



08 October 2018

Dr Sean Turner
Committee Secretary
Senate Legal and Constitutional Affairs Legislation Committee

Via email: legcon.sen@aph.gov.au

Dear Dr Turner

Inquiry into the Aviation Transport Security Amendment Bill 2018 [provisions]

Regional Aviation Association of Australia (RAAA) welcomes the opportunity to submit to the Committee's Inquiry into the Aviation Transport Security Amendment Bill 2018 [provisions] and offers the following comments.

The Regional Aviation Association of Australia is a not-for-profit organisation formed in 1980 as the Regional Airlines Association of Australia to protect, represent and promote the combined interests of its regional airline members and regional aviation throughout Australia.

The RAAA has 29 Ordinary Members (AOC holders) and 63 Associate/Affiliate Members. The RAAA's AOC members directly employ over 2,500 Australians, many in regional areas. On an annual basis, the RAAA's AOC members jointly turnover more than \$1.5b, carry well in excess of 2 million passengers and move over 23 million kilograms of freight.

RAAA members operate in all States and Territories and include airlines, airports, freight companies, engineering and flight training companies, finance and insurance companies and government entities. Many of RAAA's members operate successful and growing businesses providing employment and economic sustainability within regional and remote areas of Australia.

RAAA welcomes any move by Government to reduce the administrative burden on low risk limited resourced regional aviation operators. As stated by Minister Dutton in Parliament on 19 September 2018, "It is vital, however, to balance aviation security needs with maintaining a viable aviation sector, particularly in regional Australia. Not all industry participants face the same level of risk."

The development of a TSP under the draft Section 26B which prescribes measures and procedures without taking into account the local resource limitations and possible alternative measures and procedures which can achieve the same desired outcomes could increase the cost burden on a lower risk operator.

It is therefore imperative that the Department develops robust and transparent procedures to ensure that the draft Section 26C (1) (c) “be appropriate for the operations or locations covered by the program” is fully considered. RAAA believes that a full consultation between the Department and the individual operator must be undertaken prior to and TSP being issued, thus ensuring that viable and affordable measures and procedures which achieve the desired outcomes prescribed in the TSP.

Yours Sincerely

Mike Higgins
CEO
Regional Aviation Association of Australia