

30 November 2023

Director, Aviation White Paper Project Office
Aviation White Paper
Department of Infrastructure, Transport, Regional Development,
Communications and the Arts
GPO Box 594
CANBERRA ACT 2601
Via email: aviationgreenpaper@infrastructure.gov.au

Dear Director

Aviation Green Paper – Canberra Airport Submission

Thank you for inviting Canberra Airport to provide a submission to the recently released Aviation Green Paper – Towards 2050.

We welcome the opportunity to do so, to this end please find attached our submission.

Should you wish to discuss this further, please feel free to contact me on 0421 283 432 or m.thomson@canberraairport.com.au.

Yours sincerely



Michael Thomson
Head of Aviation

Canberra Airport Green Paper Response

Introduction

Canberra Airport welcomes the review of Australia's Aviation policy and is pleased to provide the following response to the Aviation Green Paper, Towards 2050.

Canberra Airport acknowledges:

- i. The important social and economic benefits provided by the aviation industry, with the rapid movement of people and freight, which became very clear to the Australian and global communities during the COVID-19 pandemic when these benefits were denied to all.
- ii. The ongoing growth past 2050 of a safe, efficient, sustainable, affordable, productive and competitive Australian aviation sector is critical to ensure the connection of our cities and regions across our nation and to the world.
- iii. The Aviation Green Paper is an important step in reviewing the status-quo and developing an Aviation White Paper that sets the policy direction which is fit for purpose for the full recovery of the aviation sector following the COVID-19 pandemic, and the sustainable and resilient growth out to 2050 and perhaps beyond.

Ownership History

The long-term lease of Canberra Airport was purchased from the Commonwealth by the Snow family in May 1998. The Snow family has retained ownership, management and development of Canberra Airport for over 25 years. Canberra Airport Pty Ltd is the Airport Lessee Company, and the Capital Airport Group Pty Ltd is the manager of the Airport. During this time Canberra Airport has invested over \$2.2 billion to improve the Airport's aviation capability and economic resilience. Major infrastructure works undertaken during this time include:

1. Completely demolishing the former terminal and precinct and building of the new Airline Terminal and precinct between 2008 and 2013. The international gateway infrastructure was completed in 2016 in preparation for Singapore Airlines to commence services in September 2016.
2. Lengthening and strengthening the main runway 17/35 in 2006 to service long range heavy aircraft capability, including Boeing 747 aircraft.
3. Developing a vibrant Airport precinct and community, supporting aviation with aerospace and defence office and retail parks of high-quality Green Star sustainable buildings set in lush landscape settings.

4. Developing high quality designed, specified and maintained buildings soon to house over 20,000 jobs on the Airport precincts, providing high quality on-site workplace amenities including workplace childcare, food and beverage cafes, retail, services, end of trip, sport and recreation facilities.

Consultation

In achieving the infrastructure development of the airport, extensive consultation has been undertaken with major stakeholders and the broader ACT and regional communities.

Examples include:

- a. 60 business days of public consultation for each Master Plan 1999, 2005, 2008 (refused approval), 2009, 2014 and 2020, amount to a total minimum of 360 business days, before considering pre-consultation on exposure drafts with major stakeholders.
- b. 60 business days of public consultation for each of twelve (12) Major Development Plan 2003, 2004, 2006, 2007, 2008, 2010, 2018, 2019, 2020, 2021, 2023 and in 2014 one MDP of 30 business days, a total minimum of 750 business days, before considering pre-consultation on exposure drafts with major stakeholders.
- c. Consultation meetings with and/or presentations to community groups and major stakeholders that are too numerous to list.
- d. Generally, hosting three (3) Community Aviation Consultation Group meetings each year. Peak community groups are invited to these meeting. Meeting agendas and meeting notes are distributed to all invitees.
- e. Please note, 60 business days amounts to over 3 months when weekends and public holidays are added.
- f. Over the past 25 years, public consultation on Canberra Airport developments has occurred for at least three (3) months in each of the calendar years identified in points a and b.

1.3 Giving back to the community

During the last 25 years the Airport has also contributed back to the community via contributions of over \$350 million to the Snow Foundation and Snow Medical Research Foundation. The Snow family has emerged as one of the leading philanthropic funders in Australia.

Chapter 3

Competition

What measures should be taken to ensure Australian aviation markets operate efficiently, improve competition settings, and deliver optimal consumer outcomes?

A Highly Concentrated Domestic Aviation Market

While we have heard numerous comments by the major airlines in Australia that it is one of the “most competitive” airline markets in the world, in reality Australia’s domestic aviation market is one of the most concentrated aviation markets in the world. The Australian domestic aviation market is also one of the most concentrated markets in Australia.

The Qantas Group and Virgin Australia hold approximately 95% of the Australian domestic aviation market, with the Qantas Group accounting for approximately 60% of the market by itself. This market share is reflected in passenger distribution at Canberra Airport with the Qantas Group consistently accounting for between 58 – 65% of all passengers and Virgin Australia accounting for 30 – 36% of all passengers. Link Airways, Rex Airlines and Fly Pelican generally account for approximately 5% of the total domestic passengers which travel through Canberra Airport on a daily basis.

As stated above, compared to other sectors of the economy, the domestic aviation market is very highly concentrated. By way of example:

- Australia’s two top banks (CBA and Westpac) control 47.3% of the mortgage lending market. The Big Four Banks control 75.2% of the Australian market.
- Coles and Woolworths have 64% of the market share for food and groceries. Qantas alone has a greater market share (65%) of domestic aviation than Coles and Woolworths’ combined market share in food and groceries.
- In telecommunications, Telstra and Optus control 81% of the market – there is also an independent third player that controls 18% of the market.

For the major routes, such as Sydney to Melbourne, the Australian Competition and Consumer Commission (ACCC) concluded that increased competition lowers prices, based on the reduction in fares upon the entrance of Rex Airlines into these routes and strong investment in the face of capacity constraints.¹

There are significant competition issues resulting from this highly concentrated market structure. The ACCC found in its June 2023 report on *Airline Competition in Australia* that:

- Airfares have risen above pre-pandemic levels, surpassing inflation-adjusted prices; and

¹ ACCC Airline Monitoring report June 2023

- The most recent cancellation and delay rates have regressed, indicating continued underperformance compared to long-term averages within the industry.

