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Director, Airport Reform, Sunsetting and IFAM Section
Airports Branch
Department of Infrastructure, Transport, Communications and Regional Development
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To whom it may concern

**Response to Consultation Regulatory Impact Statement:
Sunsetting Airports Regulations Stage 1a: Cutting Red Tape**

Canberra Airport thanks you for the opportunity to make a submission on Sunsetting Airports Regulations Stage 1a: Cutting Red Tape.

Subject to the following Canberra Airport supports Option 3 as outlined in the Consultation Regulatory Impact Statement (“CRIS”). In this regard Canberra Airport believes that the proposed amendments go some way to cutting red tape and reducing duplication while at the same time satisfying the Commonwealth Government oversight requirements. In respect of the specific changes outlined in Option 3 of the CRIS Canberra Airport responds as follows:

Subleasing and licensing

Canberra Airport supports the proposed amendment to permit declaration by exception rather than as a rule, noting the requirement of Airport Leasing Companies (“ALCs”) to maintain a register of subleases/licenses. This amendment would result in a not insignificant reduction of the regulatory burden and cost on ALCs in producing requests which the Department needs to review and process. Canberra Airport notes that further information is required to gain a full understanding of what exceptions will require declarations.

Furthermore short-term (less than 2 years) subleases to State or Territory government / agencies should be removed from the prohibited category.

Ownership

Canberra Airport supports a change to the ownership reporting requirements in the AOISRs and Airport Regulations. In this respect Canberra Airport is of the view that ALCs should only be required to report a change of ownership structures if a significant (to be defined) change in ownership occurs. In the event that there is no significant change in ownership Canberra Airport believes that no reporting other than that which has already been provided


should be required. The requirement to report on ownership is resource intensive and time consuming and serves no useful purpose and should not be required where there has been no significant change from the ownership which has previously reported. If this position is not accepted, it is Canberra Airport's view that reporting should be required only every 3 – 5 years or when a significant change in ownership occurs.

Canberra Airport notes that it is likely it, and other ALCs, will be declared critical infrastructure under s51 of the Security of Critical Infrastructure Act 2018. In order to reduce duplication of reporting requirements Canberra Airport recommends that the Department ensures the revised AOISR reporting requirements are accepted by Home Affairs as compliant "Notifiable Event" reporting by declared ALCs.

Head Lease Extension

While not the subject of the current regulatory reform process Canberra Airport believes it would be appropriate for the Commonwealth to undertake to provide all ALCs the option of extending their head lease to the full 99-year terms as soon as possible. Doing so will provide ALCs with certainty, encourage further investment and infrastructure development (driving economic growth) and assist ALCs in accessing funding to undertake such investment.

Yours sincerely



Michael Thomson
Head of Aviation