outset. When aircraft depart Brisbane they are allocated a SID (Standard Instrument Departure). These SIDs contain geographical **waypoints** that pilots fly to and cross at minimum specified altitudes. Prior to departure, pilots load these SIDs into the aircraft's Flight Management Computer and ensure they reach the altitude specified in the SID by that particular waypoint (or latitude and longitude). Airservices did not modify any of the SIDs for pilots to fly to, so **aircraft were still crossing the same waypoints at the same altitude as before the trial** (Figure 14).

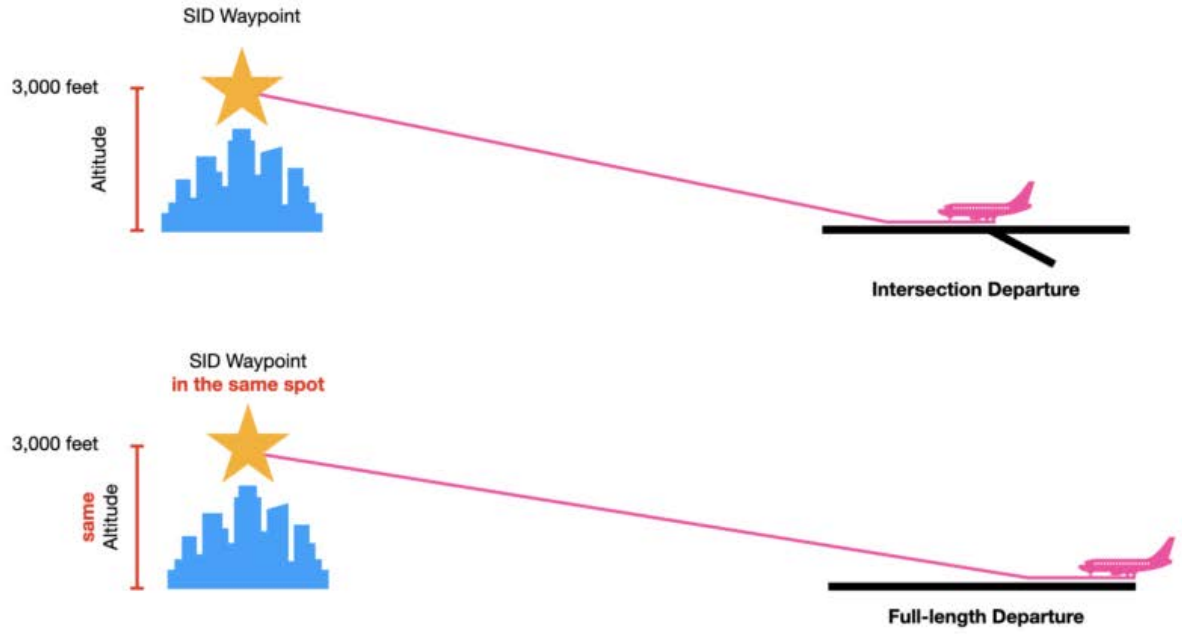

Figure 14: Visualisation illustrating the absurdity of Airservices conducting a trial restricting intersection departures whilst keeping the height markers unchanged. Source: BFPCA.

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Furthermore, pilots use the onboard Flight Management Computer to calculate take-off thrust. With no modification to the SIDs and more runway length available, the onboard computers would suggest a reduced thrust taking off from the full length of the runway, instead of using full thrust to climb higher quicker. **Airservices did not stipulate any noise abatement procedures for pilots to use**. To make the trial genuine, Airservices needed to stipulate certain parameters, which would have required pilots to use full take-off thrust, a specific noise abatement procedure, aircraft to climb at the maximum climb gradient and using a modified SID. This combination would have allowed aircraft to climb higher sooner. Airservices provided the results of this trial in "fact" [sic] sheets associated with the Brisbane Noise Action Plan but have not adjusted for temperature, wind velocity and other factors that affect noise and climb rates.

What does a full length take off mean for non-jet traffic departing to the South and then turning right over communities shortly after take off? Full length takeoff allows earlier manoeuvring to avoid built up areas for turboprop aircraft, which can usually climb to a safe turning height within the airfield boundaries. A full length take-off on runway 19R would result in aircraft **overflying fewer suburbs**; especially those to the South and South West of the runway.

If the intention is to reduce noise for as many communities as possible, there appears to be no argument against mandating full length take-offs.

On 12 Feb 2024, Airservices finally **admitted fault** in Senate Estimates (source: Hansard, p. 72):

> **"Senator Janet RICE:** Additional information in that response said, 'The flight management systems will make a determination on the amount of thrust required to meet height markers on standard instrument departures.' During the trial, were those SID height markers increased?
>
> **Mr Peter Curran:**[1] No, they were not.
>
> **Senator Janet RICE:** They were still aiming at the same markers?
>
> **Mr Curran:** Yes, that's correct. They can be above the marker, depending on the air traffic control clearance and the circumstances at the time. But the trial that we undertook was the trial that was recommended by then BAPAF group, the government-established Brisbane airport advisory forum. They made the recommendation to do a full-length trial, a no-runway-intersection trial, which is what we undertook. The trial to change a standard instrument departure is a different trial altogether and that would have required significantly more time.
>
> **Senator RICE:** Maybe I'm not seeing something. If they're basically aiming for the same height—even though you're saying, 'Use the full runway,' they're still aiming for the same height, so it's no surprise that they're not reaching a higher altitude and having less of a noise impact."

NADP1 vs NADP2

Relatedly, on the basis of the aforementioned evidence that Airservices and BAC conducted disingenuous and flawed noise trials, BFPCA also questions the validity of the 2019 / 2020 "Noise Improvement Trial" conducted at Brisbane Airport to determine whether NADP1 vs NADP2 are preferred. NADP stands for "Noise Abatement Departure Procedure," which aims to reduce aircraft noise impact on surrounding communities during takeoff. NADP1 and NADP2 are two different departure procedures with distinct noise reduction strategies (Figure 15).

NADP1 typically involves a steeper climb and higher thrust settings during takeoff, allowing the aircraft to reach a higher altitude sooner after departure. This steeper climb reduces the duration of aircraft noise over nearby communities. On the other hand, NADP2 utilises lower engine power settings and a shallower climb gradient compared to NADP1. This results in a slower climb and a

[1] Mr Peter Curran, Chief Customer and External Relations Officer, Airservices Australia

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longer exposure to not just aircraft noise for communities near the airport but also harmful and toxic nitrogen oxides (NOx) emissions according to the UK Government (Civil Aviation Authority, 2018, Source).

Airlines prefer NADP2 due to its lower power setting, which saves them fuel and reduces wear and tear on the aircraft. Therefore, it is no surprise that BAC and airlines favour NADP2 as it suits their commercial interests. However, from a noise abatement perspective, NADP1 generally offers better outcomes for local communities by reducing the duration and intensity of aircraft noise during departure. BFPCA questions the validity of the 2019 / 2020 trial, and suggests that the implementation of NADP1 be reconsidered at Brisbane Airport in order to minimise the impact of aviation noise pollution on surrounding areas. NADP1 is the standard mode used in Europe, China, Japan, and many US airports.

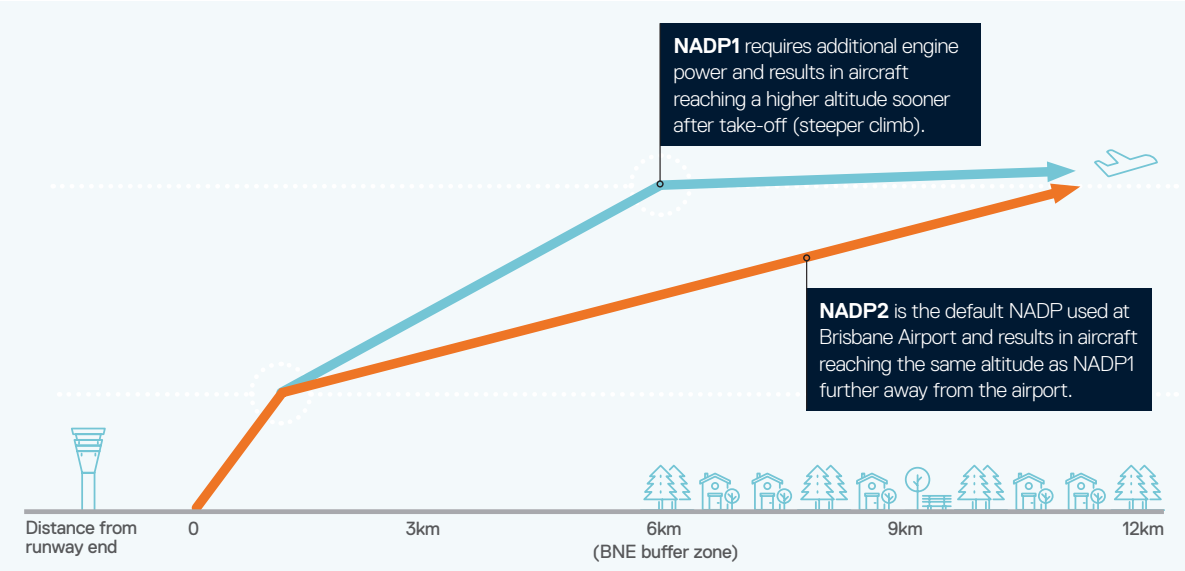

Figure 15: Noise Improvement Trial Summary, BAC, June 2020, p. 2. Source.

Extended SODPROPS

Part 68 of the Brisbane PIR Final Report states that each additional flight operating over water results in a significant reduction in noise impacts over communities. Therefore, even small changes that may only result in a slight overall difference in the total number of flights over water should be considered where viable.

On the days where conditions allow the use of SODPROPS, it is a massive benefit to the community. Allowing people to have the occasional full night's sleep and no noise early in the morning is a welcome relief from having their sleep cut short every day; which has associated health implications.

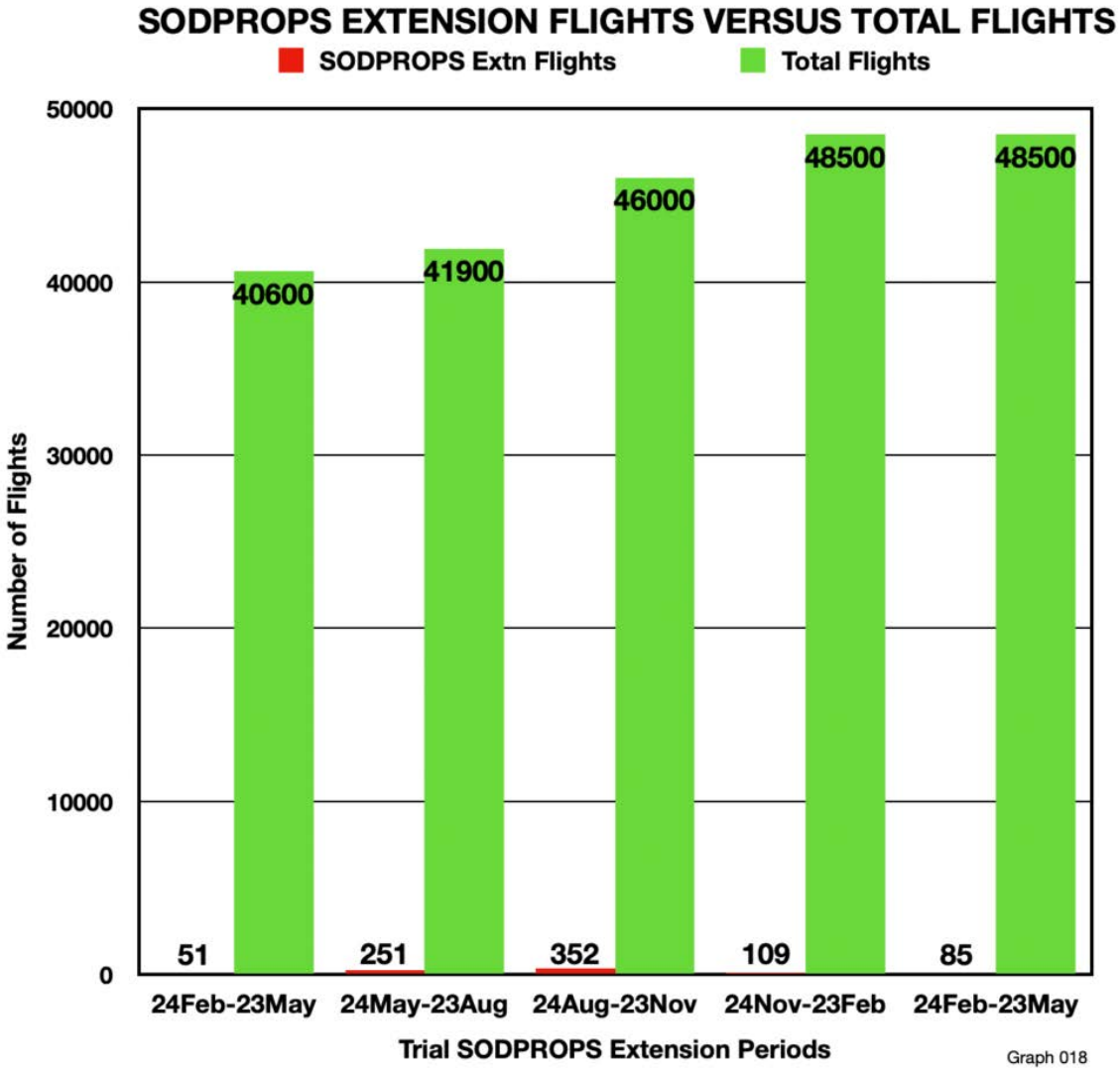

Figure 16: The weekend extension trial of an additional 6 hours of operation (Sat/Sun 6-8am, Sat 8-10pm) was yet another false hope scenario providing welcome but yet very limited relief to communities. In the overall scheme of things there was miniscule numbers of SODPROPS flights (red) compared to total flights (green) with the red bar graphs barely visible.

