



16th December 2020



Dear Sir/Madam.

Sydney Airport Demand Management Discussion Paper

We would like to thank the Department of Infrastructure for allowing us to provide a submission to the review of the legislation. The RAAA supports in principle the submission by Airport Coordination Australia (ACA), in particular closer alignment with the World Airport Slot Guidelines and maintaining the Permanent Regional Service Series (PRSS). The current slot system for Sydney Airport has generally worked well over the 23 years since its inception. The ring fencing of NSW regional slots has ensured that regional Australians have access to the nation's largest airport, post its privatisation. The certainty around slots has also allowed regional airlines to set schedules with enough notice to plan their operations and market their routes.

Protecting regional services is essential in the competing priorities of a capacity constrained airport such as Sydney Kingsford Smith. Whilst the airport landing charges attracted by a regional aircraft to that of an A380 pale in comparison if regional slots are not protected, commercial interests will take precedence over the essential connectivity for regional Australians. The RAAA is also strongly against any change to the definition of a regional slot. Changing the definition could dissolve current regional slots and disadvantage regional Australia.

The RAAA believes that the current movement cap of 80 movements per hour is not been achieved and a review of the "regulated hour" should be carried out. Instead, Sydney Airport averages about 75 movements per hour which translates to a 6.25% reduction in the capacity of the airport.

The RAAA look forward to working closely with the Department in streamlining demand management at Sydney Airport.

The RAAA represents aviation across Australia. It has over 100 members and its Air Operator Certificate (AOC) holding members directly employ over 2,500 Australians, many in regional areas. On an annual basis, the RAAA's AOC members jointly turn over more than \$1.5 billion, carry well in excess of 2 million passengers and move over 23 million kilograms of freight. Our Regional Airport members also provide and manage critical infrastructure across Australian.

