



BRISBANE FLIGHT PATH COMMUNITY ALLIANCE

**BFPCA Submission to the 100-day Review of Brisbane 2032
Olympic and Paralympic Games Infrastructure**

10 January 2025

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Executive Summary

This submission by Brisbane Flight Path Community Alliance (BFPCA) to the 100-Day Review of Brisbane 2032 Olympic and Paralympic Games Infrastructure highlights critical community concerns and provides evidence-based recommendations to ensure the Games leave a positive legacy for Queensland. Brisbane's communities have suffered severe noise pollution and health impacts since the opening of Brisbane Airport's New Parallel Runway in 2020. This submission focuses on six key issues:

1. **The Case for a Curfew at Brisbane Airport:** A night-time curfew is essential to safeguard community health and wellbeing. Brisbane remains one of the few major Australian cities without this critical protection, despite overwhelming evidence of the severe health impacts of night-time aircraft noise. The Sydney 2000 Olympics were the most successful ever and had an airport with a curfew.
2. **Unchecked Development Using the Olympics as Justification:** The Brisbane 2032 Games must not be a vehicle for fast-tracking poorly considered infrastructure projects. Past failures, such as the New Parallel Runway, highlight the need for rigorous evidence-based assessment and genuine community engagement to prevent harm.
3. **Olympic Village at Northshore Hamilton:** The proposed site is among the worst in Brisbane for aircraft noise pollution. Housing elite athletes in such an environment risks international embarrassment, undermining Brisbane's reputation and duty of care to its guests.
4. **The Case Against Delivery Drones and Air Taxis:** The introduction of Advanced Air Mobility (AAM) without proper community consultation will exacerbate Brisbane's noise and environmental challenges. AAM projects must be suspended until comprehensive impact assessments are conducted and clear governance frameworks are established.
5. **Banning Lead-Based Avgas:** The Queensland Government must ban leaded aviation fuel, a major source of airborne lead pollution. This aligns with global best practices and supports Brisbane's commitment to a sustainable, health-focused legacy.
6. **Governance:** The submission also advocates for stronger governance mechanisms to ensure meaningful community consultation. Existing engagement fora are inadequate, operating as "engagement theatre" without delivering real influence. BFPCA proposes establishing an independent community oversight body with enforceable accountabilities to integrate community concerns into Games planning.

BFPCA calls on the Queensland Government to act decisively to address these issues, prioritising the health, wellbeing, and sustainability of Brisbane's communities. By taking these steps, the Government can ensure the Games deliver not just sporting success but a lasting legacy of positive urban development and community trust.

Brisbane, 10 Jan 2025

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About BFPCA

With the launch of Brisbane Airport's New Parallel Runway on 12 July 2020 came a new airspace design and flight paths that concentrate aircraft noise over densely populated residential areas.

Brisbane Airport and Airservices Australia sold this project to Brisbane communities suggesting the New Parallel Runway will enable them to prioritise "over water" operations that direct planes away from residential areas. The CEO Gert-Jan de Graaff is [on the record](#) saying, "the net effect of aircraft flying over the city will decrease."

Brisbane families and communities are suffering from excessive noise pollution and associated health and related impacts from Brisbane Airport's new flight paths launched in July 2020. The Aircraft Noise Ombudsman report, the Brisbane Airport PIR Advisory Forum (BAPAF) and flight path design consultants TRAX International have all confirmed that Brisbane communities were misled using flawed noise modelling, deceiving community engagement, and offered inadequate noise abatements.

Brisbane Flight Path Community Alliance (BFPCA) came together in 2020 to fight back on behalf of all Brisbane families and communities experiencing this noise pollution.

For more information about BFPCA and our community advocacy work, visit: <https://bfpca.org.au/>



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1. The Case for a Curfew at Brisbane Airport

The case for a night-time curfew at Brisbane Airport aligns directly with the Terms of Reference for the 100-Day Review, which emphasise the importance of balancing the Brisbane 2032 Olympic and Paralympic Games' infrastructure needs with long-term community wellbeing, environmental sustainability, and governance. As the review assesses infrastructure deliverability, legacy impact, and integration with transport systems, addressing the severe and ongoing impacts of aircraft noise pollution across Greater Brisbane is essential.

A night-time curfew represents a critical measure to ensure that Brisbane's infrastructure planning prioritises community health, sustainable urban growth, and alignment with international best practices. By considering a curfew, the review can provide a legacy of protection for affected communities while supporting Queensland's long-term development and the successful delivery of the Games.

