



RAAA SUBMISSION

**SENATE RURAL AND REGIONAL AFFAIRS AND TRANSPORT
REFERENCES COMMITTEE**

AIRPORT AND AVIATION SECURITY INQUIRY

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20 January 2015

Committee Secretary
Senate Rural and Regional Affairs and Transport References Committee
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Sir,

RAAA SUBMISSION

Senate Rural and Regional Affairs and Transport References Committee

Airport and Aviation Security Inquiry

The RAAA is pleased to provide this submission in response to the Senate Rural and Regional Affairs and Transport References Committee - Airport and Aviation Security Inquiry.

I. RAAA Background

The RAAA and its Members

The Regional Aviation Association of Australia (RAAA) 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 Association changed its name in July 2001 to the Regional Aviation Association of Australia (RAAA) and widened its charter to include a range of membership, including regional airlines, charter and aerial work operators, and the businesses that support them.

The RAAA has 28 Ordinary Members (AOC holders) and 71 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 2million 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 Charter

The RAAA's Charter is to promote a safe and viable regional aviation industry. To meet this goal the RAAA:

- promotes the regional aviation industry and its benefits to Australian transport, tourism and the economy among government and regulatory policy makers;
- lobbies on behalf of the regional aviation industry and its members;
- contributes to government and regulatory authority policy processes and formulation to enable its members to have input into policies and decisions that may affect their businesses;
- encourages high standards of professional conduct by its members; and
- provides a forum for formal and informal professional development and information sharing.

The RAAA provides wide representation for the regional aviation industry by direct lobbying of Ministers and senior officials, through parliamentary submissions, personal contact and by ongoing, active participation in a number of consultative forums.



II. RAAA Response to Airport and Aviation Security Inquiry

The Regional Aviation Association of Australia (RAAA) welcomes the opportunity to submit to the Committee's inquiry into Airport and Aviation Security and offers the following comments.

Aviation is the most highly regulated industry in Australia with high associated regulatory and government imposed costs. Regional aviation services are essential services underpinning the economy of many regional and remote communities.

For many years regional aviation margins have remained low with some aircraft operators providing a community service for remote communities at a loss, subsidised by either other more profitable routes or by State Government subsidies through a regulated route system.

There has been a reduction in regular air services to approximately 122 communities in the period 1984 to 2010 (BITRE statistics), some of whom relied on air services for business and medical reasons. Reliable figures are not available for the period 2010 to the present. Additionally, we estimate that between December 2005 and January 2015 fourteen (14) operators providing Regular Public Transport (RPT) services to Australian regional and remote communities have closed their doors.

Aviation security operates in a dynamic environment. As such, aviation security measures must have flexibility to allow emerging threats to be countered.

World best practice encourages that aviation security measures should be intelligence lead from high quality sources, risk assessed and outcomes based. Proscriptive legislation tends to create an inefficient one size fits all approach which has not only prevented rapid and flexible changes in response to the changing threat environment but also required expensive processes and equipment to be introduced into airports and for aircraft operators where the threat does not warrant such measures. This has resulted in a waste of limited resources for no additional security outcome thus creating an undue burden on the regional aviation industry, including operators and airports.

The regional aviation industry's limited resources must be directed to counter threats against individual operators and airports, and not wasted on countering threats that do not exist or are marginal at best.

Current aviation security regulation in Australia administered by the Office of Transport Security is changing to meet current and perceived threats. The process involves regular consultation with industry and relevant Government departments to ensure that current and future threats are mitigated commensurate with the threat. If a threat applies to a site or operator, then that entity must mitigate that threat by allocating sufficient resources to counter the threat. Limited resources must not be used on threats that do not exist.

Examples of this are the regulations relating to screening. Screening has been reviewed a number of times in the last 10 years and will be reviewed again in the near future in a process involving all relevant parties. Due to the high cost of screening, a significant amount of work has been undertaken to ensure that screening occurs in airports where the threat assessment warrants such a process.



One area we feel improvement could be made is by returning the checked bag screening trigger to 30,000 kg MTOW, as it was previously, from the current 20,000 kg MTOW. Lowering the limit has meant unnecessary costs for regional operators with little or no security gain.

The RAAA is a strong supporter of the current screening regulations and will continue to support future reviews of screening to ensure that actual or perceived threats are mitigated. The RAAA supports regulation that will ensure that screening is not introduced into airports where the threat assessment does not justify the introduction and where the cost will be prohibitive to the continued provision of regular air services, for example, small regional and rural airports with low passenger numbers served by small aircraft and where the threat assessment does not recommend the introduction of screening.

Any move away from outcomes based legislation to proscriptive legislation will result in diverting resources from actual and/or viable threats to areas where no threat exists. This point is emphasised. In some cases such a move would require operators and airports to devote extra resources to security related matters and away from other essential areas. This will increase the financial burden on the industry resulting in an increase of the continuing threat to the viability of regional aviation.

III. CONCLUSION

The RAAA is grateful for the opportunity to provide our views for the Senate Rural and Regional Affairs and Transport References Committee - Airport and Aviation Security Inquiry. If you would like further information about the items contained in this submission, or clarification on any of the points we make, the RAAA would be more than happy to assist.

Regards,

Paul Tyrrell
Chief Executive Officer