



An Australian Government Initiative



## MID NORTH COAST

# Addressing Pricing Inequity and Aviation Access on the Mid North Coast of NSW

Submission to the Productivity Commission Inquiry into the Determinants of Regional Airfares

March 2026

## Executive Summary

This submission is made to the Productivity Commission (PC) in response to its inquiry into the Determinants of Regional Airfares, with a particular focus on communities of the Mid North Coast of New South Wales (NSW) and Lord Howe and Norfolk Islands.

Aviation connectivity is not a convenience for residents and businesses of the Mid North Coast — it is an economic lifeline. Yet the communities served by Coffs Harbour and Port Macquarie airports, including those in the Bellingen, Nambucca Valley, Kempsey, and MidCoast local government areas (LGAs), face airfares that are demonstrably and disproportionately higher than those available on comparable metropolitan routes, and significantly higher than routes that benefit from competition.

Original fare data sourced from the Webjet booking platform on 3 March 2026 — covering four future travel dates — forms a central evidential basis for this submission. The analysis reveals that:

- Mid North Coast regional routes average approximately \$0.61 per kilometre (one-way), compared to \$0.17 per kilometre for comparable metro routes — a premium of approximately 3.4 times (240 per cent higher).
- Coffs Harbour to Sydney fares average \$267 one-way, equating to an estimated \$1.21 per kilometre on a return basis, compared to \$0.36 per kilometre for Brisbane to Sydney.

- Port Macquarie to Sydney averages \$227 one-way, equating to an estimated \$1.42 per kilometre on a return basis — the highest mainland rate recorded in this analysis.
- Ballina (Byron Gateway), which benefits from Jetstar competition, averages just \$0.33 per kilometre on a return basis — broadly in line with metro routes — demonstrating that competition can dramatically reduce fares on regional routes of comparable distance.
- Near-term fares at Coffs Harbour (searched for travel two days hence) were 82 per cent higher than advance-purchase fares, illustrating severe price accessibility challenges for unplanned or emergency travel.
- Lord Howe Island fares represent an estimated \$2.26 per kilometre on a return basis — the highest rate recorded — reflecting an entirely captive market with no alternative transport modes.
- Norfolk Island, as an External Territory of Australia is entirely dependent on aviation, and is served solely by Qantas. With fares of \$474–\$594 one-way (an estimated \$0.63 per kilometre return), and with the Australian Government having underwritten the continuation of services to ensure essential connectivity for the island’s 2,188 permanent residents, the route raises important questions about the adequacy of current service obligations, fare controls, and the long-term sustainability of aviation access for island-dependent communities (Australian Government Department of Infrastructure 2025).

This submission calls on the Productivity Commission to recommend targeted interventions including fare transparency obligations, competition stimulus, regulated maximum fares on thin monopoly routes, and a NSW-specific airfare zone cap scheme modelled on the successful Western Australian model.

## Introduction and Background

### The Region

The Mid North Coast of NSW encompasses a diverse range of local government areas, collectively home to approximately 335,000 residents. The LGAs of primary concern to this submission are:

Local Government Area	Approx. Population	Nearest Airport / Access Point
Coffs Harbour	~81,000	Coffs Harbour Airport (CFS)
Port Macquarie-Hastings	~90,000	Port Macquarie Airport (PQQ)
MidCoast	~100,000	No scheduled services — nearest: PQQ or NTL (60–120 min drive)
Kempsey	~30,000	No scheduled services — nearest: PQQ (40 min drive)
Nambucca Valley	~21,000	No scheduled services — nearest: CFS (30–45 min drive)
Bellingen	~13,000	No scheduled services — nearest: CFS (30-60 min drive)

Source: Australian Bureau of Statistics (2024), Regional Population Statistics.

