



PEOPLE WITH DISABILITY
AUSTRALIA

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own

Determinants of Regional Airfares

Submission to the Productivity Commission Inquiry

MARCH
2026

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Determinants of Regional Airfares – Submission to the Productivity Commission Inquiry

First published in 2026 by People with Disability Australia Ltd.

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Typeset in Arial 12 and 14 pt and VAG Rounded 26 pt

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Title: *Determinants of Regional Airfares – Submission to the Productivity Commission Inquiry*

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Suggested citation: EXAMPLE BELOW

Wallace, B., *Determinants of Regional Airfares – Submission to the Productivity Commission Inquiry*, 13 March 2026, People with Disability Australia, Sydney.



About PWDA

People with Disability Australia (PWDA) is a national disability rights and advocacy organisation made up of, and led by, people with disability.

We have a vision of a socially just, accessible and inclusive community in which the contribution, potential and diversity of people with disability are not only recognised and respected but also celebrated.

PWDA was established in 1981, during the International Year of Disabled Persons.

We are a peak, non-profit, non-government organisation that represents the interests of people with all kinds of disability.

We also represent people with disability at the United Nations, particularly in relation to the United Nations Convention on the Rights of Persons with Disabilities (CRPD).

Our work is grounded in a human rights framework that recognises the CRPD and related mechanisms as fundamental tools for advancing the rights of people with disability.

PWDA is a member of Disabled People's Organisations Australia (DPO Australia), along with the First People's Disability Network, National Ethnic Disability Alliance and Women with Disabilities Australia.

DPOs collectively form a disability rights movement that places people with disability at the centre of decision-making in all aspects of our lives.

'Nothing About Us, Without Us' is the motto of Disabled Peoples' International.



Thank you for the opportunity to respond to the Federal Productivity Commission's [Determinants of regional airfares inquiry](#). This submission has been prepared by People with Disability Australia (PWDA) on behalf of the co-design partners for the aviation disability standards, namely The Australian Federation of Disability Organisations (AFDO) and the Justice and Equity Centre (JEC).

Background

As outlined in the [Determinants of Regional Airfares: call for submissions](#)ⁱ regional aviation directly affects around one thirdⁱⁱ of the Australian population who live outside capital cities, as well as domestic and international tourists who visit regional areas. Around 24 million passenger flights were made outside of capital cities in 2024-25, including 11 million intra-state passenger flights.ⁱⁱⁱ November 2025 saw a 2.5% increase in passengers carried compared with November 2024, and this was a 1.2% increase compared with November 2019 pre-COVID.^{iv}

People may depend on air travel in medical emergencies, to obtain critical supplies, or for other non-discretionary purposes that necessitate travel to a major urban centre (or 'hub'). In some cases, air travel may be the only connection to the rest of Australia during certain seasons (including remote areas such as Arnhem Land, Wadeye) or throughout the year (including the Torres Strait Islands, Flinders Island, and various islands off the mainland). Flight demand may be influenced by fly-in-fly-out employment at remote mine sites, tourism as well as the residential population.^v

For people with disability living in regional and remote areas, air travel is not a discretionary mode of transport but can be an essential means of accessing critical services, supports, and participation opportunities that are otherwise out of reach.

For some communities, the withdrawal of the sole operating airline for a route left them without aviation services (e.g. Rex's withdrawal from Bathurst and Lismore in 2022), or with a single airline when the competitor ceased operations (such as with Albury in 2022).^{vi}



Persistent high average regional fares has not guaranteed solvency for carriers, nor continued services for many regional areas.^{vii} Evidence suggests that a high proportion of regional airports operate at a loss,^{viii} raising questions over their viability. Landing fees in regional airports can be higher per customer than in major airports that operate at greater scale.

Addressing the issues

Some of the questions posed as part of this invitation to make submissions are outside the scope and resources of our organisations, so our comments reflect our particular concerns and expertise,^{ix} and accordingly we have not answered questions 3-6.^x

1. Why is regional aviation so important?

Access to regional air travel is critical for many people with disability, who often rely on air services to access essential healthcare (including clinical or therapeutic supports), education, employment, family supports, and community participation that may not be available locally. Unlike discretionary travel, these trips are frequently time-sensitive and non-negotiable, meaning high or unpredictable airfares disproportionately limit the mobility and opportunities of people with disability living in regional and remote areas.

A flight time of 1 to 2 hours can replace a land transport journey of 3 to 8 hours, reducing impacts on those who find time travelling uncomfortable, enabling perishable goods or medicines to arrive in better shape, travellers to more easily commute for a workday or weekend break, so they can spend their time and money on more productive activities.

Regional Aviation may be the only way to access timely healthcare in critical or complex cases, the flying doctor in urgent cases, or to access time-sensitive services and goods. It is also critical to enable disabled and vulnerable community members to evacuate ahead of natural disasters, particularly in more remote communities which can be easily isolated by impacts on land transport routes.



Air travel may be the only form of travel available to many in communities where there is no public transport service, or the public transport infrastructure is inaccessible, and the person is unable to access/ operate a private vehicle. Access barriers also include, but are not limited to, circumstances when journeys by boat or land transport are too long for a person to manage safely, when the person's assistance animal, disability aids or communication needs cannot be accommodated.

For people with disability, especially those unable to drive, regional aviation may be the only way to connect with essential health services, employment, education and recreation. Regular, reliable air services may mean that a skilled worker is able to move to, or remain in, a community when they/ their family member has a disability or health condition and requires regular air travel.