For example, airfares in Australia increased by 22.6% between 2019 and 2022. Domestic airfares increased by 19.3% between the first quarter of 2020 and the first quarter of 2023. Domestic on-time performance for April 2023 was at 71.8%. This is well below the long-term industry average of 81.5%.²

The increase in the cost of airfares, however, is happening at a time when key input costs are falling in the global aviation industry. For example, jet fuel, often cited as a key factor contributing to record high airfares, dropped to US\$137 per barrel in May 2023. This is a fall of almost half in real terms since the price of jet fuel hit a record high of US\$259 per barrel in June 2022. In contrast, airport charges increased by only 3% internationally between 2019 and 2022 and form only a small percentage of the average international airfare. Airlines often also cite airport charges as the second highest costs input in their operations however it is worth noting that airport charges are the subject of long term agreements and airports do not have ability to vary their charges to compensate for changing market conditions, unlike airfares, and do not increase as airfares increase.

The ACCC concluded by stating:

“The duopoly market structure of the domestic airline industry has made it one of the most highly concentrated industries in Australia, other than natural monopolies. The lack of effective competition over the last decade has resulted in underwhelming outcomes for consumers in terms of airfares, reliability of services and customer service.”³

Need for a Major Third Domestic Airline

Given the extremely high domestic airline concentration and resultant low levels of competition, Australia needs to have a third independent and competitive airline operating in the domestic airline market.

To be truly competitive the third airline must have at least 15% of the market to be effective and to have the critical mass to compete with Qantas, Jetstar and Virgin Australia. Critically, 15% of the domestic slots into and out of Sydney Airport must be available for a third competitive airline. There needs to be genuine structural policy change to achieve this.

Support For New Entrants

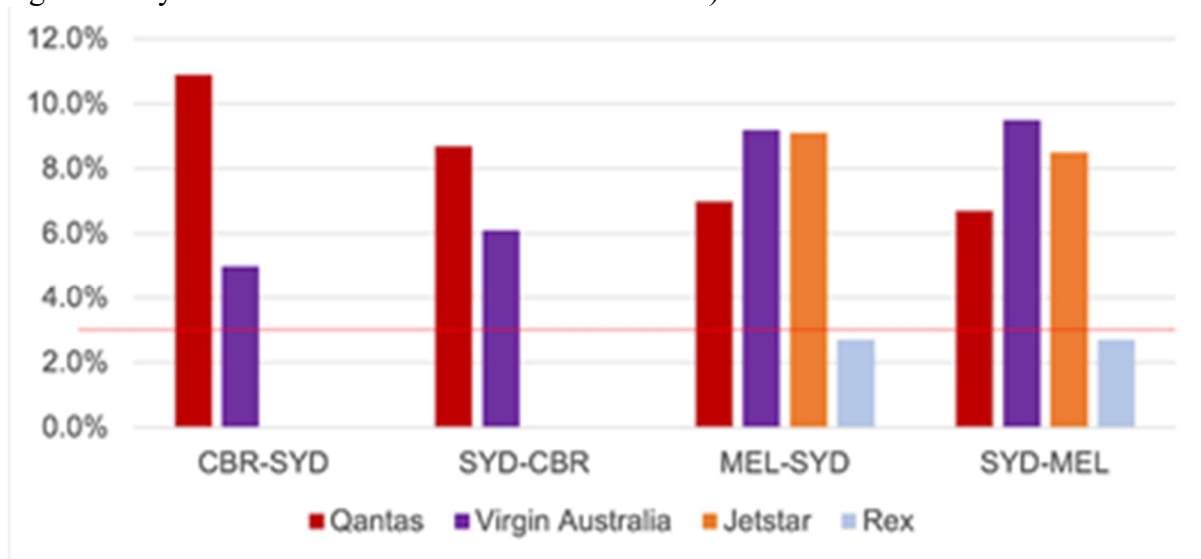
In order for a new entrant to successfully enter the Australian domestic aviation market it must have access to Australia’s biggest market, Sydney, via Kingsford Smith Airport. This will require current operators handing back slots which they are not fully utilising. To this end Qantas and Virgin Australia cancelled over 50 flights per month on the Sydney to Canberra route for the period March to August 2023, with 14.8% (or in excess of 70) Qantas flights cancelled in the month of August.

² ACCC (2023), *Airline Competition in Australia, Final Report, June*, Canberra, p. 2.

³ *Ibid.* p. 2.

In this regard, Canberra Airport notes and agrees with the ACCC’s assessment that *‘the most effective way that the Australian Government could enhance airline competition for the benefit of consumers would be to implement reforms to the way Sydney Airport slots are allocated to airlines’*.⁴ To achieve this outcome Canberra Airport recommends the Federal Government consider the following:

Amending the 80/20 ‘use it or lose it rule’: The long-term cancellation rate at Sydney Airport is 2.3%, yet for the three-month period from 1 June to 31 August 2023 the average Qantas monthly cancellation rate on the Sydney to Canberra route was 11.5%, (Virgin Australia average monthly cancellation for the same route was 4.6%).



Cancellation rates on the Sydney-Canberra and Sydney-Melbourne routes in September 2023.

The red line shows the average cancellation rate across all routes for the same month.

Under the current slot regime the major airlines are able to cancel a significant number of services resulting in the non-use of the allocated slots without penalty or even the requirement to show cause for the cancellation. As the total number of slots available into Sydney Airport are constrained, by holding these slots and not using them, new entrants’ opportunities to access the largest market in Australia are greatly reduced. In response to this issue Canberra Airport would recommend that the Government consider amending the 80:20 to a 95:5 rule (with 5% being almost two times the long-term average cancellations into Sydney).

Audit of Current Usage and Ongoing Monitoring: Current details about slot usage and airline behaviour are not well understood. Canberra Airport recommends that a forensic audit into the current use of slots at Sydney Airport should be conducted so that the facts about airline usage and behaviour are clearly understood, and so that all parties have a consistent, clear baseline about slot usage. In addition ongoing monitoring of slot usage should be instituted to ensure compliance with the slot regime.

⁴ ACCC, *Airline competition in Australia: Final Report* (June 2023), p 28

Review of the current 80 movements framework: Canberra Airport notes that while the current Sydney Airport slot regime provides for up to 80 movements per hour this cap is rarely if ever reached. In addition, when weather events occur, there is no ability for the airport and airlines to “catch up”. Consideration should be given to amending the regime to ensure that during normal operations 80 movements per hour are achieved, and in the event of a weather event this cap is an average over a three-hour period, allowing movements to exceed 80 to catch up those lost during the weather event. Canberra Airport also supports the implementation of the *Harris Review* as soon as possible.

National Standard for Airline Cancellations: Canberra Airport recommends that a National Standard for Airline Cancellations should be instituted which would:

- (a) Target the overall level of cancellations – ie the national long term cancellation rate – reducing to a level of 1.7% (a level which is 21% higher than the 2017 level of 1.4%); and
- (b) Require that no domestic airline route should have a cancellation rate of 5% or more for three consecutive months or for more than 5 months in any calendar or financial year; and
- (c) Require that no domestic airline route should have a cancellation rate which exceeds 10% in any given month.