The island communities of Lord Howe Island (382 permanent residents, ~15,000 annual tourist visits) and Norfolk Island (approximately 2,188 residents, 32,232 tourist arrivals in FY2023) represent a categorically different — and acutely more serious — access challenge, as both are entirely dependent on aviation for all connectivity to the Australian mainland (Australian Bureau of Statistics 2024; Tourism Research Australia 2024).

## Purpose of this Submission

This submission presents original empirical evidence drawn from a structured fare search conducted on the Webjet booking platform on 3 March 2026, covering one-way fares for four future travel dates (5 March, 20 March, 20 June and 20 September 2026) for eight routes to Sydney. The analysis compares per-kilometre pricing across metro and regional routes, examines the gap between advance-purchase and near-term fares, and contextualises findings within the Terms of Reference.

The submission is structured around key themes, each cross-referenced to the relevant terms of reference to assist the Commission in its review.

## Methodology and Data Sources

The primary data for this submission was sourced from Webjet ([www.webjet.com.au](http://www.webjet.com.au)), a major Australian online travel aggregator that draws fare inventory from multiple airlines. Searches were conducted on 3 March 2026 for one-way economy fares from the following origins to Sydney (SYD), for four departure dates:

- 5 March 2026 (2 days from search — representing near-term / last-minute travel)
- 20 March 2026 (17 days from search — representing short advance purchase)
- 20 June 2026 (approximately 3.5 months advance)
- 20 September 2026 (approximately 6.5 months advance — approximating advertised low fares)

Routes searched included: Coffs Harbour, Port Macquarie, Lord Howe Island, Norfolk Island, Ballina (Byron Gateway), Gold Coast, Brisbane and Melbourne to Sydney. Note that the Lord Howe Island and Norfolk Island searches may have drawn fares from dates adjacent to those searched, due to infrequent scheduling to those destinations.

Route distances are sourced from the Bureau of Infrastructure and Transport Research Economics (BITRE 2025a) Australian Air Distances dataset, representing airport-to-airport great circle distances. For consistency with the methodology used in the PC's own background materials (Productivity Commission 2025), per-kilometre analysis uses one-way distance. For comparison against the PC's Table 1 data (which uses round-trip fares), Webjet one-way fares have been doubled to produce an estimated return fare, and this conversion is clearly noted throughout.

### Methodology Note

All per-kilometre calculations in this submission were conducted independently and the working is disclosed in full. Webjet data represents the lowest available economy fare returned by the platform on 3 March 2026, for the respective date. Prices may differ from those available through other platforms or direct airline booking channels. These figures are presented as indicative evidence of fare patterns rather than exhaustive market data.

## Theme 1: Per-Kilometre Pricing Inequity

Terms of Reference addressed: Analysing the determinants of regional airfares and service offerings, and the composition of factors that contribute to differences between airfares available on regional routes and those available between major cities, including airport fees and charges.

### Summary of Findings

The single most striking finding of the Webjet data analysis is the systematic disparity in cost per kilometre between regional and metropolitan routes to Sydney. As Table 1 below demonstrates, Mid North Coast routes attract a per-kilometre premium that cannot be explained by distance alone.

**Table 1 — Webjet One-Way Fares to Sydney and Estimated Per-Kilometre Rates, 3 March 2026**

Route	Dist. (km)	5 Mar 26	20 Mar 26	20 Jun 26	20 Sep 26	Avg Fare	Est. Return	Est. \$/km
<b>METRO / NEAR-METRO</b>								
Gold Coast	792	\$124	\$110	\$68	\$92	\$98.50	~\$197	\$0.25
Brisbane	751	\$187	\$125	\$110	\$125	\$136.75	~\$274	\$0.36
Melbourne	706	\$204	\$124	\$124	\$138	\$147.50	~\$295	\$0.42
<b>REGIONAL ROUTES — MID NORTH COAST NSW</b>								
Ballina (Byron Gwy)*	611	\$91	\$156	\$66	\$91	\$101.00	~\$202	\$0.33
Coffs Harbour	441	\$374	\$285	\$205	\$205	\$267.25	~\$535	\$1.21
Port Macquarie	320	\$273	\$245	\$195	\$195	\$227.00	~\$454	\$1.42
<b>ISLAND TERRITORIES</b>								
Lord Howe Island	787	\$920	\$920	\$856	\$856	\$888.00	~\$1,776	\$2.26
Norfolk Island	1,680	\$474	\$594	\$576	\$474	\$529.50	~\$1,059	\$0.63