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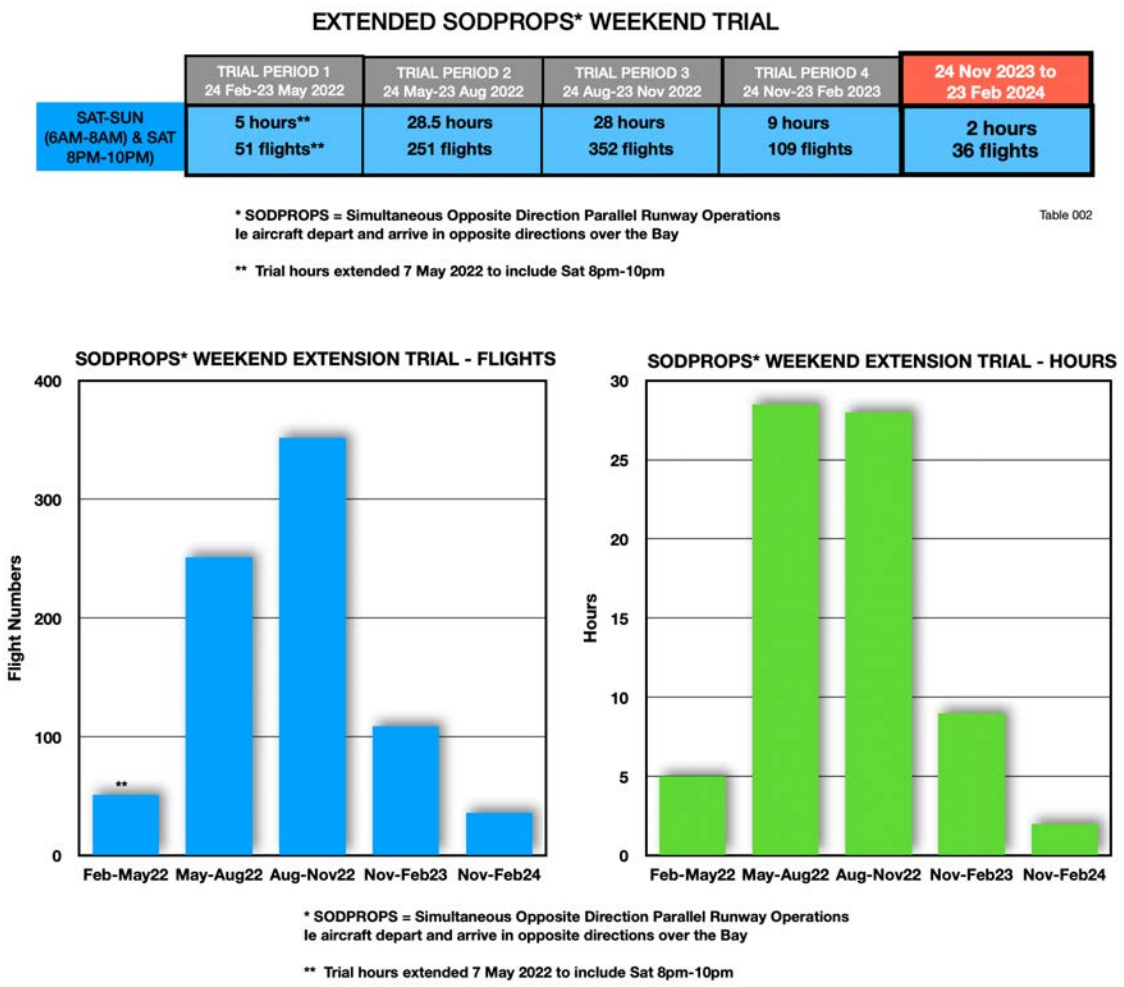

Figure 17: Extended SODPROPS Weekend Trial analysis. Source: BFPCA and Senate Estimates.

BFPCA's own trial analysis is shown in Figure 16 and Figure 17. We argue that SODPROPS should continue on weekends and be **re-instated as the number 1 priority mode at all times 24/7**. Already back in November 2020, BFPCA published evidence of SODPROPS being heralded as the number one priority mode 24/7 in the 2007 MDP/EIS, only for this mode to be subsequently silently removed by Airservices without notice, community consultation or ministerial review or approval.

We acknowledge that SODPROPS is not a usable mode 24/7 due the complexities and delays that occur when expected arrival rates exceed 20/hr. Having said that, **currently there is no requirement for ATCs to try to use SODPROPS outside of the time period of 10pm to 6am daily as the mode is not listed at all**. SODPROPS is the preferred mode at Sydney Airport outside of curfew hours, and Sydney ATCs **do** use it during the day when arrival rates make it available. This is what BFPCA would like to see happen at Brisbane. The nomination of SODPROPS as the preferred mode will bring about a change of culture whereby ATCs will always aim to use this mode whenever possible, rather than only using it when they must.

BFPCA had **revised Noise Abatement Procedures for Brisbane including a binding Noise Abatement Operating Plan** prepared by our technical consultant. These documents were tabled as part of our PIR submission in November 2022 for Airservices' immediate attention and implementation (see Appendix).

Further information: https://bfpca.org.au/16-noise-trials/

1.9 Airservices have been captured by the aviation industry

It has been 1,363 days since the new flight path architecture launched and started to inflict misery on families and communities across 226 suburbs of Greater Brisbane who now find themselves stuck in BAC's noise sewer. Nearly four years of excessive noise pollution, of deceit and lies by corporate executives, of buck passing by sham-regulators who admit in Senate Estimates that they are mere "service providers" to the aviation industry cartel, and a federal transport minister who adds insult to injury in her speech at the National Press Club in March 2023.

One key tactic that the national aviation industry cartel uses to win time, make more profits and grind us down is "**engagement theatre**." We are being asked to spend our own time and energy (for free) on lodging complaints that go nowhere, writing submissions that get ignored, attending consultation workshops that have no impact, joining sham-forums that have no authority ("Not in our Remit"). First we had BACACG, the ANO, then BAPAF, then TRAX, then the PIR workshops, and now AAB. Airservices have also released the **priorities for their "Brisbane Noise Action Plan,"** which come out of their Final PIR Report. We have translated the engagement theatre lingo into plain-speaking for you (Figure 18) – and the priority actions can be summed up with one word: **TALKFEST**.

#	Engagement theatre lingo	Plain-speaking	2023
1.1	Commence consulting with the government-appointed independent airport community forum	More talk fest.	Q1
1.1	Establish governance mechanisms including an assurance check by the Department	Airservices & Department are talking.	Q1
1.2	Community engagement on proposed communication approach for delivery of changes in response to the PIR, including confirming operating principles	Let's talk about the talk fest.	Q1/Q2
1.4	Increase public reporting and transparency of operations, including SODPROPS use, NAPs application, aircraft tracking and altitude, noise information and complaints	Bedazzle people with statistics.	Q1/Q2
2.1 2.2	Expand the use of SODPROPS mode by increasing capacity, enhancing decision-making criteria, and developing flight path changes for daytime operations	But first: More talk fest (not until end of 2023).	Q4
2.3	Develop proposals to increase height and over water operations for SODPROPS departures to reduce impacts on bayside communities	Let's not do anything drastic, let's talk first.	Q2
2.4	Develop proposals to reduce the impact of overnight operations	Let's talk about those proposals first.	Q1
3.1	Development of baseline model for pre-NPR and current NPR operations	Aviation geeks doing their thing.	Q1
3.1	Developing options to increase use of over water departures during the day	Let the community fight over options.	Q2
3.1	Develop proposals to reduce the impact of concentrated flight paths to the west of the airport	You guessed it: More talk fest, but not until end of 2023.	Q3

Figure 18: Plain-speaking translation of Airservices' engagement theatre lingo. Source: BFPCA

BFPCA has blown the whistle on BAC and Airservices' engagement theatre since we started: in our submission to the ANO back in 2021 and in subsequent submissions, newsletter articles and social media posts. This one is worth highlighting:

"Schiphol-BAC's perverted tactics revealed"

Back in August 2021, Rachelle Verdel published her Masters research thesis at Utrecht University. It is worth a read if you want to understand BAC's doctrine using Schiphol's playbook of **engagement theatre and social engineering** to try to break any resistance against their Aerotropolis cult vision. Verdel (2021) argues:

> *"… at the heart of the efforts of Schiphol's social engineering techniques is the notion of 'inclusionary control' [which] is about creating **pseudo-participatory bureaucratic forums that promise reform and influence in decision-making**. In the case of Schiphol, this is reflected in the [Schiphol Environmental Council], which was set up by the state and created to allow stakeholders to participate in discussions and decisions about the developments of Schiphol. It is an inclusive path to **potential reforms that, although they never materialize … can convince people to wait before taking more radical action**."*

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> Verdel, R. (2021). In the shadow of the corporate state: An ethnographic study of the shifting dynamics of the corporate state in the vicinity of Schiphol Airport (the Netherlands) through the exploration of counter-citizenship. Masters Thesis, Utrecht University.

Both Airservices and BAC have argued that they have "consulted widely" in the lead-up to the 2020 launch of Brisbane's new flight path architecture. Yet, the ANO found:

> *"2.6. The majority of complainants, both long term and more recent residents, were aware of the new runway before it became operational. These complainants reported varying degrees of inquiry into the potential impacts on their properties and lifestyle. Some report attending public information sessions as well as more detailed inquiries of Brisbane Airport Corporation's (BAC) public information campaign.* ***The consistent theme of these complaints is that the complainants were reassured that the impact on them would not be significant.*** *Having experienced the actual impact after July 2000, the complainants allege that the information they were given was* ***misleading****. In particular, they say that they were* ***falsely reassured*** *that the dual runway would provide for the bulk of take-offs and landings over Moreton Bay and minimising the disturbance to them. Some complainants felt so aggrieved that they alleged they were* ***intentionally and deliberately misled****."*
>
> Aircraft Noise Ombudsman (2021). Investigation into complaints about the flight paths associated with the Brisbane Airport new parallel runway, p. 7. Source.

It is important to stress at this point that nearly all the issues we are dealing with here today, have been forecast and predicted as part of the **June 2000 Senate Inquiry into the Development of the BAC Master Plan.** Excerpts have been included in the Appendix (Figure 23).

BFPCA proposes that this is what **honest, easy-to-understand and accurate information** would have looked like. Yet, nobody in Brisbane (or Western Sydney for WSA, etc.) has ever received such information. For example:

- Your home will be directly under a flight path.
- There will be more than 100 flights per day directly over your home.
- The noise pollution will be regularly in the range that the World Health Organisation deems harmful to human health.
- These noise levels are scientifically proven to be detrimental to childhood learning.
- There will be peak periods where flights will be every 2 minutes for several hours. These peak periods are early morning and early evening i.e. during family time.
- There will regularly be flights at night between the hours of 10 pm and 6 am over your home that will be disruptive to your family's sleep.
- We recommend that you move away from Brisbane if any of the above points are likely to cause you distress. We will not offer any support or compensation for this.
- Airservices and BAC assume no responsibility whatsoever for financial harm or harm to human health.

Compare this with Airservices' "Commitment to Community Engagement," which says:

> *"We are committed to clear, proactive, inclusive, accessible, responsive, transparent engagement with communities who may be affected by proposed changes to flight paths and airspace."*

The way Airservices and BAC misled the community, conducted engagement theatre, used flawed noise modelling, and deceived communities about the real impacts of the flight path architecture has been detailed in the BFPCA submission to the ANO and in the ANO report.

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Airservices' "Key Messages" document

BFPCA acquired Airservices' "Key Messages" document (Figure 19), which they publicly released by mistake as it was obviously **never intended to be seen by Brisbane communities**. This document (copy below) was created 02/02/2022 and published in error on the Airservices Engage portal, but then **quickly removed from view** as it was only intended for Airservices' airport and airline stakeholders, not for view by the community – it is easy to see why.

This document shows Airservices' true colours: The key messages or "talking points" that Airservices here recommends to their aviation industry stakeholders suggest we are dealing with Australia's government-controlled airspace regulator that is portraying to be simply a service provider in servitude to a national aviation industry cartel that is strategically colluding to privatise profits and socialise losses.

Some particularly appalling passages from this document:

- **"To enable long-term growth at Brisbane Airport (BNE), Brisbane Airport Corporation Pty Ltd (BAC) must maintain the ability to operate with minimal operational constraints.** This will be achieved through the **management of community and political responses**…"
- "As evidenced both internationally and within Australia, increased public pressure has resulted in operational restrictions at various airports, which have **significantly impacted route development opportunities, aircraft efficiency, infrastructure utilisation and ultimately, long-term growth**."
- "The **future profitability** of Australia's major airlines will in part depend on BAC's ability to keep the parallel runway system unconstrained as movements along the east coast of Australia are set to double over the next 20-30 years. The airspace and runway system provides **significantly greater efficiency and capacity than any other airport in Australia** and relieves pressure on the east coast network, given the 80-movement cap and curfew in Sydney Airport and the LAHSO [land and hold short operations] / weather constraints at Melbourne Airport."
- "The long-term benefits of Brisbane's parallel runway system will only be realised **if operational restrictions such as movement caps and curfews are avoided**."
- "Brisbane Airport's airspace and runway system provides significantly greater efficiency and capacity than any other airport in Australia and relieves pressure on the east coast network, given the 80-movement cap and curfew in Sydney and the Land and Hold Short Operations (LAHSO) / weather constraints in Melbourne. **Without the proactive management of both community expectations and aircraft noise more broadly, long-term aviation growth at Brisbane Airport could be constrained through the imposition of operational restrictions."**

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airservices

Proposal to Increase Allowable Tailwind at Brisbane Airport – Key Messages

- To enable long-term growth at Brisbane Airport (BNE), Brisbane Airport Corporation Pty Ltd (BAC) must maintain the ability to operate with minimal operational constraints. This will be achieved through the management of community and political responses to increased aircraft noise complaints and the balanced optimisation of Flight Path Operations for noise benefit and efficiency.
- Despite COVID-19 causing a significant reduction in aircraft movements, both BAC and Airservices have seen an increase in noise complaints from sections of the Brisbane community since the opening of Brisbane Airport's New Parallel Runway in July 2020.
- As evidenced both internationally and within Australia, increased public pressure has resulted in operational restrictions at various airports, which have significantly impacted route development opportunities, aircraft efficiency, infrastructure utilisation and ultimately, long-term growth.
- The future profitability of Australia's major airlines will in part depend on BAC's ability to keep the parallel runway system unconstrained as movements along the east coast of Australia are set to double over the next 20-30 years. The airspace and runway system provides significantly greater efficiency and capacity than any other airport in Australia and relieves pressure on the east coast network, given the 80-movement cap and curfew in Sydney Airport and the LAHSO/weather constraints at Melbourne Airport.
- The long-term benefits of Brisbane's parallel runway system will only be realised if operational restrictions such as movement caps and curfews are avoided.
- Brisbane Airport's airspace and runway system provides significantly greater efficiency and capacity than any other airport in Australia and relieves pressure on the east coast network, given the 80-movement cap and curfew in Sydney and the Land and Hold Short Operations (LAHSO) / weather constraints in Melbourne. Without the proactive management of both community expectations and aircraft noise more broadly, long-term aviation growth at Brisbane Airport could be constrained through the imposition of operational restrictions.
- The increased use of Simultaneous Opposite Direction Parallel Runway Operations (SODPROPS) is one way of achieving greater efficiency for airlines while reducing the impacts of aircraft noise on the community. While the current 5 knot tailwind restriction results in night-time (10pm – 6am) "over the bay" use of around 50-52%, there is an opportunity to safely increase tailwind operations to enable greater "over the bay" night-time operations by ~20%. This increase in SODPROPS utilisation would also allow flexibility for more "over the bay" movements in the shoulder periods (before 10pm and after 6am).