Show Cause obligation: The Australian Government should (potentially through the ACCC and its domestic airline monitoring process) institute a Show Cause process where the level of cancellations on an individual route:

- (a) Exceeds either 2.5 times the national long term average (at that time) or five per cent in three consecutive months; or
- (b) Exceeds 10% in any month.

The Show Cause process should be an automatic obligation on the two major domestic airlines (only) and require:

- (a) An explanation for the reasons for the level of cancellations, including an apportionment of the causes by number and percentage;
- (b) A rectification plan and measures to address and improve the cancellation rate;
- (c) A statement from the CEO or a senior company executive that the information in the Show Cause response is true and accurate.

Where an airline has a cancellation rate exceeding 10% for more than three consecutive months, the ACCC should have the ability to direct that the airline be fined up to \$100,000 per month and further, if relevant, that the airline be required to hand back slots which could be then be made available to new entrants to encourage entry into the domestic aviation market.

The two major domestic airlines must also be obligated, when they communicate with customers about delays or cancellations, to provide clear, accurate and transparent reasons for the delay or cancellation. This is something that the travelling public needs to restore trust and confidence.

An Alternate Solution: Given the extremely high barriers to entry into the Australian domestic aviation market arising from the current market concentration one alternative to enticing a new entrant to enter the market would be to facilitate a restructuring of the current status quo. There are three major airlines operating in the Australian domestic airline market (although two are part of the same group and operate cooperatively) – Qantas, Jetstar and Virgin Australia. They each have more than a 15% market share.

If the industry remains as concentrated as it currently is, and if airfares remain elevated and the profits of the largest industry player remain excessively above the industry norms of 8-10% EBIT, then the Australian Government should take the necessary steps to ensure that the ownership and operation of Jetstar becomes independent of Qantas.

This could be achieved through anti-trust legislation which, as the Minister for Competition Andrew Leigh has noted, came in to being in the United States because an upgrade of competition laws was needed to “deal with the misbehaviour of the oil titans and rail barons of 19th century America”.

In the alternative, the Australian Government could require that Qantas demerge Jetstar and set it up as an independent company within a defined period.

Scheduling of Services

At Canberra Airport Qantas is currently operating a number of flights on small aircraft to Sydney Airport with only a 10-15 minute gap between services. Canberra Airport believes that this practice can encourage the cancellation of one of the two flights and potentially provides slot hoarding opportunities. In order to overcome these concerns, it is recommended that the Government consider imposing a rule under which services by an airline from a specific destination to another specific destination must operate a minimum of 30 minutes apart. If demand is greater than capacity on a particular service the airline can always consider up-gauging the operating aircraft to satisfy the additional demand, which improves the efficiency with which the scarce slots at Sydney Airport are utilised.

ACCC Monitoring

Canberra Airport is very supportive of the Federal Government’s recent decision to reinstate airline monitoring which followed unprecedented levels of consumer complaints. Reinstating regular monitoring not only serves as a disincentive to abuse market power, but through a continuous dataset, allows for a better evidence base on which to develop industry policy into the future.

We note that major airports have been subject to an extensive monitoring regime by the ACCC for over two decades and Canberra Airport, as a tier two airport, while not part of this regime undertakes self-reporting.

Cabotage

While in theory Canberra Airport believes that cabotage provides some opportunity to increase domestic aviation competition on a select number of routes e.g. from Darwin and/or Perth to major Australian east coast ports, in practice achieving this outcome is challenging both from a carrier perspective and also from an operational perspective. As such Canberra Airport does not believe that a relaxation of current cabotage restrictions will in reality materially improve competition in the Australian domestic aviation market.

Negotiations between Airports and Airlines and the Aviation Pricing Principles

Negotiations between airlines and airports can be challenging due to the symbiotic relationship between the entities and the countervailing power of each. Notwithstanding these challenges Canberra Airport has always reached agreement with our airline partners on terminal service and airfield service agreements. To this end Canberra Airport notes that in four successive inquiries into economic regulation of airports, the Productivity Commission (PC) has concluded that on most indicators of operational efficiency, aeronautical charges and profitability, airports have not abused market power, and the current competition framework remains fit for purpose to meet government objectives for the sector.

Australia's major airlines are large commercially astute entities which regularly negotiate with airports across Australia. As such they have a whole of market understanding and knowledge of airport charges unlike airports which have a more limited scope of understanding. All airports understand that reaching agreement with airlines is crucial to the success of airports businesses. Canberra Airport's view is that the current regulatory regime, as confirmed by PC inquiries since 2002, is fit for purpose, provides the appropriate framework for agreement to be reached and does not require amendment or alteration. The current "light touch" economic regulation has seen significant investment by airport owners in the airports and surrounding precincts to the benefit of Australia. Mandating the Aviation Pricing Principles, or instituting an airport specific arbitrate framework, would impose additional obligations on airports despite no evidence that airports have exercised market power and done so to the detriment of the community.⁵ Such an approach would also preclude access to administrative and judicial review, which is currently available under the National Access Regime. The introduction of a mandated arbitrate regime would likely distort airport investment decision and could result in a reduction of competition between airlines and ultimately be detrimental to the community.

Consumer Protections

Canberra Airport notes that many other jurisdictions have mandated schemes under which airlines compensate passengers in the event of cancellations or significant delays in services. While these schemes may have merit further analysis should be undertaken to ensure that they have resulted in the desired outcomes in terms of reliability of service. There is also a risk that the cost of the passenger compensation scheme is passed on to the consumer by the airline through higher ticketing prices. In the event that a compensation scheme is introduced in Australia, Canberra Airport strongly believes that this should be between the passenger and the airline as is the case in other jurisdictions.

⁵ Productivity Commission, p.26

Disability Access

Canberra Airport has a strong focus on ensuring the passenger journey is as seamless and incident free as possible for all who use our airport. We recognise the importance of inclusivity and the challenges of those in our community living with disabilities, and in particular those with hidden disabilities, face when travelling. Canberra Airport staff and our contracted security staff have undertaken significant training in assisting people with disabilities access our airport. This training has included education sessions with various peak disability organisations such as Spinal Cord Injury Australia and the Cancer Council, as well as adopting many of the practices outlined in the AAA Hidden Disability program. Canberra Airport notes that many of the incidents reported in the media and elsewhere regarding people with disabilities and their aviation experiences do take place on airports but tend to involve industry participants other than airport operators.

Canberra Airport recommends that the Government consider establishing a working group with representatives from peak disability groups, airports, airlines and other aviation participants to develop a standardised approach to disability access, and also work together to develop staff training programs which should be implemented by all aviation participants who have face to face interaction with the travelling public or handle disability assistance equipment e.g. wheelchairs.