Brisbane's accommodation stock is widely dispersed as opposed to other cities, such as the Gold Coast, whose accommodation is more concentrated in tourist hubs. This dispersed pattern, coupled with the low volume of stock available in the city will mean 'spill over' accommodation through other means (through short stay accommodation booked via apps such as Airbnb and Stayz) will further disperse visitors across the city. This dispersal will increase visitors' exposure to Brisbane's aircraft noise crisis, negatively impacting their impression of Brisbane and diminishing the value of hosting the games.

Far from an economic barrier, a curfew at Brisbane Airport will address this problem by enabling economy-boosting aviation into Brisbane while safeguarding both the health of our residents and the enjoyment of visitors to our region, encouraging repeat visits. The Sydney Olympics in 2000 was hailed as the most successful ever by the International Olympic Committee President, Juan Antonio Samaranch, and **it achieved this while the city's airport had a curfew.**

Protecting Communities from Night-Time Aircraft Noise Pollution

Night-time curfews on aircraft operations are widely recognised as an essential community protection instrument to mitigate the harmful impacts of noise pollution. Globally, numerous airports have implemented night-time curfews to balance economic growth with the health and well-being of local residents. In Australia, federally legislated curfews exist at Sydney, Adelaide, Essendon, and the Gold Coast airports. It is high time Brisbane followed suit to address the growing public health crisis stemming from unchecked night-time aircraft noise pollution.

The Legacy of Misrepresentation and Broken Promises

Prior to 1988, Brisbane's Eagle Farm Airport operated under a night-time curfew, which was removed based on Brisbane Airport Corporation's (BAC) assurance that aircraft would prioritise "over water" flight paths to reduce noise over residential areas. This promise was reiterated in the 2007 Environmental Impact Statement (EIS) and Major Development Plan for the New Parallel Runway (NPR) project. BAC misleadingly claimed that the NPR would reduce the number of residential areas exposed to noise exceeding 70 dB(A) at night. Instead, the NPR's opening in 2020 has resulted in a significant increase in noise complaints, affecting hundreds of thousands of Brisbane residents across 220+ suburbs including LGAs of Brisbane, Logan, Moreton and Redlands.

The flawed 2013 review into the need for a curfew, conducted by a committee dominated by tourism industry representatives, dismissed community concerns.¹ It falsely asserted that the NPR would "significantly reduce aircraft noise" during potential curfew hours and framed a curfew as an

¹ <https://bfpc.org.au/37-curfew/>

“expensive and irreversible solution” to a non-issue. This review lacked community representation and was based on factually incorrect assumptions, undermining its credibility.

The Human Cost of Night-Time Aircraft Noise

The escalation of night-time noise pollution in Brisbane has led to severe health consequences for affected communities. Chronic exposure to aircraft noise has been linked to increased risks of cardiovascular disease, sleep disturbance, mental health issues, and impaired cognitive development in children.² The World Health Organisation recommends a maximum night-time aircraft noise level of 40 dB, yet many Brisbane suburbs endure levels exceeding 70 dB, with some even reaching 85 dB.

BFPCA’s 2024 community survey³ reveals that 74% of respondents report their mental health has deteriorated over time since their exposure to aircraft noise started. Alarmingly, this has required the Australian Government’s intervention, instructing Airservices Australia to establish a dedicated mental health and suicide counselling hotline for affected Brisbane residents—a stark acknowledgment of the severity of the issue.

International and National Precedents for Curfews

Night-time curfews are not only feasible but are a proven measure to safeguard public health while supporting sustainable economic prosperity. Sydney Airport’s legislated curfew, for instance, restricts operations between 11 pm and 6 am, effectively balancing community well-being with the airport’s operational needs. Brisbane deserves the same level of protection. As Australia’s third-largest city, it is internationally embarrassing for its residents to endure levels of night-time noise pollution that have been deemed unacceptable elsewhere in the country, and in the countries of many of our future Olympics’ visitors.

Rebuttal of the Cost of a Curfew

The following additional rebuttal of BAC’s economic figures prepared by Queensland Economic Advocacy Solutions (2024 Senate Inquiry Submission #49) has been kindly prepared by **ARC Laureate Fellow Professor John Quiggin**, University of Queensland (his original submission #3⁴):

QEAS Submission to Senate RRAT Committee Inquiry into Aircraft Noise: Response

Prof. John Quiggin, University of Queensland

The purpose of this response is to note that the data present in the QEAS submission is consistent with the conclusion that the imposition of a curfew and capacity caps on Brisbane Airport would yield benefits to Brisbane residents substantially in excess of the costs imposed on air travellers.

