



Archerfield Airport Corporation

Attention:
Director, Airport Reform, Sunsetting and IFAM Section
Airports Branch
GPO Box 594
CANBERRA ACT 2601

04 March 2022

Dear Sir/Madam,

RE: Consultation Regulation Impact Statement: Sunsetting Airports Regulations Stage 1a: Cutting Red Tape – Archerfield Airport

Thank you for the opportunity to comment and provide a submission on the thematic review of sunsetting regulation under the Airports Act 1996 (the Act). Archerfield Airport Corporation would like to take this opportunity to broaden the scope of this submission and to address the refinement of the regulatory framework on secondary airports.

Archerfield Airport Corporation acknowledges the system of safeguards the Act and subordinate legislation are designed to achieve, facilitating the Commonwealth's oversight on leased federal airports since privatisation. However, the continual introduction of red and green tape through regulatory amendments under the Act since 1996 and a "one size fits all" compliance regime has curbed Archerfield's opportunity for growth and efficiency.

Secondary airports are wrapped up in the same legislation that was intended for the major airports, resulting in the complexity and significant cost imposed on the smaller scale airports such as Archerfield. With the limited resources commensurate to the airport operations of Archerfield, our ability to maximize the potential of current assets is degraded by the imposition and red tape embedded in the Act. As such, Archerfield Airport Corporation appreciates the Department's role and efforts in conducting a holistic review to modernise airport regulations, providing the flexibility for secondary airports to adapt as aviation emerges from the impacts of COVID-19.

Archerfield Airport Corporation trusts the ongoing review of legislation reflects the view that a "one size fits all" approach to airport legislation would adversely affect the smaller airports.



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I attach the responses to some of the listed questions under Stage 1a of the sunseting process from the Regulatory Impact Statement. Archerfield Airport Corporation agrees with option 3 of the policy proposal to remake the Airport Regulations and the AOISRs with changes.

Archerfield Airport appreciates the Department's and Australian Government's support and efforts in this process, and welcomes any enquiries for further discussion.

Yours sincerely,

Rod Parry
General Manager



Discussion Questions Submission – Archerfield Airport Corporation (AAC)

Option 3: Remake the Airport Regulations and the AOISRs with changes

Subleases and Licensing

1. Do you agree or disagree with the proposed amendments? Please specify.

AAC agrees with the proposed amendments to only submit declaration requests to the Secretary of the Department by exception. AAC agrees to maintain a register of subleases and licenses to ensure the Department has adequate regulatory oversight of the register and the ability to intervene if required.

2. Can you suggest any improvements to the proposed amendments (e.g. is there anything else that should be included)?

AAC considers nothing else to be included with the proposed amendments.

3. What level of benefit would you expect these changes to bring to your business?

These changes would streamline our business and reduce the implications imposed on AAC's finite resources. The removal of red tape enables AAC to concentrate resources and seize the opportunity for economic development rather than administrative processes and regulatory burden.

4. Are there other opportunities to streamline and reduce red tape in regard to subleases and licensing?

AAC considers the proposed amendments to be adequate.

5. Do you agree with the Department's estimate of the regulatory impact of proposed changes?

Yes, AAC agrees with the Department's estimate of work hours and regulatory cost savings.



Ownership

1. Do you agree or disagree with the proposed amendments? Please specify.

AAC agrees with the proposed amendments to reduce the frequency of reporting on airport ownership to every three years or when a change in ownership of a certain threshold or nature occurs.

This follows as the airport ownership of Archerfield Airport has not changed since privatisation in 1998. Thus, the requirement to compile the documentation in relation to ownership matters every year is rather needless.

2. Can you suggest any improvements to the proposed amendments (e.g. is there anything else that should be included)?

AAC considers nothing else to be included with the proposed amendments.

3. What level of benefit would you expect these changes to bring to your business?

Again, these changes would enable AAC to concentrate its finite resources on developing our business rather than the administrative load of ownership declaration each year.

4. How could airport ownership remain as competitive as possible, while protecting Australia's national infrastructure?

AAC has no comments on airport ownership and interest in shares, at this stage, as Archerfield Airport is leased to a company fully based in Australia.

5. Do you agree with the Department's estimate of the regulatory impact of proposed changes?

As the ownership of Archerfield Airport and the stakes in the company do not differ from each year, the estimated time to prepare the annual declaration and report would be under 50 work hours. Nevertheless, the proposed amendments would alleviate the administrative burden significantly.