



**Ai Group Limited**  
202 Boundary Street  
Spring Hill QLD 4004 Australia  
PO Box 128  
Spring Hill QLD 4004 Australia  
Telephone: 1300 55 66 77  
[www.aigroup.com.au](http://www.aigroup.com.au)  
ABN 81 632 926 099

15 April 2024

Committee Secretary  
Senate Standing Committees on Rural and Regional Affairs and Transport  
PO Box 6100  
Parliament House  
Canberra ACT 2600  
[rrat.sen@aph.gov.au](mailto:rrat.sen@aph.gov.au)

**Subject: Defence of Brisbane Airport Corporation's 24-Hour Operation**

Dear Committee Chair and Committee members

I am writing on behalf of the national employer association **Australian Industry Group (Ai Group)** to express our support for the **Brisbane Airport Corporation's (BAC)** current 24-hour operation. While we appreciate local concerns over noise levels, we agree with the view that these are best addressed in ways that offer less disruption than would be imposed by the introduction of caps and curfews. Such a heavy-handed approach would severely curtail the significant benefits provided by the 24-hour operation of Brisbane Airport.

We believe that this operating model is essential for the continued growth and prosperity of our region and the broader Australian economy. Brisbane's 24-hour airport reinforces the city's reputation as a vibrant, globally connected capital that values economic growth, innovation, and resilience.

The projections for economic growth for the region are predicated on continued 24-hour operation of Brisbane Airport.

The loss of overnight freight movement will be the first service to go if caps and curfews are imposed.

Regional connectivity will be deeply impacted.



The decrease in tourism and export opportunities and the cramping of services to the resource sector will all result in decreased productivity and prosperity.

The airport's current mode of operation demonstrates Brisbane's commitment to being a global hub, attracting international travellers, businesses, and investors who value seamless connectivity. We compete with other major cities in the Asia Pacific region, and continuous airport operations give us an edge. It confirms our reputation as being dynamic and forward-thinking.

Aside from its critical role within the state underpinning the mining, tourism and broader economy, Brisbane airport services regional Queensland, Papua New Guinea, and the Pacific in times of need. This too will be impacted by flight restrictions.

The **Brisbane Airport Corporation (BAC)**'s 24 hours a day operation is a complex matter influenced by various factors. I would ask you to consider the following:

**1. Economic Considerations:**

- Brisbane Airport serves as a crucial hub for domestic and international travel, facilitating trade, tourism, and business connections.
- Airlines need to prioritise specific routes, leading to competition for limited slots. Restrictions on BAC's operating hours would see the withdraw of services to Brisbane, affecting passenger options and impacting flight prices.
- Queensland is a geographically large state with a decentralised population that is distributed regionally. Connecting flights and travelling regionally is already a taxing experience and can only be negatively impacted by the limitation of flights and airport operations.
- A 24-hour operation allows for continuous cargo transport, supporting supply chains and economic growth. This is jeopardised with any reduction in operating capacity.
- Revenue generated from extended operating hours contributes significantly to the local and national economy.
- A round-the-clock airport fosters innovation and entrepreneurship.



- It encourages companies to set up operations, knowing they can access global markets anytime.

## 2. **Connectivity:**

- Brisbane Airport currently accommodates approximately 700 flights per day.
- Limiting flights would severely curtail connectivity for passengers and cargo.
- This will impact the resource sector. Timetables for flights are scheduled to transport workers to meet rosters. Reducing the number of flights will undoubtedly have a negative impact on productivity of the mining operations relying on fly-in/fly-out transport for staff.
- Fewer flights mean fewer destinations served, impacting tourism, business travel, and trade.
- In an interconnected world, airports play a pivotal role in maintaining supply chains for business and national and global connectivity.
- Implications include flight delays; inconvenient domestic flight times; increased cost of airfares.

## 3. **Cargo and Freight Handling:**

- Airfreight is time-sensitive, especially for perishable goods, medical supplies, and high-value products.
- BAC's continuous operation accommodates cargo flights, benefiting industries and consumers.
- Restricting flights would hinder efficient cargo transport, affecting supply chains and industrial capacity.

## 4. **Emergencies and Disasters:**

- Airports serve as emergency response hubs during crises.
- Brisbane is a critical hub supporting northern and central Queensland, PNG and the Pacific region.
- A 24-hour airport can handle medical evacuations, humanitarian aid, and disaster relief flights promptly.



**5. Competitive Advantage:**

- Brisbane competes with other major airports globally.
- Offering 24-hour services enhances its attractiveness to airlines, businesses, and travellers.
- Existing airport infrastructure (terminals, runways, etc.) would be underused, impacting the profitability of business. Maintenance costs would remain, but revenue would decrease.

**6. Airports operation under curfews:**

- Sydney Kingsford Smith Airport (SYD) operates under strict curfews due to its legacy proximity to residential areas.
- These curfews limit nighttime flights to minimize noise impact on residents.
- Brisbane's geographical layout allows for more flexibility without compromising residential amenity.

**7. Balancing Community Interests:**

- BAC collaborates with residents, airlines, and regulatory bodies to strike a balance.
- Noise mitigation measures, flight path optimization, and community engagement are ongoing efforts.

The **Brisbane Airport Corporation (BAC)** has actively explored several options to distribute flight paths and minimise the impact of flight noise on nearby communities. We believe the options below provide pathways to mitigate impacts on residents.

**1. SODPROPS Departure Flight Paths to the South:**

- BAC considers alternative departure paths that direct flights southward over water, reducing noise impact on residential areas.



- These paths aim to strike a balance between operational efficiency and community well-being.
- 2. Over-Water Departure Paths to the South for Parallel Runway Operations:**
- By maximising flights over water during departures, BAC minimises noise exposure to suburbs.
  - These paths utilise Brisbane’s geographical layout to mitigate noise effects.
- 3. High-Altitude Routes to and from the Sunshine and Gold Coast Airports:**
- These routes traverse Brisbane airspace, restricting the use of SODPROPS (Standard Instrument Departure Procedures) over residential areas.
  - BAC collaborates with airlines and regulatory bodies to optimise these routes.
- 4. Advanced Navigation Technology and Changes to Non-Jet Operations:**
- BAC explores advanced navigation systems (such as PBN - Required Navigation Performance) to fine-tune flight paths.
  - Non-jet operations (e.g., smaller aircraft) are adjusted to minimise noise concentration.
- 5. Merge Points and Hold Downs:**
- Strategic merge points help disperse air traffic, preventing concentrated noise over specific neighbourhoods.
  - Hold downs manage aircraft spacing during arrivals, ensuring smoother flow and reduced noise impact.
- 6. Optimising the Wider Brisbane Airspace System:**
- BAC aims for long-term improvements by optimising overall airspace performance.
  - Collaborative efforts involve Airservices Australia, CASA (Civil Aviation Safety Authority), and airline partners.



BAC remains committed to engaging with residents and stakeholders, seeking additional opportunities to minimise flight noise’s impact on Brisbane suburbs. The Noise Action Plan for Brisbane outlines these initiatives and ensures transparent governance in addressing community concerns.

In summary, while Sydney’s curfews address local concerns, Brisbane’s 24-hour operation aligns with its economic role, global connectivity, and cargo demands. Striking this balance requires thoughtful planning, stakeholder engagement, and sustainable practices.

I would be happy to add further to these remarks and appear before your Committee as required.

| Yours sincerely

Michelle Farquhar  
Head of Queensland