



Shane Rattenbury MLA
Member for Molonglo

M GPO Box 1020 Canberra 2601
T 02 6205 0005
F 02 6205 0007
E Rattenbury@parliament.act.gov.au

www.act.greens.org.au

Shane Rattenbury MLA on behalf of the ACT Greens

Submission to Preliminary Draft 2009 Master Plan Canberra International Airport

The ACT Greens made a submission to the Canberra International Airport's 2008 Master Plan (attached) and as such, we do not plan to reiterate all the concerns made in that plan, as we do not believe that the new Draft Master Plan has changed so significantly as to warrant readdressing all the issues. We raised concerns about a number of issues, including planning and development at the airport, management of grasslands, and climate change implications for the airport. This submission is attached, and we would like to take the opportunity to confirm our position as it is outlined.

As such, we would like to reiterate that we do not oppose the existence of the Canberra International Airport. However, if the airport does wish to expand, this expansion can only be undertaken:

- within the context of a national sustainable transport plan;
- under the aegis of a planning regime at least equal to that which applies to the rest of Canberra;
- under a regulated curfew from 11 pm to 6 am, except for emergencies; and
- in the context of a Climate Change Strategy which both reduces and offsets greenhouse gas emissions.

However, we would like to focus in on our concerns in relation to noise, and summarise our key recommendations in that regard. We are concerned that data from the independent noise monitoring at Hackett will not be available until after the submission date for the Preliminary Draft Master Plan has closed. We are also concerned that residents of Hackett think that the noise monitoring equipment may well not be located in the correct place, and that data may well not reflect measurements that are being taken in other places in Hackett.

The ACT Greens continue to support a curfew for the Canberra between 11pm and 6am for the following reasons:

- A curfew will protect the psychological and physical health of people living in Canberra and guarantee a minimum quality of life to Canberrans. Aircraft noise has a significant adverse impact upon human health. This has been documented by the World Health Organisation (2001), and the Department of Transport and Regional Services (2000).
- Not having a curfew means “privatising the profit and socialising the cost” as Canberra Airport will benefit financially from the non-curfew revenues but those financial gains will not be shared by the community at large which will have to live with the noise produced by aircrafts arriving and departing during the night. There are financial costs also; land affected by aircraft noise can be expected to decline in value, and residents affected by noise are likely to have to engage in ‘defensive spending’: i.e. increased insulation, double glazed windows etc.
- To avoid noise sharing, we oppose the proposal to extend the cross runway, as it would have unacceptable impacts on neighbouring communities. Future development aside, for the sake of current residents of Canberra and Queanbeyan, particularly Jerrabomberra, we need a curfew now.
- All these costs are magnified for night noise, as this imposes the greatest inconvenience, and therefore the greatest adverse health effects, reduction in land values, need for defensive spending, and general reductions in quality of life.
- A curfew will provide certainty to the residents of Canberra, the surrounding region in NSW and also to business. Locking in a curfew into the Master Plan would protect the Canberra Airport from any future lawsuits from land and building developers and/or people wanting to share the noise by varying the patterns of landings and take-offs.
- It is not acceptable for night noise to be moved to Canberra to take pressure off other airports.

We note that the Preliminary Draft Canberra Airport Master Plan 2009 says that the airport is “committed to continuing to do everything possible to minimize the impact of aircraft noise”, however, on p. 174 specifically rules out a curfew for the airport.

Moreover, the Draft Master Plan makes broad statements on page 174 about the impact of a curfew without any modelling to support them, such as:

- It would “severely limit the airport capacity service international flights” – yet Sydney, with a curfew in operation, is one of our major international hubs.
- It would “slow tourism growth” – yet the Plan uses figures from Adelaide to demonstrate growth in international flights in spite of having a curfew in place.
- It would “cut jobs for the people of Canberra and the region” – this is completely unsupported in the document.

The Draft Master plan does therefore not canvass openly considerations for how a curfew could be integrated into its plan, and how a curfew could exist along side some of the other plans for development and expansion.

