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15 September 2025

Hon Catherine King MP  
Minister for Infrastructure, Transport, Regional Development and Local  
Government  
PO Box 6022  
Parliament House  
CANBERRA ACT 2600

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Dear Minister King

### **Impact of Aviation Consumer Protections Consultation on Smaller Airports**

The District Council of Grant 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.

At Mount Gambier Regional Airport, we manage 70 thousand passengers each year with a workforce of 2 full time staff. Planned works such as essential asset renewals for example, main runway overlays would be put at risk if we were required to divert funds into compliance levies and complaint handling. Mount Gambier Regional Airport is also currently facing the introduction of security screening at significant additional costs. Our airport plays a critical role in servicing health, tourism, freight, emergency services, and additional financial burdens will directly undermine our community's connectivity and resilience. Flights from Mount Gambier to Melbourne and Adelaide is on average \$0.58 per km travelled compared to domestic average of \$0.28 per km (double). Screening would come at a direct cost of up to an additional \$90 per flight for the passengers requiring screening.

Against this backdrop, adding new compliance and levy obligations risks diverting scarce resources away from practical improvements such as runway maintenance and accessibility initiatives. 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.



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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 therefore 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.

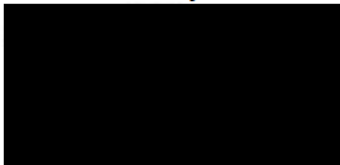
There is no other country in the world that has a consumer scheme that requires the airports to also participate. The consultation paper itself acknowledges that airlines — not airports — are responsible for the majority of operations captured by the proposed framework. Without a minimum threshold, the 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



**Darryl Whicker**  
**CHIEF EXECUTIVE OFFICER**