



# Submission on the Flying Considerately Consultation Paper

Aviation White Paper Initiative #34

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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/>



## Executive Summary

This submission examines the Australian Government's *Flying Considerately* Consultation Paper (Aviation White Paper Initiative #34, February 2026). While the stated objective – to reduce noise impacts on communities through improved operational practices – is acknowledged, the proposed framework is not capable of delivering meaningful or measurable outcomes in its current form.

The consultation paper adopts a **voluntary, behaviourally oriented model**, relying on discretionary actions by pilots and operators operating under Visual Flight Rules. This approach is fundamentally misaligned with the nature of the problem it seeks to address. Aircraft noise impacts are not primarily the result of individual operational choices. They are the product of **system-level design, traffic distribution, and cumulative exposure over time**. As such, they cannot be effectively mitigated through non-binding guidance alone.

BFPCA identifies four interrelated structural deficiencies that require urgent rectification.

1. The framework is **unenforceable by design**. It introduces no binding obligations, no compliance mechanisms, and no consequences for non-adherence. Existing voluntary instruments, including Fly Neighbourly Agreements, demonstrate the practical limitations of this approach. Without enforceability, consistency cannot be achieved and outcomes cannot be secured.
2. The consultation paper **misdiagnoses the locus of control**, placing responsibility on individual pilots while leaving system-level determinants – airspace design, flight path allocation, and traffic concentration – largely unaddressed. This produces a disjunction between responsibility and authority, fragmenting accountability and constraining policy effectiveness.
3. The framework fails to engage with **cumulative noise exposure and its associated health impacts**. Community harm arises from the frequency, density, and persistence of overflights, often from multiple aviation sources operating concurrently. The paper's focus on individual flight behaviour does not address these aggregated conditions, nor does it align with the established evidence linking chronic aircraft noise exposure to adverse health outcomes.
4. The proposal lacks **monitoring, metrics, and accountability mechanisms**. No baseline conditions are defined, no performance indicators are specified, and no reporting framework is established. In the absence of systematic measurement and traceability, claims of “continuous improvement” cannot be substantiated, and no basis exists for oversight or policy adjustment.

Collectively, these deficiencies render the proposed guidance **aspirational rather than operational**. It signals intent but does not provide the instruments required to achieve or demonstrate change.

A credible policy response requires a shift from voluntary guidance to a **structured, enforceable, and evidence-based framework**, incorporating:

- enforceable noise management requirements in affected airspace;
- integration of noise minimisation into airspace design and traffic management;
- recognition of aircraft noise as a cumulative exposure and public health issue;
- development of standardised metrics, baseline conditions, and transparent reporting; and
- establishment of clear institutional accountability aligned with regulatory authority.

The issues raised in this submission are not matters of incremental refinement. They reflect a fundamental misalignment between the scale and persistence of the impacts experienced by communities and the policy instruments proposed to address them. Without structural recalibration, the *Flying Considerately* initiative will not achieve its stated objective of reducing noise impacts in residential areas.

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## Introduction

Aircraft noise is not an abstract externality. It is a sustained, intrusive condition experienced within homes, schools, and workplaces, often at intensities and frequencies that disrupt sleep, concentration, and daily life. The consultation paper, while framed as a practical initiative, does not engage with this reality at the level required. It approaches a structurally embedded problem through discretionary behavioural guidance, and in doing so, underestimates both the scale of the impact and the responsibility of government to regulate it.