Figure 19: Proposal to Increase Allowable Tailwind at Brisbane Airport – Key Messages, Airservices Australia, created 2 Feb 2022

BFPCA asks:

i. **Why should Brisbane communities provide the buffering capacity for the rest of the East Coast at the expense of our amenity, liveability, health and wellbeing?**

ii. What precisely does Airservices mean by "**the management of community and political responses**"?

iii. The document says, "As evidenced both internationally and within Australia, increased public pressure has resulted in operational restrictions at various airports…" – **Yet, this is exactly what we want Airservices to do**: Implement NET MOVEMENT REDUCTIONS which bring about actual NET NOISE REDUCTIONS. How does Airservices' reconcile its industry key messages with Airservices' own "Community Engagement Framework," which promises "meaningful and transparent engagement with communities"? Airservices are telling communities that they will "fix" the Brisbane noise issue, yet at the same time they're telling industry to fear "increased public pressure" like the devil the holy water. **Airservices are lying to Brisbane communities.** And this entire smoke and mirrors community engagement theatre is paid for by Australian tax payers.

iv. The ANO in his 2021 report "Investigation into complaints about the flight paths associated with the Brisbane Airport new parallel runway" also found Airservices provided blatant lies to Brisbane communities, which were given to Brisbane Airport also wrapped up as key messages or "talking points" (see ANO report section 6.5–6.7, 7.16, 7.20, and report appendix B). **Has Airservices learnt any lessons from this unethical behaviour at all?** Considering the Airservices Board of Directors have agreed to implement all recommendations put forward by the ANO following his 2021 investigation, **why is it that less than a year later, Airservices are found yet again blatantly lying to communities?**

v. How does Airservices reconcile these key messages denying Brisbane communities essential noise protections with their legislated obligations under the *Air Services Act* 1995, s9 (Manner in which AA must perform its functions), which **requires Airservices to protect communities from "the effects of and associated with the operation and use of aircraft"**?

BFPCA demands that the *Air Services Act* 1995 be amended to free Airservices from its regulatory capture by the aviation industry. **The lies and deceit must end. The community engagement theatre must end. Strong regulatory controls and oversight must be installed.**

Further information: https://bfpca.org.au/3-true-colours/ and https://bfpca.org.au/47-misleading/ and https://bfpca.org.au/59-engagement-theatre/

1.10 Violation of the Air Services Act 1995

Section 9 of the *Air Services Act* 1995 stipulates:

> **s9 – Manner in which AA must perform its functions**
>
> *(1) In exercising its powers and performing its functions, AA must regard the **safety of air navigation** as the most important consideration.*
>
> *(2) Subject to subsection (1), AA must exercise its powers and perform its functions in a manner that ensures that, as far as is practicable, the **environment** [that includes **communities**] is protected from:*
>
> *(a) the effects of the operation and use of aircraft; and*
>
> *(b) the effects associated with the operation and use of aircraft.*
>
> Air Services Act 1995, s9

Airservices as a corporate service provider to the aviation industry prioritises its commercial gains and profits while communities suffer. We argue that Airservices Australia does not meet its legislated obligations under s9, that is, communities do not feel protected by Airservices from the effects of and associated with the operation and use of aircraft.

Regulatory capture refers to a situation where regulatory agencies, originally intended to oversee industries in the public interest, become unduly influenced or controlled by the industries they are supposed to regulate. This leads to outcomes that prioritise industry interests over those of the public. This phenomenon results in weakened enforcement of regulations and harm to communities due to a lack of protections.

This is precisely what we are dealing with: Airservices has been corporatised and as a result has entirely abdicated its regulatory responsibilities to protect communities in favour of doing the bidding for the aviation industry.

However, the Department of Infrastructure and Transport and its Minister remain responsible for ensuring Airservices Australia, as a government-owned corporation, does the right thing in designing airspace and conducting its business according to the regulations and legislation. That is why

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BFPCA has launched our regulatory oversight campaign, asking community members to lodge complaints with the Department about their lack of providing adequate regulatory oversight over Airservices Australia, and 1,800+ complaints have already been lodged via our online form.

Complainants have by now received a boilerplate response from the Department that suggests:

> *"While the department maintains a governance role, it is Airservices Executives and ultimately the Board of Airservices that is responsible for oversight of day to day activities involved in carrying out its statutory function."*

The full response reads:

> **From:** "clientservice" <clientservice@infrastructure.gov.au>
> **Subject: Complaint about failure to provide regulatory oversight for Airservices Australia [SEC=UNOFFICIAL]**
>
> **Date:** 19 July 2023 at 10:53:05 AM AEST
>
> **To:** BFPCA
>
> UNOFFICIAL
>
> Date: 19 July 2023
>
> Dear Marcus Foth
>
> I refer to your submission to the Director, Governance Section of the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (the department) via the Client Services email address, regarding regulatory oversight of Airservices Australia (Airservices).
>
> Airservices is a corporate Commonwealth entity established by the *Air Services Act 1995*, wholly owned by the Australian Government and accountable to the Minister for Infrastructure, Transport, Regional Development and Local Government (the Minister).
>
> Airservices is governed by its Board of Directors, under direction by the Minister. Airservices acts in accordance with its establishment Act, Statement of Expectations issued by the Minister, the *Public Governance, Performance and Accountability Act 2013* (PGPA Act) and the P*ublic Governance, Performance and Accountability Rule 2014* (PGPA Rule).
>
> The department has a role in supporting the Minister in her oversight responsibility for Airservices and other portfolio transport agencies. In this capacity, the department undertakes governance and oversight activities for Airservices, such as performance reporting and monitoring and providing advice on policy matters and Board appointments, to ensure it operates in line with the Government's aviation policies and priorities, and consistent with relevant legislation and regulations.
>
> While the department maintains a governance role, it is Airservices Executives and ultimately the Board of Airservices that is responsible for oversight of day to day activities involved in carrying out its statutory function. In particular, the department does not review or seek to intervene in Airservices carrying out its responsibilities for Australia's airspace management, aviation communications, navigation aids and technology, flight path changes, and Aviation Rescue Fire Fighting Services. Airservices is the agency with the expertise required to manage these responsibilities to ensure a safe, secure, efficient, and environmentally-sustainable aviation industry in Australia.

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Specifically in regard to Brisbane, Airservices undertook extensive consultation through its Post-Implementation Review of Brisbane Airspace Changes following the opening of the parallel runway at Brisbane Airport, with the final report released in December 2022.

The final report now forms the Noise Action Plan for Brisbane Airport, on which Airservices is leading the implementation. The implementation involves a continuation of the extensive community consultation, including through the recent established Brisbane Airport Community Airspace Advisory Board, which includes five community representatives identified through an open expression of interest process run by the independent Board Chair.

More broadly, the Government is developing a new Aviation White Paper, which will include consideration of better mechanisms regarding consultation on and management of aircraft noise impacts. Further details on the Aviation White Paper can be found at https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-white-paper.

Thank you for bringing your concerns to the department's attention.

Yours sincerely

Client Services team

clientservice@infrastructure.gov.au
Governance and Performance Reporting

Department of Infrastructure, Transport, Regional Development and Communications

As a result of the Department and its Minister abdicating from their legislated responsibilities to provide adequate regulatory oversight over Airservices Australia, BFPCA has now lodged a principal complaint submission to the Commonwealth Ombudsman under complaint reference number: **2023-713825**. Their investigation is ongoing.

Further information: https://bfpca.org.au/41-airservices-act/ and https://bfpca.org.au/oversight

Part B
Objectives

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2. Objectives

Before lodging this Senate Inquiry submission, BFPCA and our followers and supporters – since 2020 – have taken a number of steps to try to resolve the current untenable situation in Brisbane, including:

1. Submitted numerous complaints to Airservices;
2. Lodged complaints with the Aircraft Noise Ombudsman;
3. Created and signed a federal petition (EN2983, 2021);
4. Asked federal Members of Parliament for help and advocacy;
5. Participated in Airservices' PIR engagement sessions;
6. Lodged submissions to the ANO, BAPAF, PIR, and the Aviation White Paper draft ToR and the Aviation Green Paper;
7. Submitted questions to Senators for Estimates;
8. Wrote to the Dutch Parliament imploring them to intervene as BAC is part-owned by The Royal Schiphol Group, which in turn is owned by the Dutch Government;
9. Commissioned an extensive research study into the health and mental health harms and costs conducted by Dr Sean Foley;
10. Followed Catherine King's advice: "they're going to have to protest" (National Press Club, March 2023) and organised a peaceful protest that was joined by 1,000+ community members at Brisbane Airport on 10 June 2023;
11. Lodged complaints about the lack of adequate regulatory oversight with the Department of Infrastructure, Transport, Regional Development and Communications;
12. Lodged complaints with the Commonwealth Ombudsman.

Since these avenues have so far neither produced the desired outcomes nor resulted in any noticeable net aircraft noise reduction for Brisbane residents, families and communities, our hope is that this Senate Inquiry will produce a report and associated recommendations that compel the Australian Government to urgently act and install the following "proposals for the mitigation and limitation of aircraft noise, including flight curfews, changes to flight paths and alternatives to air travel" (Senate Inquiry terms of reference item C).

The objectives we hope to see translated into recommendations from this Senate Inquiry are grouped into two sections: (i) general **national** objectives, and; (ii) specific **Brisbane**-based objectives.

National Objectives

2.1 End state capture by the aviation industry

BFPCA has been collecting and analysing countless government reports, scientific studies, discussion papers, policy proposals, Senate inquiries, and amendment bills, dating as far back as **1975** (see Appendix). Yet: NOTHING HAS CHANGED. This Senate Inquiry must thus recommend and prepare for a **Royal Commission** into the state capture by the aviation industry. It is Australia's highest form of inquiry on matters of public importance.

Further information: https://bfpca.org.au/17-royal-commission/

When BFPCA started in 2020, we intuitively knew that something was wrong – more than just the noise. We came to the realisation that the excessive noise pollution was a symptom of something

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deeper and more systemic. When we suggested that corrupt conduct may be at play, many suggested we should not be using the "C" word. Well, here we are, and now there is evidence.

What is corrupt conduct? The **National Anti-Corruption Commission** explains what constitutes corrupt conduct.

i. Breach of public trust

Airservices told everyone – and even recommended BAC to use "key talking points" – that turned out to be untrue. They made the community believe the new parallel runway and associated new flight path design would allow them to direct flights away from residential areas and over water. They knew this was a furphy and lie. They breached public trust, and continued their engagement theatre.

ii. Abuse of office as a public official

Airservices conveniently self-assessed the removal of SODPROPS (over water) from daytime operations as a minor change without any significant impact. They abused the powers of their office to make this assessment in favour of BAC and against the community.

iii. Cause a public official to behave dishonestly or in a biased way when they carry out their official duties

Airservices failed to meet ministerial conditions. They outsourced their obligations under the EPBC Act to the project's proponent BAC. Not only does that constitute a bold conflict of interest, the "Noise Comparison Report" turns out to be false. It was written in a biased way to seek project approval without any hindrance or resistance from either the Minister or the community.

State Capture

We also dealing with state capture:

> *"State capture is the exercise of power by private actors — through control over resources, threat of violence, or other forms of influence — to shape policies or implementation in service of their narrow interests"* (Source)

This Senate Inquiry must thus further recommend that the **National Anti-Corruption Commission** and the **Auditor-General** conduct in-depth investigations and reviews into both Airservices Australia as well as the Aviation Branch of the Department of Infrastructure, Transport, Regional Development, Communications and the Arts for their systemic failure to provide regulatory oversight over Airservices Australia.

Further information: https://bfpca.org.au/1-corruption/

2.2 Reform Airservices

Recommend an in-depth departmental review of Airservices to be conducted in order to amend and reform both the Department's and Airservices' procedures that led to the series of faults outlined above.

Recommend that Jason Harfield as CEO of Airservices Australia as well as his complicit executive managers be removed from office with immediate effect and investigated.

Recommend that the Board of Airservices Australia be dismissed with immediate effect.

Recommend to urgently separate Airservices' conflicting interests, that is, their commercial arm servicing the aviation industry and their legislated obligation to protect communities, and ban Airservices from outsourcing compliance assessments to airport corporations.

Recommend that the Minister issues a revised "Statement of Expectations for Airservices Australia" that puts communities first as per the legislation.

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Recommend that the Australian Government urgently separates Airservices' conflicting interests, that is, their commercial arm servicing the aviation industry and their legislated obligation to protect communities.

Recommend that the independence and authorities of the Aircraft Noise Ombudsman (ANO) be strengthened and integrated with the Office of the Commonwealth Ombudsman.

Recommend to amend the *Air Services Act* 1995 to free Airservices Australia from its regulatory capture by the aviation industry and ensure it protects the human and natural environment, community amenity and residential areas from the effects of the operation and use of aircraft.

2.3 Abolish and replace ANEF noise contour maps and forecasts

Recommend that all future airport master plans in Australia also include N65 and N60 contours as per the recommendations in the Australian Government's own guidelines of the National Airports Safeguarding Framework 2016.

Recommend that the real noise impacts beyond the limited area indicated by the ANEF noise contours are being properly assessed and communicated to communities as the discrepancy between modelled noise forecasts and the lived experience is vast.

Recommend that the Australian Government revisits previous government reports on best practice noise forecasts and communication (see reports quoted above from 2000 and 2003), and turns the recommendations of these reports into policies and legislation.

Recommend that the Minister issues Airservices with revised "Manner of Endorsement" of noise forecasts that do take the government's own advice into account based on the above three points. The Australian Government must abolish and replace the flawed ANEF framework, require honest and accurate noise forecast information, and set revised "manners of endorsement" for such forecasts.

2.4 Protect communities from harm

The evidence we present in Part A makes it abundantly clear that the Australian Government has failed to protect communities from the negative effects, impacts and harms caused by aircraft operations on amenity, physical and mental wellbeing and everyday life of residents and businesses. As a result, BFPCA wants to see this Senate Inquiry:

Recommend that communities and the environment are effectively protected from the negative effects, impacts and harms caused by the aviation industry.

Recommend that Australia urgently grounds all avgas fuelled planes and prohibits the use of lead-based fuels such as avgas.

Brisbane-based Objectives

2.5 Apologise

Recommend that the Australian Government admits fault and assumes all liability on all of the above accounts and formally apologises to Brisbane communities for the harm and suffering it has caused as a consequence of (i) allowing the aviation industry to capture the state, and; (ii) not acting to remedy the issues communities have reported since 2020 and earlier.

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2.6 Ministerial Direction to Redesign

Recommend that the Minister issues an immediate Ministerial Direction to Airservices Australia as provided for under the *Air Services Act* 1995, Section 16(1), which requires Airservices to engage the advice from international experts to redesign the Brisbane airspace and flight paths that will (i) remedy the current concentration of noise pollution over Brisbane families and communities, and; (ii) achieve a significant and noticeable net reduction overall in the noise pollution and health impacts and harm experienced by Brisbane families and communities. This includes introducing international best practice noise abatement procedures such as prioritising SODPROPS at all times and meeting quarterly noise abatement performance targets.