Source: Webjet booking platform, searched 3 March 2026. All fares are one-way economy. Est. Return = one-way fare x 2 for comparison purposes. Est. \$/km = Est. Return ÷ one-way distance (BITRE 2025a). \* Ballina included as a regional route that benefits from low-cost carrier competition.

### The Scale of the Disparity

The data reveals a stark and consistent pattern. When measured on a per-kilometre basis, Mid North Coast residents face aviation costs that are entirely disproportionate to those available to residents of capital cities, and even to those in competing regional markets:

- The average per-kilometre rate across metro routes (Gold Coast, Brisbane, Melbourne) is \$0.17 per kilometre (one-way average), compared to \$0.61 per kilometre for Mid North Coast regional routes — a premium of approximately 3.4 times, or 240 per cent (calculation:  $\$0.606 + \$0.709 / 2 = \$0.658$ )

for CFS/PQQ; blended regional including Ballina =  $(\$0.606 + \$0.709 + \$0.165) / 3 = \$0.493$  per km; metro =  $(\$0.124 + \$0.182 + \$0.209) / 3 = \$0.172$  per km).

- Coffs Harbour (CFS), at 441 km from Sydney — 59 per cent of the distance to Brisbane — costs an estimated \$1.21 per kilometre on a return basis, compared to \$0.36 per kilometre for Brisbane–Sydney. That is a factor of 3.4 times the rate per kilometre, for a shorter journey.
- Port Macquarie (PQQ), at just 320 km from Sydney, reaches an estimated \$1.42 per kilometre — the highest per-kilometre mainland rate in this dataset. A Brisbane–Sydney passenger is travelling more than twice the distance for roughly one-quarter of the per-kilometre cost.
- Lord Howe Island, at \$2.26 per kilometre (estimated return), represents pricing at more than 13 times the competitive metro rate. This extraordinary disparity reflects a fully captive market where no alternative transport mode exists.
- Norfolk Island, at an estimated \$0.63 per kilometre (return), is served solely by Qantas. While lower in per-kilometre terms than some shorter regional routes, the absolute fare levels of \$474–\$594 one-way impose a substantial burden on a territory population with limited income diversity. Notably, the Australian Government has underwritten the continuation of scheduled services to Norfolk Island, recognising the island’s complete aviation dependence (Australian Government Department of Infrastructure 2025). This intervention, while necessary, has not been accompanied by corresponding fare controls, leaving residents exposed to pricing set by a sole operator without competitive discipline.

#### **Significance: The Competition Effect**

Ballina (Byron Gateway Airport), at 611 km from Sydney, returns an estimated \$0.33 per kilometre — broadly comparable to metro routes. The critical difference is competition: Jetstar provides services to Ballina alongside QantasLink, introducing genuine price competition. Coffs Harbour and Port Macquarie are served by Rex and QantasLink respectively, with limited competitive tension. This comparison provides powerful evidence that the per-kilometre disparity is not structurally inevitable — it is a market competition problem amenable to policy intervention.

## Comparison with Productivity Commission Reference Data

For additional context, the PC's own background materials (Productivity Commission 2025, Table 1) present return fare data searched in November 2025. That data reports Adelaide–Port Lincoln at \$1.44 per kilometre (return fare basis), and Mackay–Rockhampton at \$1.27 per kilometre. The Webjet data for March 2026 places Coffs Harbour and Port Macquarie in a directly comparable range, at \$1.21 and \$1.42 per kilometre respectively. The Mid North Coast therefore represents a pattern of pricing consistent with the most expensive regional routes anywhere in Australia.

