

*Office of the Mayor*

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Dear Minister

## **IMPACT OF AVIATION CONSUMER PROTECTIONS CONSULTATION ON SMALLER AIRPORTS**

Geraldton welcomes the opportunity to respond to the Aviation Consumer Protections Consultation Paper released on 8 September 2025. While we support the Government's objective to strengthen consumer protections in aviation, we are deeply concerned that the framework, as currently proposed, will impose significant, disproportionate and counterproductive burdens on smaller airports such as ours.

The majority of Australian airports are regional or remote, essential to their communities for health care, education, tourism, and economic opportunity. Yet around 60 per cent of council-owned airports operate at a financial loss each year, requiring subsidies from already stretched local governments. The collapse of Bonza and uncertainty surrounding Rex Airlines has only heightened the fragility of regional aviation. While grant programs such as the Regional Airports Program (RAP) and the Regional Airport Upgrade Program (RAUP) provide welcome short-term relief, there remains no sustainable, long-term funding mechanism to support critical works at these airports.

Geraldton is Tier 2 Airport, local government owned with 5 x RPT Bays which can take a mixture of Code C and Code E aircraft that services a mix of RPT routes and charter operations.

Also, General Aviation spread over 5 x GA bays of various sizes.

RFDS Operations (potential to be 2<sup>nd</sup> largest permanent base in WA) and defence force utilising the airport with aircraft from PC21's to KC30 (A330).

We have significant activity:

- NEXUS RPT Airline - Q400 Aircraft based at Geraldton... with overnight parking requirements.



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- International Diversion program. Agreements in place with multiple international airlines.
- RPT and Charter Services from airline carriers including Qantas, Virgin, Alliance, Marooomba and Skippers.

The airport employees seven permanent staff members including operations and administration covering operational hours from 6am to 8pm daily, but in reality, resources are required 24/7 which is a significant challenge for a regional airport. Geraldton Airport has recently awarded a tender for new security screening equipment upgrade to meet regulatory requirements - \$2.1m without any support from federal or state funding bodies. The airport made submissions to both bodies.

Geraldton Airport has developed into an international alternate diversion port, because of infrastructure works in 2019 including runway extension to 2389m. The airport is now an integral part of the national and state aviation infrastructure network and is the closest airport north of Perth capable of receiving aircraft up to and including 4E aircraft. Approximately 90% of inbound international arrivals to Perth transit overhead or in the immediate vicinity of Geraldton Airport. The infrastructure involved has constant life cycle costs to maintain operational and safety standards.

Airport security screening compliance and recent airport perimeter incursion detection and response enhancement add to the resourcing challenges of a regional airport, ironically there is no consideration of a consistent industry levy approach to support regional airports (spreading these security costs across all airports including major city airports) as proposed in Aviation Consumer Protections Consultation Paper.

Against this backdrop, adding new compliance and levy obligations risks diverting scarce resources away from practical improvements (such as safety upgrades, runway maintenance and accessibility initiatives – you may want to change this). This could undermine productivity by creating duplication, confusion and administrative inefficiency at a time when the Government has rightly identified reducing red tape and boosting productivity as national priorities.

The framework is also inconsistent in its treatment of industry participants. Airports would be captured twice. The first is where a direct consumer relationship exists (for example car parking) and the second, through accessibility obligations. By contrast, government agencies, such as Airservices Australia and the Australian Border Force who are entirely excluded.

Accessibility is already comprehensively regulated under existing legislation, including the Disability Discrimination Act 1992, the Disability Standards for Accessible Public Transport 2002, and associated human rights frameworks, all of which are currently under review. In addition, airports and airlines are subject to the Australian Consumer Law, which governs cancellations, refunds and service guarantees. Airports are further working with Government on the development of aviation-specific disability standards, with more than 145 initiatives underway across the country.

Introducing an additional consumer protection framework risks confusing passengers, duplicating obligations and undermining productivity, shifting effort into multiple overlapping compliance regimes rather than delivering genuine service improvements.

There is no other country in the world that has a consumer scheme that requires the airports to also participate. The consultation paper itself acknowledges that airlines, not airports, are responsible for the majority of operations captured by the proposed framework. Without a minimum threshold, the proposed scheme would impose unsustainable compliance costs on smaller airports while delivering little, if any, additional benefit to consumers.

We urge the Government to:

- Exempt airports with fewer than one million passengers annually from the framework, consistent with international best practice such as the UK's Aviation ADR scheme, which covers 91.7% of passengers by including only larger airports.
- Ensure that costs are proportionate, with levies primarily recovered from airlines, who hold the direct contractual relationship with passengers.
- Align the framework with existing legislative and regulatory obligations to prevent duplication and productivity loss.
- Provide flexibility and staged implementation to avoid further undermining the financial viability of regional airports.

Strengthening consumer protections should not come at the expense of regional connectivity, community access or national productivity. We ask for a reconsideration of the current approach to ensure reforms are effective, proportionate and sustainable for airports like ours.

Yours sincerely



Jerry Clune  
MAYOR

**Bcc.** Hon Kristy McBain MP, Minister for Emergency Management, Minister for Regional Development, Local Government and Territories