BFPCA has conducted a preliminary analysis of the **London City Airport** (LCY) Noise Action Plan (2018 – 2023) (see Appendix), which appears to have implemented such international best practice noise abatement procedures and appears to be achieving acceptable aircraft noise avoidance and mitigation levels. LCY's approach and methods are not difficult or exceptional and should be within the capabilities of any competently managed airport, and able to be monitored and enforced by any competent government aviation agency. Sadly both are absent for Brisbane and other Australian airports.

2.7 Abolish BACACG and AAB and establish a genuine Brisbane Airport Community Forum

Recommend to discontinue both the Brisbane Airport Community Aviation Consultation Group (BACACG) chaired by Brisbane Airport and the Brisbane Airport Community Airspace Advisory Board (AAB) in their current form, as they have both proven to be meaningless and inconsequential, and instead establish a strong, independent, permanent, and fully funded Brisbane Airport Community Forum that will:

- Deal with aircraft noise abatement and related environmental issues and have access to all necessary data, performance targets and technical expertise;
- Have broad representation of all areas affected by airport operations;
- Be chaired independently with terms of reference designed to avoid any perception of or susceptibility to industry capture, including by regulators, aviation companies, or the airport operator;
- Have broad Terms of Reference that **do not gag community representatives** in the same manner that the current AAB Terms of Reference do;
- Receive secretariat support from the Department of Infrastructure, Transport, Regional Development and Communications.

2.8 Long-Term Operating Plan for Brisbane

Recommend that the Minister issues an immediate Ministerial Direction to Airservices Australia as provided for under the *Air Services Act* 1995, Section 16(1), which requires Airservices to engage in a major consultative process over 12 months to develop the Brisbane Airport Long-Term Operating Plan (LTOP) to better manage the aircraft noise associated with Brisbane Airport. The LTOP is to ensure that aircraft movements are maximised over water and non-residential land. Where overflight of residential areas cannot be avoided (including by introducing and prioritising flight curfews and caps at Brisbane Airport) the LTOP aims to safely share the noise between communities as the very last resort. The Brisbane Airport Community Forum becomes the main body for consultation on and governance of the Brisbane LTOP.

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2.9 Curfew

Recommend the legislation of a Brisbane Airport Curfew Act that introduces a curfew from 10 pm to 6 am.

Recommend the passing of the *Brisbane Airport Curfew and Demand Management Bill* 2023 (further information here).

2.10 Airport Capacity Declaration

Recommend that the Minister issues an Airport Capacity Declaration for Brisbane Airport of 45 flights an hour as provided for under the *Airports Act* 1996, Section 195, in order to provide Brisbane families and communities with certainty about the maximum number of flights to expect in a given day as well as into the future.

2.11 Collect Aircraft Noise Levies

Recommend that the Minister declares Brisbane Airport a leviable airport under the *Aircraft Noise Levy Act* 1995 to impose and collect aircraft noise levies. These levies are to be distributed as compensation to all Brisbane residents in the vicinity of any of Brisbane Airport's flight paths and within the noise contours associated with compromised health and educational outcomes.

2.12 Reinstate SODPROPS 24/7

Recommend that the Minister issues an immediate Ministerial Direction to Airservices Australia as provided for under the *Air Services Act* 1995, Section 16(1), which requires Airservices to immediately reinstate SODPROPS mode as the top priority mode at Brisbane Airport 24/7 combined with binding performance expectations. BFPCA acknowledges that SODPROPS is not a usable mode 24/7 due the complexities and delays that occur when expected arrival rates exceed 20/hr. Having said that, **currently there is no requirement for ATCs to try to use SODPROPS outside of the time period of 10pm to 6am daily as the mode is not listed at all**. SODPROPS is the preferred mode at Sydney Airport outside of curfew hours, and Sydney ATCs **do** use it during the day when arrival rates make it available. This is what BFPCA would like to see happen at Brisbane. The nomination of SODPROPS as the preferred mode will bring about a change of culture whereby ATCs will always aim to use this mode whenever possible, rather than only using it when they must.

BFPCA had **revised Noise Abatement Procedures for Brisbane including a binding Noise Abatement Operating Plan** prepared by our technical consultant. These documents were tabled as part of our PIR submission in November 2022 for Airservices' immediate attention and implementation (see Appendix).

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Part 3
Appendices

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3. Appendices

3.1 Previous Government Reports and Senate Inquiries

Here is a selection of reports and inquiries that came before us. What has changed? How will this Senate Inquiry make a difference when inquiries and reports since 1975 did not?

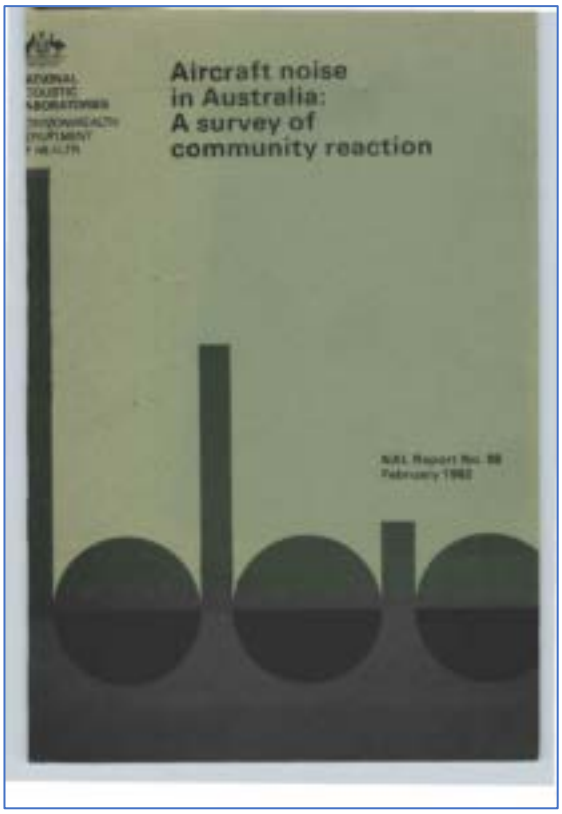

Figure 20: 02/1982 Aircraft noise survey of community reactions

"… in areas with an exposure level of 20 NEF, almost half the residential population will be at least moderately affected, and 12% of residents will be seriously affected by aircraft noise. Considering what it means to be moderately or seriously affected, it does not seem unreasonable to describe a NEF value of 20 as an **"excessive" amount of aircraft noise – more than is acceptable or desirable in a residential area**. Therefore, it is considered appropriate that the 20 NEF contour be plotted on maps showing aircraft noise exposure around airports.

If it were possible to alter aircraft operations or to re-zone around airports so that there were no residential areas inside the 20 NEF contour, then the aircraft noise problem in Australia would be dramatically reduced. Even then, however, **the problem would not be completely eliminated because many people are adversely affected by noise exposure levels less than 20 NEF**. To describe 20 NEF as an excessive amount of aircraft noise is to offer a reasonable interpretation of the scientifically determined dose/response relationship. **Whether or not areas with this exposure are incompatible with residential zoning is another matter.** As scientists, the authors are charged with describing community reaction to aircraft noise. The task of prescribing regulations and standards relating to land-use around airports properly belongs to legislative and planning authorities. They must translate the findings of the present investigation into practical guidelines."

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p. 154

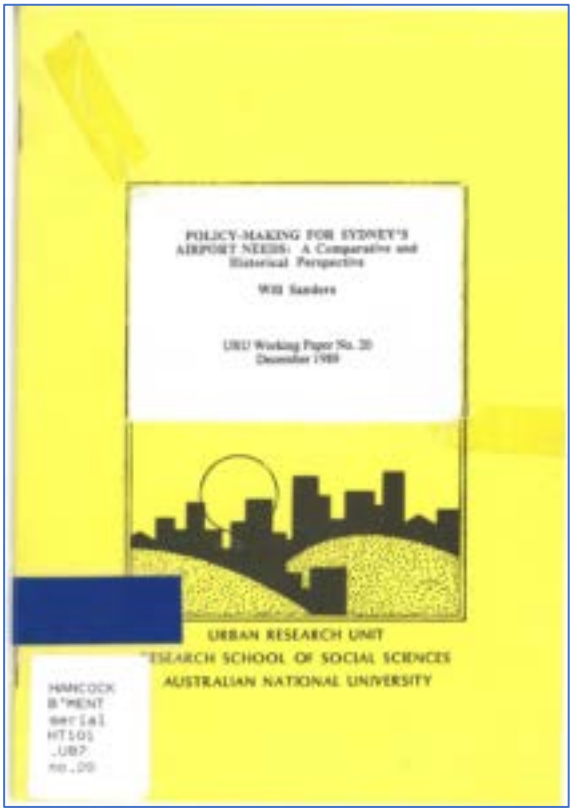

Figure 21: 12/1989 Policy-Making for Sydney's Airport Needs: A Comparative and Historical Perspective

"When governments around the world in the early-1970s failed to back many of the airport and runway construction plans of their aviation authorities, some of these authorities began investigating other 'nonconstruction' ways of addressing airport capacity and congestion problems. … In Australia, the Commonwealth aviation authorities responded to the Whitlam government's decision to build a second airport at Galston instead of a third runway at KSA by arguing that they could handle all aircraft movements at KSA until 1990 without further runway construction if certain traffic management and pricing measures were introduced. These included the exclusion or limitation of access of certain small types of aircraft, the **abandonment of preferred noise-reducing runway utilisation patterns** and the introduction of peak-period pricing."

p. 10

06/1991 Brisbane Airport – the Impact of Aircraft Noise

"While the new Brisbane International Airport was being planned and constructed **it was expected that aircraft noise would reduce considerably or disappear entirely in all areas of Brisbane** when the new runway system was commissioned. Since the airport was opened the main issue to be addressed by the Task Force in response to complaints was the **continued impact of aircraft noise** in suburban areas and the means by which it might be minimised."

The Report of the Task Force to Review the Operation and Planning of Brisbane Airport to Minimise the Impact of Aircraft Noise on Surrounding Communities, p. 7.

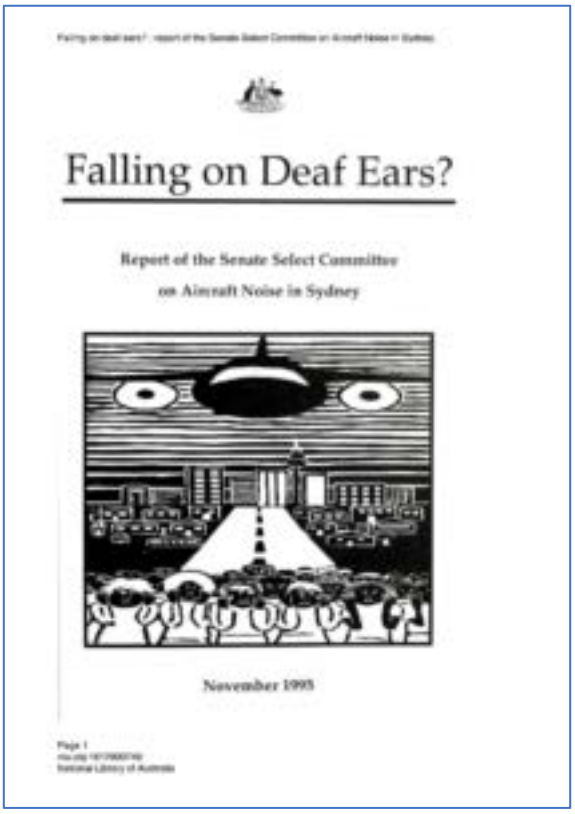

Figure 22: 11/1995 Falling on deaf ears? Report of the Senate Select Committee on Aircraft Noise in Sydney

People were misled

8.111 There is a clear public perception that **the noise impact of the changed operations at KSA has been understated at every turn**. This extends as far back as the Prime Minister's press statement of 22 March 1989.

pp. 203 – 205

8.123 **There is a serious issue here of attempting to minimise the true impact.**

p. 207

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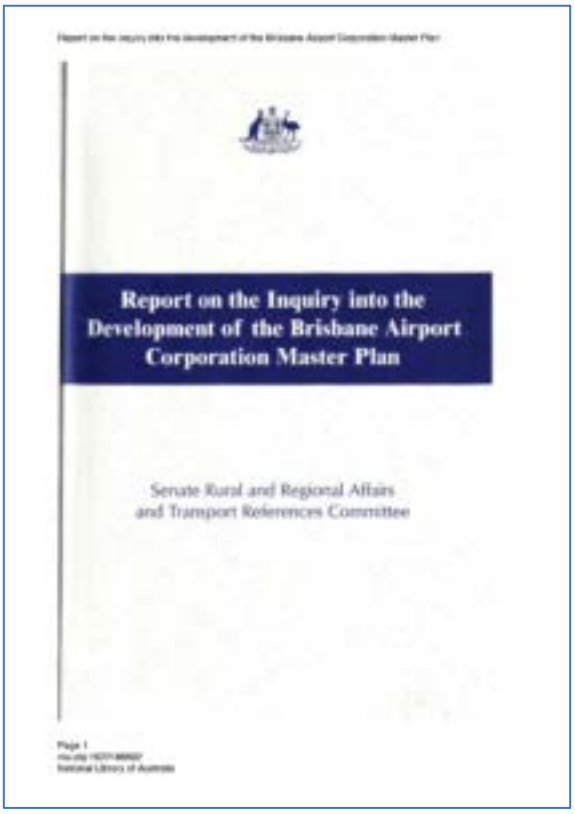

Figure 23: 06/2000 Inquiry into the Development of the BAC Master Plan

4.18 Opposition to, or concern over, the parallel runway option identified in the Master Plan came from residents groups, schools and individuals. In many cases the opposition is based on a **long standing perception that residents were misled** when the airport was first developed and that any parallel runway development next to 01/19 would perpetuate that deception.

p. 36

4.28 A concern expressed in a number of submissions is related to the necessity, in different wind conditions, for aircraft to take-off and land over residential areas, **when the proposals envisaged such movements over Moreton Bay**.

p. 38

4.32 BAC claim one of the advantages of parallel runways is the ability to operate Simultaneous Opposite Direction Parallel Runway Operations (SODPROPS). SODPROPS enables simultaneous direct landing and take-offs over Moreton Bay. The **concerns expressed to the Committee about meteorological conditions** may need further consideration against the claim by BAC for SODROPS over Moreton Bay.

p. 39

4.54 There appears to be a community perception that **Airservices Australia has a conflict of interest in providing advice to BAC as a consultant and then having been required to advise the government** on the technical accuracy of the ANEF. This perception is heightened by the general expectation of flight paths having been constructed for the development of the ANEF and Airservices Australia having had a role in the ANEF.

p. 44

4.55 Another submission stated:

We are also aware that Airservices Australia was BAC's paid consultant in preparing the draft Master plan and the same body provided advice to the Minister when he was considering the plan. Surely this is ***Caesar judging Caesar****.* ***No wonder the people have begun to question the Minister's objectivity.***

p. 45

4.59 […] The Committee notes that the Federal Minister for Transport and Regional Services should ensure that Airservices Australia prepare and publish a comprehensive statement on a protocol for separating (both in fact and as a matter of perception) its regulatory function under the Airports Act and its commercial fee-for-service function in relation to airport operators, which Airservices Australia has a statutory responsibility for regulating.

p. 46


The Senate

Rural and Regional Affairs and Transport References Committee

The effectiveness of Airservices Australia's management of aircraft noise

June 2010

Figure 24: 06/2010 The effectiveness of Airservices Australia's management of aircraft noise

6.24 The committee recommends that an independent review be undertaken of Airservices Australia's procedures for the lodgement of complaints about aircraft noise and the extent to which complaints data is analysed and disseminated to relevant stakeholders with a view to more effectively managing aircraft noise issues.

