

Australian Airports Association (AAA) Questions on Notice

Supplementary Submission – PJCS Review of the Transport Security Amendment (Security of Australia's Transport Sector) Bill 2024

The Australian Airports Association (AAA) provided evidence to the Committee on Thursday 20 February from 8.30am to 9.00am. During the hearing, the AAA took a question from Mr Andrew Wallace MP on notice in relation to cost implications of the proposed legislation in the Bill on airports.

Question from Mr Wallace MP: Where have you got those figures from?

AAA Response:

The figures the AAA quoted in the hearing related to cybersecurity costs are indicative as they can differ for a variety of reasons. These reasons include the provider chosen, the complexity of the business, the number of staff, the combination of vulnerability management services selected (there are numerous options for coverage depending on package), and whether hardware/IT infrastructure is also supplied as part of the quote.

During the hearing, the AAA quoted two figures in relation to the costs of implementing the new cyber security measures in the bill. The first was in relation to IT vulnerability management services, which could cost airports between \$50,000 and \$200,000 (or more). The second was in relation to the cost of IT security audits, which could cost airports between \$3,000 to \$50,000. This is not the full suite of expenses that we expect airports to be subject to under the Bill.

By the Department of Home Affairs' own estimates outlined in its First Impact Assessment, the aviation sector will be required to collectively expend an additional \$23.85 million[^] annually on implementing cyber security measures alone. This is in addition to the expenses resulting from the implementation by the sector of cyber security obligations introduced through the SOCI Act, many of which, as we have indicated are duplicative, in relation to Designated and Tier 1 airports.

Under the Bill, Tier 2 airports, including those that are council-owned and managed, and those that are privately operated will now also be subject to the same requirements as Designated and Tier 1 airports under the SOCI Act. This would also include the additional measures included in the Bill, such as vulnerability testing. At the low end, if a Tier 2 airport was to hire a cybersecurity expert on even just a permanent part-time basis to provide cyber security vulnerability measures, the annual salary would [start at around \\$50,000](#) in regional Australia. At the higher end, if a larger or major Designated and/or Tier 1 airport was to hire a senior cybersecurity specialists, this would [start at around \\$200,000](#) on full-time permanent basis, as per the AAA's indicative quoted figures of \$50,000 to \$200,000.

Further, to ensure that an airport's IT systems are prepped and ready for any vulnerability testing regime that Home Affairs intends to implement, an airport would need to perform network security audits, which would also form evidence of their compliance with the forthcoming regulations. We used several sources for the AAA's quoted figures that show indicative costs of these services starting from around \$3,000 through to \$50,000. One Australian IT provider's website [states](#), "Generally, a typical security audit can range from \$5,000 to \$50,000." Another Australian IT provider [states](#) in its website FAQs "External audits can range from a few thousand dollars for smaller assessments to tens of thousands of dollars or comprehensive engagements."

[^]The Department of Home Affairs First Pass Impact Assessment (IA) indicated that the Bill's ongoing cost of implementation to both the aviation and maritime sectors will be \$203 million (high estimate) (p. 39) annually. The overall costs to the aviation sector account for 47% of this total, which amounts to an annual cost of \$95.4 million. Of this, the new cybersecurity measures represent 25% (p. 40) of this total, which amounts to \$23.85 million annually in additional ongoing costs to the aviation sector of these new measures alone.