It is further noted that the PC's Table 1 reports Brisbane–Sydney at \$0.26 per kilometre. The present analysis, using March 2026 Webjet data, returns \$0.36 per kilometre for the same route — representing a 38 per cent increase in metro fares since November 2025. This temporal shift reinforces the importance of fresh, real-world booking data as a complement to longitudinal BITRE statistics.

## Theme 2: The Gap Between Advertised and Actual Fares

**Terms of Reference addressed:** Identifying the main drivers of demand for regional air services; analysing the composition of factors that contribute to differences between airfares.

Airlines and booking aggregators frequently advertise fares at their minimum available price points, which typically require advance planning, flexible dates, and early purchase. For communities facing emergency medical travel, unplanned business needs, or time-sensitive family obligations — situations disproportionately common in regional and rural areas — these advertised fares are functionally inaccessible.

### Near-Term versus Advance-Purchase Fares

The Webjet dataset enables a direct comparison between near-term pricing (5 March 2026, searched on 3 March — effectively two days' notice) and advance-purchase pricing (20 September 2026, approximately 6.5 months ahead). The results are presented in Table 2.

**Table 2 — Near-Term versus Advance-Purchase Fares: Premium Analysis**

Route	Near-Term (5 Mar)	Advance (20 Sep)	Premium \$	Premium %	Category
Coffs Harbour	\$374	\$205	\$169	<b>82.4%</b>	Regional
Port Macquarie	\$273	\$195	\$78	<b>40.0%</b>	Regional
Lord Howe Island	\$920	\$856	\$64	<b>7.5%</b>	Island
Norfolk Island	\$474	\$474	\$0	<b>0.0%</b>	Island
Ballina (Byron Gwy)	\$91	\$91	\$0	<b>0.0%</b>	Reg. (competitive)
Gold Coast	\$124	\$92	\$32	<b>34.8%</b>	Metro
Brisbane	\$187	\$125	\$62	<b>49.6%</b>	Metro
Melbourne	\$204	\$138	\$66	<b>47.8%</b>	Metro

Source: Webjet booking platform, 3 March 2026. Near-term = 5 March 2026; Advance = 20 September 2026.

The Coffs Harbour near-term premium of 82.4 per cent is particularly concerning. A resident who faces an unplanned journey — whether for a medical appointment, a family emergency, or a business obligation — must pay \$169 more than the lowest fare available, on a route that is already prohibitively expensive in absolute terms. At \$374 for a single leg to Sydney, this fare represents a substantial proportion of weekly income for many regional households.

The absence of a near-term premium on Ballina (0 per cent) further reinforces the role of competition: in a multi-carrier environment, yield management does not produce the same punishing near-term pricing structures, because carriers must remain responsive to price-sensitive demand.

For Lord Howe and Norfolk Islands, the dynamics are different. Lord Howe's consistently high fares (\$856–\$920 regardless of booking horizon) suggest pricing constrained not by peak demand but by a monopoly supply position, where the small passenger cap (consistent with the island's environmental protection framework under the Lord Howe Island Act 1953 (NSW)) insulates the operator from competitive pressure at all booking horizons.

## Consumer Transparency and Pricing Clarity

The Webjet analysis also highlights a broader transparency concern. The platform presents fares from multiple airlines and routes, but the availability of advertised low fares depends on specific conditions that are frequently not met for regional travel. In a submission to the Senate Rural and Regional Affairs and Transport References Committee in 2019, multiple regional community representatives noted that airline advertisements featuring sub-\$100 fares to regional destinations were routinely unavailable when actual bookings were made (Senate Rural and Regional Affairs and Transport References Committee 2019).

This submission recommends the Commission consider mandating that airline advertising disclose the proportion of seats available at advertised low fares, and the average fare paid across all passengers on a route, to provide consumers with more accurate pricing expectations.

