

Disabilities Transport Access Secretariat  
Road Safety and Transport Access Branch  
Department of Infrastructure and Transport  
GPO Box 594  
CANBERRA ACT 2601

26 April 2013

Dear Disabilities Transport Access Secretariat

**2012 Review of the Disability Standards for Accessible Public Transport 2002 (Transport Standards): Issues Paper**

The Australian Airports Association (AAA) is the national voice for Australian Airports that represents the interests of over 250 airports and aerodromes across Australia, from regional landing strips to major international gateway airports.

The AAA and its members have reviewed the Transport Standards Issues Paper. Every airport is unique and hence specific airports may make direct submissions highlighting these. The AAA would like to raise a number of general issues however in this submission. The AAA is an active member of the Aviation Access Working Group, represented by AAA Chairman Stephen Goodwin.

**Standards Australia (Recommendation three)**

As noted in the Issues Paper, transport is in many ways quite different from other areas of the economy and hence general technical standards prepared by Standards Australia might not always be a perfect fit. Aviation and airports present specific difficulties.

Transport (and aviation) specific national standards may go some way towards dealing with this.

However, the method of work employed by Standards Australia in appointing members of committees, is likely to see the majority of members of committees be made up of non-aviation (or even transport) representatives. As has been the experience with these groups, the outcomes may be heavily influenced by matters that reduce the currency of the outcomes.

The airports industry therefore do not support the making of additional standards through this mechanism, especially as these standards will have in effect the same powers of de facto regulations, but without the necessary procedural rigor to ensure that the outcomes are in line with the stated goals.

### **Modal industry committees (Recommendation four and 15)**

The AAA supports modal committees where industry experts provide best practice guidance material such as the Aviation Access Working Group. This will ensure that the myriad other rules and regulations concerning safety, security, consideration for special emergency situations and future infrastructure and technology changes can be considered to provide collective and integrated solutions.

### **Government assistance (Recommendation seven)**

The AAA agrees with the content and reasoning for the inclusion of recommendation seven. The fact expressed by the Issues Paper concerning the difference in resources (including monetary) between various types and locations of airports do influence the ability of operators to deliver the programs they aspire to within the shortest time span.

A recent study showed that 50% of regional airports are unable to cover their operational expenses leaving very little for infrastructure refits (before considering increasing spending pressure because of constantly evolving safety and security regulations). Although figures are difficult to access, smaller airports are under even more pressure.

More than 70% of regional and rural airports are only serviced by one airline operator making payback of infrastructure changes from passenger revenue very risky should that airline reduce services or choose to change routes.

On average, relative regulatory imposts costs regional and rural ports at least three times as much as it does large airports. In addition, the further from capital cities work must be entered into, the more expensive it is. Staffing and skills are key issues at times.

The AAA fully supports various types of assistance for airports. A number of precedents exist for this, such as funding assistance in recent security upgrades and using a different mechanism and education of critical airport safety personnel.

### **In conclusion**

Airports are capital intensive businesses, where fixed costs represent a large part of the total cost. A small variance in either the cost of funding or number of travelers can have a large impact on viability. In addition, a number of airport operators have limitations on funding, sometimes imposed by statute such as with Council operated airports.

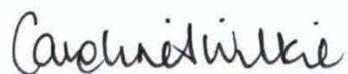
Because airports exist to service the community, their commitment to serving all the community must not be underestimated. Airports however will welcome resource assistance, and industry specific modal working groups to create certainty that investments made will have maximum effect and will remain acceptable over the life of the funding needed.

The industry however cautions against creating open ended commitments (via recommendations such as Recommendation three), or rules based on the assumption that public transport is homogenous.

I thank you for your consideration of this submission.

Should you or your staff have any inquiries, please do not hesitate to contact the AAA Policy and Research Manager, Salomon Kloppers on 02 6230 1110 or at [SKloppers@airports.asn.au](mailto:SKloppers@airports.asn.au).

Regards,

A handwritten signature in black ink that reads "Caroline Wilkie". The signature is written in a cursive, flowing style.

Caroline Wilkie  
CEO  
Australian Airports Association