

8 March 2022

Attention:  
Director,  
Airport Reform, Sunsetting and IFAM Section  
Airports Branch  
GPO Box 594 CANBERRA ACT 2601

Dear Sir/Madam,

**SUBJECT: Sunsetting Airports Regulations Stage 1a: Cutting Red Tape**

Perth Airport is Australia's fourth largest capital city airport, serving as Australia's Western Hub and playing a critical role in providing services for the FIFO-based resources sector and in keeping Western Australians connected to the rest of the nation and the world.

Perth Airport appreciates the opportunity to be involved in this on-going consultation process.

While our comments on Stage 1a are understandably brief and succinct due to its relevance to our continued operations, we look forward to a deeper involvement in future stages. We would also be happy to elaborate further on these responses if that would assist the Government in its deliberations.

Perth Airport provides the following responses to the key questions posed in your discussion paper:

Option 1: Status quo: Allow the Airports Regulations and the AOISRs to sunset

1. Do you think the Airports Regulations and the AOISRs should be allowed to sunset? **Perth Airport comment:** No, not in this instance.
2. What are the benefits of no regulations on airport subleases, licensing and ownership? **Perth Airport comment:** None, given there are requirements in the Act.
3. What are the consequences of no regulations on subleases, licensing and ownership? **Perth Airport comment:** In this case, uncertainty.

Option 2: Remake the Airports Regulations and the AOISRs without changes

1. Do you agree or disagree with keeping the Part 1, 2 and 3 of the Airports Regulations and the AOISRs as is and without changes? **Perth Airport comment:** Disagree
2. What are the benefits or efficiencies in keeping these two Regulations as is? **Perth Airport comment:** Status quo – no need to change processes
3. What are the inefficiencies in keeping these two Regulations as is? **Perth Airport comment:** The provisions are time consuming, costly to comply with and disproportionate to the benefit.

Option 3: Remake the Airport Regulations and the AOISRs with changes  
Subleases and Licensing

1. Do you agree or disagree with the proposed amendments? Please specify. **Perth Airport comment:** From our understanding, what is being proposed is that instead of requiring a declaration, the basic proposition would be that subleases / licences are not prohibited unless the Department expressly states they are (. If this interpretation is correct, then we agree with the proposed amendments along with the introduction of a register to allow visibility and the opportunity for the Department to intervene if necessary.

2. Can you suggest any improvements to the proposed amendments (e.g. is there anything else that should be included)? **Perth Airport comment:** No comment.

3. What level of benefit would you expect these changes to bring to your business? **Perth Airport comment:** There will be a significant time and cost saving. A considerable amount of work goes into preparing applications and they are always approved.

4. Are there other opportunities to streamline and reduce red tape in regard to subleases and licensing? **Perth Airport comment:** No comment.

5. Do you agree with the Department's estimate of the regulatory impact of proposed changes? **Perth Airport comment:** Yes

#### Ownership

1. Do you agree or disagree with the proposed amendments? Please specify. **Perth Airport comment:** Perth Airport supports the proposed amendments because it makes sense to simplify the language, increase the thresholds and make the declaration due every three years.

2. Can you suggest any improvements to the proposed amendments (e.g. is there anything else that should be included)? **Perth Airport comment:**

- Simplify reporting requirements: e.g. it is redundant to have a board approval, declaration and a statutory declaration.
- Department should be conscious of unintended consequences. For instance, the concept of prescribed interest should be maintained in some form.
- In addition, improve the lodgement portal, which is somewhat inefficient as it makes the user copy and paste information into numerous fields. It would be better if a word document could be submitted or if the previous year's declaration could be used as a base.

3. What level of benefit would you expect these changes to bring to your business? **Perth Airport comment:** The changes would deliver both time and cost savings.

4. How could airport ownership remain as competitive as possible, while protecting Australia's national infrastructure? **Perth Airport comment:** No comment.

5. Do you agree with the Department's estimate of the regulatory impact of proposed changes? **Perth Airport comment:** Perth Airport believes the Department's estimate is reasonable.

If you require further information or would like to discuss our comments, please contact me on [REDACTED] or on [REDACTED].

Yours sincerely,



Matt Brown  
GENERAL MANAGER, CORPORATE AFFAIRS