## Theme 3: Market Structure, Competition, and Barriers to Entry

**Terms of Reference addressed:** Examining any barriers to entry or expansion for airlines to provide regional services; identifying the extent of competition between different air transport services; identifying policies and regulatory settings that may contribute to higher regional airfares, reduced service levels or reduced competition.

### Current Market Structure on Mid North Coast Routes

The aviation market serving the Mid North Coast of NSW is characterised by highly concentrated supply, limited competitive tension, and structural barriers that make new entry commercially unattractive. As at March 2026:

- Coffs Harbour (CFS) is served by Rex Airlines and QantasLink. Following Rex's voluntary administration in July 2024 and subsequent sale to Air T in December 2025, the airline has refocused on its regional network (McCutcheon and O'Halloran 2025). Both operators use turboprop aircraft (Saab 340 and Dash-8 series), limiting frequency and passenger volumes.
- Port Macquarie (PQQ) is served principally by QantasLink, with limited Rex presence. The market is effectively a near-duopoly with minimal competitive pricing tension.

- Taree Airport (serving MidCoast LGA) has no scheduled RPT passenger services at all, requiring residents to travel 60–120 minutes to access either Coffs Harbour or Port Macquarie airports.
- Ballina (BNK) — by contrast — is served by Jetstar and QantasLink, and the resulting competitive dynamic is directly reflected in fare levels averaging \$0.33 per kilometre (estimated return), broadly comparable to metro routes.

The contrast between Ballina and the Coffs Harbour/Port Macquarie routes is a natural experiment in the effect of competition on regional fares. The structural characteristics of these markets are broadly similar in terms of distance to Sydney, regional demographics and tourism profiles, yet fare outcomes diverge dramatically.

## Barriers to New Entry

A number of structural barriers inhibit the entry of additional carriers on Mid North Coast routes. These include:

- Aircraft economics: Regional turboprop and smaller jet aircraft involve high fixed costs relative to seat count. Without high load factors — difficult to achieve in thin markets — per-seat costs are prohibitive. Baker et al. (2021) note that the fixed cost structure of regional aviation creates natural tendency towards monopoly or duopoly on thin routes.
- Airport infrastructure and charging: Regional airports typically operate at significant loss, as noted by the PC's 2019 Economic Regulation of Airports report (PC 2019, p. 11). Landing fees on a per-passenger basis can be substantially higher at smaller regional airports than at major airports, increasing operating costs for entrant carriers.
- Incumbent advantage: Established carriers hold advantages in slot access, codeshare arrangements, frequent flyer programme integration, and established distribution. These advantages are difficult and expensive for new entrants to replicate.
- Absence of low-cost carrier access: Jetstar and Virgin's exit from Coffs Harbour and Port Macquarie in the post-COVID period has not been reversed. The commercial case for low-cost carrier operation on routes with limited catchment populations remains marginal without targeted incentives.
- Regulatory risk: Potential entrants may be deterred by the absence of a stable, long-term policy framework for regional aviation — an uncertainty compounded by the administration of Rex in 2024 and the broader volatility of the domestic aviation sector.

Merkert and O'Fee (2015) identify that the combination of thin demand, high fixed costs, and incumbent network effects represents a particularly potent barrier to entry in Australian regional aviation, particularly for shorter-haul routes under 600 kilometres — precisely the distance profile of Coffs Harbour and Port Macquarie routes.

## The Role of Air Freight

For Lord Howe and Norfolk Islands, air freight performs an essential dual function: it is both commercially critical to the viability of passenger services and operationally essential to community supply chains. The kentia palm seed export industry on Lord Howe Island, and fresh produce imports to both islands, depend on reliable air freight access. The viability of passenger routes is partly cross-subsidised by freight revenue; any disruption to either creates cascading vulnerability for both (Forsyth, Guiomard and Niemeier 2023).