Recent institutional responses have increasingly acknowledged the severity of community distress, including the provision of mental health and wellbeing support services for affected residents.<sup>1</sup> Such measures, while not without value, sit uneasily alongside a policy framework that declines to exercise the regulatory levers necessary to prevent the underlying harm. The provision of support in the absence of effective mitigation risks normalising the impacts rather than addressing them. It is not a substitute for policy intervention. **It is evidence that intervention has been insufficient.**

The current approach also misdirects responsibility. Pilots operating under Visual Flight Rules are, in the main, adhering to professional standards within a system that prescribes their operational environment. Expecting discretionary adjustments in-flight to compensate for system-level design choices places an unrealistic burden on individuals while leaving intact the structural conditions that generate the impacts. **This is not a question of goodwill or awareness. It is a question of governance.**

Submissions from across the sector, including those broadly supportive of the initiative, converge on several points of concern: the absence of measurable outcomes, the lack of monitoring and accountability, and the failure to address cumulative exposure arising from multiple sources operating within shared airspace. These are not marginal critiques. They go to the core of policy effectiveness. A framework that cannot measure its outcomes, cannot attribute responsibility, and cannot manage aggregate exposure cannot credibly claim to mitigate impact.

At the same time, the aviation environment is becoming more complex. General aviation operations now coexist with commercial traffic, rotary-wing activity, and an expanding presence of remotely piloted aircraft and drones, with further growth anticipated through advanced air mobility platforms such as air taxis.<sup>2</sup> These developments are proceeding under fragmented regulatory settings, while communities experience their combined effects as a single, continuous exposure. A guidance document confined to one segment of this system, and dependent on voluntary compliance within that segment, is necessarily partial.

The scope of Initiative 34 is currently confined to general aviation operations under Visual Flight Rules in Class G airspace. However, the operational environment to which it applies is neither static nor bounded by this category. Low-altitude airspace is increasingly shared by a heterogeneous mix of users, including rotary-wing operations, remotely piloted aircraft systems (drones), and the emerging class of Advanced Air Mobility (AAM) platforms such as electric vertical take-off and landing aircraft. These systems operate under distinct regulatory frameworks, yet their impacts are experienced by communities as a single, continuous noise environment.

This divergence between regulatory segmentation and lived experience introduces a structural policy gap. Noise exposure does not respect the administrative boundaries between aviation categories. A framework that addresses only one subset of airspace users, and does so through voluntary guidance, risks becoming progressively less relevant as new forms of aviation activity expand within the same spatial and acoustic domain.

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<sup>1</sup> <https://engage.airservicesaustralia.com/community-wellbeing-support>

<sup>2</sup> <https://bfpca.org.au/drones/>



Initiative 34 should therefore be positioned not as a discrete guidance document for general aviation, but as the foundation for a technology-neutral, whole-of-airspace approach to noise governance in low-level airspace. The core principle – that operators should minimise adverse impacts on communities where practicable – applies irrespective of aircraft type or propulsion system. Embedding this principle at a system level would enable consistent expectations to be extended across manned and unmanned operations, rather than developed in parallel and potentially inconsistent regimes.

The need for early integration is particularly acute in relation to remotely piloted aircraft and AAM operations. Current regulatory settings leave significant segments of drone activity – especially recreational use – largely outside formal noise management frameworks. At the same time, AAM systems are being actively developed, with regulatory architectures still in formation. The experience of general aviation demonstrates the limitations of introducing community impact frameworks retrospectively, after operational patterns and exposure pathways have become established. A prospective approach, incorporating noise management, community engagement, and baseline monitoring requirements from the outset, is both more effective and more efficient.

Positioning Initiative 34 in this way would allow it to serve as a coherent policy anchor for future developments in low-altitude aviation. It would ensure that the expansion of new aviation technologies does not replicate existing governance gaps, and that community impacts are addressed as an integrated system rather than as a series of disconnected regulatory problems.

The issues identified in this submission are therefore not matters of refinement. They are structural. They concern the alignment between policy intent and policy instrument, between responsibility and authority, and between the scale of the problem and the ambition of the response. Without addressing these alignments, the proposed guidance risks operating as a well-intentioned but ultimately ineffective layer within an already complex system.

The following sections set out four interrelated issues that arise from the consultation paper and propose corresponding measures required to establish a credible, enforceable, and evidence-based framework for managing aircraft noise.