Curfew

As shown in Figure 1, the number of flights by hour of day occurring between 10pm and 6am averages around 2,000 (2018-29), less than 10 per cent of the total. These flights could be

² <https://bfpca.org.au/health-study/>

³ <https://bfpca.org.au/survey2024/> and <https://bfpca.org.au/survey2022/> and <https://bfpca.org.au/community-survey/>

⁴ <https://www.aph.gov.au/DocumentStore.ashx?id=07e7f3fc-5855-4304-91c0-e4b3df75974f&subId=754188>

accommodated during lower demand periods: 6am – 8am, 8am – 10pm, 11am – 5pm, without exceeding existing caps.

Freight

Again as shown in Figure 1, most flights during the proposed curfew hours are carrying freight. Other freight carriers (trains and heavy trucks) make substantial efforts to minimise disturbance associated with night-time operations. By contrast, Brisbane Airport Corporation's strategic plans involve expansion of 24-hour freight operations (see also Section 8 – Aerotropolis – turning Brisbane into the Detroit of Australia).

If, as a result of the poor design decisions associated with the construction of the second runway, it is impossible to pursue this strategy without substantial noise impacts, then BAC, rather than Brisbane residents, should bear the costs.

Given the inability of BAC to manage noise associated with its operations, it would be preferable for freight operations to use other airports in SEQ, such as Wellcamp, which is a dedicated cargo airport, or to use alternative modes such as rail.

Growth projections

The growth projections on which the QEAS submission is based take no account of the very weak growth in air transport observed in recent years. More importantly, they imply no role for democratic decisionmaking about transport policy. The view implicit in the QEAS submission is that demand for the services of Brisbane Airport should be met at all costs, regardless of disamenity and health impacts on Brisbane residents.

Size of the affected population

Aircraft noise will have different effects on different people living under the flight path. Everyone will be affected to some extent, some more so than others. Nevertheless, the suggestion that it is impossible to estimate welfare effects displays an ignorance of the vast international literature on the topic of hedonic pricing, including analysis of the cost of airport noise.

Supply and demand analysis

The QEAS analysis in Figure 9 is correct as far as it goes, but needs to be completed with an analysis of welfare effects. A standard welfare analysis shows that the net reduction in economic welfare is given by $0.5 (P1 - P2)(Q1 - Q2)$. To explain this, observe that the consumers deterred from flying will be those for whom the benefit of the flight is less than $P2$ (otherwise they would still fly) and greater than $P1$ (otherwise they would not fly even in the absence of restrictions). There are $Q1 - Q2$ such passengers, and their average value for the flight is $0.5 (P1 - P2)$.

We can quantify this for the case when the number of flights is reduced by 10%. That is $(Q1 - Q2) = 0.1 Q2$. The associated difference in willingness to pay, given by $(P1 - P2)$, depends on the elasticity of demand. Typical estimates are close to 1, that is a 10% price change is associated with a 10% quantity change.

The standard formula then shows that the loss in economic welfare is approximately equal to 0.5% of the initial revenue $P1 Q1$. As noted in my previous submission (#3), this would be of the order of \$10 million per year, a tiny fraction of the economic loss associated with aircraft noise.

Conclusion

Throughout this process, the position of Brisbane Airport Corporation and the consultants it employs has been to assume that the operations of the airport are so essential that no restriction can be justified, and that the economic and health impacts on Brisbane residents should be disregarded. This is no different from the position taken by other polluting industries prior to the passage of Clean Air and Clean Water acts. The data supplied by QEAS shows that the economic impact of appropriately designed restrictions on airport operations would be modest.

BFPCA Addendum:

BAC—through QEAS—present a narrowly scoped Economic Impact Analysis (EIA). Forsyth et al. (2021)⁵ argue that, “**EIA does not address the problem [how to evaluate investments in airports] satisfactorily, and it misleads air transport policy.**” But this evaluation contrasts sharply with practice. EIA has been extensively used to decide on airport investment.” They recommend the use of a proper Cost–Benefit Analysis (CBA) or a more extensive and detailed Computable General Equilibrium (CGE) model.

In the following, we also refer the Review Committee to Chapman, A. (2023). *Losing Altitude: The economics of air transport in Great Britain*. New Economics Foundation.
<https://neweconomics.org/2023/07/losing-altitude>

Why increasing levels of air travel won't lead to growth in UK productivity or GDP

<https://www.aef.org.uk/2023/07/17/why-increasing-levels-of-air-travel-wont-lead-to-growth-in-uk-productivity-or-gdp/>

17 July 2023

Aviation reports by the industry and Government almost always begin with a statement about the supposed economic benefits of air travel. But up-to-date, independent evidence to substantiate these claims has been lacking. Old statistics, when repeated regularly enough, are prone to being accepted without further question.

Economic arguments are often used to justify an increase in noise and emissions, especially when it comes to airport expansion plans. With 2023 bringing a fresh round of airport applications to increase capacity, the Aviation Environment Trust provided funding for the New Economics Foundation to analyse whether these claims can be substantiated.