6.28 The committee recommends that the Aircraft Noise Ombudsman must be established independently of Airservices Australia and report publicly and directly to the Minister for Infrastructure, Transport, Regional Development and Local Government and to the Australian Parliament.

6.34 The committee recommends that the government revise the current process through which ANEFs are developed to establish an independent body charged with the coordination of the process and the review of the accuracy and reasonableness of the data upon which the forecasts are made.

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6.35 The committee recommends Airservices Australia review noise levels over affected areas with a view to offering a noise amelioration scheme compensating residents affected by aircraft noise consistent with that of other Australian capital city airports.

5.3 … the committee heard evidence and received submissions which suggested that **Airservices Australia has a partnership approach with the aviation industry**. The committee was told that this partnership approach has lead to the **prioritisation of aviation industry requirements above those of local communities** and also to a **loss of community confidence** in the organisation's ability to perform its functions with impartiality:

*… the organisation has proved itself **too beholden to the industry at the expense of the public interest in minimizing aircraft noise**. A separation of powers is essential. ASA's **regulatory failure** on Noise Management has been so complete leading to an absolute loss of faith in the organization by its public "customers".*

5.4 It was also suggested that this partnership approach has contributed to the **prioritisation of aviation industry requirements** above those of non-aviation business communities. In one circumstance relating to the Australian Noise Exposure Forecasts and development around airports, it was suggested that **Airservices Australia had acted as an advocate for an airport operator**.

p. 57

5.8 The committee observed that this perceived lack of organisational independence had led to a **loss of confidence in Airservices Australia's ability to effectively engage with local communities**. Curfew4Canberra, a community based organisation, suggested that the partnership approach has affected Airservices Australia's ability to perform its duties in an open and transparent manner:

*… a commercial service provider to the aviation industry, it has a **profound conflict of interest** in that its revenue driven relationship with the industry results in a partnership which precludes scrutiny and thus transparency, to the detriment of its broader responsibilities to the community.*

p. 58

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3.2 Chronology

Also available at: https://bfpca.org.au/chronology/

This timeline brings together various key events and milestones pertaining to and culminating in the launch of the New Parallel Runway at Brisbane Airport and its associated changes to flight paths as well as developments since. Dates and descriptions are primarily sourced from the ANO Report (Oct 2021) and have been complemented with further web searches including public notices under the EPBC Act.

2022

19/01/2022

The Brisbane Airport Post Implementation Review Advisory Forum (BAPAF) publicly released its first Quarterly Progress Report (Oct – Dec 2021) addressed to Deputy Prime Minister and Minister for Infrastructure, Transport and Regional Development Barnaby Joyce. The report is another strong vindication for the community that has been misled and duped since 2007. The report made four recommendations.

2021

12/10/2021

A string of failures at Airservices Australia has been uncovered in an investigation by the **Aircraft Noise Ombudsman** (ANO) into the community engagement and 2007 Environmental Impact Statement (EIS) process for Brisbane Airport's new runway. The ANO report finds that Airservices failed to effectively engage with communities potentially affected by new flight paths nor did it provide full and complete information about aircraft noise to potentially impacted community. Further, the findings show that Airservices did not conduct a detailed assessment of whether changes it made to Brisbane flight paths after the initial 2007 approval had a significant environmental impact.

24/09/2021

The Australian Government announced the establishment of the Brisbane Airport Post Implementation Review Advisory Forum (BAPAF).

30/07/2021

Airservices Australia commenced its Post Implementation Review (PIR) of the Brisbane Airport Flight Path Changes with the release of the PIR draft Terms of Reference.

21/06/2021

A day before his ousting by Nationals adversary Barnaby Joyce, Minister for Infrastructure, Transport and Regional Development Michael McCormack renews the Statement of Expectations for Airservices Australia for the Period 1 July 2021 to 30 June 2023.

2020

19/11/2020

First informal meeting of what will eventually become the Brisbane Flight Path Community Alliance, Inc. (BFPCA) at QUT Gardens Point campus.

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12/07/2020

Launch of the New Parallel Runway at Brisbane Airport

19/05/2020

The federal Department of Agriculture, Water and the Environment (DAWE) made a further decision to **vary the conditions of the Minister's approval** of the EIS originally given on 13/09/2007 (Notification of Variation to Approval EPBC 2005/2095).

10/03/2020

The Minister for Infrastructure, Transport and Regional Development Michael McCormack approved Brisbane Airport's 2020 Master Plan.

31/01/2020

Community Engagement Plan Addendum, Airservices Support Plan for Brisbane Airport's New Parallel Runway Community Update Program – Final Flight Path Design.

21/01/2020

Airservices provided BAC with the "latest" design and the Parallel Runway Operations Implementation Group (PROSIG) meeting minutes record continued contact between BAC and Airservices to clarify and finalise flight numbers for the BAC flight path tool up until April 2020.

2019

06/12/2019

The major environmental assessment work undertaken by Airservices based its modelling on the detailed design in the Critical Design Review Report EA 1353 from 29/05/2018. However, an **addendum to this assessment** finalised on 06/12/2019 – "Addendum to Environmental Assessment of Proposed SIDS and STARS (outside the EIS boundary) for Brisbane's New Parallel Runway Project" – environmentally assessed what it described as "minor design changes" the impact of "new updated flight tracks (design v21.6, 25/10/2019)."

04/11/2019

An Airservices' officer emailed BAC referring to discussion "regarding the potential **difference between Airservices final design and the one used for the BAC flight path tool**."

26/08/2019

Airspace Change Proposals (ACP) required to implement the new flight paths were approved by the Civil Aviation Safety Authority (CASA) on 31/10/2018 and 26/08/2019. The flight paths themselves had yet to be finalised and consequently the projected numbers of flights and their altitudes over particular suburbs was also not final. This ACP approval did not cover 12 other routes, which were to be dealt with separately.

26/07/2019

BAC also engaged consultants to **update the noise modelling** for the flight paths in 2019. The report of this exercise is dated 26/07/2019 and notes it is based on a workshop with Airservices on 18/07/2019, to update the noise modelling assumptions including calibrating the noise model based on actual flight tracks.

28/06/2019

In "Environmental Assessment of Proposed Changes to Routes associated with the Brisbane Airport New Parallel Runway Project" (EA 1340, v1.1 from 18/06/2018 and v2.1 from 28/06/2019),

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Airservices assessed the impact of 37 new routes and flight path changes, the purpose of which it described as improving safety and "to take advantage of Performance Based Navigation capabilities of modern aircraft." **The 28/06/2019 update (v2.1) notes an increase to a total of 42 proposed route changes for assessment.**

08/05/2019

Airservices Australia endorsed Brisbane Airport's **Aircraft Noise Exposure Forecast** (ANEF) (Brisbane Airport Ultimate Practical Capacity ANEF) in accordance with the 'manner of endorsement' document approved by the former Minister of Infrastructure and Transport Darren Chester (18/04/2017).

24/04/2019

Airservices adopted a different approach regarding community engagement for the areas identified as affected visually and audibly in report EA 1353. In the Background section of its **Support Plan** ("BAC's New Parallel Runway, Community Update Program (November 2018 – August 2020), Airservices Support Plan"), Airservices notes the establishment of a working group with BAC in early 2018 to deliver information to the community. Governing this working group was a Parallel Runway Operations Implementation Group (PROSIG). The Support Plan also notes, "the consultation phase has been completed [by the 2007 EIS]. Therefore the community engagement phase for these activities is to inform, educate and update community." (page 5).

2018

21/12/2018

The major work of environmental assessment by Airservices is set out in the report EA 1353 titled "**Environmental Assessment of proposed SIDs and STARs (outside the EIS boundary) for Brisbane Airport's New Parallel Runway Project**". The initial draft was on 14/08/2018, and the report was finalised on 21/12/2018. This assessment did not conduct a direct comparison of the flight paths between 2007 and 2018. It extracted a map from the 2007 EIS, applied its internal criteria for "significant" impact at 60dB(A), imposed the N60 contour onto and, since it substantially fitted within the map, determined that the significant environmental impact on the area with the map, and any requirements under the EPBC Act, had been approved under by the 2007 EIS.

31/10/2018

Airspace Change Proposals (ACP) required to implement the new flight paths were approved by the Civil Aviation Safety Authority (CASA) on 31/10/2018 and 26/08/2019.

09/08/2018

Airservices wrote to the Department of Environment and Energy on 09/08/2018 attaching the **Noise Footprint Comparison** report (see 07/05/2018 entry) and advising that it had taken account of options to minimise noise impacts and considered its obligations under the Minister to be satisfied. It endorsed the conclusions of the Noise Footprint Comparison to the effect that there was no material difference between the flight paths proposed at that time compared to those in the 2007 EIS. However, Airservices own environmental assessment was not concluded until 21/12/2018.

(This letter has now been released under Department of Infrastructure & Transport FOI 22-146 on 18/02/2022.)

16/07/2018

Airservices submitted an **Airspace Change Proposal** (ACP) to CASA for review on 16/07/2018, which CASA approved on 31/10/2018. (Source: Department of Infrastructure & Transport FOI 22-146 released 18/02/2022)

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13/07/2018

Airservices prepared an **Engagement Plan** regarding the proposals to lower airspace for light aviation to accommodate the PBN flight paths and an Interim Engagement Plan regarding the changes to concentrate flight paths at high altitudes and at considerable distances from the airport.

03/07/2018

Airservices also provided a commitment in the ACP submission to CASA to "engage extensively with all areas within the updated EIS airspace under N70 and N60 day and night noise contours and potentially sensitive communities identified as overflown beyond these noise contours to approximately 10,000ft" (page 8, **Stakeholder Engagement Program for ACP submission** – Brisbane's New Parallel Runway, v1.1, 03/07/2018).

18/06/2018

In "**Environmental Assessment of Proposed Changes to Routes** associated with the Brisbane Airport New Parallel Runway Project" (EA 1340, v1.1 from 18/06/2018 and v2.1 from 28/06/2019), Airservices assessed the impact of 37 new routes and flight path changes, the purpose of which it described as improving safety and "to take advantage of Performance Based Navigation capabilities of modern aircraft." The 28/06/2019 update (v2.1) notes an increase to a total of 42 proposed route changes for assessment.

29/05/2018

More intensive work on flight path design is set out in Airservices **Critical Design Review Report**. The first draft was developed from 19/11/2017 to 09/05/2018, and the report was finalised on 29/05/2018. This report noted that the final designs should not deviate more than 10% from those in the Preliminary Design Review Report from 02/08/2017. The Preliminary Design Review Report, however, lists as one of its limitations "differences between the PDR design and the design as depicted in the MDP/EIS have not been assessed" (page 9).

07/05/2018

Airservices consulted and worked with BAC during the design of the flight paths. In 2018, BAC commissioned consultants to carry out a **Noise Footprint Comparison** of the latest flight path designs with those proposed in the 2007 EIS. Airservices advised that it participated in this assessment through a series of workshop. The report of this exercise found no significant differences between the two. The report appears to have been completed in the first half of the year, as Airservices agreed with the conclusions of the report in a letter to BAC on 07/05/2018, saying there was "no material difference" between the flight paths as then designed and those in the 2007 EIS. The letter noted a "comprehensive and detailed review" was conducted by Airservices and its "noise and environmental specialists" agreed with the conclusions. There was, however, **no documentation of Airservices' own assessment of environmental impact** at this stage and its relevant environmental assessment was not concluded until 21/12/2018.

2017

02/08/2017

Further flight path design work by Airservices is documented in the Brisbane New Parallel Runway Airspace Design – **Preliminary Design Review Report** (PDR), which began in March 2017 and was finalised on 02/08/2017.

18/04/2017

Minister for Infrastructure and Transport Darren Chester issued 'manner of endorsement' document, which directs Airservices how to assess and endorse **Aircraft Noise Exposure Forecasts** (ANEF).

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2015

03/02/2015

Deputy Prime Minister and Minister for Infrastructure and Regional Development Warren Truss approved **Brisbane Airport's 2014 Master Plan** (see media release).

2013

17/12/2013

Following a recommendation in the Australian Government's National Aviation Policy White Paper (Dec 2009) to conduct "periodic reviews" of the need for a curfew, the report "Future Brisbane Airport Operations – A Review of the Need for a Curfew at Brisbane Airport" was released. The report states:

> *"the Steering Committee believes that the establishment of curfew restrictions at Brisbane Airport is not the appropriate policy response for the management of aircraft noise impacts on Brisbane residents."*
>
> page 4, Curfew Report 2013

The Steering Committee comprised five people representing: the Australian Government Department of Infrastructure and Regional Development, Queensland Government Department of Tourism, Brisbane City Council, Tourism and Transport Forum, and Airservices Australia.

2011

08/02/2011

The Minister for Transport Anthony Albanese approved a **Minor Variation to the 2007 Major Development Plan** (MDP) requested by BAC in December 2010. The original MDP proposed an initial runway length of 3,000m and a Runway End Safety Area (RESA) length of 90m. BAC now received approval for a length of 3,300m and a RESA length of 240m. This resulted in the southern end of the New Parallel Runway shifting 150m to the south and closer to the city.

2009

17/09/2009

Minister for Infrastructure, Transport, Regional Development and Local Government Anthony Albanese approved **Brisbane Airport's 2009 Master Plan** (see media release).

2007

04/12/2007

The Federal Department of the Environment and Heritage confirmed that the **Final Assessment Report** was received (accredited assessment) for EPBC 2005/2144 (airspace management changes – parallel runway).

03/12/2007

The Federal Department of the Environment and Heritage issued a notification of the **Assessment Report** – EPBC 2005/2121 (Parallel Runway Project).

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24/11/2007

The **2007 Australian federal election** was held in Australia. The Australian Labor Party, led by Kevin Rudd and deputy leader Julia Gillard, defeated the incumbent Coalition government, led by Liberal Party leader and Prime Minister, John Howard, and Nationals leader and Deputy Prime Minister, Mark Vaile, by a landslide. Kevin Rudd takes offices as Prime Minister of Australia on 03/12/2007.

