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RE: INQUIRY INTO THE AVIATION TRANSPORT SECURITY AMENDMENT BILL
2018 (PROVISIONS)

Thank you for your correspondence of 24 September 2018 inviting submissions in regard to the Aviation Transport Security Amendment Bill 2018.

The Northern Territory has over 400 aerodromes, many of which are located in remote areas and are heavily relied on as the only means of access for many months of the year for a large number of Aboriginal communities. For isolated island communities, it is the only means of immediate urgent transport throughout the year.

With the exception of a small number of commercially operated airports in major centres, aerodromes in the Northern Territory are generally not commercially sustainable and are heavily reliant on external funding and support to remain operational. An ongoing major challenge for these aerodromes is identifying and having in place an entity to undertake the aerodrome operator function.

The Northern Territory Government has outlined these and other challenges in detail its February 2018 submission to the *Inquiry into the Operation, Regulation and Funding of Air Route Service Delivery to Rural, Regional and Remote Communities*.

In regard to security, the Northern Territory submission highlighted the need to ensure that any regulatory framework is tailored to take into account the level of risk for varying operational environments, and recommended the need for risk based security requirements rather than a one size fits all response.

I recognise that the proposed bill supports this recommendation by enabling a Transport Security Program (TSP) to be provided to industry participants if they are lower risk or the administrative burden is not proportionate to security outcomes. However I am concerned that the availability and / or capacity of an aerodrome operator entity to be responsible for implementing the TSP requirements for remote aerodromes may still be an ongoing issue in some areas of the Northern Territory.

Yours sincerely

ANDREW KIRKMAN
Chief Executive

4 October 2018