## 1. Reliance on a Voluntary Framework and Unenforceable Mechanisms

The consultation paper establishes a framework premised on voluntary adoption. The proposed guidance is explicitly designed to operate without the imposition of additional regulatory or administrative burden on pilots or operators, and is to be implemented through discretionary behavioural change supported by instruments such as Fly Neighbourly Agreements.

Effectiveness is framed as contingent upon uptake, cooperation, and iterative improvement. No binding obligations are introduced. No compliance architecture is specified.

### Critique and rebuttal

A voluntary framework of this form cannot function as an effective policy instrument in a domain characterised by dispersed actors, asymmetric incentives, and externally borne costs. The absence of enforceability is not a secondary limitation. It is constitutive.

Voluntary adherence, even where normatively endorsed, produces uneven uptake, selective compliance, and rapid erosion under operational pressure. Aviation is not an exception. The sector is structurally conditioned by safety imperatives, commercial profit growth aspirations, airspace design, and training requirements. In such an environment, discretionary noise mitigation will predictably yield to operational expediency wherever tension arises. The consultation paper itself concedes this

hierarchy, repeatedly positioning safety and practicality as overriding considerations. The practical consequence is clear. **Noise considerations remain subordinate in all contested situations.**

Empirical experience with existing voluntary arrangements confirms this dynamic. Fly Neighbourly programmes, including those in long-standing operation, articulate detailed expectations regarding routing, altitude, and timing. Yet they remain unenforceable, variably observed, and readily displaced by routine operational conditions.<sup>3</sup> The resulting condition is one of formal guidance without behavioural certainty. Communities are therefore exposed not to a managed system, but to a discretionary one.

The framework also lacks the minimum conditions for evaluability. No baseline is required. No performance metrics are defined. No reporting obligations are imposed. “Continuous improvement” is invoked, yet no mechanism exists by which improvement could be demonstrated, verified, or contested. In policy terms, this renders the initiative non-falsifiable. Outcomes cannot be measured; failure cannot be established.

More consequentially, the model redistributes responsibility without redistributing authority. Pilots and operators are encouraged to mitigate impacts that arise primarily from system-level determinants over which they exercise limited control. Regulators retain control over airspace design, traffic distribution, and operational constraints, yet assume no corresponding obligation within the framework. This disjunction produces diffuse accountability. No actor is ultimately responsible for outcomes.

The cumulative effect is a policy architecture that is symbolically responsive yet operationally indeterminate. It signals intent. Yet, it is tokenistic and does not secure outcomes.

## Recommendations

A credible response requires the introduction of enforceable structure, calibrated to the scale and persistence of the impacts being addressed. The following elements are necessary.

- **Establish a baseline regulatory layer for noise management in relevant airspace.** This should include defined expectations regarding routing, altitude, and temporal sensitivity in areas of demonstrated impact, with clear criteria for when such measures are activated.
- **Introduce a compliance and accountability framework.** Monitoring must be systematic rather than discretionary. Reporting must be standardised. Outcomes (including raw data) must be publicly accessible. Without these elements, neither oversight nor trust can be sustained.
- **Require measurable performance indicators, including baseline conditions and defined targets over specified time horizons.** Evaluation should be embedded *ex ante*, not appended retrospectively.
- **Reposition Fly Neighbourly Agreements as subsidiary instruments within a regulated system.** Where such agreements exist, they should be subject to minimum standards, transparency requirements, and periodic review. Their function should be to refine, not replace, enforceable settings.
- **Assign institutional responsibility explicitly.** Agencies with control over airspace design and operational parameters should bear corresponding responsibility for noise outcomes. Alignment between authority and accountability is a precondition for policy effectiveness.

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<sup>3</sup> For example: <https://www.avsef.gov.au/sites/default/files/2022-08/documents/AvSEF%20Paper%20-%20Qld%20Fly%20Neighbourly%20Principles.pdf>

Voluntary guidance may retain a role in shaping professional norms. It cannot, in isolation, manage a distributed environmental externality of this magnitude. Without enforceable parameters and verifiable outcomes, the framework will remain aspirational. The impacts it seeks to address will not.