NEF's [report](#), released today, is the first comprehensive analysis of the economic costs and benefits of the UK air travel sector since the government published the Aviation Policy Framework a decade ago. It was peer-reviewed by the respected economist John Siraut, and casts doubt on many of the aviation industry's key claims.

Analysis shows the boom in air travel since 2015 has failed to increase UK productivity or GDP growth, while business use of air travel – a key argument for expansion – has declined by 50% since 2013. Similarly, air travellers spend £32 billion more abroad than foreign travellers spend when visiting the UK. NEF argues this compounds regional inequality and damages the domestic tourism sector.

Job creation could compensate for some of these impacts, but even before the pandemic, at a time of record passenger numbers, jobs in the air transport sector had declined since 2007. In fact, NEF's assessment shows that the sector is one of the poorest job creators per pound of revenue, with wages lower than they were in 2006.

The Government's Jet Zero strategy aims to deliver a net zero emissions air travel sector by 2050, but allows for unlimited growth in flying. It forecasts over 200 million more passengers a year by 2050 and at least nine airports across the UK have permission or are currently [attempting to expand](#). There have been numerous studies questioning whether the aviation industry will be able to meet its net zero goals without reducing growth in air traffic and the Climate Change Committee has argued that there should be no further airport

⁵ Forsyth, P., Niemeier, H.-M., & Njoya, E. T. (2021). Economic Evaluation of Investments in Airports: Recent Developments. *Journal of Benefit-Cost Analysis*, 12(1), 85–121.
<https://doi.org/10.1017/bca.2020.31>

expansions in the UK until the Government has developed a 'capacity management framework'.

The NEF report recommends that the Government pause all growth in air travel, including airport expansions, until it has conducted a comprehensive, independent review of the economic evidence of expanding the UK's air travel sector, and the compatibility of air transport growth with policies on climate change, levelling-up, and domestic tourism.

Dr Alex Chapman, senior researcher at the New Economics Foundation (NEF), said:

"For years, this government has let the air travel industry balloon in size, based on dangerously outdated claims that it is boosting the UK's economy. The reality is declining business air travel, declining wages for air travel workers, declining job numbers, and declining domestic tourism spending in the UK. And that's before you consider the rise in noise, air pollution and dangerous emissions driven by UK airports. So who exactly is benefitting from ever more air travel? You needn't look much further than the highly paid executives, the private shareholders, and the wealthy minority of ultra-frequent flyers."

Cait Hewitt, Policy Director at the Aviation Environment Federation, said:

"The question of whether or not airports should expand is often assumed to be about balancing environmental harms against economic benefits. This new analysis suggests we should think again; while flying definitely causes harm in terms of noise and emissions, it's uncertain if it actually brings any economic benefits. Obviously, people benefit from going on holiday, but policies that support British tourism and leisure – rather than increasing travel abroad – would be good for the UK economy as well as the climate."

Read the full report here: <https://www.aef.org.uk/uploads/2023/07/Losing-altitude-The-economics-of-air-transport-in-Great-Britain-.pdf>



Figure 1: Chapman, A. (2023). Losing Altitude: The economics of air transport in Great Britain. New Economics Foundation. <https://neweconomics.org/2023/07/losing-altitude>

A Moral and Legal Imperative

Reinstating a night-time curfew at Brisbane Airport aligns with the Queensland Government's commitment to prioritising the health and well-being of its citizens. It is a necessary step to rectify the failures of past governance, including BAC's broken promises and the inadequacies of the 2013 curfew review. A curfew would also uphold the principles of environmental justice, ensuring that economic growth does not come at the cost of community health and quality of life.

The case for a night-time curfew at Brisbane Airport is compelling and urgent. It is supported by international best practices, a robust body of scientific evidence on the health impacts of noise pollution, and the lived experiences of Brisbane communities. The Queensland Government must act decisively to legislate a curfew, providing long-overdue relief to thousands of residents and affirming its commitment to a sustainable and equitable future for all.

2. The Olympics as a Carte Blanche for Unchecked Development

The Brisbane 2032 Olympic and Paralympic Games present a generational opportunity to deliver infrastructure that benefits both the Games and Queensland’s long-term development. However, there is growing concern that the Games are being used as a carte blanche to fast-track infrastructure projects and development proposals without sufficient evidence to justify their necessity or assess their long-term impacts on the community. This approach risks sidelining community voices and ignoring critical evidence about the potential social, economic, and environmental consequences of poorly planned projects.

The rush to approve infrastructure under the guise of Games-readiness raises serious questions about the rigour of the decision-making process. Key elements of the 100-Day Review include ensuring value for money, legacy benefits, and alignment with long-term planning objectives. However, without robust evidence to support the need for certain developments, there is a risk that projects may prioritise short-term objectives over enduring community benefits, exacerbate existing challenges such as noise pollution, and impose unnecessary financial and social costs.