## Infrastructure, Regulatory, Security and Emergency Services Costs

A significant but frequently underappreciated driver of the per-kilometre fare premium on regional routes is the disproportionate burden of fixed infrastructure, regulatory, security and emergency services costs that must be recovered across a far smaller passenger base than at major metropolitan airports. These costs do not scale proportionally with distance or passenger numbers, meaning that on thin regional routes, each passenger effectively shoulders a far greater share of the fixed cost base than their counterpart on a high-volume metro route.

### Airport Infrastructure and Capital Costs

Regional airports must maintain runways, taxiways, terminals, navigation aids, fuel infrastructure, lighting systems and airfield equipment to standards mandated under the Civil Aviation Safety Authority (CASA) and the Airports Act 1996 (Cth). These standards do not vary materially based on passenger volumes: a runway capable of handling turboprop or regional jet operations requires the same pavement strength, lighting and maintenance regime whether it serves 50,000 or 500,000 passengers per year. The PC's 2019 Economic Regulation of Airports inquiry found that a high proportion of regional airports operate at a financial loss, with aeronautical revenues insufficient to cover operating and capital costs (PC 2019, p. 11). The difference is typically covered by local government subsidies, council rate revenue, or Commonwealth grants under programs such as the Regional Airports Program. Where airport operators attempt to recover a greater share of costs through aeronautical charges, the per-passenger landing fees rise markedly — a cost passed through directly to airlines and, ultimately, to ticket prices.

For the airports serving the Mid North Coast — Coffs Harbour (owned by the City of Coffs Harbour and operated under a long-term lease to Pallisade Investment Partners) and Port Macquarie (owned and operated by Port Macquarie-Hastings Council) — the infrastructure cost recovery model differs from that of major capital city airports, which benefit from non-aeronautical revenues (retail, parking, property) to cross-subsidise aeronautical charges. Regional airports without significant terminal retail or commercial precinct development have no equivalent cross-subsidy mechanism, placing greater pressure on per-passenger landing fees and ultimately on fares (Forsyth, Guionard and Niemeier 2023; Baker and Donnet 2012).

### Aviation Security Costs

Under the Aviation Transport Security Act 2004 (Cth) and its associated regulations, airports servicing regular passenger transport (RPT) operations are required to implement and maintain approved transport security programs, including passenger and baggage screening, access control systems, security personnel training, and incident response planning. The Australian Government levies the Passenger Movement Charge and Aviation Security Identification Card (ASIC) costs are borne by airports and industry participants. For regional airports processing limited daily passenger volumes, the fixed costs of maintaining a compliant security regime — including the costs of screening equipment, trained security personnel, and regulatory compliance administration — represent a significantly higher cost per passenger than at major airports where the same fixed costs are spread across vastly greater throughput. The Department of Home Affairs' aviation security regulatory framework does not provide a scaled cost-recovery model for smaller airports, meaning that regional communities

effectively subsidise a national security standard through higher ticket prices (Department of Home Affairs 2023).

## Airservices Australia Enroute and Terminal Navigation Charges

Airservices Australia levies enroute and terminal navigation charges on all commercial aviation operators as a cost recovery mechanism for the provision of air traffic management, navigation infrastructure and aeronautical data services. These charges are calculated based on a combination of aircraft weight and distance flown, and are ultimately passed through to passengers in the form of higher fares. For shorter regional routes — such as Sydney to Coffs Harbour (441 km) or Sydney to Port Macquarie (320 km) — the fixed component of the navigation charge represents a proportionally higher share of total operating cost per seat than on longer metro routes. The Australian Government’s Airservices Australia Enroute Charges Payment Scheme partially addresses this through reimbursing enroute charges for eligible regional and remote operators, but this subsidy is targeted at very remote routes and has not been extended to the Mid North Coast routes examined in this submission (Australian Government Department of Infrastructure 2025).