The Greens believe:

- A curfew can co-exist with a freight hub as there is no freight which cannot deal with an aircraft curfew of 7 hours. Even freight arriving at 06:00 can be delivered in Canberra that morning and in other capital cities that day. The additional number of trucks into and out of Canberra, mostly to Sydney, of 20 units a day each and freight on those trucks should be able to be processed within the Canberra airport freight hub during the 23:00-06:00 hours. Freight can still be sorted and put on pallets and loaded on to the aircraft ready for take off at 06:00 – it is only the aircraft movements that should be curtailed to between 6am and 11pm.
- The curfew should allow emergency flights, such as emergency landings, and medical evacuations, and VIP aircraft and Heads of Government to land and take-off during those hours.

This submission contains a brief overview of our concerns. We would be happy to discuss these in further detail if required, and can be contacted via the details below.

Yours sincerely
Shane Rattenbury MLA

shane.rattenbury@parliament.act.gov.au
ph (02) 6205 0005

ACT Greens submission to Canberra International Airport Preliminary Draft 2008 Master Plan

The ACT Greens wish to make it clear that we do not oppose the existence of the Canberra International Airport and nor do we oppose expansion of its services. However, we wish to see these completed:

- within the context of a national sustainable transport plan;
- under the aegis of a planning regime at least equal to that which applies to the rest of Canberra;
- under a regulated curfew from 11 pm to 6 am, except for emergencies; and
- in the context of a Climate Change Strategy which both reduces and offsets greenhouse gas emissions.

1. Aviation Growth

The Scale of the Proposed Expansion

The authors share Canberra Airport Group's concern that public debate be well-informed, and based upon a realistic assessment of likely aircraft traffic. We take at face value the projections included in the 2008 Master Plan. According to this document:

The long-term practical capacity of Canberra International Airport's existing runways (with extensions to Runway 12/30) has been assessed as 282,119 fixed wing aircraft movements per annum. This assessment was compiled by Rehbein-AOS Airport Consulting in 2005 using international models for airport capacity assessments derived using the US Federal Aviation Administration Capacity and Delay Model as detailed in the US FAA Advisory Circular AC150/5060-5 *Airfield Capacity and Delay* ... Ignoring any effect on Canberra due to Canberra serving demands of the Sydney basin, **it is projected that this capacity will be reached between 2050 and 2060**. However, with the constraints upon Sydney Airport and the significant demand growth in the Sydney basin, and particularly given the population growth in the Sydney-Canberra Corridor, additional traffic is likely to shift to Canberra, bringing forward the date at which Canberra Airport in its current configuration will reach capacity. (pp. 48-49, emphasis added)

To put this estimate into some perspective, 282,119 aircraft movements would entail an average of one aircraft movement every 1 minute and 52 seconds. That is, an average of less than four minutes between each aircraft flying 'in', and each aircraft flying 'out'.

The Master Plan also includes projections for annual aircraft movements between now and 2027/28. By 2027/28, the Master Plan forecasts a low range estimate of 136,209, a medium range estimate of 149,425, and a high range estimate of 180,551 (p. 43). Macintosh and Downie (2008) of the Australia Institute consider the mid-range forecasts within this second set of estimates to be "conservative", since they do

not factor in growth due to overflow from Sydney airport. This is more than double current flight numbers, and is of concern.

We note that CIA strives to be an international airport within the next 2-3 years, but we don't believe it is feasible to maintain a regular flight to any particular overseas destination as the market is too small, rather we see that Canberra is best operated as a predominantly domestic airport. There may be occasions when international flights are feasible, but experience indicates that on a regular basis, they fail to be economical. The ACT Greens don't think that international flights to leisure destinations are viable from Canberra, especially given that Canberra can't even justify a direct link to Hobart at this stage. Comparing the CIA with the Adelaide airport is misleading, as Adelaide has a much larger population. In terms of the Federal Government commencing customs, immigration and quarantine services in the next financial year, these only need to be put in on a part-time basis, when/if flights occur. It would be a waste of Federal funding to put these officers in CIA full-time.