Chapter 5 Decarbonisation

Canberra Airport is an environmentally conscious organisation. It has taken significant steps to reduce its carbon emissions with the aim of being carbon neutral by 2030. These steps include:

- Extensive use of solar on airport precinct buildings, producing 2.65MW of energy – the second largest solar farm in Canberra.
- Rainwater harvesting and reuse.
- Australia’s first 5 star Green star, and Canberra’s first 6 star Green star, design and construct buildings.
- All new buildings since 2019 are “electrified” and carbon neutral in operation.
- WELL International principals are incorporated in all new buildings.
- Reduction in carbon emission from the existing building portfolio by 35% in operation which excludes power supplied by the ACT grid, which is 100% green energy.
- Pressure testing of all new constructions for leakage and thermal performance;
- An on-site worm farm which annually processes 7,800kg of food waste (and growing).
- Electric vehicle charging infrastructure, including a Tesla super-fast charging station, 50KW Evie charger and multiple 7KW chargers throughout the Airport precinct.

Canberra Airport has also invested in several Australian companies focused on reducing impact on the environment or improving alternative energy options including a recent investment of US\$10 million in Vast, an Australian company and technology that offers a critical solution to solar energy capture and storage which allows energy storage for 8-16 hours, which is much longer than present battery solutions.

Canberra Airport supports the establishment of the Jet Zero Council, and the role airports have to play on the Council. We note that the majority of carbon produced by the aviation sector is attributable to the airlines. While there have been a number of developments which have made aircraft more fuel efficient the most likely near-term option for the sector to achieve net zero targets is the uptake of Sustainable Aviation Fuel (SAF), while continued development of electric and hydrogen fuel sources occurs. Canberra Airport’s fuel farm is capable of taking SAF mixed fuel however supply and costs issues exist. Canberra Airport recommends that Government provide incentives to the fuel production sector to develop SAF supplies while also mandating that aviation fuel suppliers must supply SAF for aviation fuel to airlines.

Chapter 6 Airport Development Planning Processes and Consultation Mechanisms

Chapter 6 of the Green Paper covers aircraft noise, community consultation processes and mechanism and land use planning and development regime on leased airports across Australia. Canberra Airport supports the willingness to review and assess if the existing legislative requirements and procedures are fit for purpose.

Canberra Airport acknowledges and supports the Green Paper statement “*the Australian Government is not considering imposing any additional constraints on airports such as curfews or movement caps.*” This Green Paper statement is crucial for the aviation and airport sector as it signals a commitment from the Australian Government to maintain a regulatory environment that fosters operational flexibility and unhindered movement for airports. By explicitly stating that there are no plans for additional constraints such as curfews or movement caps, the Government provides a stable framework for the industry which has promoting efficiency, economic growth, and the overall well-being of the aviation sector which contributes significantly to Australia’s transportation infrastructure.

The following subsection of this Chapter provide responses to the key themes of aircraft noise, community consultation mechanisms and land use planning regimes at airports.

6.1 Aircraft Noise

- a. The community accepts that safety first has primacy in the design of flight paths and operational procedures for aircraft on arrival or departure of airports and the designs have regard to the capability of aircraft, consistent with manufacturers specification. The safe operation of aircraft on arrival or departure of airports is in the public interest and essential for the crew and passengers on board and the community on the ground.
- b. Due to a history of land use planning decisions by States, Territories and Local Government over many decades, there are residents who have decided to purchase homes under or nearby flight paths to many airports across Australia. These residents as a result of *residential creep under or nearby flight paths* are exposed to aircraft noise and most likely their homes have inadequate aircraft noise attenuation consistent with Table 3.3 AS2021-2015. Sydney KSA, Gold Coast and Adelaide Airports have had curfews imposed, due to resident aircraft noise complaints.
- c. Canberra Airport supports the Government’s policy of adopting the ICAO Balanced Approach to Aircraft Noise Management - reduction of aircraft noise at source; noise zoning, land-use planning and management; noise abatement procedures for aircraft operation; and restrictions for aircraft operation.
 - i. *Reduction of Aircraft noise at the source:* As a result of ICAO and aircraft manufacturer initiatives, aircraft of a similar size now generate less noise compared to older aircraft. Australia has one of the youngest fleet of airliners in the world. The jet age commenced in the 1960s. ICAO with its member nations (including Australia) has adopted chapter standards evolved over time to reduce the noise all new manufactured aircraft, including jets, emit. ICAO has transitioned through Chapters 2 (commencing 1973 and which are now banned from flying in Australia), Chapter 3, Chapter 4 and for aircraft designed and

manufactured after 2013 Chapter 14 aircraft, consistent with ICAO's four Pillars, designed to reduce noise at the source. Most aircraft flying in Australia in 2023 comply with either Chapter 3 or 4 and, over the next 10-15 years most will be Chapter 14 compliant aircraft.

- ii. *Noise Zoning and Noise Abatement procedures:* As an example, over 99.5% of the Canberra and Queanbeyan residential communities, living in over 240,000 dwellings, are protected by Noise Abatement Areas implemented by Airservices Australia in 1995/96, over 28 years ago. The Canberra and Queanbeyan Noise Abatement Areas were designed with a gap to facilitate aircraft on Arrival and Departure to the airport's main runway 17/35 thus creating a Noise Zone. The 'Gap' in truth is the Flight Path Corridor Noise Zone available for aircraft arriving and departing runway 17/35.
- iii. *Land Use Planning:* An example of the failure of Land Use Planning to embrace ICAO's policy, occurred in Queanbeyan NSW where land was rezoned for residential development at Jerrabomberra and South Jerrabomberra (formerly South Tralee) to the south of the Airport. This has resulted in dwellings constructed in the Flight Path Corridor Noise Zone. Currently about 800 dwellings are now constructed and further development in South Jerrabomberra has planning approval for up to 1,200 additional dwellings which are likely to be built over the next 5 years. The Jerrabomberra residents have complained of aircraft noise since 1996 in response to aircraft arriving and departing the Airport's main runway 17/35. Consistent with ICAO noise abatement Canberra Airport has worked with CASA and Airservices Australia to develop alternate in the corridor Noise Zone. The first in 1996 for departing aircraft resulting in an offset Standard Instrument Departure (SID). With technology development alternate arrival RNP flight paths by-passing Jerrabomberra to the west were designed and implemented in 2006 and 2013. Over time more airliners will fly RNP when safe to do so. The SID and RNP procedures implemented provide noise sharing across the Flight Path Corridor Noise Zone when safe to do so.
- iv. The National Airports Safeguarding Framework (NASF) guideline A is world leading, as is AS2021-2015, Table 3.3, "Indoor Design Sound Levels." Unfortunately, the States and Territories have not implemented these into their planning schemes.
- v. The disconnect continues as the Federal Government has been unable to convince the State and Territory Governments to implement NASF Guideline A, albeit they all signed off on them in May 2012, over 10 years ago. It is in the national and public interest for the States to embrace Land Use policies preventing residential creep under and nearby arriving and departing aircraft flight paths, and to require all dwellings exposed to aircraft noise to be noise attenuated consistent with Table 3.3, AS 2021-2015.
- vi. The latest NASAG meeting was held online on Wednesday 8 November 2023. Attendees included state and territory planning and transport departments, the Department of Defence, CASA and Airservices Australia. NASAG continues to discuss the work associated with recommendations of the Implementation

Review of the National Airports Safeguarding Framework (NASF). These recommendations included State/Territory governments implementing the Principles and Guidelines of NASF in their planning regimes by 2027.