## 2. Misalignment Between Behavioural Framing and System-Level Determinants of Noise

The consultation paper locates the primary opportunity for noise mitigation in pilot behaviour, emphasising discretionary decisions regarding route selection, altitude, timing, and operational practices during flight. The guidance is framed as a set of practical measures that individual pilots and operators can adopt to reduce impacts on communities when operating under Visual Flight Rules, particularly outside controlled airspace.

Implicit within this framing is the assumption that noise outcomes are materially shaped by individual decision-making at the point of operation, and that behavioural modification constitutes the principal lever available to government.

### Critique and rebuttal

This framing rests on a mischaracterisation of how aircraft noise is produced, distributed, and experienced. It attributes causal weight to individual conduct where, in reality, **outcomes are overwhelmingly structured by system-level parameters.**

Aircraft noise exposure is not primarily the product of isolated pilot choices. It emerges from the interaction of:

- airspace design and classification;
- flight path allocation and segregation;
- traffic density and sequencing;
- airport location and operational patterns; and
- the spatial concentration or dispersal of movements over time.

These parameters are not determined in-flight. They are established *ex ante* through regulatory, procedural, and infrastructural decisions. Within these constraints, pilot discretion is often narrow, episodic, and subordinated to competing imperatives. Safety requirements, traffic separation, weather conditions, training objectives, and air traffic control instructions delimit the scope within which any “considerate” choice might be exercised. Where conflict arises, noise minimisation is not, and cannot be, determinative.

The consultation paper’s emphasis on behavioural adjustment therefore produces a structural displacement. Responsibility is directed towards actors with limited capacity to effect meaningful change, while those entities with decisive control over the configuration of the system remain peripheral to the framework. This is not merely an issue of emphasis. It has material consequences.

First, it **fragments accountability**. If outcomes depend on individual judgement exercised within constrained conditions, then adverse impacts can be attributed to variability in behaviour rather than to the design of the system itself. Systemic patterns become reframed as episodic deviations.

Second, it **obscures cumulative effects**. Behavioural guidance operates at the level of the individual flight. Community impact is generated at the level of aggregated movements over time and space. No amount of marginal adjustment at the level of the individual can resolve structural concentration of traffic or sustained exposure resulting from network design. (More on this in Issue #3 below.)



Third, it **limits policy ambition**. By defining the problem in behavioural terms, the range of acceptable solutions is implicitly narrowed to those that do not disturb existing operational or regulatory arrangements. Structural interventions – redistribution of traffic, redesign of airspace, or reallocation of operational capacity – are rendered conceptually out of scope.

The result is a policy that addresses symptoms at the margin while leaving underlying drivers intact. The expectation that discretionary pilot conduct can materially offset system-generated impacts is not supported by operational reality.

## Recommendations

Policy settings should be recalibrated to align responsibility with control and to target the determinants that materially shape noise outcomes.

- **Require that noise minimisation be embedded within airspace design and management processes, including the planning and review functions undertaken by Airservices Australia.** This should extend to the distribution of flight paths, the management of traffic density, and the avoidance of sustained concentration over residential areas where practicable.
- **Establish explicit obligations on system designers and regulators** to assess and mitigate noise impacts at the planning stage, rather than relying on in-flight behavioural adjustment as a primary control mechanism.
- **Introduce integrated management of traffic flows** across aviation types, recognising that general aviation operations interact with commercial and other users within shared airspace environments. Noise outcomes should be addressed at the level of the total system, not in isolated segments.
- **Define operational constraints where necessary** – including caps, curfews, scheduling controls, or spatial redistribution mechanisms – where cumulative exposure exceeds WHO defined acceptable thresholds.
- **Position behavioural guidance as supplementary**, to be applied within a framework where structural settings have already been optimised for noise outcomes. Pilot discretion should refine, not substitute for, system-level mitigation.