We note that there has been growth in direct flights to Adelaide, Brisbane and Melbourne, as people are choosing to fly direct, rather than via Sydney and/or Melbourne. At the same time, due to flight costs, freeway development, and the resulting lowering of travel time there has been a drop in air travel to Sydney. A high speed rail would see this drop further. The Greens consider this a good outcome in terms of greenhouse emissions, which we will discuss later in this submission. Furthermore, we disagree that CBR airport will see the widebody aircraft predicted on p. 7 as the regional population does not warrant passenger traffic of that order. In terms of the targets for regional and domestic routes, we don't consider most of the proposed destinations likely, with the possible exception of occasional trips to the Gold Coast in winter.

Comments on p.58, outlining a potential training school and aviation college are contradicted by comments on the decline of general aviation.

In terms of the terminal, we do agree that the number of carousels available is insufficient.

There are many references to Tiger being encouraged to start Canberra services, obviously this will be amended, now that services have actually started.

Flight paths and runways

Due to the current configuration and length of the second runway, it is likely that flight paths will remain as they are.

We do not support the proposal to extend the 12/30 runway, as it would bring about noise sharing proposals. We note that the Airport is opposed to noise sharing, and we agree with this principle. The High Noise Corridor should not be widened.

The proposal to introduce a parallel runway does not seem necessary, and we do not support it, as it would bring about a wider flight path corridor, and hence more areas would be subjected to noise.

As will be noted later, there is evidence that a certain amount of noise is being experienced by suburbs outside the flight path, and we regret the Airport's trivialisation of these concerns.

The establishment of an ILS on Runway 17 should be prioritised.

2. Community Consultation

Objective 1 of the Detailed Development Objectives lists "working with the community to ensure appropriate land uses under flight paths". We wonder whether the campaign against the proposed Tralee development constitutes "working with the community".

Page 23 notes that the Preliminary Draft Master Plan reflects "a recognition of local views". The refusal to institute a curfew, however, does not back this up. Noting that this is only a Preliminary Draft, there is ample opportunity for CIA to move towards a curfew, or at least restrict any aviation growth to outside of 11pm – 6am.

We note that consultation is currently undertaken with the community through the Canberra Airport Noise Consultative Forum, however, we wonder how much of the community's concerns are taken up through this process.

Appendix 2 shows a list of organisations which were offered pre-consultation meetings, however, we note that community organisations were not included through this process. In future processes, we would hope that interest groups such as the Gungahlin Community Council, the Conservation Council of the South East Region and Canberra, the North Canberra Community Council, the Jerrabomberra Residents' Association, the Planning Institute of Australia and the Griffin Society were included too.

3. Noise

We strongly agree that aircraft noise is an issue for our community. Comments on p.59 stating that Majura Ridge provides a natural separation between the airport and North Canberra do not reflect the reality of the situation. This separation may seem large from the air, but on the ground the noise travels over the ridge, in the saddle between Mt Ainslie and Mt Majura into Hackett very clearly, especially early in the morning when there is little background noise. Readings from a house in Hackett (in summer, on the front porch) have been consistently around the mid 60's dBA. It is unacceptable that current acceptable noise levels are measured inside with the windows closed and a photocopier going. That is not how the average person at home, especially in summer, lives. Air Services Australia needs to change its methodology to ensure that outside noise readings are also taken, as we don't want to end up in a situation where every house near the flight path needs to get all windows double glazed to block out the noise, especially since it would require them to spend their lives indoors.

To avoid noise sharing, we oppose the proposal to extend the cross runway, as it would have unacceptable impacts on neighbouring communities. Future development aside, for the sake of current residents of Canberra and Queanbeyan, particularly Jerrabomberra, we need a curfew now.

Externality Costs Associated with Aircraft Noise

Increases in noise pollution impose costs upon the community at several levels. Canberra Airport Group has not conducted any research into the likely magnitude of these costs: they expect others to bear them, however high they might be. Indeed, it denies that aircraft noise adversely affects any Canberra residents, despite the clear evidence to the contrary presented earlier in this report. In this section, we provide a list of the adverse consequences of aircraft noise, in order to reinforce the case that their impact must be studied, and residents must not simply be left to bear these costs. We would also like to draw attention to Dr Murray May's report for the North Canberra Community Council (2008), which examines these issues in more depth.

