

November 27, 2023

WSI Airport Airspace and flight path design
Department of Infrastructure, Transport, Regional
Development, Communications, and the Arts
GPO Box 594 Canberra ACT 2601 Australia

By email: eis.submissions@infrastructure.gov.au

**RE: Draft Environmental Impact Statement for Western Sydney International (Nancy-Bird Walton)
Airport preliminary flight paths**

The [Affiliated Insulation Industry Coalition](#) (AIIC) welcomes the opportunity to make a submission regarding the Draft Environmental Impact Statement for Western Sydney International (Nancy-Bird Walton) Airport preliminary flight paths and associated Noise Insulation and Property Acquisition policy.

The AIIC is a collective of insulation trade associations including the Australian Modern Building Alliance (AMBA), Insulation Australasia (IA) and the Insulation Council of Australia & New Zealand (ICANZ). Collectively, the AIIC represents Australian insulation manufacturers, accredited insulation installer organisations and polymers-based insulation supply chain manufacturers.

Insulation plays a significant role in the acoustic performance of buildings and will make a positive contribution to assisting residents with noise in impacted areas. It will also provide residents with secondary benefits associated with improved thermal performance, such as better health and comfort at home.

This submission reflects our endorsement of the use of insulation to mitigate noise in impacted properties and will provide advice to government on safety and quality to ensure this work proceeds successfully.

Noise Insulation and Property Acquisition policy

The AIIC calls attention to the precedent for this approach set in the *Sydney Airport Noise Amelioration Program* which ran in the 1990s. An audit of the program found it achieved objectives broadly, however, not all the original targets were achieved, particularly in the residential insulation element.¹ Suggestions for improvement included establishing performance information for cost monitoring and quality control.

The insulation industry has done extensive work on quality control in recent years, culminating in the [roadmap for quality control and safety in insulation installation](#) and associated and ongoing work to support it.

¹ Australian National Audit Office, [Sydney Airport Noise Amelioration Program: Department of Transport and Regional Development](#), 1997, p.8.

Insulation for noise reduction

The audit of the *Sydney Airport Noise Amelioration Program* noted that the lack of any quantifiable noise reduction target made it difficult to assess program effectiveness in the administration of the insulation element, or to hold contractors accountable for the achievement of specific standards of noise reduction.²

To enhance program effectiveness and accountability, it recommended:

- Development of specific measurable objectives for the noise reduction targets to be achieved in the insulation work carried out on residences under the program; and
- Publishing of performance information for the program against agreed measurable performance objectives.³

The AIIC notes that under the requirements of *AS 2021:2015 Acoustics - Aircraft Noise Intrusion - Building Siting and Construction - Australian Government*, all areas within Aircraft Noise Exposure Forecast 20 and 25 contours should have noise abatement implemented. The programs should cover residential premises, schools, childcare, early learning centers, aged care facilities and public buildings such as libraries and community centers.

Noting that the Perth airport set a target of 35 dB(A) for sleeping and 45 dB(A) for other areas, WSI should aim for similar.

Targets should be pragmatic, noting that the amount of noise reduction likely to be achieved in residences will vary according to the structure and condition of each residence, home-owner decisions on available treatment options, and (in some residences) the impact of cost constraints.⁴ However even modest reductions in noise levels can significantly improve quality of life for residents because the decibel scale is not linear - each 3 dB(A) increase is equivalent to a doubling of the noise level.⁵

Property types

The 1997 audit report noted that insulated rooms in brick residences achieved substantial compliance with indoor design sound levels determined by the applicable Australian standards of the time, with more varied results in light-weight constructions.⁶ The AIIC suggests that better outcomes could have been achieved if in addition to ceiling insulation, light-weight constructions were also given wall insulation (rather than relying on sealing doors and windows only).

² Australian National Audit Office, [Sydney Airport Noise Amelioration Program: Department of Transport and Regional Development](#), 1997, p.8.

³ Ibid, p. 13.

⁴ Ibid, p.24.

⁵ The Institution of Occupational Safety and Health (IOSH), [Sound levels and their relevance](#).

⁶ Australian National Audit Office, [Sydney Airport Noise Amelioration Program: Department of Transport and Regional Development](#), 1997, p.10.

Techniques for installing wall insulation in existing residences (brick and lightweight buildings) has improved considerably in the last ten years, with new products and installing techniques making retrofitting quick (with most residences being completed in a day) and economical.

Given this, the government should offer options for ceiling *and* wall insulation for all buildings impacted by the Western Sydney Airport to ensure they achieve appropriate noise reduction benefits.

Quality control and safety

It is the position of the AIIC that quality and safety should be paramount in *any* government program, scheme or intervention including the insulation product.

For properties eligible for insulation under the Noise Insulation and Property Acquisition policy, we recommend:

- All installers contracted to undertake insulation work hold an [EEC Certified Insulation Installer certification](#), or equivalent;
- An electrical safety inspection be undertaken by a licensed electrician prior to installation; and
- The use of insulation materials with independent third-party building product certification through the Australian Building Codes Board administered [CodeMark](#) Certification Scheme, or similar JAS-ANZ governed certification scheme.

The insulation industry is ready, willing, and available to support the government in the development of the policy as it relates to insulation and looks forward to working constructively to support environmental objectives.

Should you wish to discuss the matters raised in this submission or engage with us further, please contact our advisor, Rachael Wilkinson at [redacted] or on [redacted].

Alternatively, I am available at [redacted] or on [redacted].

Sincerely,

Jim Hall
Chair, Affiliated Insulation Industry Coalition