



Every Queensland
community deserves
to be a liveable one

1 December 2023

Director, Aviation White Paper Project Office
Aviation White Paper
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
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RE: LGAQ Submission – Aviation Green Paper: Towards 2050

The Local Government Association of Queensland (LGAQ) welcomes the opportunity to provide feedback to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts on the Aviation Green Paper: Towards 2050 (September 2023).

The LGAQ is the peak body for local government in Queensland, advising, supporting, and representing local councils since 1896, enabling them to improve their operations and strengthen relationships with their communities. The LGAQ does this by connecting all of Queensland's 77 councils to people and places; supporting their drive to innovate and improve service delivery through smart services and sustainable solutions; and providing them with the means to achieve community, professional and political excellence.

Local government plays a central role in Queensland's aviation sector, with Civil Aviation Safety Authority (CASA) data showing that local governments own and operate 60 of the 81 registered aerodromes across the state. These aerodromes provide essential services to regional and remote communities including health services, education, justice, tourism, and delivery of essential goods. In Australia's most disaster-prone state, aviation provides a means of access during natural disasters where access would otherwise be obstructed.

The LGAQ understands the Aviation Green Paper is an important step in developing an Aviation White Paper that will set the policy direction for the aviation sector out to 2050. This is of particular interest to Queensland councils and the LGAQ due to:

- The financial impacts experienced by councils in owning airports and aerodromes
- Increased pricing of regional airfares
- Local government's role in the pathway to net zero for the aviation sector
- Indirect impacts associated with the adoption of emerging technologies.

The LGAQ has reviewed the Aviation Green Paper and prepared detailed feedback in relation to the funding challenges experienced by local government as a result of owning aerodromes and airports in Attachment 1.

Overall, the LGAQ makes seven recommendations for the consideration of the Department, summarised below:

- **Recommendation 1** – The LGAQ recommends that the federal government engages with state and local governments to address specific challenges associated with regional and remote aviation.
- **Recommendation 2** - The LGAQ recommends that an ongoing regional airport infrastructure funding program be established by the federal government to offer continued support for



regional airport and aerodrome compliance with Civil Aviation Safety Authority (CASA) standards.

- **Recommendation 3** - The LGAQ recommends that the federal government supports Queensland councils' calls for resource company users to be required to contribute to the maintenance and upgrade of airports and other infrastructure managed by local governments.
- **Recommendation 4** – The LGAQ recommends that the federal government implements a regulatory framework for the operation of emerging aviation technology such as eVTOLs, including an allowance for local government to consider associated land use implications.
- **Recommendation 5** – The LGAQ recommends that a Consultation Regulation Impact Statement (C-RIS) is undertaken as part of the development of the Aviation White Paper, expected in mid-2024, to ensure associated policy impacts are assessed against alternatives in a transparent manner.
- **Recommendation 6** – The LGAQ recommends that a funding program be established by the federal government for the upgrade of charging infrastructure to support the adoption of electric and hydrogen technologies once these aircraft are deployed to the public.
- **Recommendation 7** – The LGAQ recommends that the federal government provides financial support for sustainable aviation fuels in regional airports and incentives for adopting low-emission technologies in the regional fleet.

Importantly these recommendations align with three previous resolutions of Queensland councils, which were carried at previous LGAQ Annual Conferences and detailed in Attachment 3, and the LGAQ Policy Statement which states the following of relevance to the scope of the Aviation Green Paper:

- *6.1.8.1 Councils within proximity of a strategic major airport have a right to have direct input into the operations of that airport, to ensure appropriate transport and amenity is provided for local communities, while minimising environmental impacts*
- *8.3.1.1 Airline licensing policies should take account of the decentralised population in Queensland to ensure that rural residents are not disadvantaged by cost and inadequate service levels.*
- *8.3.1.2 The State and Federal governments should guarantee regional airline networks be protected in the conditions of sale of major airports, ensuring access is maintained and regional airlines are not squeezed out by higher costs.*
- *8.3.1.3 The Federal Government should adequately subsidise regional and sub-regional airports and associated services as a community service obligation, with an emphasis on rural and remote areas.*
- *8.3.1.4 The State Government should continue to support subsidised air fares for residents of remote and discrete First Nations communities to travel to the nearest regional centre.*

Thank you again to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts for the opportunity to provide feedback on the Aviation Green Paper. Please do not hesitate to contact Jarrod Hellmuth, Lead – Roads and Transport via email at jarrod_hellmuth@lgaq.asn.au or phone 07 3000 2237 should you wish to discuss any aspect of this submission.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Alison Smith', written in a cursive style.