1. Aircraft noise has a significant adverse impact upon human health. This has been documented by the World Health Organisation (2001), and the Department of Transport and Regional Services (2000).
2. Land affected by aircraft noise can be expected to decline in value.
3. Residents affected by noise are likely to have to engage in 'defensive spending': i.e. increased insulation, double glazed windows.
4. Aircraft noise creates more general, intangible reductions in the quality of life of affected residents.

All these costs are magnified for night noise, as this imposes the greatest inconvenience, and therefore the greatest adverse health effects, reduction in land values, need for defensive spending, and general reductions in quality of life. The ACT Greens would prefer that these costs be minimized, or that they not arise in the first place. As these costs are greatest when noise is experienced at night-time, we support a legislatively imposed curfew from 11pm to 6am.

However, if the airport expansion is to go ahead without a curfew, at the very least those who would profit from such an expansion (i.e., Canberra Airport Group) should meet these costs. Accordingly, we call for a comprehensive study to be conducted into the externality costs imposed upon residents, and for these costs to be paid to residents in the form of compensation which would vary according to the frequency of aircraft movements, the intensity of the noise audible from each location, and the time of day during which it is experienced.

We understand that these costs will be significantly lower for Canberra residents than for some other communities affected by aircraft noise, such as some Sydney suburbs. For this reason, we extend our call for compensation to all those affected by aircraft noise, and not just Canberra residents. However, if this is not enacted as an Australia-wide policy, there is no principle of justice that would imply it should not be enacted in the ACT: just because costs are unfairly imposed upon one group does not mean that they should also be imposed upon another.

If compensation is not made available to noise affected residents, effectively the airport will be gaining financially at the financial cost of residents. Indeed, even with compensation, intangible reductions in quality of life will still be imposed upon

residents, and for this reason a curfew is necessary to prevent aircraft movements occurring when they are most damaging.

Curfew-free status/ Freight hub

On page 8 we note that CIA maintains that it is the only airport between Melbourne and Brisbane without a curfew. However, this does not reflect the fact that only freight on VIP 747 and A380 may land in the future – not passengers. We do not accept that Canberra should necessarily be able to continue curfew-free, and as such do not accept that we should become a night-time passenger and freight hub. It is not acceptable for night noise to be moved to Canberra. We understand that at some times it would be necessary for Canberra to be used as an alternative landing site to Sydney, but this should be reserved for emergency purposes only, as **Canberra is not close enough to Sydney to be a viable second runway.**

We do not agree that a curfew would make being a hub for time-sensitive freight impossible, as freight could still be landed by 11pm, and sent out at 6am. We understand that time sensitive/ just in time systems can cope with 12 hours delay. In terms of jets being hush-kitted to meet regulatory requirements, they would still be too noisy for night conditions in the Majura Valley. We also don't believe that the airport has the infrastructure to be able to treat international freight at this stage, as a despatch centre and hangar are not currently available. We also note that John D. Kasarda states that "41% of the value of world trade already goes by air...", however, we understand in terms of volume that this is actually extremely small.

We do not wish to limit CIA's capability of running a freight hub, however, we believe that it should be operated within the constraints of a curfew from 11pm to 6am.

Regional hub/ multi-modal transport hub

The ACT Greens acknowledge that there is potential for the airport to be serviced by a long-distance rail hub as set out in the Canberra Spatial Plan. We support the development of a high-speed rail network into Canberra, acknowledging that the development that would occur along the rail corridor will present challenges in terms of planning and environmental and social impacts. Although we support the development of rapid rail from Sydney to Canberra, we consider that rail that could deliver in less than 80 minutes would be too costly, as well as being a high greenhouse gas emitter. However, we don't think that the high speed rail would act as a catalyst to significantly increase flights to Canberra by international tourists.

