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Hon Catherine King MP
Minister for Infrastructure, Transport, Regional Development and Local Government
PO Box 6022
Parliament House
CANBERRA ACT 2600
Email: Minister.King@mo.infrastructure.gov.au

25 September 2025

Dear Minister,

Impact of Aviation Consumer Protections Consultation on Smaller Airports

Whitsunday Coast Airport and its subsidiary airports of Bowen, Collinsville & Mt Coolon 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 which had a significant uptake in our community and projected budgeted increase in passenger numbers (which has now been revoked) and uncertainty surrounding Rex Airlines has only heightened the fragility of regional aviation. Whilst 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.

Our dedicated team of only 18 employees directly oversee all operational requirements across all 4 of our responsible airports which covers a large geographical area. It is important to note that PPP is the only airport that operates scheduled RPT commercial services and financially subsidises the operational losses of our other 3 smaller airports. The consequences of any proposed introduction of additional charges directly effects all our serviced communities which will lead to an increase in rates charges, municipal fees etc. as a result of a decrease in any financial gains made that are transferred into the local council's funds. Essential community services that include the Royal Flying Doctors, Life Flight and the Care Flight Helicopter that utilise all our airports for emergency care will be put at risk due to reduced funding that is critical to maintain operational safety and compliance aspects of our airports.

Against this backdrop, adding new compliance and levy obligations risks diverting scarce resources away from practical improvements such as our proposed terminal upgrade master plan, scheduled runway overlays and our continual improvement maintenance programme. 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.



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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,



Ry Collins

Mayor | Whitsunday Regional Council