6.2 Community consultation mechanisms

The Australian Government want to work with stakeholders to evaluate the effectiveness of existing consultation arrangements and identify how best to improve the framework.

- How can the existing consultation framework be improved to facilitate efficient planning and development, while preventing environmental harm and ensuring continued access for aviation users?

Canberra Airports response to this question is separated into two parts, the first focuses on public and stakeholder consultation requirements in the airport planning and development processes, while the second part of the question focuses on how to prevent environmental harm and allow access for aviation users.

Existing consultation framework and opportunities to improve planning and development efficiencies.

The existing public consultation processes and timeframes for Major Development Plans (MDP) and Master Plans under the Airports Act 1996 are undeniably extensive, surpassing by some measure the norms set by DA and rezoning notification periods and assessment processes in other state, territory or local planning regimes. The prolonged duration of public consultation timeframes, considerable procedural demands in the Airports Act 1996 inevitably result in protracted assessment timeframes, delayed decision-making processes that all hinder the timely expansion of crucial airport infrastructure and development of Federal leased airports. This disparity is particularly pronounced when compared to the more streamlined planning processes and consultation approaches applicable to land immediately around Federal leased airports, resulting in a competitive disadvantage for the development of airports.

To address this issue, a re-evaluation of the need for existing public consultation timeframes, the multiple steps and procedures required for progressing, assessing and determining MDPs and master plans is imperative. Implementing a more streamlined and responsive communication and engagement strategy can enhance efficiency without compromising the integrity of preparing, assessing and determining MDPs and master plans.

As set out previously, the consultations required for MDPs and Master Plans has realised community consultation time taken of over 3 months per year during 15 years of the past 25 Years at Canberra Airport. This consultation is before considering the time taken for the CACG & PCF, stakeholder engagement and community group presentations.

It would be useful and efficient for the existing blanket, one size fits all requirement of 60 business days public consultations timeframes for MDPs to be substantially reduced in line with standard Development Application notification periods of 14 calendar days. The Government should consider the following initiatives to speed up approvals for infrastructure and buildings that have little or no impact on the broader community, for examples non-

aviation projects for offices, retail and ancillary land uses including car parking, aviation hangars, aviation aprons and the like. Canberra Airport suggests the following:

- i. Cost trigger for an MDP be increased to a minimum of \$50 million from the current \$25 million (noting the recommendation to increase the MDP trigger to \$100 million as detailed in 6.3 below). Further that the cost trigger be indexed annually. The cost escalation over the past four (4) years has been significant as realised by all investors in infrastructure and buildings and governments, including the Commonwealth Government's review of its infrastructure pipeline as announced by Minister Catherine King in November 2023.
- ii. Consistent with *Airservices Australia Community Engagement Standard September 2023*, proposed new and extensions to runway projects which require new flight paths and impact on the community should remain at 60 business days public consultation if these future projects are to be approved via the Airports Act. To clear up any confusion, the White Paper should also confirm the consultation timeframes and approval process now envisaged by the Commonwealth for such future projects in the context of the roles of the EPBC Act and the Airports Act and the role of *Airservices Australia Community Engagement Standard September 2023*.
- iii. The community consultation period for all projects costing over the MDP threshold (excluding proposed new and extensions to runway projects which require new flight paths) should be 30 calendar days. This initiative would closely align community consultation for these projects with the States and Territories for similar projects.

Efficiencies in consultation while preventing environmental harm and access for aviation users.

It is important to note that any reduction in any public or stakeholder consultation will not compromise environmental protection nor result in environmental harm at Federal leased airports. That is because all Federal leased airports are subject to a considerable number of Commonwealth environmental assessment and protection Acts and Regulations. Specifically, Airport Environment Officer (AEO) play a crucial role in overseeing and regulating environmental aspects related to airport operations and development. Their responsibilities are not diminished by changes to public or stakeholder consultation, as their responsibilities include monitoring and managing potential environmental impacts, ensuring compliance with relevant regulations, and implementing measures to mitigate any adverse effects.

Additionally, the Environment Protection and Biodiversity Conservation (EPBC) Act serves as a comprehensive legal framework in Australia for the protection of the environment, including matters related to aviation and airport development. The Act requires thorough assessments of proposed actions that may have significant environmental impacts. By adhering to the provisions of the EPBC Act, authorities can ensure that any modifications to consultation requirements are carefully considered and do not result in environmental harm.

To strike a balance between efficiency and environmental protection, it is essential to foster collaboration between all stakeholders including environmental agencies (AEO and those administering the EPBC Act), and airport lessees. Regular dialogue and engagement can lead to the development of streamlined consultation processes that maintain a high standard of

environmental stewardship while facilitating the needs of aviation users and development of airports.

Canberra Airport is continuing to experience significant issues regarding the administration of the Airports Act 1996, Airport (Environment Protection) Regulations 1997 and EPBC Act. These issues create uncertainty for airport planning and development, generate significant additional consultation requirements which often result in conflicting or confusing advice and outcomes. A simple way to overcome these issues would be to provide additional environmental assessment powers to the AEO in the MDP process and only refer matters to the EPBC Act where genuine national environmental impacts are generated.

6.3 Land use planning on-site at airports

The Australian Government considers there may be opportunities to modernise the regulatory framework for the 22 Leased Federal Airports under the Airports Act and notes the importance of ensuring regulatory arrangements promote productivity, investment and efficiency.

- How could the Australian Government improve regulation to facilitate efficient planning and development while preventing environmental harm and protecting airports for aviation use?

Australia's aviation and airport sector plays a crucial role in connecting people, goods, and services across the vast expanse of the country and internationally. In recognising the significance of the Leased Federal Airports, the Australian Government and White Paper should be actively pursuing opportunities to review and modernise the Airport Act 1996 and the myriad Regulations currently applicable to airports. The emphasis should be on ensuring that regulatory arrangements not only promote productivity, investment, and efficiency but also maintain environmental protection and safeguarding airports for aviation uses.