2. How much do fares influence demand for regional air services?

[The Productivity Commission] is keen to understand:

- a) What are the main drivers of demand for regional air services – including but not limited to fares?

As we have outlined above, in addition to demand drivers such as tourism, sporting fixtures, agriculture, mining or other regional employment, people with disability need access to regular and reliable air travel to obtain access to healthcare and other services, and to participate in employment, education and recreation equitably with others in the community. High fares can limit the ability of people in regional areas to access services and participate in activities, requiring them to choose only the most essential travel. This can have flow on effects for demand. Our organisations are not in a position to comment further on the drivers of demand or fares.

We note the federal government's initiatives to reduce barriers to competition, support regional aviation, fund regional infrastructure, train workers and move towards

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decarbonisation all appear to be moves in the right direction.^{xi} As the Productivity Commission would be aware, in the 2024 Aviation White Paper, the Australian Government committed to co-design new aviation disability standards recognising that equitable access to air travel is crucial. As the co-design group working on the disability aviation standards, we look forward to the implementation of the above initiatives to improve the accessibility of aviation.

Improving the affordability of fares and access to aviation for people with disability in regional Australia requires a coherent package of policy measures that strengthens both the accessibility and the financial sustainability of regional air services. We recognise that some regional and remote airports lack the infrastructure, equipment and budgets available to major airlines and metropolitan airports to deliver essential accessibility features such as appropriate boarding technology, safe and reliable mobility-aid handling, accessible terminals, and assistance services. To ensure the vision for the new aviation disability standards can be achieved, we recommend the establishment of a fund by the federal government to help these smaller airports improve their accessibility. Similarly, targeted programs may be needed to support regional airlines to upgrade equipment and invest in workforce training to improve accessibility.

Support and incentives for regional airports and airlines to provide accessible services could reduce the hidden premium that inaccessibility imposes on travellers with disability, and increase the ability of more people to utilise regional air travel more often, contributing to longer term sustainability.

The development of clear, consistent, and enforceable national accessibility standards for aviation will also contribute to this, creating regulatory certainty as well as greater protection for travellers with disability. Over time, this can reduce operational disruptions, minimise damage to mobility aids, decrease passenger transfer delays, and build consumer confidence, each contributing to a more reliable and cost-effective regional aviation system.



Parties to this submission

This submission has been prepared by PWDA on behalf of the co-design partners for the aviation disability standards, namely:



[Australian Federation of Disability Organisations](#) (AFDO) the national peak body representing the national and state disability advocacy organisations who represent Australians with disability.



[Justice and Equity Centre](#) (JEC) is a leading independent law and policy centre that uses test cases and policy advocacy to tackle injustice experienced by marginalised communities, including people with disability.





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People with Disability Australia (PWDA) is a national disability rights and advocacy organisation made up of, and led by, people with disability.

For individual advocacy support contact PWDA between 9 am and 5 pm (AEST/AEDT) Monday to Friday via phone (toll free) on **1800 843 929** or via email at

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ⁱ Australian Government, Productivity Commission, Determinants of Regional Airfares; call for submissions, page 7, last accessed February 12th, 2026 https://assets.pc.gov.au/2025-12/regional-airfares-call.docx?VersionId=mtx7zCyWBSERYyfmMS9bnEexLqx1_XcE

ⁱⁱ Australian Bureau of Statistics (2025).

ⁱⁱⁱ Productivity Commission estimates based on ACCC (2025) data.

^{iv} Bureau of Infrastructure and Transport Research Economics (BITRE), 2025, Domestic aviation activity, Statistical Report, BITRE, Canberra ACT.

^v Australian Government, Productivity Commission, Determinants of Regional Airfares; call for submissions, page 7, last accessed February 12th, 2026 https://assets.pc.gov.au/2025-12/regional-airfares-call.docx?VersionId=mtx7zCyWBSERYyfmMS9bnEexLqx1_XcE

^{vi} Casey, D 2022, 'Rex to exit five regional points', *Aviation Week Network*, accessed 16/2/2026 <https://aviationweek.com/air-transport/airports-networks/rex-exit-five-regional-points>

^{vii} Australian Government, Productivity Commission, Determinants of Regional Airfares; call for submissions, page 9, last accessed February 12th, 2026 https://assets.pc.gov.au/2025-12/regional-airfares-call.docx?VersionId=mtx7zCyWBSERYyfmMS9bnEexLqx1_XcE

^{viii} PC (Productivity Commission) 2019, *Economic Regulation of Airports*, Report no. 92, Canberra Page 11, last accessed 16/2/2026, <https://assets.pc.gov.au/inquiries/completed/airports-2019/draft/airports-draft.docx>

^{ix} Australian Government, Productivity Commission, Determinants of Regional Airfares; call for submissions, page 12-13, last accessed February 12th, 2026 https://assets.pc.gov.au/2025-12/regional-airfares-call.docx?VersionId=mtx7zCyWBSERYyfmMS9bnEexLqx1_XcE

^x Ibid 3. What factors influence regional airfares? 4. What characteristics of the regional aviation sector have influenced the level of airfares? 5. Have government policies or regulations made a difference? 6. What could be done to make fares more affordable and to improve access to aviation?

^{xi} Australian Government, Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts, last accessed 17 February 2026, <https://www.infrastructure.gov.au/department/media/publications/aviation-white-paper-towards-2050>