We do not support the airport being a bus and coach hub as it is too far from the city centre. At present there are very few public transport options from the airport to the city, especially cheap ones. It is likely that a taxi fare from the airport into the city, or any other destination would cost more than the bus fare from Sydney, thus making it an unattractive travel option. The bus terminal should stay in the city.

We believe that the best transport option is light rail from the airport, through Russell and the parliamentary triangle into Civic and that it should be funded by the airport,

the Commonwealth and the ACT Government. The airport could take leadership on this and indicate that there is some commitment to sustainable transport systems.

We support Canberra being used as a base for regional or national airlines, and as an aircraft maintenance centre, however, note that positioning empty aircrafts would be costly.

We agree with the need to have a transport hub between road, rail and air, however, this should not come at the expense of additional noise at night for local residents. Night aircraft movements should be restricted to emergency use only. We don't consider a 24 hour passenger service, nor freight hub, to be viable – economically nor in terms of community support. **We would like the 24 hour use of the airport to be limited now.**

The Greens do not believe that Canberra is the optimum location for such a centre. We believe that a concerted effort to develop a sustainable transport plan for Canberra might come up with an altogether different scheme, and this is what we will encourage the Federal Government to do, in the context of an effective Climate Change Strategy.

We are unclear as to whether the right to operate on a 24 hour basis is entrenched in the lease, but maintain that a curfew from 11pm to 6am would allow a window of 7 hours for people in the area to sleep.

We note that Objective 10 of the Detailed Development Objectives is to “Adopt best available technology to improve all-weather utilisation of the Airport”. We agree that this is of utmost importance, especially given the foggy conditions in Canberra winters. If this equipment were to be installed, planes could land in zero visibility conditions at their scheduled times, there would be no need to shift flights to night-time. **We would like to see this objective prioritised and made an urgent condition for the upgrade of airport facilities,** in line with the Terminal upgrades. Indeed, as part of your response to my submission, I would be interested to know why the airport has delayed the installation of this equipment.

4. Business and retail hub

We note that CIA is promoting itself as a specialist tax-free trade zone, however, with the advent of Free-Trade Agreements, this is no longer a valid argument, and hence is not a business advantage.

Planning

The general aviation area currently includes the new Airport fuel farm. Although this is a modern underground facility, for safety and security purposes it would be better if it were moved away from public areas.

In terms of the Spatial Plan, we agree that transport and employment links between Civic and the Airport need to be given high priority. However, we would have preferred that Canberra had not been presented with this as a *fait accompli*, but had some say over development which required it.

Retail and Business Development

Proposed and existing retail and business development at the airport has not been planned with consideration to potential impact on other town centres or activity nodes in Canberra and Queanbeyan.

We acknowledge that the airport conforms to the National Capital Plan, which it is no longer required to do. However we are confident that the level of development encompassed by the Airport Draft Masterplan was never envisaged when the National Capital Plan was approved.

When office development first began on site, it was permitted on the basis that it was specifically airport related. Clearly the notion of what is ‘airport related’ has broadened immeasurably since then. The list of existing and anticipated development including defence industry, general office, business parks, retail, accommodation, conference, hotel, personal services, community facilities, horticulture, nurseries and recreation implies a significant and potentially indiscriminate impact on other local development and activity.

While it didn’t appear to us that the NCA took the social and economic impact of such development on the wider Canberra region community sufficiently into account, there was at least the opportunity to do so.

Of course, we are concerned that the Airport is no longer required to have its developments approved by the National Capital Authority.

Finally, we are also very strongly of the view that any development at the airport needs to also satisfy local planning requirements, and that the Canberra community that will be affected by developments have some real influence over the outcomes.

We note the positive commitments to sustainable building design, particularly buildings such as the Canberra Airport Headquarters, but find no reference to mandatory standards for future development. It would appear that the Brand Depot retail buildings are way short of environmental best practice and have no reason, apart from some statements in the Plan, to believe that future development will not be similarly deficient.

We are aware that many employees of Government departments who work at Brindabella business park are not happy that they need to travel so far, that there is no effective public transport system, and that they cannot enjoy the benefits that most other public service workers have in Canberra of a convenient work place.

