



19 November 2021

Briony Martin
Lyndel Hopkins
Proximity Advisory Services Pty Ltd
Via email: briony.martin@proximity.com.au, lyndel.hopkins@proximity.com.au

Dear Briony/Lyndel

Review into Australia's Aviation and Maritime Transport Security

Thank you for the opportunity to provide this submission for this review. The Regional Aviation Association of Australia (RAAA) has been involved in previous inquiries and reviews over the years as the upgrades of aviation security measures has had an incredibly negative effect on the viability of regional air services. This issue has been covered in detail previously in Chapter 5 of the attached Rural and Regional Affairs and Transport References Committee Inquiry into the "Operation, regulation and funding of air route service delivery to rural, regional and remote communities." I do not intend to go over the final report and recommendations in their June 2019 report, however it is essential that this review consider these findings, in particular Recommendation 5;

"The committee recommends that following a financial analysis into the ongoing costs of the provision of security screening at regional airports, the Australian Government consider providing ongoing financial assistance to those regional airports which have been identified as requiring passenger security screening enhancements as part of the 2018–19 Budget, where required."

It is the RAAA's view that the relocation of the then 'Office of Transport Security' from the Department of Infrastructure, Transport, Regional Development and Communications (DITRC) to the Department of Home Affairs under the name of Aviation and Maritime Security (AMS), created a chasm in the relationships between airports/airlines and officials in Canberra. This was highlighted in the lack of financial analysis on the requirements for new upgrades of security measures at airports by Home Affairs. During Senate Estimate hearings, Senators were left confused as to which Department held responsibility for the analysis of new aviation security regulations. Industry was left with the farcical situation whereby officials from (DITRC) were tasked with doing the financial analysis of regulations owned by Home Affairs that had already been made. Prior to the move to Home Affairs, officials within DITRC would have had a closer handle on cost effects on the aviation industry to any new measures. This was lost in the move to Home Affairs and industry feel they now they just have to accept new security measures as that is what the intelligence community have recommended, no matter the cost.

Whilst AMS have made a number of changes to reduce the applicability of the upgrades of security screening and therefore reducing the number of airports affected, we are still left with a huge operating expense for regional air travellers. It was highlighted in the RRAT Inquiry of the disparaging gap between costs for regional air travellers versus domestic air travellers. This is still the case and due to the nature of regional air travel where smaller number of passengers are flying on smaller aircraft, the cost per passenger to be screened in regional airports is in the order of \$14-20 per passenger, compared with less than a dollar in a capital city airport.

In response to the challenges faced by regional airports and airlines during the Covid-19 pandemic, the Federal Government has been meeting the operating costs of this screening. However, our understanding is that this is a

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temporary measure and at some stage the costs will pass on to the airports and therefore the travelling public. The RAAA has and will continue to call on the Federal Government to provide ongoing financial assistance as national security is a Federal matter. It is totally unreasonable to expect regional travellers to pay up to 20 times that of a city traveller to be screened at an airport, a cost which adds to the already high costs of regional air travel.

On top of the security screening upgrade requirements, we have also incurred cost increases for new air cargo handling measures. On the Home Affairs website it states;

It is essential Australia's aviation industry employ effective security measures to address the threat environment and protect our trade and travel.

The RAAA supports strong aviation security measures however the costs being borne by aviation organisations such as airports and airlines to protect our nation's "trade and travel" is now exorbitant. It is no longer enough to just say that industry must absorb these costs, to have a strong national security framework the RAAA believes the Federal Government must take responsibility to pay for it. This may be way of direct funding or via a levy on ALL airline travelling public (on applicable aircraft size) to help alleviate the imbalance of higher costs borne by regional air travellers.

Once again, thank you for the opportunity to provide this information and please do not hesitate to contact me if you wish to discuss this in further detail.

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Chief Executive Officer

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The RAAA has approximately 100 members that directly employ over 10,000 people, many in regional areas. On an annual basis, the RAAA's AOC members jointly turnover more than \$1.5b, carry well in excess of 2 million passengers and move over 23 million kilograms of freight. The RAAA represents a number of major aviation stakeholders including REX, Alliance Airlines, Air North, Cobham, Maroomba Airlines, Skippers, Sharp Airlines, Link Airways and Fly Pelican to name a few. We also represent charter organisations as well as a number of the larger flying schools across Australia.

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