As a starting point all development on airport is required by the Airports Act to be consistent with the Airport's Master Plan, which includes as an appendix the Airport's Environment Strategy. Master Plans are approved by the Minister for Infrastructure and Transport after extensive stakeholder consultation and 60 business days of public consultation. Further, the approved Canberra Airport Master Plan is acknowledged as the precinct plan for Canberra Airport by the National Capital Authority, within its National Capital Plan, which is the Dominant Plan within the ACT Planning System.

Unfortunately, the existing legislative and regulatory environment is marred by numerous, cumbersome, and outdated provisions that have tangible impacts on the efficiency of airport planning, environment and development. This contributes to lost efficiency, imposes additional costs on airports, and subjects all parties to unnecessary bureaucratic processes and procedures and hinders economic activity and investment of in-situ development on Airports.

Canberra Airport has already provided comments earlier in 2023 and awaits the government's responses to these submissions on the Sunsetting provisions of various Regulations including:

- *Proposed changes to the Airports (Environment Protection) Regulations 1997.*

- *Airport Environment Officer Charging and Cost Recovery Arrangements*
- *Airport (Building Control) Regulations 1996 – Charging Framework: Round 2 Consultation – Proposed framework and implementation (a copy of this submission is attached).*

Canberra Airport submits that the White Paper provides the Government an opportunity for adopting policies that will streamline the approval processes for in-situ development approval on Airport.

Further consider and have regard to the following:

1. *Commit to regular reviews and updates to Regulations* – Built into the new Acts and Regulations mechanisms for undertaking regular review and updates to enable government flexibility and adapt to changes in the aviation and airport sectors.
 2. *Adopt a risk based approach to Regulation*, acknowledging that after 25 plus years of airport privatisation the aviation and airport sector and Government have a sound understanding of areas of risk in planning, development and the environment.
 3. Acknowledge, Federally Leased Airports have without regulation embraced environmental initiatives by building new and/or retrofitting existing buildings to align with the commonwealth government’s aspirations to achieve net zero. In the context of commercial viability the environment initiatives will continue to evolve over time and reinforce the resilience of airport operations.
 4. As previously stated in 6.1, the airlines in Australia have one of the youngest fleets in the world. The benefits to the community this provides include noise reduction and less fuel emissions. This is an ongoing investment trend initiative by the airlines without regulation. Airservices Australia are assisting the airlines by either providing route flight paths with less track miles or routes with less head wind designed to reduce fuel burn and emissions. Airports are assisting the airlines by providing efficient on ground infrastructure to reduce taxiing fuel burn and emissions.
 5. Implement performance metrics and reviews of the AEO and the Airport Building Controller (ABC) – Often the Regulation of airports are divested to the ABC and AEO. The ABC and AEO roles are contracted to the private sector consultancies at significant cost to both the government and airports, albeit the airports are not privy to these contracts. Accordingly, these contracts should be provided to the airports for review and be subject to ongoing performance metrics and reviews to ensure value for money and industry best practice and quality of service.
- Is a monetary threshold still an appropriate mechanism for determining ‘major airport development’ requiring a MDP? What other significance tests could the Australian Government consider?

Increasing the MDP threshold from the current \$25 million to \$50 million in 2024 is considered the bare minimum to enable the effective ongoing development of airports.

Noting the current inflationary and cost escalation environment a more appropriate figure of \$100 million is recommended as being more appropriate. Specifically noting that developments captured under the MDP cost threshold are consistent with approved airport master plans.

As stated previously in this submission reducing the complexity and cost of MDPs for proponents and airports is also vital. The MDP process can take up to 18 months from lodgement to approval. This is significantly out of step with equivalent state and local government approval processes across Australia, placing on-airport developments at a significant disadvantage to identical developments off-airport.

Chapter 8 Fit For Purpose Agencies

Roles and responsibilities

Canberra Airport believes that the structure of the agencies involved in aviation are generally fit for purpose. That said, Canberra Airport has some concerns about the expertise and staffing levels currently existing in those agencies. Principal amongst these are:

- The aviation security skills and capability within the Department of Home Affairs. The broadening of responses from a counter-terrorism focus to the emerging ‘all hazards’ focus occurred alongside a significant regulatory change to aviation security infrastructure and service delivery. High staff turnover and aviation skills gaps within Home Affairs, coupled with a counter-terrorism focus have created issues for the aviation sector.

CISC’s expansion to cover 10 sectors of the economy in addition to transport under the *Security of Critical Infrastructure Act 2018*, (the SOCI Act) has resulted in aviation specific skills shortages. Canberra Airport is of the view the current aviation security arrangements are no longer fit for purpose, and the aviation (and maritime) security functions currently in CISC should be returned to DITCRDA.

Canberra Airport is a strong advocate and supporter of a secure and safe aviation environment. It has one of the highest performing passenger screening operations in Australia as rated by the CISC Quarterly Performance Scorecard. Notwithstanding its screening performance Canberra Airport is concerned that the current focus on enforcement and punitive responses for security failures to the detriment of education and system improvement will ultimately not result in better security outcomes for the aviation sector. Canberra Airport recommends that the Government increases its focus on security education to achieve sector wide improvement in performance.

- Similarly, there are concerns over the level of specialist knowledge and skills in the Aviation Divisions of DITCRDA. Significant staff turnover and a lack of specialist aviation knowledge means the Department making Australia’s domestic and international aviation policy as well as overseeing CASA and Airservices does not necessarily have the technical skills and abilities to effectively manage the range of current and emerging aviation policy challenges to 2030 and beyond.
- In recent times a percentage of flight delays have been caused by ATC staff shortage, and airlines looking to operate at Canberra Airport have raised concerns about ARFF staffing level and category compliance. While Canberra Airport recognises that the Pandemic caused skilled personnel to leave the industry, and considerable time is required to upskill employees to undertake specialised services, the Government needs to ensure that robust plans are in place to ensure staffing shortages are addressed in as short a time as possible.

Enhanced Security Obligations

Canberra Airport appreciates the need to have a strong security framework to protect aviation from threats. It is one of the leading airports in the implementation of screening upgrades and has generally had one of the highest performing passenger screening operations of the

monitored airports. The cost of implementing major security screening upgrades is significant and Canberra Airport would request that the Government review its position on the co-funding of future mandated security upgrades. Canberra Airport would also request that the Government reviews what constitutes fit for purpose security screening operations and equipment requirements in staff and good screening operations prior to mandating certain requirements. While Canberra Airport recognises a secure aviation network is paramount, it also notes that ultimately mandated security upgrade costs are passed on to passengers in the form of higher ticket prices.