Building more shops and recreation activities at the airport for the sake of the workers who are trapped there by their work is back to front development.

The same thing is true of the associated road works. Fairbairn Ave was developed in such a way that it can never expand beyond two lanes. While that decision – made by the NCA – might well reflect consultation with Campbell residents at the time, it makes no sense in the context of the growing level of activity at the airport. Similarly, the proposed extension to Monaro Highway (when it comes) will help Gungahlin

commuters - who use Majura Road to access Fyshwick, Parliament and Russell. In the meantime however, the Airport's retail and other developments that connect to Majura Road add to their tedious traffic problems.

Requiring the Airport to comply with a planning regime that ensures orderly and staged development is essential. The problem is not unique to the Canberra Airport, and this issue has been raised nationally by the Local Government Association among others. However, to argue, as the Federal Government did in the past, that because the Perth Airport didn't need to comply with NCA requirements neither should the Canberra Airport is ludicrous.

It is the ACT Greens' view that the Department of Transport should talk with the ACT Government and the NCA about a process to pull the airport back into the local planning framework.

5. Heritage

The area of Fairbairn (North East) precinct of the Canberra Airport is heritage-listed with the National Trust, and damage and demolition from development by the Canberra International Airport is listed as a threat. This is a concern, especially given the very few planning controls that the Airport has.

We are also concerned by the proposal to clear a small indigenous cultural site on the South-Eastern corner of the Airport site.

6. Roads and Traffic

The peak-hour congestion around the airport is of significant concern. The developments around Brindabella Park have exacerbated the situation, and we note that there have not been cycle paths extended from Russell to the Business Park. We agree that there is urgent need to upgrade the roads around the airport, but are extremely concerned that Pialligo Road is being widened into Pialligo, thus forcing the removal of the visual corridor and noise buffer of large trees abutting housing in Pialligo. We certainly hope the cycle paths are part of each of the road improvements surrounding the airport.

We note that pick up and set downs create kerbside congestion at the terminal during short peak demands, and ask that this demand be catered for, as it is inefficient and frustrating if cars have to circle the area repeatedly to make a quick drop off. Generally the traffic flow and parking arrangements have been poorly designed to date, but hopefully this will be rectified in the current redevelopment.

7. Grasslands

We note that the Airport's natural temperate grassland is a very significant area in terms of habitat for the endangered species Eastern Earless Dragon and the Golden Sun Moth. This is not the place for a long discussion of the Grassland Management Plan, so here we keep our comments to the context of planned developments.

The notable major issue is the road planned to the North of the airport which will link Majura Road to the Northern end of Fairbairn. This will cut straight through this significant area of grassland, further destroying necessary habitat. **We oppose this road in its current form.** It must be noted that, although roads do not take up a lot of space physically, often such scars on the landscape can be enough of a barrier for a small rodent or reptile to cross, as being caught in the middle of the road leaves them open to predation.

The best way for this area of grassland to be protected would be in conjunction with ACT Government Grassland and species specific Action Plans, and as such, we would like to see the Airport sign a Memorandum of Understanding or similar Protocol with the ACT Government.

The Foreword of the Grassland Management Plan states that the Plan has been endorsed by the Department of Environment and Heritage, however, we can find no record of this, but would be pleased to receive a copy of any endorsement or agreement.

8. Externality costs

The 2008 Canberra International Airport Preliminary Draft Master Plan contains no independent assessment of the externality costs that will be imposed upon the community if the airport is to expand. This represents a severe shortcoming: not only does the airport seek to impose these costs upon the community, but it refuses to calculate their likely magnitude.

This section seeks to redress this lack of openness and accountability by providing a mix of qualitative and quantitative information concerning the likely magnitude of these costs. It begins with an assessment of the likely greenhouse emissions that will be caused by expanding the airport, and concludes with a discussion of the impact of increased aircraft noise upon Canberra residents. Throughout this section policy recommendations are included to eliminate or limit these costs, or to compensate the community that has to bear them. We recognise that such suggestions fall outside the scope of the consultation process surrounding the Master Plan. However, they are included in order to present a set of necessary conditions which should be met for an expansion of the airport to even be considered by policy makers. In the absence of such conditions, the ACT Greens outright oppose the expansion of the airport as detailed in the new Master Plan.

