



AUSTRALIAN  
AIRPORTS  
ASSOCIATION

2 October 2025

Committee Secretary  
Senate Standing Committees on Environment and Communications  
PO Box 6100  
Parliament House  
Canberra ACT 2600

**Submission on the Environment Protection and Biodiversity Conservation Amendment (Board of Management Functions) Bill 2025**

Dear Chair and Committee Members,

The Australian Airports Association (AAA) welcomes the opportunity to comment on the Environment Protection and Biodiversity Conservation Amendment (Board of Management Functions) Bill 2025.

The AAA is the national industry body representing more than 340 airports and aerodromes across Australia, from the largest international gateways to small regional and remote airstrips. Airports are essential national infrastructure, underpinning connectivity for communities, freight, tourism, health services, and emergency response. Collectively, the sector contributes more than \$100 billion annually to the Australian economy and supports over 160,000 jobs. Airports also operate in and adjacent to sensitive environmental areas, including Commonwealth reserves, and are subject to strong obligations under the EPBC Act.

The AAA acknowledges the Bill's intent to provide continuity of decision-making by Boards of Management of Commonwealth reserves after a management plan has expired. Continuity is important to avoid governance gaps. However, safeguards are necessary to ensure that expired management plans do not become de facto long-term instruments, particularly where they are inconsistent with current environmental science, aviation safety considerations, or government policy.

From an aviation perspective, decisions made under expired plans could affect airport operations. For example, vegetation management, wildlife hazard controls, and restrictions on land use in or around reserves may directly influence aviation safety, operational resilience, and future infrastructure planning.

The Bill's provision that Boards may act in a manner "consistent with the expired plan" is ambiguous and could create uncertainty for stakeholders such as airports that rely on clarity in environmental and planning frameworks.

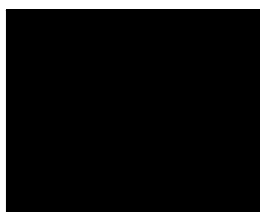
To address these concerns, the AAA recommends:

- Introducing a maximum timeframe (for example, 12–18 months) in which Boards may act under an expired plan, with a clear statutory obligation to finalise a new plan within that period.
- Clarifying what constitutes “consistency” with an expired plan, including excluding decisions that represent materially new activities or policy directions.
- Requiring Boards to publish notice when exercising powers under the expired plan provision, including justification for the decision, and to report annually on the use of this mechanism.
- Ensuring consultation with affected stakeholders, including airports and aviation operators where relevant, as well as Indigenous communities and local governments.
- Mandating that Boards consider updated environmental science, climate data, and relevant national policies, even when acting under an expired plan.

These measures would ensure that the Bill achieves its intended purpose of providing continuity of governance while avoiding the risks of outdated or inconsistent decision-making. They would also provide greater certainty for aviation operators and other stakeholders whose activities are closely linked with land and environmental management.

The AAA supports measures that strengthen governance and accountability within the EPBC framework. We would welcome the opportunity to engage further with government and the Committee to ensure that the Bill delivers both continuity and robust environmental stewardship. Should you require any further information or clarification, please do not hesitate to contact Sybilla Grady, Senior Manager, Policy and Research via email [\[redacted\]](#)

Kind regards



Simon Westaway  
Chief Executive Officer