



By Email

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Dear Chair and Committee,

## **AUSALPA COMMENTS ON THE PROPOSED SYDNEY AIRPORT DEMAND MANAGEMENT AMENDMENT BILL 2024**

The Australian Airline Pilots' Association (AusALPA) is the Member Association for Australia and a key member of the International Federation of Airline Pilot Associations (IFALPA) which represents over 100,000 pilots in 100 countries. We represent more than 7,100 professional pilots within Australia on safety and technical matters. Our membership places a very strong expectation of rational, risk and evidence-based safety behaviour on our government agencies and processes and we regard our participation in the work of Australia's safety-related agencies as essential to ensuring that our policy makers get the best of independent safety and technical advice.

AusALPA is the umbrella association for the safety and technical interests of the Australian Federation of Air Pilots (AFAP) and the Australian and International Pilots Association (AIPA).

AusALPA welcomes the opportunity to provide feedback to the inquiry on the proposed Sydney Airport Demand Management Amendment Bill 2024 ("the Bill").

### **Overview and Introduction**

The pursuit of enhanced and effective uses of public aviation infrastructure is meritorious. So too is the balancing of this against the community's concerns regarding the impact of aircraft noise upon their amenity, physical and mental wellbeing. However, the pursuit of these balanced considerations and goals must come as secondary priorities to that of the safety of air navigation. It is within this context that we provide input to the Senate Inquiry into the Bill.

### **Safety Concerns and Operational Considerations**

AusALPA has no issues with the intent of the Bill to create better governance and accountability upon operators for "failing to return or transfer unused slots". Our concerns and cautions are regarding the aviation safety and procedural matters.

### Safety and Operational Efficiency

Operational efficiency must never come at the expense of safety. Any proposed changes, particularly with the increase of the number of hourly movements, should continue to prioritise safety over throughput (movements). Safety remains the ultimate measure of success in air traffic management.

### Wind Limitations for Runway Selection

Into wind operations for take-offs and landings are the safest mode of runway use for aircraft. The standards of the International Civil Aviation Organisation (ICAO) designate the cross wind and tail wind limitations for when Noise Abatement Procedures (NAPs) must cease being an operational consideration due to the researched safety thresholds being reached. In the case of Sydney Airport's operations, Australia already accepts and designates that these international standards may be further reduced by allowing an additional 5 knots of cross wind for the runway mode selection decisions.

We are aware, anecdotally, that this generous concession, based on lower local standards compared to the international standards, are exacerbated by current practices which involve holding onto selected runways even when wind conditions exceed the designated thresholds for changing the runway mode selection. If aviation agency interpretations of the Bill lead to an increased pressure upon operational decisions, i.e. to try to achieve the proposed increased movement rate by using the parallel runways when the designated threshold is exceeded, the safety of flight will be further exposed to a compounding and impactful compromise to safety.

### Capacity and Feasibility of 85 Movements per Hour

While we remain to be convinced that 85 aircraft movements per hour is achievable under current operational conditions, we are open to reviewing any data that substantiates this target. Despite this, our concern is that, in practice, this may not prove viable without significant adjustments to operational frameworks. It must be understood that aircraft separation and wake avoidance standards, runway incursion mitigations and associated procedures, weather and other operational impacts all have an influence on what would otherwise be an ideal state of efficient operations.

### Balanced Runway Utilisation and Intersection Departures

Politically directed outcomes must not impede upon safety risk mitigations. However, we do believe that some improvements can be made to allow for recovery scenarios if they are intelligently targeted to enhance the limited operational opportunities available.

We continue to advocate for an increased consideration for balanced use of available runways. This means that the parallel runways have a similar movement rate as possible to each other (weather conditions permitting) i.e. aircraft that are operationally able to utilise the shorter parallel runway should be allocated or encouraged to do so. This would allow for a more equal share of movements on both runways simultaneously, thus helping to maximise the intended movement recovery rates as well as normal movement rates.

Additionally, the ability to achieve the intent of the recovery-hour needs to include the option for the strategic use of intersection departures (take-offs commencing from less than the full length of runway) to optimise efficiency while minimising congestion and delays. Current NAPs limit or prohibit the use of intersection departures. A change to this restriction, particularly during recovery-hour operations, would not impact safety but could help reach recovery outcomes through shortened taxi times and allow for strategic avoidance of wake turbulence constraints. This would, enhance the recovery goals whilst not affect safety or materially change the aircraft noise footprint from Sydney Airport operations.

## **Funding Infrastructure Enhancements**

The ability of Sydney Airport to host and reach successful recovery-hour outcomes will be challenged when conditions require that the runway selection is that of the cross runway (RWY 07/25). This runway has existing occupancy time issues due to it not being served by a Rapid Exit Taxiway (RET), unlike the other runways. The feasibility of constructing a RET should be considered. The maximum hourly rate for aircraft movements will remain impeded without the federal government financing infrastructure projects to assist in reducing runway occupancy.

## **Summary Comments**

AusALPA supports the goals of the proposal related to fairness of slot allocation and contingency optimisation. However, we envisage that the intended goals will not be reached without the use of the specific contingency measures of balanced runway use and intersection departures.

In addition, we are concerned that if these measures are not considered and implemented, a greater emphasis and pressure will exist (implicit or otherwise) for further deterioration of safety standards, procedures and practices in order to reach the intended outcomes of the Bill.

We therefore recommend that the Explanatory Memorandum to the Bill be updated to include language outlining that the intent of the Bill does not intend to create any expectations that existing operational safety practices, limitations and standards be changed or downgrade to facilitate the intended outcomes of the Bill.

Yours sincerely,

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Captain Steve Cornell  
Safety & Technical Director AusALPA