Alison Smith
CHIEF EXECUTIVE OFFICER



ATTACHMENT 1: LGAQ Overview

Financial impacts of owning aerodromes

In Queensland, the economic landscape presents a challenge for several regional and remote airports, which struggle to achieve commercial viability. These airports often form the vital conduits for connectivity in regional and remote areas, which often have limited road or rail alternatives. This results in local government commonly taking on the ownership and operation of these facilities due to the critical services they facilitate.

Further to the operation of airports/aerodromes, local government is then required to continue to upgrade and maintain these assets which places a significant strain upon councils. As providers of aerodromes, councils are subject to Part 139 of the Civil Aviation Safety Regulations (CASR) which includes the standards for these facilities, obstacle control, operational procedures and safety management. Councils provide regional aerodromes to support their communities, however the requirement to meet these regulations often results in significant costs for both security and infrastructure requirements.

The LGAQ has recently received feedback from several regional and remote councils regarding the cost implications associated with owning airports/aerodromes due to changes to Civil Aviation Safety Authority (CASA) maintenance/safety standards, routine inspection costs, and upgrades to accommodate new Royal Flying Doctor Service (RFDS) planes. Whilst it is acknowledged that grant funding opportunities exist at both federal and state levels, these are largely competitive grant programs which fail to provide the vital ongoing support to local governments to keep up with rising costs associated with ageing infrastructure, maintenance and compliance costs. This is highlighted in a recent report by Regional Capitals Australia (RCA) which estimates 60% of Australia's regional airports are running at a loss.

Another key contributor to the cost pressures felt by local government in owning airports are the costs associated with security staff and new security equipment. Federal funding/grants were available in 2019 to assist in the purchase of new security screening equipment however, as Resolution #56 in Attachment 3 notes, purchasing of new security screening equipment is only a small percentage of the ongoing cost of complying with security requirements. Other costs include staffing, administration, changes to building and infrastructure, additional floor space consumed that in small terminals must be recreated elsewhere, and new expensive maintenance regimes.

Regional communities do not have high enough travel numbers to defray the costs imposed. The benefits of aviation security are national; an adverse event will impact the national economy, local and international tourism sectors amongst others, and the Australian Government impose increasing security regimes on regional airports. As such, aviation security is then a public good and a national responsibility, similar to national security, the Australian Federal Police or Defence Force. As a national benefit and a national public good, the cost must be carried federally.

The interplay of regional development, accessibility, and economic feasibility underscores the need for further policy considerations and collaboration to ensure the longevity of these essential transportation hubs.

Regional air fares

Air services that are frequent and affordable are vital for providing access to health services, work, education and for facilitating tourism. An ongoing Australian Housing and Urban Research Institute (AHURi) enquiry has identified that one of the key determinants of populations remaining in regional areas is access to reliable and regular connections to metropolitan areas.



The high cost of regional airfares is a social and economic equity issue which impacts Queenslanders in the heart of some of our most economically important regions. Whilst it is acknowledged that one of the impacts of ticket prices is airport landing fees and other service charges, greater consideration of this issue is required at the federal level to address market failures in Regular Public Transport (RPT) services for regional and remote communities.

The flight to net zero

The LGAQ support the aviation sectors pursuit of net zero emissions as a crucial step forwards in fostering an environmentally responsible future. Not only does this commitment align with global efforts to mitigate climate change, but also underscores the aviation industries dedication to innovation and progress. With the adoption of new technologies in the future, it must be noted that airports and aerodromes will need to upgrade their infrastructure to support either electric or hydrogen technologies. It is essential that financial assistance is provided to local government by state and federal governments to progress renewable aircraft. Failing to provide assistance at an early stage will likely inhibit the uptake of these new aircraft and restrict their relevance to regional and remote communities who may benefit, particularly for short haul flights.

Emerging technologies

With Australia set to be a leader in emerging aviation technologies such as electric vertical take-off and landing (eVTOL) aircraft, it is important that a regulatory framework is developed prior to their adoption to ensure a safe and secure introduction of these aircraft. Further, local governments will be required to consider land use implications associated with eVTOL aircraft requiring early consultation.