20/09/2007

The Federal Department of the Environment and Heritage issues a notification of **publication of the final EIS** – EPBC 2005/2121 (Parallel Runway Project).

18/09/2007

The Deputy Prime Minister and Minister for Transport and Regional Services, Mark Vaile, announced approval for the construction of the New Parallel Runway at Brisbane Airport (see media release). This approval occured only 29 days before the Australian Government went into caretaker mode with the issue of electoral writs on 17/10/2007 for the Australian federal election held on 24/11/2007.

13/09/2007

The Minister for the Environment Malcolm Turnbull made a decision (decision number EPBC 2005/2095) under the *EPBC Act* to approve the proposed action with conditions.

The office of the Minister for the Environment advised that the assessment of the proposal had been completed although some further consideration was required, "to take account of the options to mitigate noise impacts," and "require validation of uncertainties inherent in the forecasts" of the EIS regarding safety and environmental assessment prior to the opening.

12/09/2007

Following Airservices' referral of airspace aspects to the Commonwealth Environment Minister on 27/05/2005 (EPBC 2005/2144), the Minister for the Environment Malcolm Turnbull provided advice on 12/09/2007 in relation to two issues, namely:

- the review of potential safety impacts within the Obstacle Limitation Surface (OLS); and
- taking into account options to mitigate noise impacts outlined in the draft Environmental Impact Statement and Major Development Plan (EIS/MDP) and supplement, and validation of the **uncertainties inherent in the forecasts when conducting the safety case and environmental assessment of the proposal**, prior to operation of the New Parallel Runway.

(Source: Department of Infrastructure & Transport FOI 22-146 released 18/02/2022)

03/07/2007

The Federal Department of the Environment and Heritage confirmed that the **Final Assessment Report** was received (accredited assessment) for EPBC 2005/2095 (Brisbane Airport New Parallel Runway Project).

06/02/2007

The **draft EIS** was open for public exhibition and submissions from 01/11/2006 to 06/02/2007.

2006

03/11/2006

The Federal Department of the Environment and Heritage issued a notification of **publication of the draft EIS** – EPBC 2005/2121 (Parallel Runway Project).

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2005

07/09/2005

The Federal Department of the Environment and Heritage issued the **final guidelines** – EPBC 2005/2121 (Parallel Runway Project).

29/06/2005

The Federal Department of the Environment and Heritage issued an invitation for **public comment on the draft guidelines** – EPBC 2005/2121 (Parallel Runway Project).

23/06/2005

In accordance with s87 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act), Senator Ian Campbell, Minister for the Environment and Heritage, decided that the proposed action must be assessed by an **accredited process** (Decision on Assessment Approach EPBC 2005/2095 and EPBC 2005/2121 and EPBC 2005/2144).

16/06/2005

The Minister for the Environment advised Airservices that an **Environmental Impact Statement**(EIS) would be required including public consultation.

27/05/2005

In compliance with s160 of the *Environmental Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) Airservices wrote to the Minister for the Environment notifying that airspace management associated with Brisbane Airport's proposed new runway was likely to have a **significant impact on the environment** (EPBC 2005/2144).

06/05/2005

The Federal Department of the Environment and Heritage declared that BAC's proposed action to develop a new runway and associated works and activities at Brisbane Airport was a '**controlled action**' requiring assessment pursuant to the *Environmental Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) (Decision whether action needs approval EPBC 2005/2095)

21/04/2005

BAC informed the Federal Department of the Environment and Heritage about its proposed action to develop a new runway and associated works and activities at Brisbane Airport (**Public Notification of Referral** EPBC 2005/2095)

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3.3 BFPCA Submissions and Reports

#	Date	Title	Pages	URL
3.3	02/2021	**BFPCA ANO Submission**	49	bfpca.org.au/duped
3.4	11/2021	**BFPCA BAPAF Submission with appendices** This document also incorporates: 1. **BFPCA's Community Survey 2021 Report**: A January 2021 survey of more than 2,000 Brisbane households affected by new flight paths reveals the true extent of the human impacts generated by aircraft noise pollution since Brisbane Airport's new runway launched in July 2020. 2. **BFPCA's Submission to the ANO (February 2021)** collates and analyses evidence of flawed data modelling, inadequate community engagement and misleading statements that duped Brisbane communities in believing there is no need to object to the new runway project. 3. **BFPCA's Feedback on PIR draft Terms of Reference v0.1 (September 2021)** presents a strong argument grounded in detailed evidence for the inclusion of 23 critical amendments to the draft ToR. 4. **BFPCA's Feedback on PIR draft Terms of Reference v0.2 (November 2021)** rebuts Airservices' rejecting all but two of our original recommendations and again reinforces the need for an independent technical review of the flight paths.	337	bfpca.org.au/bapaf
3.5	08/2022	**BFPCA Community Survey 2022 Final Report**	30	bfpca.org.au/survey2022release
3.6	11/2022	**BFPCA PIR Report Response** This document also incorporates the BFPCA amended Brisbane Airport Noise Abatement Procedures (NAP) (track changes are intended to show the revisions we propose) and the Noise Abatement Operating Plan.	29	bfpca.org.au/pir
3.7	12/2022	**BFPCA Drone Delivery Services Submission**	19	bfpca.org.au/drones
3.8	12/2022	**BFPCA Letter to Dutch Parliament**	12	bfpca.org.au/tweedekamer
3.9	01/2023	**BFPCA Archerfield Master Plan Submission**	11	bfpca.org.au/archerfield

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3.10	03/2023	**BFPCA Aviation Whitepaper ToR Response**	39	bfpca.org.au/ whitepaper
3.11	08/2023	**Brisbane Aviation Noise Pollution and Community Health Study**	30	bfpca.org.au/ health-study
3.12	11/2023	**BFPCA Aviation Green Paper Response**	68	bfpca.org.au/ whitepaper

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3.4 BFPCA Analysis of London City Airport Noise Action Plan (Feb 2024)

12 pages

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London City Airport (LCY) – Extracts from 'Noise Action Plan (2018-23)'[1]

Introduction

The London City Airport (LCY) has a single runway and associated infrastructure located in heart of London city. It is adjacent to the Thames River in an area called Docklands where the old Royal Docks were located. It is a busy airport with some 100,000 aircraft movements per year in 2018 prior to Covid.

Brisbane Airport (BNE) has some major similarities to LCY. It is located close to the central business district (CBD) and hundreds of arriving and departing flights overfly the CBD and dozens of long established residential suburbs at low altitudes (3,000'-1,000') almost every day. Unlike LCY there are no restrictions on aircraft noise levels, noise contours are not annually updated, there is no independent monitoring or sanctions, and several hundred thousand residents, students and workers are daily subject to excessive (>65 dBA) aircraft noise.

We have selected LCY as the basis of comparison with BNE as their Noise Action Plan (NAP) provides a good illustration of the processes for preparing a NAP, establishing: airport and airline operating and performance standards, activities, including financial mechanisms, for achieving acceptable aircraft noise avoidance and mitigation levels.

Importantly, their NAP incorporates annually verified aircraft noise contours based on actual flight operations as the basis for a range of mandatory conditions and requirements, something urgently needed in Brisbane (and Australia). Although some stakeholders (e.g. HANCAN) think some noise levels should be lower, the noise levels are based on ICAO, WHO and EU standards, unlike Australia which no standards.

LCY claims to be the most advanced airport in the UK in terms of noise management. This may be true, but their approach and methods are not difficult or exceptional and should be within the capabilities of any competently managed airport, and able to be monitored and enforced by any competent government aviation agency. Sadly both are absent for Brisbane and other Australian airports.

Australia lags well behind most western countries in lacking laws, regulations and government capacity to ensure people are not harmed by aircraft noise. Comparing what is required and done at LCY with BNE provides a stark illustration how much work needs to be done in Australia to protect people from aviation-related pollution.

Preparing LCY's Noise Action Plan[2]

While it is not directly comparable to Brisbane airport LCY does face similar challenges of having to minimise the effects of aircraft noise on surrounding communities. It does this by a combination of limiting the number of aircraft movements, tightly restricting

[1] "London City Airport (2018) "LONDON CITY AIRPORT NOISE ACTION PLAN 2018 – 2023." Verbatim extracts and dot points are indented, comments and explanations are not indented.
[2] LCY's draft Noise Action Plan for 2024-28 has recently been circulated for comment. There are no significant changes in the data or what actions are being proposed compared to the NAP for 2018-23.

them at night-time and on holidays, and financing high quality acoustic insulation for home, businesses and social facilities (e.g. schools) within specified noise contours.

These operating conditions are the subject of extensive, and intensive, negotiations every five years between affected residents and businesses, local and national government agencies, and the airport that appear to take considerable time to finalise. The results have legal standing, and the airport's performance and compliance with these standards and conditions is actively monitored, defined scales of financial penalties can be imposed on the airport and airlines for breaches. The standards followed are, broadly, those of the European Union (EU) and the ICAO, supplemented by national standards. LCY's Noise Action Plan (NAP) implicitly recognises that it has not yet managed to fulfill its own goal of being always regarded as a 'good neighbour'.

A formal legal framework at local and national level provides a firm basis for consultations, negotiations, and operating standards and conditions. It is clear the primary motive for this is preventing or minimising harm to human health and wellbeing caused, primarily, by excessive aircraft noise pollution.

As with many corporations the LCY aims to be and be regarded as a 'good neighbour' by the thousands of people affected by its operations. However, it understands that achieving this depends crucially on meeting and maintaining community expectations, not simply declaring it considers itself to be a 'good neighbour'. Independent and timely monitoring is essential, as is transparent public reporting and accountably.

There is no reason why Brisbane Airport Corporation (BAC) should not be required to achieve similar levels of genuine community consultation, adhere to similar standards and levels of noise management, limits on the number and timing of aircraft movements, or face financial penalties for failing to meet agreed standards of responsible performance.

Recognising there is a dearth of effective aviation legislation and regulation in Australia should not be a barrier to expecting that BAC, and other airport operators, are required to achieve similar levels of performance.

Summary and Extracts

Below we have summarised and extracted the most relevant portions of the LCY Noise Action Plan. Unless otherwise indicated all extracts are verbatim and page numbers are provided; section numbers are as in the original.

Activity Summary

- The total number of aircraft movements at the airport increased from 73,642 in 2013 to 80,299 in 2017. This is an increase of 9%. For 2017, LCY had a total of 80,299 actual aircraft movements and 88,425 noise factored movements.
- LCY has a limit of 111,000 actual aircraft movements and 120,000 noise factored movements per annum
- In 2017 the airport handled approximately 4.5 million passengers, representing an increase of 50% since 2012.

City Airport Development Plan (CADP)

> … These cover a wide range of environmental matters. These include a number of noise monitoring and mitigation measures, of which some are new and some are

replicated from the previous 2009 planning permission. These were detailed in the NAP (2013 – 2018). The new measures include (but are not limited to):

- Aircraft movement limits;
- A new fixed contour area limit;
- An improved Noise and Flight Track Monitoring System;
- A new Incentives and Penalties Scheme;
- Measures to control and reduce noise from aircraft on the ground;
- An enhanced Sound Insulation Scheme;
- A new Aircraft Noise Categorisation Scheme.

As well as an enhanced sound insulation scheme to mitigate aircraft noise, LCY are also providing advanced sound insulation for properties close to the airport to mitigate the noise impacts from construction activities. Nearly 600 properties have been offered treatment under this scheme, providing high performance double glazing and acoustic ventilation. (p.8)

There are two important points to note in the figures below. First, the noise contours for both day-night average levels (LAeq16) are all below 65 dBA except in the immediate vicinity of the airport runway (Fig 1a). Second, the noise contours decline to ~55 dBA within 3 km of the ends of the runway. These are the result of stricter, enforced noise abatement procedures and steeper approach and departure flight paths.

Night time noise contours are even lower and tighter (Fig 1b). Both these conditions are in contrast to the situation in BNE where >60 dBA noise contours extend over 12 km from the end of the runways at all hours. The figures below illustrate noise contours for LCY in 2016, these have since been tightened.

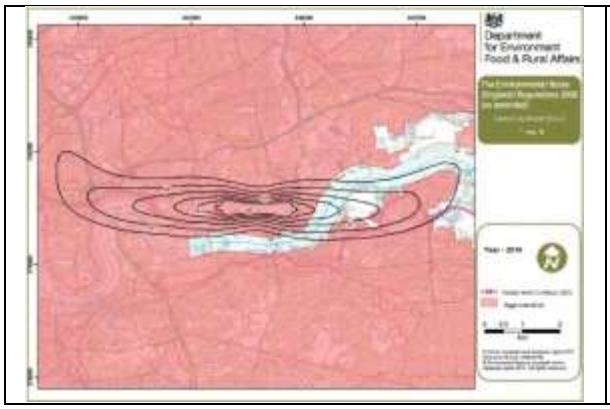


Fig. 1a - Noise Contours – LCY LAeq16

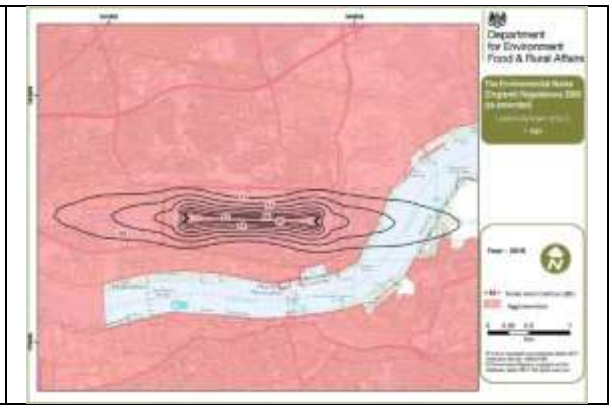


Fig 1b -Noise Contours – LCY Lnight

6.1 Aircraft Movement Limits

As part of the planning permission granted by LBN in July 2009 LBN introduced strict limits to the number of daily aircraft movements, these have been retained within the CADP permission. These include:

- 100 per day on Saturdays, 200 per day on Sundays, but no more than 280 on any consecutive Saturday and Sunday;
- 592 per weekday, except for Public or Bank Holidays, specifically:
  - 132 on 1st January;

- 164 on Good Friday;
- 198 on Easter Monday;
- 248 on May Day;
- 230 on late May Bank Holiday;
- 230 on late August Bank Holiday;
- 100 on 26th December.

Also retained in the CADP permission are the previous limits for aircraft movements which occur during specific operational periods:

- 400 aircraft movements per calendar year or 150 in any consecutive 3 months between 22.00 and 22.30 hours, or 12.30 and 13.00 hours on a Saturday;
- 6 aircraft movements between 06.30 and 06.59 hours on Mondays to Saturdays with no more than 2 in the first fifteen minutes.