Chapter 9 – Emerging aviation technologies

Enabling the manufacture and uptake of emerging technologies

Australia has the potential to be at the forefront of aerospace research, development and manufacturing due to the diverse range of industry stakeholders, award-winning researchers and space academics that are immersed throughout the aviation sector. This highly specialised knowledge-based sector offers Australia a competitive advantage in the continual development of space sector technologies. With investment in, and encouragement of, industry participants, and progressive policy making the Government and private sector have the potential to further develop and establish Australia's sovereign aerospace capabilities.

Consideration must be given to:

1. Advanced Aerospace Manufacturing

As more Australian companies expand their research and development programs, there will be financial barriers encountered. Ensuring funding opportunities or concessions are available should be a key priority. This may include commercialisation opportunities of fit-for-purpose electric propulsion technologies to enhance sustainability.

The growth in aerospace manufacturing in recent decades has led to workforce shortages, which may threaten future domestic manufacturing programs. Governments and industry participants must be actively engaged in the promotion and development of a highly skilled local workforce. Engaging with tertiary providers and identifying recruits from similar sectors should be a key priority to ensure the ongoing growth of aerospace manufacturing in Australia.

2. Future Air Traffic Management

The advancement of domestic aerospace manufacturing will also necessitate detailed consideration of future air traffic management, particularly concerning aerospace activities that occur above Class A airspace. Further international advances in power and propulsion, aerodynamics and flight automation has increased the number of aerospace vehicles travelling above 60,000 feet. As the domestic aerospace capabilities advance, and more vehicles begin travelling above Class A airspace, there needs to be detailed assessment of how this airspace will be appropriately managed, and by which body.

Chapter 11 International Aviation

Access to Regional Airports

Prior to the pandemic Qatar Airways and Singapore Airlines operated services from Canberra seven days a week. In March 2020 both carriers ceased these services and are yet to return. These services arose, in part, as a result of the major city airport access restrictions and provided great economic and social benefit for business and individuals who reside in the ACT and surrounding regions, with a population of nearly 1 million people located within 2 and ½ hour drive of the Airport. Canberra Airport is supportive of the current major city/regional regime to remain in place as it provides substantial incentive to carriers and benefits to regions outside the larger cities of Brisbane, Sydney, Melbourne and Perth. In July this year Canberra welcomed the commencement of a direct service to Fiji (with excellent connections on to the west coast of America). Again, restriction on access to Sydney and Melbourne influenced Fiji Airways' decision to provide a direct service to Canberra which provides benefit to the whole region.

Capacity Ahead of Demand

Canberra Airport supports the continuation of the current “Capacity ahead of Demand” approach to bilateral air services agreements. As recent experiences have shown with extremely high airfares and low seat availability there is an urgent need to provide capacity ahead of demand. Given Australia’s geographic isolation air connectivity and affordable airfares remain critical in ensuring that Australians are able to connect with the rest of the world.

13 July 2023

Megan Thomas
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Dear Megan,

RE: CANBERRA AIRPORT SUBMISSION ON ROUND 2 CONSULTATION AIRPORT (BUILDING CONTROL) REGULATIONS 1996 – CHARGING FRAMEWORK AND IMPLEMENTATION

Thank you for the opportunity to make this submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (**DITRDCA**), on the *Airport (Building Control) Regulations 1996 – Charging Framework: Round 2 Consultation – Proposed framework and implementation (the Round 2 Consultation Paper)*. The Round 2 Consultation Paper details significant increases to current charging arrangements under the provisions of the *Airports (Building Control) Regulations 1996 (ABC Regulations)* and as an Airport Lessee Company (**ALC**) Canberra Airport and its tenants will be directly impacted by the proposed changes.

The review of the Round 2 Consultation Paper indicates that several significant issues raised in the original Canberra Airport submission were not considered, outlined nor addresses in the Round 2 Consultation Paper, the key matters are summarised below:

- **Canberra Airport does not support** any of the proposed fee options from the original Consultation Paper nor the revised option in the Round 2 Consultation Paper. Canberra Airport maintains that proposed charging framework methodology and hourly rate used Airport Building Controller fees are fundamentally flawed. The approach in the consultation papers *fails to establish the minimum efficient cost* for the ABC activities which is a requirement under the Australian Government Cost Recovery Policy (**AGCRP**).
- **Proposed standardisation of building and works permit fees across all Commonwealth leased airports will result in significantly higher fees at Canberra Airport.** In addition, the standardisation of building and works permit fees is contrary to the Commonwealth leased airport competitive neutrality intent in the airport Head Lease. The proposed fees as outlined in the Round 2 Consultation Paper will restrict Canberra Airports ability to operate with competitive neutrality in the ACT and NSW regional context as the fees charged on airport are significantly higher than equivalent fees charged off airport around Canberra Airport.
- **Significant increase in building and works permit fees are unjustified and fail to provide any increase or improvement to ABC services and functions.** Significantly higher fees for no improvement to efficiency, productivity nor a reduction to administrative costs to ALC, DITRDCA and ABCs.

- **Canberra Airport maintains DITRDCA should undertake a holistic review of the ABC and AEO services (including fees) and functions along with the ABC Regulations and AEP Regulations will result in a superior outcome for DITRDCA, ALCs and industry.** A coordinated and holistic approach would likely result in increased efficiencies, productivity, a reduction in administrative costs and time, along with improvements to ABC and AEO services. This approach aligns with the Australian Government Charging Framework charging principles, in particular transparency, efficiency, performance and simplicity.
- The significant increase to charges and proposed charging arrangements **fail to provide adequate information as required under the AGCRP**, such as, the minimum efficient cost for each of the activities; Cost Recovery Implementation Statement (CRIS); and Detailed breakdown of services for fees and levies as required under Table 12 of the AGCRP.

The Canberra Airport submission on the original Consultation is attached (see **Attachment 1**) for the consideration of DITRDCA.

With regard to the Round 2 Consultation Paper Canberra Airport objects to the proposed ABC Regulations Charging Framework on the following grounds.

1. Flawed methodology and inadequate evidence used to formulate proposed ABC Regulation building and work permit application fees.

Canberra Airport maintains that proposed charging framework methodology and hourly time and rates used for calculating Airport Building Controller fees is fundamentally flawed. This approach fails to establish the minimum efficient cost for the ABC activities which is a requirement under the AGCRP. The proposed fee framework continues to assume that with the increase in cost of a building or work the cost for the ABC and DITRDCA continues to increase which is not the case in the broader private certification industry. Furthermore, the assumptions under the section titled 'Calculation of Fees' indicates that the cost of delivering the ABC function will increase by around 65% in 2024-25 from the 2019 levels. The cost increase of 65% for ABC functions are astonishing, not backed up by statistical evidence nor consistent with broader industry evidence.

