

# Australian Business Aviation Association Inc.

ABN 32 082 750 492

13th November 2020

Director  
Project Strategy Unit  
Strategic and Economic Policy Projects  
GPO Box 594  
CANBERRA ACT 2601

Via e-mail to: aviationconsultation@infrastructure.gov.au

Dear Director,

## **Response to Future of Australia's Aviation Sector - Issues Paper**

As a member of the General Aviation Advisory Network (GAAN), I would like to convey my 100% support of the response 11th November by Mr Andrew Anderson, Chair of the GAAN. Mr Anderson has covered many matters of importance to the General Aviation Sector in Australia.

The ABAA would like to add the following comments and recommendations:

**Covid-19** The ABAA wishes to thank the Hon Michael McCormack, Deputy Prime Minister and officers of the Department of Infrastructure, Transport and Regional Development, together with CASA and Airservices Australia for their support of the Aviation Industry during Covid-19. Many ABAA member companies have been in a position to accept both the financial and operational assistance measures, such as renewal of pilot licenses and ratings etc.

### **Lack of International Harmonisation of CASA Regulations**

As we emerge from the Covid-19 induced lockdowns, the ABAA will closely monitor the operational introduction of several CASA revised regulations, which include CASRs 121 and 135, which may impact negatively on some ABAA member companies.

Also, revised CASRs 135 and 121 do not harmonise with US FAA Regulations. We see this as imposing unnecessary extra cost burdens for several ABAA member companies and again, Australia will be out of step with the USA, which has by far the largest and most successful aviation industry and aviation Infrastructure in the world.

### **Business jet operations at Sydney Airport during the curfew**

Discussions have continued during 2020 with the Department of Infrastructure, Transport and Regional Development. Our latest proposal follows:

- 1) A fair and reasonable cap be introduced for quiet business jet movements during the curfew period at Sydney Airport.
- 2) Whilst waiting for the relevant Sydney Airport Act to be amended, a dispensation process be implemented to permit quiet business jets, which are certified to ICAO Chapter IV noise standards and certified with seating for a maximum of 19 passengers, to operate during the curfew. Perhaps, this could be similar to recent dispensations for Boeing 737 freight operations during the curfew period.

We are recommending that quiet business jets, which are certified as above, be permitted to operate during the curfew. The proposal is for these newer quiet business jets to join those which are already approved in accordance with the 1990s legislation. Our proposal is scientifically based on noise, not weight.

For example, latest technology, long range business jets, which have recently commenced production include the Bombardier Global 7500, certified to Chapter IV noise standards and certified with a maximum of 19 passenger seats. These certification standards for business jets have been accepted throughout the world for many years. The Global 7500 has a Maximum Take-Off Weight (MTOW) of 52,095kg and a Maximum Landing Weight (MLW) of 39,735kg.

Also, the Gulfstream G700, soon to be certified to Chapter IV noise standards and with a maximum of 19 passenger seats, is expected to have an MTOW of 48,807kg and MLW of 37,875kg.

Unfortunately, both the Global 7500 and the G700 are not permitted to operate during the curfew due to the anachronistic (appropriate to an earlier period), MTOW limit of 34,000kg, which was stipulated in the 1990s legislation. This was based on the largest business jet in general use at that time being the Gulfstream GIV with an MTOW of 33,800kg.

#### The Economic Case

Sydney is widely recognised as Australia's leading Gateway City, with many business jet operators visiting on a regular basis to conduct meetings, negotiate contracts and to assess business opportunities. Most of these operations are carried out in non curfew periods, however there is a requirement for a relatively small number of movements in the curfew period.

Since the early 2000s, longer range, quieter and more fuel efficient business jets have been replacing older less fuel efficient aircraft. We are aware that at least five Bombardier Global 7500 and Gulfstream G700 business jets have been ordered by Australian customers, who are replacing older less efficient business jets.

It would seem unfair, to penalise these operators for choosing new state of the art, fuel efficient, low noise aircraft.

Movement Statistics (Provided by Department of Infrastructure and Transport)

Movements during the curfew period in recent years have been dominated by BAe146 freight aircraft with 2,395 movements in 2019 and 595 in the 1st quarter of 2020. Also, in the permitted propeller aircraft category, some movements would have been with noisy Garrett powered turbo prop aircraft. The complete list of aircraft operations during the curfew period in 2019 follows:

<u>BAe146 freight</u>	<u>Dispensations approved</u>	<u>Pre-curfew taxi clearance</u>	<u>Curfew shoulder movements</u>	<u>Emergency &amp; search/rescue movements</u>	<u>Permitted jet movements*</u>	<u>Permitted propeller aircraft</u>
2,395	113	298	458	909	121	241

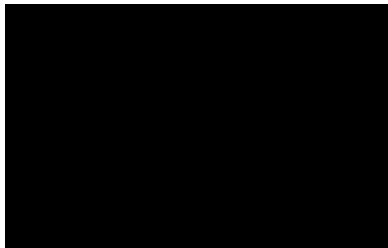
\* Business jet movements of 121 in 2019, represented 2.7% of total curfew movements.

BAe146 freight jets have a cap of 74 movements per week. However, in 2019 these aircraft used only 62.24% of their movement cap.

The ABAA is seeking a reasonably "level playing field" even though we do not expect anywhere near the number of BAe146 freight movements and search/rescue movements. We are seeking a fair and reasonable outcome for our members and visiting business jets.

Yours sincerely

David Bell OAM  
Chief Executive Officer  
Australian Business Aviation Association Inc.



13th November 2020

The ABAA represents owners and operators of turbine powered business aircraft, which are based in Australia. Also, the ABAA is a member of the International Business Aviation Council (IBAC), co-located with ICAO in Montreal, Canada. IBAC comprises 14 Business Aviation Associations throughout the world. Please visit [www.ibac.org](http://www.ibac.org)