



AUSTRALIAN
AIRPORTS
ASSOCIATION

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AAA submission to the Alternative Commonwealth Capabilities for Crisis Response Discussion Paper

The Australian Airports Association (AAA) is pleased to provide this submission to the Department on its *Discussion Paper on Alternative Commonwealth Capabilities for Crisis Response* (the Discussion Paper).

The AAA is the national voice for airports, representing the interests of more than 340 airports and aerodromes across Australia. These airports house more than 500 aircraft available for aerial firefighting and significant fixed and rotary-wing aeromedical assets that allow airports to facilitate over 6000 aeromedical evacuations a year. The AAA also represents more than 150 corporate members supplying products and services to airports and the aviation industry.

The AAA notes the Discussion Paper's key theme of reducing reliance on the Australian Defence Force (ADF) for domestic crisis response. Airports have a long history of ADF usage, in both war and peace. Many present-day airports began life before or during World War Two as military airfields. Today, airports still host ADF flight movements, with the AAA facilitating payment of landing fees from the Department of Defence to airports for using airfields and other infrastructure.

In terms of natural disasters, airports and the aviation industry face a range of threats from extreme weather events, including strong winds (particularly crosswinds), thunderstorms, heavy rainfall, extreme heat, tropical cyclones, hail, smoke and dust storms.¹ An example of these increasingly common weather events included September 2023's restrictions to flight operations at Sydney and Melbourne airports from strong winds with cascading cancellations and delays across the national aviation network.

The AAA makes the following comments regarding the Discussion Paper:

Critical capacities and capabilities: For airports to support Australian governments in meeting the challenges from Australia's evolving strategic environment, the Commonwealth needs to develop a stable, long-term funding program for aeronautical and other critical infrastructure at regional and remote airports to better enable aviation-led responses to natural disasters and other crises. For example, appropriate funding to upgrade and maintain regional and remote airports to support a sovereign fixed and rotary-winged aerial firefighting capability is consistent with Recommendation 8.1 in the report of the Royal Commission into National Natural Disaster Arrangements.²

¹ S Browning, T Mortlock and R Crompton (2020), 'Weather-related flight disruptions in a warming world', Risk Frontiers Newsletter, Vol. 19, Issue 3. Accessed on 8 September 2023 at: <https://riskfrontiers.com/insights/newsletter-volume-19-issue-3/>

² Royal Commission into National Natural Disaster Arrangements (2020), *Report*, p. 223.

Most Australian airports are owned by local governments, with ownership transferred from the Commonwealth in the 1980s and 1990s under the Aerodrome Local Ownership Program (ALOP). Many local government airports have difficulty raising capital for airport infrastructure upgrades due to limits on borrowing, low rate bases and competing infrastructure demands at regional councils.

Prior to the pandemic, AAA research indicated the declining state of regional airport infrastructure was compounded by an annual \$17 million maintenance 'deficit', equating to a \$170 million shortfall in essential infrastructure and maintenance funding at regional airports over the 10 years to 2025-26.³ Part of the infrastructure deficit at regional airports is the cyclical challenge occurring every 10-15 years as runways and taxiways reach the end of their operating life, requiring resurfacing and reconstruction. These projects are usually the highest cost capital investments at regional airports and are often unaffordable for local government airport operators without both Commonwealth and State/Territory government funding.

The pandemic accelerated the maintenance deficit as local governments deferred or reprioritised spending to maintain and upgrade aviation assets. The Australian Local Government Association's (ALGA) *National State of the Assets 2021* report indicated local government-owned airport assets in Poor condition have increased from \$155 million (5% of the total local government airport asset base) in 2017 to \$414 million (13% of the airport asset base).⁴ Deterioration of the local government airport asset base has come at a time when the Commonwealth Government ended both its grant funding streams for upgrading infrastructure at regional airports (Regional Airports Program) and remote aerodromes (Remote Airstrip Upgrade Program) during FY22-23.

Larger, non-council owned 'mid-sized' airports in capitals and large regional centres also face these pressures, particularly General Aviation (GA) focused 'metro' airports, which often host emergency response aircraft and support facilities. While having a larger revenue base than local government-owned airports, their different ownership structures (superannuation funds and property trusts) and the need to deliver commercial returns through a balance of non-aeronautical and aeronautical development can often complicate capital raising for aeronautical upgrades.

Growth of this 'infrastructure deficit' for airport infrastructure through the effects of natural disasters is another critical challenge to maintaining an effective national disaster response capability. 'Hardening' airport assets against the effects of extreme weather and other hazards is vital to ensure initial and ongoing response efforts can be conducted safely and effectively.