Increases in Greenhouse Emissions

The severe threats posed by anthropogenically induced climate change are well understood, and need little reiteration here. Suffice to say, many experts have found that the situation may well be more serious than earlier predicted. To quote the recently released Garnaut Climate Change Review Interim Report:

Developments in mainstream scientific opinion on the relationship between emissions accumulations and climate outcomes, and the Review's own work on future "business as

usual” global emissions, suggest that the world is moving towards high risks of dangerous climate change more rapidly than has generally been understood. (Garnaut 2008 p. 4)

Australia Institute Projections

In January 2008, The Australia Institute released a paper calculating the likely increases in greenhouse emissions that would be caused by the proposed expansion of the Canberra Airport. Their figures are based upon the mid-range estimate of emissions by 2028 listed above, and the airport's predicted that “long-term practical capacity” will be reached by 2050. They find:

- Domestic passenger-related emissions are projected to increase by 297 per cent, rising from 117,000 tonnes of carbon dioxide equivalent (t CO₂-e) in 2005 to 465,000 t CO₂-e in 2050.
- International passenger-related emissions are projected to be 187,000 t CO₂-e in 2025 and 3.14 million tonnes (Mt) CO₂-e in 2050.
- By 2025, aviation emissions are projected to account for nine per cent of the Territory’s total emission allowance under the ACT Climate Change Strategy.
- By 2050, aviation emissions are projected to be twice as large as the ACT’s total emission allowance, accounting for 216 per cent of its permitted emissions. (Macintosh and Downie, 2008)

Macintosh and Downie argue that these represent conservative projections: they are based upon a low “uplift factor” of 1.7. (An uplift factor is used to calculate the climate effects of non-carbon dioxide emissions.) It should not be necessary to detail the dire consequences of allowing such growth in emissions to proceed. As Macintosh and Downie point out, by 2050 this would make it impossible for the ACT to achieve its emissions reductions targets, even if the rest of the economy produced no emissions whatsoever!

This paper is attached for your information.

The ACT Chief Minister's Response

In a press release dated 21/01/2008, the ACT Chief Minister argued that aviation does not, and should not, fall within the ACT's Climate Change Strategy. He argues:

The ACT’s emission reduction target was developed to be compatible with those adopted by other states and territories, with Federal Labor’s election policy and those in the European Union,” Mr Stanhope said. “None of these targets address aviation emissions in the manner suggested by the Australia Institute Report. For the ACT to ignore international practice and adopt an expensive and complex monitoring system for the comparatively few air-kilometres travelled within the ACT’s small airspace would be impractical. (Stanhope 2008)

Although the authors recognise that the ACT does not have jurisdiction over the content of the Master Plan under the Airports Act, we will address this line of argument in anticipation of it being made by others.

To address Mr Stanhope's more minor concern, there is no need for expensive monitoring equipment to calculate greenhouse emissions caused by aircraft using Canberra Airport. The Australia Institute report demonstrates that information concerning the number aircraft movements and their destinations is all that is required to estimate emissions.

Mr Stanhope also raises the more substantive objection that aviation does not form a part of the ACT's Climate Change Policy. This is a dangerous policy. If climate change policy is to have any effect, either at the territory level or nationally, it will need to restrict the usage of greenhouse gas emitting transport (whether via taxes, a permit system or direct regulation). If aviation is excluded from such a scheme, it will gain a competitive advantage relative to other forms of transport, and reductions in emissions in the other transport sectors will just be swallowed up (at least to some extent) by increases in the aviation sector. To argue that aviation is not a part of existing climate change policy, and therefore we do not need to worry about its expansion, is short-sighted: any coherent response to global warming will need to address the issue. If the expansion of the airport is goes ahead at the level desired by its owners, the political difficulties associated with imposing responsible targets after the fact will be significantly increased, as owners of the airport will no doubt fight to secure the profitability of their capital investment.

