

2 October 2025

Aviation Consumer Team
Department of Infrastructure, Transport,
Regional Development, Communications, Sport and the Arts

Sent by email to: aviationconsumer@infrastructure.gov.au
cc: southwestactandnswairports@infrastructure.gov.au

Re: Submission to Aviation Consumer Protections Consultation Paper

On behalf of Aeria Management Group (AMG), manager of Bankstown Airport and Camden Airport, thank you to the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (Department) for the opportunity to make this submission to the Aviation Consumer Protections Consultation Paper, released in September 2025.

Our general aviation airports, in Southwest Sydney, provide essential services for communities across metropolitan and regional New South Wales, including emergency and aeromedical services and flight training. Together, our airports contribute more than \$1.8 billion a year to the NSW economy and support 9000 jobs, on-site and across the supply chain.

AMG supports the Government's objective of clarifying and strengthening aviation consumer protections, subject to the considerations detailed below. This submission provides AMG's response to the combined Aviation Consumer Protections Framework (Framework) and related primary and subordinate legislation.

Explicit exclusion of non-RPT airports from the Framework and related legislation

The Framework proposes to regulate only flights for the public transport of passengers, also known as Regular Passenger Transport (RPT) services. The Consultation Paper specifically excludes from this scope general aviation services, such as charter flights, joy flights, pilot training flights and agricultural work.

The Department has since confirmed in writing to AMG that neither the Framework nor related legislation apply to non-RPT airports, such as Bankstown Airport and Camden Airport.

Despite this, the Consultation Paper states that "it is not expected to exempt any airlines or airports from compliance requirements at this stage".

The Department should clarify this point by explicitly excluding non-RPT airports from the Framework and any related legislation, in line with the intent and scope of proposed aviation consumer protections and Government support for general aviation services, such as flight training.

Framework compliance and funding

Airport Lessee Companies (ALCs) are already subject to significant and growing government imposts, including increased charges for Airport Building Controllers and Airport Environment Officers and substantial sums in Ex-Gratia Land Tax. Such costs constrain the capacity of ALCs to invest in critical airport facilities and infrastructure. Further cost impositions risk diverting additional funds from such critical works.

Cost recovery contributions by any airport under the Framework should be variable based on the size and scope of each airport's passenger transport operations. Specifically, we endorse the Australian Airports Association's position that airports with fewer than one million public transport passengers a year should be excluded from the Framework, in line with international best practice.

Further, Airservices Australia should not be excluded from the Framework and related cost recovery provisions, given the responsibility and role of the government agency in a percentage of network delays that directly impact consumers.

Separately, the Government's proposal to recover costs from airports and airlines for dealing with ineligible complaints, referrals and general inquiries undermines the good faith commitment of the aviation industry to consumer protections. Under this proposal, airports and airlines would, for example, bear the cost of complaints mistakenly being made to the wrong party or for meritless complaints, which is unjustifiable.

Aircraft Noise Ombudsman

We note the Department is considering a full-cost recovery model for the operations of the Aircraft Noise Ombudsperson (ANO), which is primarily charged with reviewing the handling of aircraft noise complaints by Airservices Australia.

Given this primary focus of the ANO, the exclusion of Airservices Australia from any such cost recovery model is untenable, inequitable and inconsistent with the consumer protection principles put forward by the Department.

Further, any broader ANO cost recovery model imposed on airports should exclude aircraft noise complaints relating to essential emergency and aeromedical services operations, which provide critical care and support 24 hours a day.

Any ANO cost recovery model imposed on airports should also be based on a tiered system, accounting for the relative size of the airport and number of aircraft noise complaints relating to its operations.

Accessibility

We note the Government is co-designing new aviation-specific disability standards and proposes to release an impact analysis for broad consultation in the second half of 2025. We look forward to the opportunity for engagement and consultation on these standards.

We welcome further discussions with the Department on any of the matters discussed above.

Kind regards,



Tom Smith
Chief Executive Officer
Aeria Management Group