Australian Business Aviation Association Inc.
www.abaa.com.au
ABN 32 082 750 492

23 October 2024

Committee Secretary
Rural and Regional Affairs and Transport References Committee
PO Box 6100
Parliament House ACT 2601

Via email: rrat.sen@aph.gov.au

Submission in response to the Sydney Airport Demand Management Amendment Bill 2024

The Australian Business Aviation Association Inc. (ABAA) welcomes the opportunity to respond to the Sydney Airport Demand Management Amendment Bill 2024 (the Bill) and provides the following comments.

The ABAA and Business Aviation in Australia

A collective voice for the Australian business aviation community, the ABAA is a non-profit organisation that promotes the highest standard of operational safety and efficiency and represents its members across various domestic and international jurisdictions.

As part of Australia's essential General Aviation sector, business aviation has contributed significantly to developing a strong Australian economy for more than 50 years. Its flights support a diverse range of industry sectors, including mining and resources, manufacturing, agriculture, logistics, tourism, retail, and media/entertainment. It is also involved in various community, non-profit, or government functions, including aeromedical (patient and medical personnel transport and organ transfers), prisoner transportation, surveillance, and search and rescue.

Business aviation flights connect passengers, businesses, and communities across Australia and from overseas, operating beyond the constraints of the scheduled services network. In this respect, the sector performs an essential role in meeting Australia's overall air transport needs.

Business Aviation at Sydney Airport

While the Bill appears to focus on scheduled operators, there are other user groups for whom access to Sydney Airport is essential. While it may fall outside the current scope, we encourage the Committee to consider them within the broader context.

As non-scheduled (non-airline) operators, business aircraft operators do not apply for long-term or seasonal slot allocations; instead, they apply on an ad hoc basis for remaining single-use slots that best align with their requested flight operations. The ABAA and its members have an excellent working relationship with the Slot Manager and with Air Services Australia, and the current system is ostensibly suitable. However, operators are often required to take up slots well outside peak periods. As such, they fulfil an important role in maximising the utilisation of airport infrastructure throughout the day.

Within the Sydney basin, Sydney Airport is the only aerodrome with dedicated aircraft handling, border control services, and maintenance organisations that provide essential ground-based services to the domestic and international business aircraft community. At the time of writing, ground-based facilities are yet to be made available to general (including business) aviation at Western Sydney Airport. For operational reasons, Bankstown Airport is generally unsuitable for large category visiting business jets and the facilities there are increasingly limited.

Consistent and reliable access to Sydney Airport and the opportunity to participate fairly within the Slot Management Scheme is, therefore, a primary concern for the association. To this end, the ABAA supports, in principle, the proposed mechanisms to optimise the efficiency of the Sydney Slot Management Scheme and enhance the airport's resilience via the application of a controlled recovery period.

Recovery Period

Due to limited crew and fleet resources and the unsuitability of other airports, business aviation operators have limited capacity to recover quickly in the event of cancellations or diversions. Disruption to the traffic flow within the Sydney basin and/or across the broader network can add track miles, leading to increased emissions and aircraft noise. It also adds complexity to the management of crew fatigue and other operational risks.

The association supports the introduction of a limited recovery period that temporarily facilitates an increase in hourly movements to 85 to accelerate network recovery after a disruptive event.

Within this context, business aviation aircraft have the advanced performance capabilities and operational agility to respond quickly and can thus contribute to the timely resumption of standard operations.

Governance and Transparency

The ABAA supports the intent to increase transparency and Ministerial governance of the Slot Management Scheme via the provisions outlined in the Bill.

Penalties for Misuse

The association supports the intent to apply penalties for deliberate misuse of the Slot Management Scheme. This also carries the potential to add held slots back into the daily movement pool and enhance accessibility for non-airline operators. However, it is not immediately clear how the proposed civil penalty system will be applied to non-scheduled operators whose user profiles and operational parameters are inherently different from those of the airlines.

We ask that the Committee and the Minister consider how this system of penalties will play out on a day-to-day basis across various operational settings, including business and general aviation, and encourage continued engagement across a broad spectrum of airport users.

Thank you for the opportunity to address aspects of the Sydney Airport Demand Management Amendment Bill 2024. Should you wish to engage with the association on any aspect of this submission please contact the Chief Executive via the details provided.

Chief Executive Officer
Australian Business Aviation Association Inc.