A policy architecture that assigns responsibility at the level of behaviour while retaining control at the level of system design cannot produce coherent outcomes. Effective noise management requires that the primary levers of change – those embedded in the configuration of the aviation system – be engaged directly.

## 3. Failure to Address Cumulative Noise Exposure and Associated Health Impacts

The consultation paper approaches noise mitigation at the level of the individual flight, framing impacts primarily in terms of amenity and community disturbance. The proposed guidance focuses on how discrete operational choices – route, altitude, timing – might reduce the effect of a given overflight, with improvement understood as the aggregate result of incremental behavioural adjustments.

The underlying model is implicitly episodic. Noise is treated as a series of events capable of localised mitigation.

## Critique and rebuttal

This framing is misaligned with both the empirical character of community exposure and the established evidence base on aircraft noise impacts. It treats as discrete what is experienced as continuous; it addresses marginal variation where the harm is cumulative.

Community impact is not determined by the acoustic profile of an isolated movement. It is produced through repetition, density, and temporal persistence. Multiple aircraft, often from different operational domains, traverse the same airspace within overlapping intervals. Exposure accumulates across hours, days, and years. The resulting condition is not one of intermittent disturbance but of sustained environmental load. This is particularly evident in areas surrounding flight training operations, where repetitive movements and training manoeuvres generate highly concentrated and persistent exposure.

Stakeholder evidence reflects this distinction. The need to differentiate between individual and cumulative impacts has been explicitly identified, as has the centrality of frequency and repetition in determining lived experience.<sup>4</sup> The consultation paper does not engage with this distinction in any operational sense. No mechanism is proposed to manage total exposure, nor to limit the concentration of movements over time and space.

The omission has direct implications for health. The effects of aircraft noise are not confined to momentary annoyance. A substantial body of evidence, synthesised in international guidance, associates chronic exposure with sleep disturbance, cognitive impairment, stress-related outcomes, and elevated cardiovascular risk. These effects arise from cumulative exposure exceeding tolerable thresholds, not from isolated exceedances. A framework that operates exclusively at the level of the individual flight cannot regulate such conditions.

The problem is further compounded by source fragmentation. Communities are not exposed to a single category of aircraft operating in isolation. General aviation movements coexist with commercial traffic, rotary-wing operations, and an expanding cohort of remotely piloted aircraft (drones, air taxis, advanced air mobility vehicles). These are governed under distinct regulatory regimes, with no integrated mechanism for managing their combined impact. The consultation paper, confined to general aviation operating under Visual Flight Rules, addresses only one component of a composite environment. The result is regulatory partiality: each source may be considered in isolation, while **aggregate exposure remains ungoverned**.

The trajectory of technological change intensifies this concern. The proliferation of recreational and commercial drone operations, many of which fall outside existing noise approval frameworks, introduces additional low-altitude noise sources into residential environments. Advanced air mobility platforms are in development, with prospective deployment in similar airspace strata. Absent a whole-of-system approach, these additions will compound existing exposures without a corresponding expansion of policy coverage.

The present framework therefore fails at the level at which harm is generated. It neither measures nor manages cumulative exposure, and it does not recognise the health-based nature of the risk. Incremental behavioural guidance, applied to individual movements, cannot resolve a structurally cumulative condition.

## Recommendations

A recalibration is required, shifting from event-based mitigation to exposure-based management, grounded in public health principles and applied across the full spectrum of low-altitude airspace use.