Example

The Brisbane 2032 Olympics are being touted as a once-in-a-lifetime opportunity to transform the region, but they also risk being used as a cover to push through poorly considered and highly disruptive infrastructure projects. The New Parallel Runway (NPR) at Brisbane Airport is a cautionary example: promised to reduce noise and impact on communities, it has instead created some of the worst noise pollution in Australian aviation history. Now, the Olympics are being wielded to justify the expansion of aviation operations without first addressing the legacy of harm caused by the NPR.

Mr Elliott [Tourism and Events Queensland]: *“Looking ahead to 2032 and the Olympics and Paralympic games, there is significant opportunity to attract visitors to Queensland and disperse them across the state. This is not only an opportunity to develop more international services into Queensland but it has the potential to expand the interstate and intrastate domestic aviation networks.”*⁶

BFPCA disagrees. This is unsubstantiated and doubtful at best.

We refer the Review Committee to the submission by Professor Sara Dolnicar.⁷

We also draw attention to this post-Olympics 2000 analysis by Hensher & Brewer (2002):

“The anticipated Olympic flight bonanza did not happen, with over 60% of initial bookings, more than 2200 flights, cancelled. Domestic tourism was the major casualty with 800 flights cancelled over the Games’ 14-day period. The optimism in January 2000 when there were bookings for 3700 flights evaporated to 1400 flights. Almost all the cancelled flights were domestic, with the initial bookings of 3150 reducing to 2300. International flights and business jets were as expected at 330 and 220 respectively. On the peak incoming days—15 and 15 [sic, 16] September—bookings fell from 958 and 949 to 899 and 873.” (p. 387)⁸

The BFPCA has documented systemic issues in the governance and approval processes for infrastructure linked to the Games, including a lack of genuine community consultation and

⁶ 2024 Senate Inquiry, Brisbane Hearing, Hansard Excerpt (p. 36): Tourism and Events Queensland

⁷ <https://www.aph.gov.au/DocumentStore.ashx?id=9a8be4ee-b257-4e2a-b495-e0e3f13b048e&subId=755274>

⁸ Hensher, D. A., & Brewer, A. M. (2002). Going for gold at the Sydney Olympics: How did transport perform? *Transport Reviews*, 22(4), 381–399. <https://doi.org/10.1080/01441640110121112>

transparency. The Games entities and Brisbane Airport Corporation (BAC) continue to prioritise economic growth over public health and environmental sustainability, ignoring the lessons from international examples where unchecked aviation growth has been curtailed to protect communities.

End Taxpayer Subsidies to Profitable Airlines

The Queensland Government's *Attracting Aviation Investment Fund (AAIF)*⁹ was established to stimulate tourism and economic growth by supporting new international flight routes. However, the Senate Inquiry revealed that these subsidies have enabled 54 night-time flights each week, exacerbating aircraft noise impacts on Brisbane's communities. This is particularly troubling given that many of the recipient airlines, such as Qatar Airways, have posted record-breaking profits exceeding billions of dollars. Queensland taxpayers should not be subsidising highly profitable international airlines while local communities bear the brunt of increased noise pollution and health impacts. The government must reassess its priorities and redirect public funds towards projects that genuinely benefit the community. Ending AAIF hand-outs for night-time flights is a necessary step to align infrastructure investment with the public good and mitigate the harmful legacy of unchecked aviation growth.

The Risk of "Rubber-Stamping" Projects

The Brisbane 2032 Olympics should not serve as a blanket justification for approving infrastructure projects that fail to meet rigorous evidence-based standards. Instead, projects should be scrutinised for their alignment with long-term urban planning goals, their impact on community health and wellbeing, and their potential to deliver a positive legacy. By avoiding the mistakes of past large-scale developments, such as the NPR, Queensland can ensure that the Games leave behind a truly sustainable and equitable legacy.

It is imperative that the 100-Day Review critically examines all proposed infrastructure projects, especially those with significant community impacts like the expansion of Brisbane Airport operations and its proposed third terminal. Without this scrutiny, the Games risk becoming a vehicle for the unchecked growth of noise, pollution, and social inequity, undermining the very legacy they aim to create.

⁹ <https://bfpca.org.au/11-warchest/>



3. The Olympic Village at Northshore Hamilton: A Fundamentally Flawed Location

The proposed Olympic Village at Northshore Hamilton represents a deeply concerning decision, as it is located in one of Brisbane's worst areas for aircraft noise pollution. This will not only expose athletes to significant health risks but also undermine Brisbane's reputation on the world stage. Chronic exposure to noise levels between 70 and 90 decibels, as experienced in Northshore Hamilton, has well-documented health consequences, including sleep disruption, increased stress, and cardiovascular strain. It is unfathomable that the Queensland Government would disregard its duty of care by subjecting Olympic athletes—some of the world's most elite competitors—to such an unsuitable environment.