The experience of airports in the Northern Rivers region of NSW during the flood events of February and March 2022 is indicative of the effects repeated natural hazard events have on aviation infrastructure.

- The region's regular public transport (RPT) airport at Ballina-Byron was out of action for several days on each occasion due to flood waters affecting runway, apron and hardstand pavements and water inundation of the terminal,
- In Lismore, the region's 'satellite' GA airport was effectively destroyed twice after the airfield was repeatedly flooded and filled with debris, washing away perimeter fencing, inundating and damaging key electrical systems such as airfield lighting, navigational equipment and airport control systems.

'Metro' airports are also vulnerable to severe weather events, particularly flooding. The Sydney basin's multiple flood events during 2022 affected the 'metro' airports of Bankstown and Camden on several occasions:

- At Camden, floodwaters washed away fences and undermined aerodrome pavements from flood inundation,
- Bankstown airport also faced significant, repeated flood damage to taxiways and other pavements.

³ Acil Allen Consulting (2016), *Regional Airport Infrastructure Study: Report to the Australian Airports Association*, p. 25.

⁴ AAA analysis of: Australian Local Government Association (2021) *Australia's Local Government 2021 National State of the Assets – Technical Report*, October. Accessed on 13 September 2023 at: <https://alga.com.au/category/publications-and-submissions/state-of-the-assets/>

The experience of airports from the recent series of natural disasters leads the AAA to view targeted Australian Government funding support to ‘harden’ aeronautical infrastructure at ‘metro’ and larger regional airports hosting aerial crisis response capabilities would be a worthwhile investment to improve national crisis response capacity and capability.

Recommendation: The Australian Government develops and delivers a grant funding program to support disaster resilience and recovery operations by co-funding upgrades to essential aeronautical infrastructure at key urban, regional and remote airports.

Key pressure points or challenges for responding to competing and concurrent crises: A key challenge for responses to competing or concurrent crises is logistical support, both for immediate emergency responses, but also for sustainment of communities in crisis zones. This is particularly the case in remote Australia. The reliance on airborne logistics places a focus on fit-for-purpose aerodrome infrastructure, not only for runways and taxiways to accommodate fixed and rotary winged assets, but also for hardstands to manage higher than usual requirements for aircraft parking, refuelling and replenishment of other consumables.

The 2023 floods in the Kimberley region of Western Australia demonstrated the reliance of remote areas in northern Australia on aviation infrastructure and services during a crisis, utilising either through ADF or civilian assets. As an example, Broome airport’s role in managing the aviation aspects of the Kimberley flood response included a mix of ADF and civilian aircraft undertaking:

- aerial evacuation of casualties and endangered populations,
- fly-in of emergency supplies and equipment (such as fuel, food and essential medicine),
- sustainment of emergency service personnel and equipment, and
- resupplying affected communities and other locations isolated by extreme weather events.

While the Civil Aviation Safety Authority (CASA) regulations allow the ‘overloading’ of airfield pavements in some circumstances⁵, pushing pavements beyond their design capacity more rapidly degrades the pavement, requiring earlier remediation. Examples of this from recent years include:

- Merimbula airport, an RPT and GA airport on the NSW South Coast was a critical hub during and after the 2019-20 bushfires, supporting the aerial firefighting response and evacuation and repatriation of the region’s residents with ADF and civilian aircraft.
- Ballina-Byron reopened to RPT airport after the 2022 Northern rivers flood events, but with significant restrictions on the ability of heavy commercial aircraft to use the airfield with concerns around post-flood pavement stability.

Once the emergency ends, the cost of renewal of crisis damaged assets falls to the airport owner, even if the damage to the asset was not caused by the airport. Funding to replace or repair these assets can be difficult for local governments to fund, given other calls on local government funds to repair disaster-affected transport and other infrastructure.

Previous Australian Government disaster relief and response funding has not necessarily focused on rehabilitating essential infrastructure such as airports. The former National Recovery and Resilience Agency’s Disaster Recovery Funding Arrangements relied on state or territory government determining levels of assistance required, including funding for reconstruction of essential public infrastructure. Airports account for around \$3 billion of local government assets but make up less than 1% of the total asset base.⁶ This means airports often miss out as local governments prioritise restoration of other infrastructure such as roads and bridges.

Targeted funding for asset renewal of aeronautical infrastructure at airports either affected by a crisis or rapidly depreciated by a crisis response would be a significant support from the Australian Government to ensure the national aviation network remains in a state of good repair.

Recommendation: The Australian Government provides ‘asset renewal’ funding to help make good damage to airfield pavements and other aeronautical infrastructure either from natural disasters or during a crisis response.