In addition as part of the CADP permission a new limit of 45 scheduled movements per hour has been introduced and the annual movement limit of 120,000 movements per year has reduced to 111,000 per year.

6.2 Airport Operating Hours (p.14)

The airport's approved operating hours are unchanged under CADP. The airport is permitted to operate flights between the following hours:

- 06.30 and 22.30 on weekdays;
- 06.30 and 13.00 on Saturdays;
- 12.30 and 22.30 on Sundays;
- 09.00 and 22.30 on Public or Bank Holidays;
- Full closure on 25th December.

There is a 24 hour period of closure from Saturday lunchtime to Sunday lunchtime.

6.3 Management of Environmental Complaints

LCY has an environmental Complaint Management System by which anyone can contact LCY to register a complaint or request information about airport operations. Communication can be either by telephone, post, email or via the LCY website.

Each complaint or enquiry is registered by the airport, investigated, responded to and resolved where practical. All environmental complaints and enquiries are reported to LBN within 15 days, a summary of these are provided quarterly to the London City Airport Consultative Committee (LCACC) and they are reported annually in the APR.

Figures 2a and 2b present the number of environmental complaints received by LCY since 2013 in absolute terms and per 1,000 aircraft movements respectively. These are categorised as following:

- Aircraft noise – including all airborne aviation issues such as traffic frequency, flight paths, aborted approaches etc.;
- Ground noise – including aircraft and nonaircraft sources of noise such as engine runs, plant, generators, construction, road noise, maintenance and bird-scaring activities;

- Other – non-noise related complaints such as air quality or alleged TV signal interference;
- Non-LCY – complaints regarding air traffic not associated with this airport.

London City Airport Complaints Received (2013 – 2017)

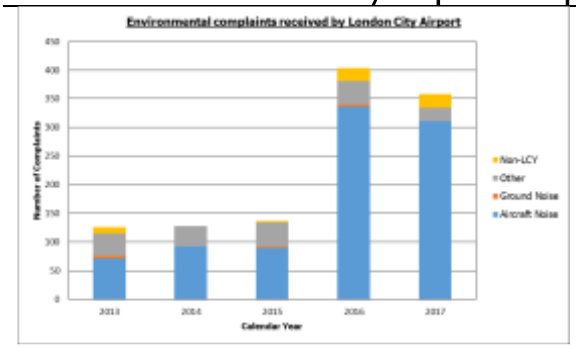


Fig. 2a Total Environment complaints

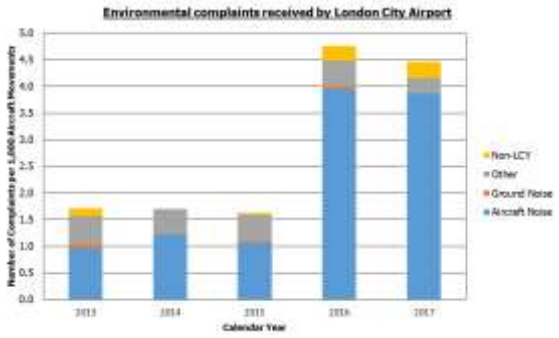


Fig. 2b Complaints/1,000 Aircraft Movements

As displayed in Figures 2a and 2b the number of noise complaints remained broadly constant until 2016. *The increase in 2016 has been attributed to the introduction of RNAV routes* [italics added], which concentrate flights along the existing flight paths, thereby reducing the total area overflown, but also leading to an increased number of overflights for those directly below the flight paths. (p.14)

6.4 Departure and Arrival Procedures

The routes flown to and from any major UK airport are prescribed by Standard Instrument Departures (SIDs) and Standard Terminal Arrival Routes (STARs). These departure and arrival routes are established by the Civil Aviation Authority. The UK Aeronautical Information Publication (AIP) for LCY outlines the restrictions on aircraft operators and aircraft movements to control noise6. These include:

- Standard noise abatement procedures for aircraft departing the airport following the Standard Instrument Departure (SID) instructions;
- Minimum requirements for aircraft departing LCY to climb straight to a minimum of 1000 feet above airport level (aal) before turning on track unless otherwise instructed by Air Traffic Control (ATC);
- Aircraft approaching LCY to follow a descent path which will result in the aircraft not being lower at any point than the altitude prescribed by the Instrument Landing System (ILS);
- A minimum altitude of 1,500 feet for aircraft carrying out visual approaches (where the airport is clearly in the pilot's sight) until established on the final approach (within approximately four miles of the airport);
- Instructions for following holding patterns over the airfield.

In addition to the above, *aircraft approaching LCY follow a steep approach angle of 5.5 degrees on final approach* [italics added] (compared to 3 degrees in place at other airports) which helps keep aircraft higher for longer, reducing the noise impact on local communities.

6.4.1 Airspace Strategy

- LCY shares London's airspace with several other airports. At times this restricts aircraft departing LCY from climbing above a certain altitude or requires aircraft approaching LCY to be at a lower than would otherwise necessary. (p.16)

6.5 Noise Management and Mitigation Scheme (NOMMS) (approved May 2017) (p.16)

NOMMS has been expanded under CADP to cover a wide range of measures and procedures to monitor and manage the noise impact of LCY operations. These include:

- Combined Noise and Track Monitoring System;
- Quiet Operating Procedures;
- Incentives and Penalties Scheme;
- Control of Ground Noise;
- Production of Annual Noise Contours;
- Minimise use of Reverse Thrust;
- Sound Insulation Scheme.

Noise and Flight Track Monitoring System (NFTMS).

- The noise data from the NFTMS is used to validate the noise contours produced for the Sound Insulation Scheme and to monitor compliance with the contour area limit introduced as part of the CADP [City Airport Development Plan] permission. It is also used for determining credit awards and penalties as part of the Incentives and Penalties Scheme and for categorisation purposes following the introduction of the Aircraft Noise Categorisation Scheme.
- The flight track monitoring component of the system is permanently linked to the airport's radar feed, which is provided by the local Air Traffic Control centre. Aircraft flight tracks are correlated with flight information and noise events. (p.16)

6.5.2 Quiet Operating Procedures

LCY requires that every operator of aircraft adopt procedures which will produce the least noise disturbance. Where aircraft manufacturers have established special procedures for the purposes of reducing noise, these are required to be applied to operations at LCY, subject to the safe operation of aircraft.

Quiet operating procedures at LCY also include the following:

- Minimum use of reverse thrust;
- Use of fixed electrical ground power where possible and minimum use of auxiliary power units;
- Operation of a steep glide slope (5.5 degrees);
- An Electronic Flight Progress Strips System (EFPS), which provides the ability to monitor the time that aircraft operate engines on the ground.

6.5.3 Incentives and Penalties Scheme

A scheme of incentives and penalties based on departure noise levels as measured by the NFTMS has been introduced following approval by LBN in May 2017. The penalty limits are the most stringent of any UK airport for daytime operations.

The scheme encourages airlines to operate aircraft more quietly, rewarding those airlines with credits towards co-partnering LCY delivering a Community Projects Fund each year.

Under the penalties part of the scheme a fixed penalty for exceeding upper noise limits is charged at a rate of £600 per dB [~AUD1,200] of exceedance. The money from any penalties accrued is added to the Community Projects Fund.

6.5.6 Annual Noise Contours

Air noise contours are produced annually [italics added], based on the actual summer (16th June – 15th September inclusive) movements in the previous year and the forecast summer movements in the following year. The noise contours are regularly validated using results from the NFTMS.

The CADP planning permission has introduced a *limit on the area of the **57 dB LAeq,16h contour of 9.1 km²*** [emphasis added] and LCY are required to produce a Noise Contour Strategy that seeks to reduce the area of the noise contours by 2030 and beyond. The noise contours are also used for determining eligibility under the Sound Insulation Scheme. (p.19)

6.5.8 Sound Insulation Schemes

Residential

- As part of the CADP permission, the Airport has upgraded its two tier scheme to an improved three tier scheme, offering sound insulation treatment to eligible residential properties within the 57 dB LAeq,16h (Tier1) and 66 dB LAeq,16h (Tier 2) and adding a third tier for properties within the 63 dB LAeq,16h (Tier 3) noise contour. The sound insulation works involve the treatment of habitable rooms (defined as bedrooms, dining rooms, living rooms and kitchen diners within eligible dwellings) to upgrade eligible external windows and doors. The scheme also provides the option of acoustic ventilation in accordance with the sound insulation standards given in the Noise Insulation Regulations. Previously treated properties are inspected every 10 years.
- Properties within the 57 dB LAeq,16h contour (Tier 1) are eligible for works to achieve an average sound reduction of not less than 25 dB. (p.20)
- Eligible properties within the 66 dB LAeq,16h noise contour (Tier 2) are offered a higher standard of noise reduction and, following CADP, the scheme has now been enhanced to provide 100% of the cost of high performance double glazing.
- In 2017 there were around 32,500 people within the 57 dB contour, around 2,400 people within the 63 dB contour and around 700 people within the 66 dB contour

Construction Noise Sound Insulation Scheme

- As part of the CADP permission, as well as an enhanced sound insulation scheme to mitigate aircraft noise, LCY are also providing advanced sound insulation for properties close to the airport to mitigate the noise impacts from construction activities. Nearly 600 properties have been offered treatment under this scheme, providing high performance double glazing and acoustic ventilation.

Public Buildings

- Eligible community buildings such as schools and community centres are also offered improvement works under the scheme on a similar basis to the Residential Sound Insulation Scheme. Sound insulation works are assessed on a case-by-case basis and agreed with the local authority.

6.6 Noise Factored Movements (NFM)

All aircraft operating at LCY are required to demonstrate their ability to operate within one of five departure Noise Categories, as shown in Table 1.

The Noise Reference Level is the departure noise level as measured at NMTs 1-4. It is expressed in PNdB and calculated using an established procedure described in the CADP permission.

As this table demonstrates, LCY has an upper noise limit of 94.5 PNdB based on an annual average of departure noise levels for a given aircraft type and therefore only those aircraft categorised as Category A or less are permitted to operate at LCY.

Aircraft Noise Categories (p.21)

Category of Aircraft	Noise Reference Level	Noise Factor
A	91.6 – 94.5 1.26	1.26
B	88.6 – 91.5 0.63	0.63
C	85.6 – 88.5 0.31	031
D	82.6 – 85.5 0.16	0.16
E	Less than 82.6	0.08

Each category is also assigned a noise factor as shown in Table 1 above and there is currently a limit of 120,000 noise factored movements per year. In addition noise factored movements are restricted to 125% of the weekly movements limit.

6.9 London City Airport Consultative Committee (LCACC) (p.22)

The London City Airport Consultative Committee (LCACC) is an independent committee whose role is to provide a forum for discussion on all matters concerning the development or operation of the Airport which have an impact on the users of the airport and on people living and working in the surrounding area. The main committee meetings are open to the public.

Members of the committee include representatives from 8 neighbouring London Boroughs, as well as community representatives and other relevant stakeholders.

LCACC has two sub-committees. The airspace and environment committee considers noise among other issues. The number of complaints is reported to LCACC on a quarterly basis.

Further details can be found at: http://lcacc.org/

6.10 Mitigation measures and residual Noise Impact Assessment

LCY's performance against all legal limits, including any breach of planning limits will be reported in the APR. The most recent APR (2017) confirmed that there were no issues of non-compliance with the operational requirements of the CADP permission.

It is important to recognise that the NAP's primary purpose is to determine if the various mitigation techniques employed by the airport are protecting the local community by mitigating resulting noise impacts from the airport operation. This is assessed in Appendix A and indeed forms part of the overall conclusion of the performance of the NAP in Section 7. (p.23)

Annex 1

6.7 Aircraft Noise Categorisation Scheme (ANCS)

A new Aircraft Noise Categorisation Scheme (ANCS) has been introduced at the airport based on a noise quota count (QC) system. The scheme has been running alongside the existing noise factored system since January 2018. After one year of operating simultaneously the NFM system is due to be replaced by the ANCS.

Under the ANCS each aircraft type will be assigned a separate quota count (QC) for arrivals and for departures, based on their certification noise levels and categorised into 1 dB bands, rather than the 3 dB bands used in the existing NFM system. The noise level bands that correspond to each QC score are shown in Table 2 (right). The quota count system is similar to that operated at many UK airports at night.

Certification noise levels are measured in EPNdB and are assessed according to a standardised procedure set out by the International Civil Aviation Organisation (ICAO). The certification noise levels are measured at three points known as approach, sideline and flyover as shown in Figure 3. As the certification noise levels are assessed with an approach angle of 3°, an adjustment is made to the arrival certification noise levels to allow for the 5.5° approach used at LCY.

Noise Quota Counts

EPNdB	QC Score	EPNdB	QC Score
94 - 94.9	2.0	80 - 80.9	0.08
93 - 93.9	1.6	79 - 79.9	0.063
92 - 92.9	1.25	78 - 78.9	0.05
91 - 91.9	1.0	77 - 77.9	0.04
90 - 90.9	0.8	76 - 76.9	0.0315
89 - 89.9	0.63	75 - 75.9	0.025
88 - 88.9	0.5	74 - 74.9	0.02
87 - 87.9	0.4	73 - 73.9	0.016
86 - 86.9	0.315	72 - 72.9	0.0125
85 - 85.9	0.25	71 - 71.9	0.01
84 - 84.9	0.2	70 - 70.9	0.008
83 - 83.9	0.16	69 - 69.9	0.0063
82 - 82.9	0.125	68 - 68.9	0.005
81 - 81.9	0.1		

EPNdB = Effective perceived noise in decibels (EPNdB) or Effective Perceived Noise Level (EPNL) is a measure of the relative noisiness of an individual aircraft pass-by event. It is used for aircraft noise certification and applies to an individual aircraft, not the noise exposure from an airport.

By allowing for arrival and flyover noise the ANCS takes into account communities to the east and west of the airport, in addition to those to the north and south who were already taken into account under the NFM system.

The ANCS QC system has an annual limit designed to be equivalent to the NFM limit of 120,000 noise factored movements. The annual QC limit has initially been set at 22,000 per calendar year, with a maximum of 742.5 in any single week. These limits will be reviewed after the first year of operation and periodically after that.