2. The Round 2 Consultation Paper Appendix 1 Proposed fees payable for ABC building and works permits will on average increase fees by 133% this is equivalent to an increase in fees of \$68,739.26 per application.

Canberra Airport has completed an analysis of the existing ABC Regulations Schedule 1 Fees payable for building applications Part 4 Canberra Airport and the Round 2 Consultation Paper Appendix A Schedule 1: Fees payable for building activities – building and works permit applications (refer to Attachment 2 for the comparison table) this analysis has determined:

- ABC building and works permits will on average **increase fees by 133%** this is equivalent to an **increase in fees of \$68,739.26 per application.**
- The proposed fees maximum fee of \$1,500,000 or price on application for a building activity or works with a value above \$150,000,000 will increase existing ABC Regulation Schedule 1 fees by **1411% or \$1,400,700.**
- Amendment of approval fees will also increase considerably for both the below and above the \$1,000,000 cost of works threshold with no reasoning provided for the increased fees.

The plus requirement for payment of additional application fees for an amendment application is unworkable and would likely impact on the amendment process. It is recommended that the Plus component of the amendment fee is removed.

- The significant fee increases the building and works permit fee options fail to avoid imposing excessive and unnecessary costs to Canberra Airport and its tenants.
- Costs are not evidence based, do not demonstrate value for money and are significantly out of step with off-airport (including surrounding ACT and regional NSW context) public and private certification fees and charges for equivalent development values.
- The section titled 'Calculation of Fees' states that the fees have had regard to and are comparable to fees and charges off-airport (see page 6), while on page 7 of the Round 2 Consultation Paper it states that fees are somewhat higher than local government development application fees. The Round 2 Consultation Paper contains a number of inconsistent statements and continues to fail to provide any statistical evidence to support the significant fee increases.

3. The Round 2 Consultation Paper fails to provide evidence nor requirement to support the full cost recovery model which would increase ABC permit fees 30% per application.

The Round 2 Consultation Paper section titled Full Cost Recovery indicates that the DITRDCA is considering implementing a full cost recovery option and if adopted this would result in the application of a 30% levy to the proposed ABC Regulation fees and charges. The Round 2 Consultation Paper fails to provide any evidence why such a levy is required and the services which the levy would fund this is clearly inconsistent with the AGCRP and the consultation requirements for the policy which requires transparency and evidence to support such significant policy decisions for the aviation and airport industry. The imposition of such a significant levy would further increase costs on airport for building and works permits with no improvements to services, function, and outcomes from the ABC nor the operations of DITRDCA. Canberra Airport does not support the imposition of a levy as outlined in the Round 2 Consultation Paper.

4. Proposed ABC Regulations charging framework and structure is inconsistent with the requirements of the Australian Government Charging Policy.

Round 2 Consultation Paper reaffirms that the primary objective for the ABC Regulations is the requirement of DITRDCA to develop a charging framework that is consistent with the AGCP. However, the consultation papers have failed to outline how the proposed charging framework address the AGCP principles specifically:

- **transparency** – making available key information about the activity, such as the authority to charge, charging rates, and, where relevant, the basis of the charges.
- **efficiency** – delivering activities at least cost, while achieving the policy objectives and meeting the legislative requirements of the Australian Government.
- **performance** – which relates to effectiveness, risk mitigation, sustainability and responsiveness. Engagement with stakeholders is a key element of managing and achieving performance. Entities must regularly review and evaluate charges in consultation with stakeholders to assess their impact and whether they are contributing to government outcomes.

DITRDCA should revise the consultation paper and reissue to include information such as the minimum efficient cost for each of the activities; Cost Recovery Implementation Statement (CRIS); and a detailed breakdown services for fees and levies as required under Table 12 of the AGCRP.

5. Round 2 Consultation Paper fails to consider and address Canberra Airport responses on the original consultation paper.

The Round 2 Consultation Paper section titled Summary of stakeholder feedback provides high level commentary on the stakeholder feedback provided as part of the original consultation program. Canberra Airport notes that many matters raised on the original consultation paper are not detailed nor considered in the Round 2 Consultation Paper. AGCP principles, framework and consultation plans requires Australian Government Departments to genuinely consider and address stakeholder feedback and responses to date this has not occurred.

6. Consultation Papers are not accompanied by an Impact Analysis required under the Australian Government Guide to Policy Impact Analysis.

The Australian Government *Guide to Policy Impact Analysis (the Guide)* was prepared by the Department of the Prime Minister and Cabinet under the Office of Impact Analysis and came into effect from 1 March 2023. The Guide requires all Australian Government policy makers undertake a detailed Impact Analysis where a policy or action of government will result in more than a minor change in behavior or impact for people or business, the Guide states inter alia:

Any policy proposal or action of government, with an expectation of compliance, that would result in a more than minor change in behaviour or impact for people, businesses or community organisations.

(see page 8 https://oia.pmc.gov.au/sites/default/files/2023-05/oia-impact-analysis-guide-march-2023_0.pdf)

It is Canberra Airports view that the proposed Round 2 Consultation Paper for significant fee increases under the ABC Regulations amount to a policy proposal and government action which will result in more than a minor change in behavior or impact for ALCs and tenants which are businesses. Accordingly, in accordance with the requirements of the Guidelines the Round 2 Consultation Paper must be amended to include an Impact Analysis of how the proposed changes to the ABC Regulations fees schedule and associated areas will impact on airport businesses prior to the implementation of the proposed policy reforms.

Despite the significant concerns and issues raised with regards to the Round 2 Consultation Paper, Canberra Airport supports a holistic review and modernisation of the ABC and AEO services and functions as part of, and giving consideration to, the broader review of ABC Regulations and AEP Regulations.

If you would like to discuss any element of this submission, or to setup additional stakeholder meetings, please contact me by phone on (02) 6275 2207 / 0428 171 487 or email a.connor@canberraairport.com.au.

Your sincerely



Andrew Connor
Planning and Environment Manager
Canberra Airport

LIST OF ATTACHMENTS

- ATTACHMENT 1 CANBERRA AIRPORT SUBMISSION ON DITRDCA ORIGINAL CONSULTATION PAPER FOR ABC REGULATIONS 1996 – CHARGING FRAMEWORK**
- ATTACHMENT 2 ANALYSIS OF EXISTING ABC REGULATIONS SCHEDULE 1 PART 4 FEES AND APPENDIX A PROPOSED ABC FEES IN ROUND 2 CONSULTATION PAPER**