A Global Embarrassment for Brisbane

The world will be watching Brisbane during the 2032 Games, and housing athletes in an area plagued by excessive aircraft noise risks permanently damaging our state and government's reputation. The International Olympic Committee promotes the importance of athlete wellbeing, and providing subpar accommodation in an environment detrimental to their health and performance directly contradicts these values. Such a decision would signal to the world that Brisbane prioritises aviation profits over the wellbeing of its residents and guests, tarnishing its image as a responsible and forward-thinking host city.

Evidence of Unsuitability from BAC Itself

Ironically, Brisbane Airport Corporation (BAC) has already acknowledged the incompatibility of residential living in areas affected by excessive aircraft noise. BAC has sought to impose covenants on new urban developments near the airport, effectively gagging residents from complaining about noise impacts.¹⁰ This policy is an implicit admission that these areas are unliveable. BAC also conceded that Brisbane suburbs regularly exposed to noise levels between 60 and 70 decibels are incompatible with residential use. If these areas are unsuitable for Brisbane's residents, why are they deemed acceptable for Olympic athletes? Will BAC also impose restrictions on athletes, preventing them from publicly addressing the noise issue during the Games?

The Double Standard: Athletes vs. Residents

This double standard raises serious ethical questions. If Northshore Hamilton is unsuitable for Olympic athletes due to aircraft noise, why are the same conditions deemed acceptable for Brisbane residents? Subjecting either group to such conditions disregards human rights and health, and the Government's failure to address this issue reflects poorly on its commitment to sustainable and inclusive urban planning. It is not enough to use the Olympics as a justification for poor decision-making that ignores long-term impacts on health and community wellbeing.

The Queensland Government must reconsider the location of the Olympic Village. To avoid international embarrassment and fulfil its duty of care, the Government should select a site that guarantees a healthy and comfortable environment for athletes. The long-term legacy of the Games must reflect thoughtful planning and respect for the wellbeing of all people—residents and visitors alike. Anything less risks tarnishing Brisbane's reputation and compromising the health and performance of its most honoured guests.

¹⁰ <https://bfpca.org.au/26-covenant/>

4. The Case Against Delivery Drones and Air Taxis

Misleading Terminology and Lack of Transparency in Brisbane City Council's Urban Air Mobility Plans

Brisbane City Council's "Games Transport Legacy" strategy¹¹ introduces the concept of "Urban Air Mobility" (UAM) but avoids explicitly defining it as *Advanced Air Mobility* (AAM), which involves delivery drones, air taxis, and verti-ports. This lack of clarity obscures the true implications for Brisbane residents, keeping them in the dark about the disruptive changes such technologies would bring to their communities. By omitting terms like "drones," "air taxis," and "verti-ports," the Council risks eroding public trust and fails to engage the community in meaningful dialogue about the potential impacts.

Adverse Impacts on Community and Environment

The introduction of delivery drones and air taxis would exacerbate Brisbane's already severe noise pollution. As BFPCA has documented,¹² Brisbane residents endure noise levels exceeding 70 dB from existing flight paths. Drones and air taxis, which operate at lower altitudes and higher frequencies, will compound these issues. Frequent take-offs and landings, along with hover times, are expected to produce noise levels between 50 and 70 dB—levels deemed harmful by the World Health Organization when experienced chronically.

Noise pollution from drones has significant health implications, including sleep disturbances, cardiovascular stress, and diminished mental health. The Australian Government has already acknowledged the severe mental health impacts of current aircraft noise, evidenced by the establishment of a dedicated mental health and suicide counselling hotline for Brisbane residents affected by excessive flight path noise pollution. Expanding AAM operations without proper safeguards would only deepen these health crises.

No Social Licence to Operate

The 2032 Olympic Games are again used as a *carte blanche* to rapidly push through the deployment and rollout of drone delivery services and air taxis. It mirrors the flawed approach taken with the New Parallel Runway (NPR), where Brisbane Airport Corporation (BAC) failed to secure a social licence to operate. Community consultation was limited, flawed, and the impacts of the NPR were grossly understated. Introducing AAM without broad and genuine community engagement risks repeating these failures. The absence of public consensus or a transparent business case raises concerns about whether these technologies are being imposed by vested interests for corporate profit rather than public benefit.