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<sup>4</sup> <https://bfpca.org.au/dbh/>

- Recognise aircraft noise explicitly as a cumulative environmental exposure with demonstrable health effects, and **align policy settings with established international guidance** on environmental noise.
- Develop and implement cumulative noise **metrics and thresholds**, capable of capturing frequency, intensity, and temporal distribution of overflights. These should inform both planning and operational decision-making.
- Introduce **mechanisms to manage concentration**, including limits on the frequency of movements over defined areas, controls on repetitive training activities, and spatial redistribution of traffic where sustained exposure exceeds acceptable levels.
- Establish **integrated oversight across aviation sources**, ensuring that general aviation, commercial operations, rotary-wing activity, and remotely piloted aircraft and drones are assessed within a unified exposure framework rather than in regulatory isolation.
- **Extend the principles of considerate operation**, in appropriately adapted form, to emerging airspace users, including remotely piloted and advanced air mobility platforms, to prevent the progressive expansion of unregulated noise sources.
- Require that **cumulative impact assessment** be incorporated into airspace design, operational approvals, and periodic review processes, with outcomes reported transparently.

Noise policy that does not engage with cumulative exposure will remain disconnected from lived experience and from the scientific evidence base that defines the risk. Effective management depends not on moderating individual events in isolation, but on governing the aggregate conditions under which those events occur.

## 4. Absence of Monitoring, Metrics, and Accountability Mechanisms

The consultation paper proposes that the effectiveness of the Flying Considerately guidance will be supported through voluntary monitoring, community feedback, and iterative improvement over time. It refers to enhanced awareness, improved flight planning, and the potential use of emerging technologies to assist operators and communities. No formal monitoring framework, performance indicators, or reporting obligations are specified.

The concept of “continuous improvement” is presented as a central organising principle.

### Critique and rebuttal

The framework lacks the minimum technical and institutional conditions required for evaluation, verification, or accountability. It invokes improvement while omitting the instruments by which improvement could be established.

No baseline conditions are defined. No metrics are prescribed. No reporting architecture is articulated. In the absence of these elements, there is no means to determine whether noise exposure has changed, whether guidance has been adopted, or whether outcomes differ across locations or operators. The framework is therefore non-measurable in design.

This limitation is not incidental. **It renders the policy non-operational.** A system that cannot generate evidence cannot support oversight; one that cannot support oversight cannot sustain compliance. Even stakeholders otherwise supportive of the initiative have identified the absence of measurable indicators and monitoring mechanisms as a critical deficiency.

The reliance on community feedback as a proxy for monitoring introduces further distortion. Complaint systems are inherently partial. They depend on awareness, capacity, and the labour and

persistence on the part of affected individuals. They are also constrained by traceability. A material proportion of general aviation aircraft operating in low-level airspace are not readily identifiable in publicly accessible systems, limiting the ability of communities to attribute noise events to specific operators. Where attribution is not possible, neither is accountability.

The absence of traceability has broader implications. Without reliable identification of aircraft movements:

- patterns of behaviour cannot be analysed;
- operator-level performance cannot be assessed; and
- targeted interventions cannot be designed.

The system therefore defaults to generalised guidance in place of evidence-based regulation.

The invocation of “emerging technologies” does not resolve this deficit. Without mandated adoption, standardisation, and integration into a formal reporting framework, technological capability remains latent. Data, where it exists, remains fragmented across platforms, inaccessible to communities, and unlinked to policy evaluation processes.

The cumulative effect is a framework that depends on self-reporting, anecdotal evidence, and informal feedback loops in a context that requires systematic measurement and independent verification. Under such conditions, claims of improvement cannot be substantiated, disparities cannot be identified, and adverse outcomes cannot be remedied.

A further structural limitation arises from the **absence of consistent aircraft identification capability** within the very airspace to which the guidance is directed. In Class G airspace, a substantial proportion of aircraft operating under Visual Flight Rules are not required to carry ADS-B OUT or equivalent tracking technology. As a result, many aircraft generating noise impacts in low-level airspace are not identifiable through publicly accessible systems, nor reliably traceable by regulators or affected communities.