An expansion of Canberra Airport will lead to an increase in Australia's net emissions

Such a large expansion in capacity at Canberra Airport would only be sustainable in the context of large reductions in aircraft traffic at other terminals. The Preliminary Draft Master Plan does not argue that this is either likely or desirable. However, if it were true that an expansion in Canberra Airport's capacity would lead to an equal or greater reduction in traffic at other terminals, this would be a point standing in its favour.

Such an outcome is improbable. The closest the Preliminary Draft Master Plan comes to making such a suggestion is in the context of Canberra Airport becoming "Sydney's second airport" (p. 52). However, it is important to remember that if Canberra airport were to become a destination for Sydney bound passengers or freight, this would not mean that aircraft movements at Sydney or any other terminal would be likely to be reduced. Indeed, the Master Plan refers frequently to the 'healthy' state of demand for aviation across Australia. With Sydney Airport sitting at or near full capacity, to the extent that Sydney freight and passenger services did use Canberra Airport, this would simply be soaking up excess demand. Moreover, an expansion of capacity at Canberra Airport would have a price effect, tending to create an expansion in overall demand for aviation.

There is no way around it: an expansion in air traffic at Canberra Airport will lead to a net increase in Australia's greenhouse gas emissions.

Recommendations for Changes to the Master Plan

At present, no mention is made within the Master Plan of greenhouse gases, aviation emissions, or the airport's role in increasing the probability and likely severity of climate change. The ACT Greens believe the Federal Minister responsible should require the airport either to fund independent research into the likely increase in emissions the proposed expansion will cause, or accept the findings of Macintosh and Downie (2008), and publish them within the Master Plan. At present, the airport asks the community to accept a plan which does not even calculate the likely environmental impact it will impose, let alone propose sustainable emissions targets.

The authors are also concerned that the proposed expansion might serve a political purpose against the interests of the community. A key concern of environmental movements concerns the shape of a future greenhouse emission trading scheme (which may or may not explicitly include airports). The general, defining features of emissions trading are now well understood, and will not be repeated here. However, a crucial issue that has received less attention concerns the perverse incentives that a scheme may create *in advance* of the adoption of a specific carbon trading regime.

A suggestion advanced by some would see carbon permits allocated under a system of 'grandfathering'. Under such a scheme, polluters would be allocated rights to continue to emit greenhouse gases in proportion to their 'baseline' emissions. Unfortunately, even the mere possibility of such a scheme being enacted creates perverse incentives for polluters to increase their emissions, so that when the 'baseline' year arrives they will be allocated a larger share of rights. For this reason, the authors oppose the implementation of a scheme that includes 'grandfathering', and call upon government to rule it out.

Interestingly, the recently released interim Garnaut Climate Change Review Interim Report (2008) also comes out against handing out rights to pollute for free. However, the Federal government has not yet publicly endorsed this finding. At the very least, the ACT and Australian Greens will be calling upon governments to send a strong signal that recent increases (or planned future increases) in pollution will *not* entitle polluters to a greater allocation of carbon credits. This could be done by announcing that pollution increases will not be counted towards a future allocation from this date forward.

In the absence of such government action, we call upon Canberra Airport Group to guarantee that it will not use increases in emissions under the new Master Plan to secure a larger share of carbon permits. If the airport were both to increase emissions, and then use this as a basis for the sort of rent-seeking activity described above, it would be a double impost on the community and the atmosphere.

More generally, the Federal government needs to examine whether *any* substantial increase in total aircraft movements is compatible within Federal emissions targets. If an increase is not possible, then regulation or taxation needs to be considered as an interim measure (before the implementation of a carbon trading scheme) to stop the creation of 'white elephant' infrastructure, and the associated political difficulties with reducing emissions to a responsible level once the infrastructure has been put in place. In the absence of a publicly available, independently conducted study into this question, approval for Canberra Airport's Master Plan should at least be delayed until its feasibility can be examined against the arrangements put in place for an Australian emissions trading system.

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