Improved response and recovery from national-level crises: The ability for airports to remain open and operational amid broad scale regional or national-level crisis is essential to support aviation-based response and recovery efforts. Hardened airfield and safety-critical infrastructure (e.g., airfield lighting) is part of the solution, along with broader precinct level works including:

- flood barriers and obstacle removal,
- facilities to supply electricity and potable water,
- rest and shower facilities for aircrew and ground staff, and;
- safe storage for aviation fuel and other essential supplies (e.g., fire retardant chemicals).

The AAA is the recipient of a grant from the NSW Government to develop a natural disaster preparedness strategy for airports in NSW March 2024. The grant funding has a particular emphasis on identifying appropriate investment in ‘hardened’ airfield infrastructure that is resilient to a range of natural hazards and provides an aviation-based capability to improve crisis response and recovery in NSW. Extension of a state-based strategy to a national level could provide a template to governments for investment in infrastructure to maintain a resilient national aviation network for both commercial and emergency flights.

Recommendation: The Australian Government funds a national strategy identifying airports vital to managing natural disasters and other crises to better guide investment and provide resilient, hardened airfield infrastructure.

What changes are necessary to deliver the capabilities and capacity to manage concurrent crises?

A more systematic approach to basing, maintenance and sustainment of fleets of civilian fixed wing and rotary wing emergency management aircraft should also guide the development, funding and delivery of an appropriate network of maintenance and support infrastructure across Australia. Not only will this enable higher levels of aircraft availability, but it will also enable rapid deployment of assets to attack bushfires, floods and other natural disasters.

To achieve this more systematic approach to managing the national fleets of emergency management aircraft, there needs to be a more complete understanding of the locations of natural disasters and other crisis events to guide development of project selection and infrastructure investment to provide the right level of capability and appropriate levels of capacity to manage concurrent crises.

Other comments: The AAA also wishes to make additional comments on the issues facing the resilience of airports under a range of crisis situations where ADF support may not be available:

- The role of government in crisis telecommunications. During the 2022 northern NSW flood events, Ballina-Byron airport, the main crisis response airport in the region lost its telephone, internet and radio capabilities from floodwaters. This required the ADF to set up a separate satellite-based telecommunications network to enable disaster recovery operations. In the absence of the ADF, what local, state or Commonwealth agencies have the capability to stand up a crisis telecommunications network.
- Accelerated implementation of Satellite Based Navigation (SBN) capabilities at airports to assist in airborne response and recovery efforts. This is important when ground-based navigation aids and equipment become unserviceable because of extreme weather events or other crises, particularly for uncontrolled airspace in large areas of regional or remote Australia.
- Ensuring resilient, all-weather road access to airports is essential to support and maintain aerial disaster response capabilities, particularly in regional Australia. During the eastern Australia flood events of 2022, road closures meant safety critical staff had to be helicoptered into airports and often had to remain on-airport in makeshift shelters on the airport for days with minimal catering and showering/sleeping facilities, leading to fatigue. This also meant the transfer of relief staff from civilian emergency response agencies (e.g., NSW State Emergency Service and Rural Fire Service) and critical relief freight (recovery

and relief plant and equipment, medical and blood supplies) had to be brought in by fixed wing assets rather than by road.

- Pre-positioning aviation fuel, diesel fuel and other consumables ahead of crises, along with their replenishment will need to be considered. Experience from airports during the 2019-20 Bushfires, floods in Northern NSW and Murray-Darling Basin in 2022 and the Kimberley cyclone events in 2023 showed that disaster related closures of roads and highways meant resupply of fuel became difficult, with some road freight operators unable to operate into declared flood zones. Lessons learned from the Northern NSW floods were used during floods along the Darling River in Western NSW, with additional fuel tankers pre-positioned at airports as floodwaters moved downriver.
- Effective management of airspace during crises is also important. During the 2019-20 Bushfires, the ADF deployed military air traffic control (ATC) assets to safely manage the large numbers of aircraft using Bairnsdale airport during firefighting operations in East Gippsland. During the 2022 Northern NSW floods, many airport operators needed was required. Due to well-documented shortages of Airservices Australia air traffic controllers, many airport operators needed to manage congested airspace, which was a major safety concern during periods of low visibility. If military ATC support cannot be counted on in future crises, civilian ATC assets from Airservices Australia may be required to control large volumes of ADF and civilian aircraft working in affected areas to prevent closing of airspace and maintain safe operations around airports and in danger zones.

The AAA appreciates the opportunity to contribute to the Discussion Paper. Should you have any further questions regarding the AAA's response, [REDACTED]

Yours sincerely

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