This is not a marginal technical constraint. It is a foundational limitation on the operation of any monitoring or accountability framework. Where aircraft cannot be identified, individual noise events cannot be attributed to specific operators. Where attribution is not possible, patterns of behaviour cannot be assessed at the operator level, compliance cannot be evaluated, and targeted interventions cannot be applied. Complaint systems, regardless of their design, are thereby reduced to the recording of unverified events rather than actionable evidence.

The implications extend beyond data quality to the integrity of the policy model itself. The Flying Considerately framework relies on voluntary adherence supported by transparency and community trust. However, trust in this context is contingent upon the possibility of verification. In an operational environment where a material proportion of aircraft movements are structurally untraceable, verification is not merely difficult—it is, in many cases, impossible. This creates an asymmetry in which communities are expected to accept ongoing impacts without any corresponding capacity to establish causation or seek accountability.

The Government has separately initiated consultation on the phased expansion of ADS-B requirements for Visual Flight Rules operations. That process is relevant not only to airspace safety and efficiency, but directly to the viability of any noise management framework predicated on monitoring, reporting, and continuous improvement. In the absence of sufficient aircraft identification coverage, the core mechanisms envisaged under the guidance cannot function as intended.

A credible policy approach therefore requires explicit recognition that effective monitoring and accountability are contingent on traceability. Without it, the framework risks operating in an evidentiary vacuum, where impacts are experienced but not attributable, recorded but not verifiable, and acknowledged but not actionable.

## Recommendations

A credible policy framework requires the establishment of a comprehensive monitoring and accountability architecture, proportionate to the scale and persistence of the impacts being addressed.

- **Define a national set of standardised noise metrics**, capable of capturing both individual events and cumulative exposure. These metrics should be applied consistently across jurisdictions and operational contexts.
- **Establish baseline conditions** for affected areas, against which future performance can be measured. Baselines should be derived from verified movement and noise data, not inferred from complaint volumes.
- **Introduce mandatory reporting requirements** for relevant operators, including data on flight paths, altitudes, frequency of movements, and temporal distribution. Reporting should be periodic, standardised, and subject to audit.
- **Require aircraft traceability within monitored airspace**, through the adoption of appropriate identification technologies or equivalent mechanisms, to enable attribution of noise events and support operator-level accountability.
- **Develop a publicly accessible data platform**, integrating movement and noise data, enabling communities to understand exposure patterns and supporting transparency in decision-making.
- **Establish independent oversight arrangements**, with responsibility for data validation, performance assessment, and publication of findings, including regular outcomes reporting at a national level.
- **Link monitoring to enforcement and policy adjustment**, ensuring that identified exceedances or persistent impacts trigger review and, where necessary, the imposition of additional controls.

Without measurement, there is no evidence; without evidence, no accountability; without accountability, no effective policy. The proposed framework, as currently configured, does not meet this threshold. A transition to a data-informed, verifiable system is therefore essential.

## Bibliography

This bibliography provides the evidentiary foundation for the submission's central contention: aircraft noise is not merely an amenity issue to be managed through voluntary courtesy, but a cumulative environmental exposure with documented health harms and effects on sleep, mental health, cardiovascular health, cognition, wellbeing, and quality of life. The listed sources include authoritative public health guidance, systematic reviews, meta-analyses, longitudinal studies, exposure-response research, and policy-relevant analyses. Taken together, they show that the harms associated with aviation noise are measurable, recurrent, and serious enough to require a regulatory response grounded in evidence, accountability, and public health protection.

The publications also support the specific issues identified in the submission. They demonstrate that cumulative exposure and concentration matter more than isolated events; that chronic aircraft noise is associated with adverse health outcomes; that fairness and burden-sharing are central policy questions; and that credible governance depends on clear thresholds, monitoring, and measurable outcomes. The bibliography therefore does more than provide background reading. It substantiates the submission's critique of a purely voluntary framework, its rejection of an overly behavioural framing of the problem, and its call for a more rigorous, system-level approach to aircraft noise management.



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