ATTACHMENT 2: LGAQ Comments on relevant Consultation Questions

Consultation Question	LGAQ Comment
<p>Chapter 4: Where should the Australian Government focus its engagement in regional and remote aviation, including helping achieving Closing the Gap outcomes, noting established state, territory and local government responsibilities and programs?</p>	<p>It is recommended that the Australian Government engage with State and local governments to address specific challenges associated with regional and remote aviation. Aligning aviation initiatives with Closing the Gap outcomes is crucial, requiring policies that prioritise access to essential services. The Australian Government is in a position to provide tailored support through funding mechanisms, grants, and capacity building programs to empower local governments in managing and enhancing regional and remote aviation services. This will positively contribute to the overall socio-economic development of these areas, complimenting the unique roles of each level of government.</p>
<p>Chapter 4: What opportunities do emerging aviation technologies present for regional and remote Australia?</p>	<p>New aviation technologies hold significant promise for regional and remote communities in Australia, enhancing connectivity and economic development. With Advanced Air Mobility (AAM) services expected to improve regional air connectivity, this could be the solution for on-demand short routes in remote areas. These new technologies also bring the potential to stimulate economic growth through creating skilled jobs and efficient transportation solutions where infrastructure is limited.</p>
<p>Chapter 4: What are the specific issues experienced by the regional and remote aviation sector in the context of decarbonisation? What elements should the Transport and Infrastructure Net Zero Roadmap and Action Plan include to recognize the specific circumstances of the regional and remote aviation sector?</p>	<p>The regional and remote aviation sector encounters distinctive challenges in the context of decarbonization, attributed to factors like extended flight distances and limited infrastructure for alternative fuels. The Transport and Infrastructure Net Zero Roadmap should acknowledge these issues by incorporating targeted initiatives, including financial support for sustainable aviation fuels in regional airports and incentives for adopting low-emission technologies in the regional fleet.</p>
<p>Chapter 4: What are the challenges faced by regional and remote aviation and airports by our changing climate?</p>	<p>Regional and remote airports are currently in an infrastructure deficit with an estimated \$170M shortfall in funding over the next 10 years, as reported in the ACIL Allen Regional Airport Infrastructure Study 2016.</p>
<p>Chapter 4: How do local governments and aerodrome operators consider climate resilience when managing their aviation assets?</p>	<p>As many local governments struggle to fund routine maintenance for aerodromes, many face limitations in their capacity to assess climate risks and implement necessary adaptation strategies. With targeted support for regional airports, they will be in a far greater position to undertake climate risk assessments and undertake infrastructure resilience works.</p>
<p>Chapter 5: How can Government work with industry to ensure a strong and sustainable aviation sector that supports emissions</p>	<p>Through the development of supportive regulatory frameworks, offering incentives and funding for research and development of environmentally friendly</p>

<p>reduction targets while growing jobs and innovation?</p>	<p>technologies. Governments can facilitate workforce development programs to develop skills required for advancing aviation practices.</p>
<p>Chapter 6: How could the Australian Government improve regulation to facilitate efficient planning and development while preventing environmental harm and protecting airports for aviation use?</p>	<p>Consider investigating adopting covenants on title for properties affected by significant airport noise, to minimise reverse amenity concerns.</p>
<p>Chapter 6: Is a monetary threshold still an appropriate mechanism for determining “major airport development” requiring an Major Development Plan (MDP)? What other significance tests could the Australian Government consider?</p>	<p>A monetary threshold may not be appropriate, as costs may not be fully confirmed until later in the development planning process.</p> <p>Capacity or scale may be more appropriate measures and would match thresholds used for other types of development.</p>
<p>Chapter 6: Do current master planning processes adequately account for climate risks and if not, how could they be improved?</p>	<p>Currently airports are required to develop an Airport Environment Strategy which, among other things, should address sustainability considerations and climate adaptation.</p> <p>Notwithstanding, further guidance, similar to ICAO’s ‘Climate Change: Climate Risk Assessment, Adaptation and Resilience’ for Australian contexts may be of assistance</p>
<p>Chapter 6: Do the current master planning processes support all airport users, including general aviation?</p>	<p>Current practice involves a collaborative effort among government authorities, airport operators, airlines, and local communities to balance economic development, environmental sustainability, and the needs of aviation stakeholders. However, if there was a view to improve support for general aviation users, consultation processes under the Airports Act could be amended, to require key stakeholder consultation prior to general public consultation.</p>



ATTACHMENT 3: LGAQ Relevant Motions and Resolutions

2020 Motion #50 – Financial Assistance for Council Owned Airports

The Resolution asks that the LGAQ lobby the State and Federal Governments to provide financial assistance to local government owners and operators of airports that have suffered a negative economic impact because of the COVID 19 Pandemic

2020 Motion #78 – Resource Industry Contribution to Airports and other infrastructure

That the LGAQ lobby the State Government to apply conditions to exploration and production licenses and permits issued under the Minerals Resources Act 1989, Petroleum Act 1923, or the Petroleum and Gas (Production and Safety) Act 2004 requiring resource companies to contribute to the maintenance and upgrade of airports and other infrastructure managed by local governments.

2019 Resolution #56 – Federal Funding for Aviation Security

The Resolution asks LGAQ to “lobby the Federal Government to offset any new regulatory security requirements imposed by the Federal Government on regional airports that result in significant cost increases with funding assistance to ensure regional communities are not further disadvantaged.”