



26 Sep 2025

Contact: Airport Operations  
Our Ref:  
Your Ref: Request for Submissions

## Submission Letter - Response to Consultation Question 6

To: Aviation Consumer Protections Consultation  
Department of Infrastructure, Transport, Regional Development, Communications and the Arts

Subject: Submission on Proposed Aviation Consumer Protections Framework

Dear Sir/Madam,

I write on behalf of [Council / Airport Name] in response to the Aviation Consumer Protections Consultation Paper (September 2025). This submission addresses Primary Legislation Consultation Question 6:

"Is the role of the ACPA as proposed sufficient to protect aviation consumers and lift consumer standards, while not imposing undue regulatory burden and costs on the sector?"

### Response to Question 6

We support the introduction of stronger protections for aviation consumers. Passengers should have clear rights when flights are delayed, cancelled or baggage is mishandled. These responsibilities properly rest with airlines and charter operators, as they hold the direct contractual relationship with passengers.

Extending the framework to non-RPT and council-funded airports, however, imposes an unreasonable regulatory and financial burden without producing meaningful benefits for consumers.

Not consumer-facing: Council airports do not sell tickets or transport passengers. Their role is to maintain safe infrastructure so that operators can provide air services. Complaints about refunds, disruptions or baggage handling are matters for airlines. The consultation paper itself confirms this distinction by defining baggage as an airline service, even where airports are involved

Cost impact: Small airports operate on very limited budgets and often depend on council subsidies. New levies and compliance costs would reduce funds available for essential safety works, such as runway upgrades, firefighting and wildlife management.

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Consistency: The paper excludes travel agents and government agencies (such as Border Force and Airservices) because they do not have direct consumer relationships

The same reasoning applies to non-RPT airports.

Regional risk: Additional costs may force regional airports to reduce services or delay critical upgrades, undermining community access to air travel rather than improving consumer outcomes.

Secondary Link to Question 1

Question 1 asks if the proposed regulation of airline and airport services covers the core consumer experience. We submit that the core consumer experience is shaped by airlines and charter operators, not council airports. Including non-RPT airports extends regulation to entities that do not control passenger outcomes.

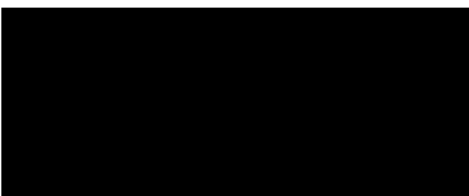
Requested Change

We recommend that the Government:

- Exclude non-RPT and council-funded airports from the framework.
- Apply obligations and levies only to airlines and charter operators who deal directly with passengers.
- If exemptions are not granted, establish a passenger threshold (e.g. fewer than one million passengers) or provide levy relief for small airports.

Conclusion

The ACPA can protect consumers and raise standards effectively if regulation is targeted at airlines and charter operators. Applying these obligations to non-RPT airports would create unnecessary burdens, divert scarce resources, and deliver no real benefit to passengers.



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