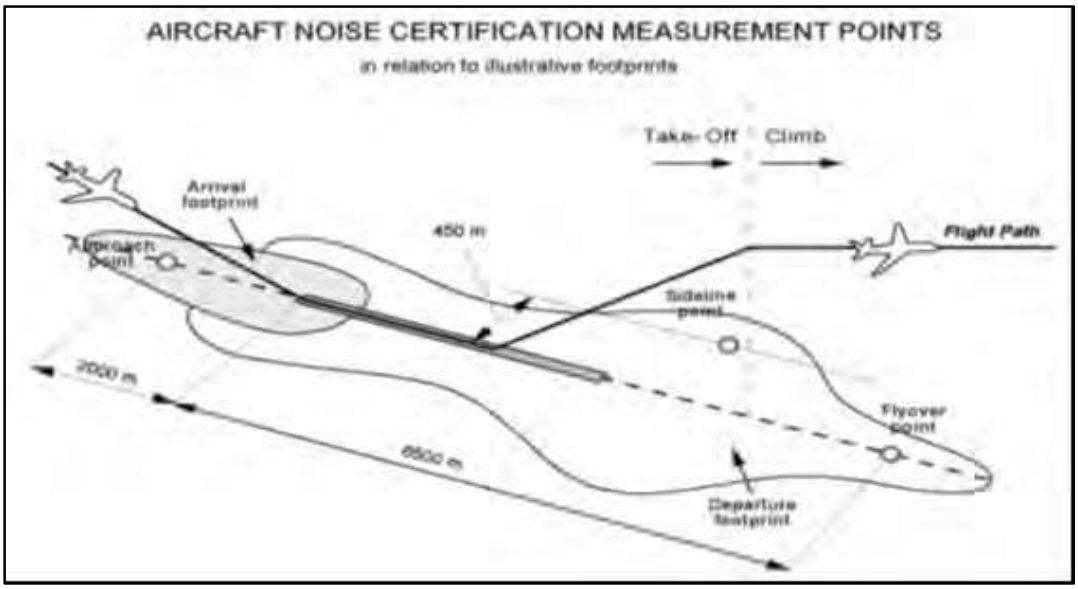
Under the ANCS all aircraft that operate at LCY must comply with the noise requirements of ICAO Chapter 4. [3]

In addition no aircraft louder than those permitted to operate at LCY under the NFM system will be allowed to operate under the ANCS and the following noise level limits will be applied:

- Flyover: 88.0 EPNdB;
- Sideline: 93.5 EPNdB;
- Approach 98.0 EPNdB.[4]

The sum of the certification noise levels at each of the three positions must also be less than 271 EPNdB.

Certification Measurement Points



. (Reproduced from ERCD Report 0205 Quota Count Validation Study: Noise Measurements and Analysis, Civil Aviation Authority)

[3] Chapter 4 of Annex 16 to the Convention on International Civil Aviation, Environmental Protection, Volume 1, Aircraft Noise.

[4] This relates to the specific noise certification level on approach given in the aircraft's noise certificate (which relates to an approach at 3 degrees) rather than the Arrival Level used for determining QC scores as described above (which relates to an approach at 5.5 degrees.)

Response from HACAN East

Summary

- The new Noise Action Plan: Works on the basis that the 54 and 51 decibel contours are now regarded by Government as 'the onset of community annoyance'
- Produces annual 51 and 54 decibel contours
- Extends the mitigation measures currently on offer to residents within the 57 contour to those within the 54 contour
- Commits to informing all residents within the 51 and 54 contour areas – and their elected representatives - of the latest airport developments on a regular basis
- Confirms whether London City can commit to the retention of the existing cap and operating hours through the years 2018 to 2023
- Looks again at the concentrated flight paths, with a view to providing respite for communities
- Commits to doubling the number of noise monitors
- Gives more prominence to TraVis2 on the airport website
- Explores the possibility of London City aircraft flying higher
- Spells out cooperative working with Heathrow

Ministerial Correspondence

3.5 Michael McCormack 03/06/2021

3 pages

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The Hon Michael McCormack MP

Deputy Prime Minister
Minister for Infrastructure, Transport and Regional Development
Leader of The Nationals
Federal Member for Riverina

Ref: MC21-002197

03 JUN 2021

Mr David Diamond
Chair
Brisbane Flight Path Community Alliance
contact@bfpca.org.au

Dear Mr Diamond

Thank you for your letter of 14 April 2021 regarding flight operations for the New Parallel Runway (NPR) at Brisbane Airport. I understand that you are corresponding in your role as Chair of the Brisbane Flight Path Community Alliance (BFPCA), representing community members across the Brisbane region.

I note the considerable effort involved in organising the BFPCA and acknowledge the BFPCA membership's concerns about the impacts of operations from the NPR at Brisbane Airport.

Managing aircraft noise is a difficult issue and I acknowledge your concerns about operations from Brisbane Airport. The Australian Government is seeking to minimise the impact on the community through airspace design, noise abatement procedures and land use planning.

The construction of the NPR Project at Brisbane Airport has been envisaged as part of the Master Planning process since 1983. All subsequent master plans for Brisbane Airport have included details about the new runway.

I note the concerns raised by BFPCA with respect to BAC's engagement. I understand BAC undertook extensive public engagement on the NPR, including on potential aircraft noise impacts from operations, since the sale of the lease of Brisbane Airport was completed in 1997. BAC considered multiple configurations for the new runway in their 1998 and 2004 Master Plans, which attracted 4,183 and 452 public submissions respectively. The preferred configuration was settled on in 2004 based on economic, social and environmental considerations.

BAC's formal public engagement program on the NPR development and aircraft operations commenced in September 2005 and targeted widespread engagement from the community through a variety of formats. This included public briefing sessions, briefing local elected representatives, information stands at community events and local shopping centres, establishing a freecall 1800 information line, distributing community newsletters and fact sheets in both hard copy (to residents within 15 kilometres of the Airport) and online, advertising in print media and utilising local news media.

The combined draft Environmental Impact Statement and Major Development Plan (EIS/MDP) for the NPR was published for a 90-day public consultation period in November 2006, and was advertised extensively through the formats noted above. The draft MDP received 196 submissions from the public.

Following concerns raised during these processes on the potential noise impacts associated with operations on the NPR, the development approval for the project required Brisbane Airport to run updated community awareness programs, including detailed information on the airport operational plan as approved by the Civil Aviation Safety Authority, for at least one year prior to the commencement of operations.

In your letter, you call for the immediate commencement of a new EIS and community consultation process by BAC and Airservices Australia on airspace use around Brisbane Airport. An EIS is a mechanism available under the *Environment Protection and Biodiversity Conservation Act 1999* which allows the Minister for the Environment to consider potential environmental impacts before a new development is approved. As the NPR project is completed, BAC cannot be directed to complete a new EIS.

However, I understand that BAC is continuing to engage with the community and there is a planned review of operations and other mechanisms in place through which the community can raise issues or concerns.

Airservices Australia (Airservices) will undertake a Post Implementation Review (PIR) of Brisbane Airport operations from July 2021, with outcomes to be finalised by the end of the year. The PIR will examine procedures for runway modes and noise abatement at Brisbane Airport to identify where safe and practical operational improvements could be made. You are able to provide a submission to the PIR at www.engage.airservicesaustralia.com/brisbane-airport-flight-path-change.

As noted in your correspondence, the Aircraft Noise Ombudsman, Mr Kieran Pehm, is conducting a review of Airservices engagement in relation to the flight paths at Brisbane Airport. I understand the BFPCA has also provided a submission to this review, with the report on findings to be delivered later this year.

The Brisbane Airport Community Aviation Consultation Group (BACACG) is a consultative forum designed to bring together government, the aviation industry, and the community to discuss a range of topics including aircraft noise, airport developments, airport operations and Terminal access. Members of the public can contact the BACACG by email at bacacg@bne.com.au.

I encourage you and other BFPCA members to remain engaged through these public consultation and review processes.

Thank you for bringing BFPCA's concerns to my attention and I trust this information is of assistance.

Yours sincerely

Michael McCormack

3.6 Barnaby Joyce 29/11/2021

2 pages

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The Hon Barnaby Joyce MP

Deputy Prime Minister
Minister for Infrastructure, Transport and Regional Development
Leader of The Nationals
Federal Member for New England

Ref: MC21-009336

29 NOV 2021

The Hon Ken O'Dowd MP
Chair
Standing Committee on Petitions
Parliament House
CANBERRA ACT 2600

Dear Mr O'Dowd Ken,

Thank you for your letter of 18 October 2021, regarding the petition presented to the House of Representatives in relation to flight operations at Brisbane Airport (EN2983).

Managing aircraft noise is a difficult issue. The Australian Government supports minimising the impact of aircraft noise on the community through a combination of airspace design, noise abatement procedures and land use planning. However, some level of aircraft noise is unavoidable in major cities, such as Brisbane, particularly in areas close to the airport.

The *Air Services Act 1995* requires Airservices Australia (Airservices) to regard the safety of air navigation as the most important consideration, while also ensuring that, as far as practicable, the environment is protected from the effects of, and the effects associated with, the operation of aircraft. The Australian Government has no current plans to review the *Air Services Act 1995*.

Under the *Airspace Act 2007*, the Civil Aviation Safety Authority (CASA) is responsible for the administration and regulation of Australian airspace, including the amendment of airspace and air routes. Airspace changes required to implement the new flight paths at Brisbane Airport were approved by CASA on 31 October 2018 and 26 August 2019.

On 20 July 2021, Airservices commenced a Post-Implementation Review (PIR) of the flight path and airspace changes required for Brisbane Airport's New Parallel Runway. The PIR is reviewing the outcomes of the flight path changes for the community, environment and industry, and provides an opportunity to identify possible improvements to minimise noise impacts on the community as a whole, where safe and feasible to do so.

The Hon Barnaby Joyce MP
Parliament House Canberra | (02) 6277 7520 | minister.joyce@infrastructure.gov.au
PO Box 963, Tamworth NSW 2340

In addition, the Australian Government announced the Brisbane Airport Post Implementation Review Advisory Forum (the Forum) on 24 September 2021 in recognition of the significant community interest in aircraft operations around Brisbane Airport. The Forum is an independent, community-oriented body that complements existing engagement mechanisms. The Forum has been established specifically to provide advice and feedback to Airservices on matters relating to its PIR of Brisbane Airport's new runway operations. The Chair will also provide me with a quarterly report.

Through the PIR, Airservices will consider community suggestions for improvement of Brisbane's airspace arrangements, as well as look for improvements to noise outcomes based on a review of operations since the opening of the runway. Proposed changes to airspace architecture must be approved by CASA via an airspace change proposal. Further information on the airspace change process can be found at www.casa.gov.au/airspace/airspace-regulation/airspace-change-process.

Construction of a new runway and design of new airspace arrangements are inherently complex projects that take many years to develop, during which time aviation technology continues to improve. The approval of the major development plan for the New Parallel Runway at Brisbane Airport in 2007 by the then Minister for Transport and Regional Services under the *Airports Act 1996* related only to the construction of the runway. Operational aspects, including airspace operations, required separate approval from CASA once these aspects were finalised. Enhanced aviation navigation technology has been developed since the approval, endorsed by the International Civil Aviation Organization and included in the design as international best practice.

The 2007 Environmental Impact Statement for the New Parallel Runway, which included the implementation of a plan for aviation airspace management, was approved by the then Minister for the Environment under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The EPBC Act is administered by the Department of Agriculture, Water and the Environment and the Minister for the Environment. As the New Parallel Runway project is completed, Airservices cannot be directed to complete a new Environmental Impact Statement, however this does not mean that the issues being raised are unable to be addressed by alternative mechanisms, which I understand are being considered through the Airservices' PIR.

Thank you for referring this petition to me and I trust this information is of assistance. I have copied this letter to the Hon Sussan Ley MP, Minister for the Environment.

Yours sincerely

Barnaby Joyce MP

cc The Hon Sussan Ley MP, Minister for the Environment

3.7 Catherine King 08/02/2023

2 pages

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Office of the Hon Catherine King MP

Minister for Infrastructure, Transport, Regional Development and Local Government
Member for Ballarat

Ref: MC22-011258

Dr Marcus Foth
Chair
Brisbane Flight Path Community Alliance
PO Box 2031
NEW FARM QLD 4005

via: contact@bfpca.org.au

Dear Marcus,

Thank you for your letter of 23 November 2022 to the Hon Catherine King MP, Minister for Infrastructure, Transport, Regional Development and Local Government, regarding flight operations at Brisbane Airport. The Minister has asked me to respond on her behalf. I apologise for the delay in responding.

Managing the impacts of aircraft operations on communities around airports is a challenging issue, and the Minister acknowledges your concerns about operations at Brisbane Airport.

As you are aware, Airservices Australia has committed to implementing the four packages recommended by Trax International. These have been included and expanded on in Airservices' Post Implementation Review report, which was released in December 2022.

The assessment and implementation of the changes to be identified in the final report will include safety and environmental assessments, as well as opportunities for further community engagement. I understand that some actions as part of Package 2 could be delivered in the early part of this year. I encourage the Brisbane Flight Path Community Alliance to engage constructively and collaboratively with Airservices as this implementation work commences.

As you may be aware, the Government is in the process of establishing a permanent consultation body on aircraft noise around Brisbane Airport to improve engagement with the community on airport operations, including noise issues and focus on improving outcomes for all Brisbane communities.

Beyond this, the Government will also deliver a new Aviation White Paper, which will include consideration of better mechanisms for consultation on, and management of, aircraft noise. The Terms of Reference for this White Paper were released on 7 February 2023, and I encourage your group to make a submission through that process. Further details on the permanent community consultation body will be announced in due course.

While the Minister will unfortunately not be available for a meeting at this time, I thank you for bringing your concerns to her attention.

Yours sincerely,

Joseph Solomon
Chief of Staff

8 / 2 /2023

3.8 Mark Bailey (QLD) 21/09/2023

2 pages

Queensland Parliamentary Service

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Our Ref: A1158345

21 September 2023

Professor Marcus Foth
PO Box 2031
NEW FARM QLD 4005

Dear Professor Foth

Ministerial response to petition 3904-23

For your information as principal petitioner, please find attached a ministerial response to your e-petition tabled in the House.

Yours sincerely

Neil Laurie
The Clerk of the Parliament

Enc

Queensland Government

Minister for Transport and Main Roads
Minister for Digital Services

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Our ref: PET50760
Your ref: A1151329

21 September 2023

Mr Neil Laurie
The Clerk of the Parliament
Parliament House
George Street
BRISBANE QLD 4000

Dear Mr Laurie

I refer to petition 3904-23, lodged with the Legislative Assembly by Dr Amy MacMahon MP, Member for South Brisbane on 22 August 2023, about establishing a Parliamentary Inquiry into the impact of Brisbane Airport's flight paths.

Neither the Queensland Government nor the Department of Transport and Main Roads (TMR) have jurisdiction over flight paths.

Brisbane Airport is subject to the Australian Government's airport planning framework and approvals under the *Commonwealth Airports Act 1996*. This framework, including approval and consultation processes for flight paths, is separate to Queensland's planning system. Further information is available on the Australian Government's Department of Infrastructure, Transport, Regional Development, Communication and the Arts website at www.infrastructure.gov.au and by clicking on (1) 'Infrastructure, transport & vehicles', (2) 'Aviation', (3) 'Airports', and then (4) 'Airport planning & regulation'.

It would be appropriate for the petitioners to raise their concerns with the Australian Government.

I trust this information is of assistance.

Yours sincerely

MARK BAILEY MP
Minister for Transport and Main Roads
Minister for Digital Services

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