Regulatory and Operational Failures

Australia's regulatory framework for aviation noise is already inadequate, and the same toothless regulations are being applied to drones. Noise abatement measures are non-existent, and current regulations lack enforceable noise limits and penalties. Airservices Australia has struggled to manage existing air traffic effectively and is ill-equipped to oversee the complex integration of drones and air

¹¹ <https://www.brisbane.qld.gov.au/about-council/news-and-publications/the-race-to-gold-brisbanes-games-transport-legacy>

¹² <https://bfpca.org.au/22-drones-air-taxis/> and <https://bfpca.org.au/drones/>

taxis into Brisbane's congested airspace. These operational challenges heighten the risk of safety breaches, privacy violations, and diminished community amenity.

Questionable Environmental and Economic Justifications

Proponents of AAM tout its environmental benefits, but these claims often focus narrowly on "last-mile delivery emissions," ignoring the broader ecological and logistical impacts of scaling drone operations. The lack of a comprehensive Environmental Impact Assessment further undermines the credibility of these environmental claims. Additionally, the purported economic benefits, including job creation and efficiency gains, remain speculative and unsubstantiated.

Recommendations

- 1. Suspend AAM Projects Until Proper Consultation is Conducted**
The Queensland Government must halt the implementation of AAM until genuine, inclusive, and transparent consultations are conducted with affected communities. These consultations should explore whether AAM is even desirable for Brisbane.
- 2. Conduct Comprehensive Impact Assessments**
Rigorous environmental, social, and economic impact assessments should be mandatory before any AAM-related infrastructure is approved. These studies must be publicly available for scrutiny.
- 3. Strengthen Regulatory Frameworks**
Amendments to aviation noise regulations are necessary to include enforceable noise limits and meaningful penalties. Robust oversight mechanisms must also be established to ensure compliance.
- 4. Focus on Sustainable Transport Alternatives**
Instead of investing in controversial AAM technologies, Brisbane should prioritise sustainable and proven transport solutions that align with community values and environmental goals.

The adoption of delivery drones and air taxis in Brisbane under the guise of "Urban Air Mobility" is fraught with risks and lacks community support. These technologies will intensify noise pollution, undermine public health, and impose significant environmental and operational challenges. The Queensland Government must prioritise transparency, accountability, and genuine community consultation to ensure Brisbane's transport legacy serves its residents, not just corporate interests.



5. Urgent Need to Ban Lead-Based Avgas

The 100-Day Review of Brisbane 2032 Olympic and Paralympic Games infrastructure includes a critical focus on long-term community wellbeing, environmental sustainability, and alignment with broader transport and mobility strategies. Lead-based aviation gasoline (avgas) poses a significant and immediate threat to these objectives. Aircraft operating with leaded avgas contribute to toxic emissions, which compromise public health, damage the environment, and tarnish Brisbane's potential to set a global benchmark in sustainable urban development and the IOC's obligation for the 2032 games to be climate-positive. The Queensland Government must take decisive action to ban all lead-based avgas to align with the Review's aims and deliver a healthier, more liveable city for both residents and visitors.

The Dangers of Lead-Based Avgas

Leaded avgas remains the largest source of airborne lead emissions in Australia, posing severe health risks to communities living near airports.¹³ Scientific evidence confirms that even low levels of lead exposure can result in serious health issues, including reduced cognitive function, developmental delays in children, cardiovascular problems, and increased risks of kidney and brain damage. The World Health Organization (WHO) has categorically stated that there is no safe level of lead exposure.

Brisbane communities, particularly those near Archerfield Airport and Brisbane Airport, are directly exposed to harmful lead emissions from light aircraft using leaded avgas. These emissions persist in the air, soil, and water, creating long-lasting contamination that disproportionately affects vulnerable populations such as children, elderly residents, and individuals with pre-existing health conditions.

International and Domestic Precedents for Banning Leaded Fuel

Globally, the phase-out of leaded fuels has been recognised as a vital public health measure. The United States, Europe, and several other regions have implemented stringent restrictions or outright bans on leaded avgas. In Australia, however, lead-based avgas remains in widespread use despite the availability of safer, unleaded alternatives such as UL91 and G100. According to the Australian Petroleum Statistics, **69.8 million litres of avgas were sold in Australia in 2023, resulting in the release of 39 tonnes of lead into the environment, primarily around airports.** The Queensland Government has an opportunity to lead the nation by banning lead-based avgas, setting an example for other states to follow and protecting its residents from avoidable harm.

Environmental and Reputational Costs

The continued use of leaded avgas undermines Brisbane's efforts to position itself as a sustainable, world-class city for the 2032 Games. Lead emissions contaminate local ecosystems, harming wildlife and degrading air and water quality. This environmental damage is incompatible with the sustainability principles outlined in the Review's Terms of Reference. Moreover, Brisbane risks international criticism and reputational damage for failing to eliminate a known public health and environmental hazard, potentially overshadowing its role as an Olympic host city.

¹³ <https://bfpca.org.au/lead/>

The Queensland Government's Responsibility

The Queensland Government has both a moral and legislative duty to protect its residents from harmful pollutants. Banning leaded avgas would:

- **Safeguard Public Health:** Reduce lead exposure for communities near airports, preventing health conditions linked to lead toxicity.
- **Promote Environmental Sustainability:** Align with global best practices in environmental stewardship by eliminating a key source of lead pollution.
- **Support Brisbane's Legacy Goals:** Strengthen the city's commitment to a sustainable and liveable future, ensuring the Games leave a positive legacy.

The 100-Day Review offers a timely opportunity for the Queensland Government to demonstrate leadership and commitment to its citizens by banning lead-based avgas. Such a decision would align with the Review's core goals of fostering long-term community wellbeing and environmental sustainability while positioning Brisbane as a forward-thinking, health-conscious city. The time to act is now—to protect Brisbane's communities, enhance its global reputation, and secure a safer, healthier future for all.



6. Better Governance: Embedding Community Concerns in Games Infrastructure and Planning

The existing community engagement fora, such as the Brisbane Airport Community Aviation Consultation Group (BACACG) and the Airport Advisory Board (AAB), have failed to deliver genuine community representation and influence. These bodies operate as "engagement theatre," where the appearance of consultation masks the absence of meaningful dialogue or action. Key decisions, including those affecting flight paths and aircraft noise mitigation, continue to prioritise aviation industry interests over the health and wellbeing of Brisbane's communities. Such governance arrangements lack the necessary accountability and authority to address community concerns effectively.

Governance Reform: Establishing Genuine Community Engagement

To align with the 100-Day Review's Terms of Reference and the principles of equitable and sustainable urban development, the governance framework for the Brisbane 2032 Games must prioritise genuine community engagement. This requires creating ongoing governance mechanisms with clear mandates, enforceable accountabilities, and the power to influence decision-making. Specifically:

1. Independent Community Oversight Body

- Establish an independent body tasked with overseeing the integration of community concerns into Games planning and infrastructure projects.
- Ensure this body is chaired by a representative from the affected communities and includes experts in public health, environmental sustainability, and urban planning.
- Grant the body decision-making authority over key issues, including noise abatement measures, transport connectivity, and land use planning.

2. Mandated Community Consultation

- Require comprehensive and transparent community consultation processes for all major infrastructure projects related to the Games.
- Ensure consultations are independently facilitated, inclusive, and conducted in multiple formats to reach a broad audience.
- Publish consultation outcomes, including how community feedback has influenced final decisions, to ensure accountability.

3. Community Impact Assessments

- Mandate independent community impact assessments (CIAs) for all major projects, with a focus on noise, health, and environmental impacts.
- CIAs must include input from affected residents and propose actionable mitigation strategies, with implementation overseen by the independent oversight body.

4. Regulation of Aviation with the Same Rigor as Roads and Infrastructure

- Implement a robust regulatory framework to govern the operation of aircraft, including drones and air taxis, mirroring the level of oversight applied to road transport and other critical infrastructure.
- Enforce noise limits, establish curfews, and set clear penalties for non-compliance, ensuring the skies above Brisbane are managed sustainably and equitably.

- Introduce real-time monitoring and public reporting on compliance with aviation noise and safety regulations, providing communities with transparency and accountability.

These measures will ensure that the governance framework not only prioritises the voices of affected communities but also delivers tangible, enforceable protections for their wellbeing. By embedding these reforms, Brisbane can set a new standard for community-centric urban and infrastructure planning, ensuring the Games leave a legacy of trust, inclusivity, and sustainability.

Accountability and Transparency

Robust governance requires enforceable accountability mechanisms. To achieve this:

- **Regular Reporting:** Require Games-related entities, such as the Games Independent Infrastructure and Coordination Authority and Brisbane Airport Corporation, to provide regular public reports detailing their response to community concerns.
- **Independent Audits:** Conduct periodic independent audits of governance and consultation processes to ensure compliance with community engagement commitments.
- **Grievance Mechanism:** Establish an accessible grievance mechanism that allows communities to lodge complaints, with a clear process for investigation, resolution, and penalties for non-compliance.

The governance framework for the Brisbane 2032 Olympic and Paralympic Games must embody principles of transparency, accountability, and community empowerment. By prioritising genuine engagement and establishing governance arrangements with enforceable accountabilities, the Queensland Government can rebuild trust, address systemic failures in community consultation, and ensure that the Games deliver a lasting legacy of inclusion, sustainability, and improved quality of life for all Brisbane residents.