## Emergency Services and Aviation Rescue and Firefighting

Under CASA regulations, airports handling RPT operations above certain passenger thresholds must provide or contract Aviation Rescue and Firefighting (ARFF) services, as well as meet standards for airport medical response capability. Airservices Australia provides ARFF services at Coffs Harbour Airport, with the cost recovered through charges that ultimately flow through to airlines and passengers. At airports with low daily movements, the cost per movement — and therefore the cost per passenger — of maintaining a standing ARFF capability is substantially higher than at major airports with high daily traffic. Similarly, regional airports must meet obligations for perimeter security, wildlife management, and emergency response planning under the Airports (Building Control) Regulations 1996 and associated instruments. These regulatory compliance costs, while essential for passenger safety, are not volume-sensitive and represent a fixed overhead that is disproportionately borne by regional passengers (CASA 2023; Airservices Australia 2024).

## Policy Implications

The cumulative effect of these fixed cost burdens is significant. When infrastructure capital costs, security compliance, ARFF provision, navigation charges, and regulatory overhead are aggregated and spread across a thin passenger base, a structural floor is created below which fares cannot fall without an operating loss — regardless of competition. This structural floor is substantially higher at regional airports than at major airports. Recognition of this asymmetry has direct policy implications: addressing regional airfare inequity cannot rely solely on competition policy, but must also consider targeted government cost relief on the fixed regulatory and infrastructure cost components that inflate the regional fare base. Options include expanding the Airservices Australia Enroute Charges Payment Scheme to cover Mid North Coast routes, providing direct ARFF cost subsidies for smaller RPT airports, and reviewing the cost-recovery settings for aviation security at low-volume regional facilities.

## Theme 4: Economic Impact on Mid North Coast Communities

Terms of Reference addressed: Identifying the impacts of regional air fares and access to regular and reliable air services on regional economies (including tourism and migration), productivity, and improving Closing the Gap outcomes.

### Aviation and Regional Economic Growth

There is robust academic and policy evidence that aviation connectivity and regional economic growth are bidirectionally causal. Airports Council International and independent researchers have consistently found that improved air access stimulates regional GDP growth, employment and investment attraction (InterVISTAS Consulting 2015). In the Australian context, Baker et al. (2015) identify that regional airports serve as catalysts for economic activity, with each additional return flight per week on a regional route associated with measurable increases in local business activity and tourism expenditure.

The Mid North Coast's economic base is heavily weighted toward sectors that are acutely sensitive to aviation connectivity:

- **Tourism:** The region attracted approximately \$3.9 billion in total visitor expenditure in 2022–23, with intrastate and interstate air visitors accounting for a significant proportion of high-yield overnight spend (Destination NSW 2023). High airfares directly reduce visitation volumes and shift visitor profiles toward lower-yield day trippers accessible by car.
- **Health and medical services:** Regional residents routinely require air travel to access specialist medical services in Sydney. For conditions requiring multiple visits — oncology, cardiology, renal care — the cumulative cost of return fares at \$374 per leg represents a significant and inequitable financial burden that discourages timely medical engagement.
- **Business and professional services:** The ability of businesses to attract and retain professional staff, and to maintain client relationships with Sydney-based organisations, is materially affected by the cost and reliability of air connections. Several submissions to the 2019 Senate inquiry cited examples of businesses being unable to attract senior staff due to the cost and inconvenience of regional air access.
- **Regional migration and population retention:** The Australian Government's Aviation White Paper (2024, p. 128) explicitly identifies regional migration as a policy objective supported by improved regional air access. The Mid North Coast — with strong liveability attributes — is well-positioned to attract sea-changers and remote workers, but high airfares undermine the economic case for relocation.

### The MidCoast, Kempsey, Nambucca and Bellingen Disadvantage

A particularly important inequity affecting four of the six LGAs in this submission is the complete absence of scheduled passenger air services within their boundaries. Residents of MidCoast, Kempsey, Nambucca Valley and Bellingen LGAs must drive 30 minutes to over two hours to reach the nearest

operating airport, compounding the financial cost of travel with substantial time, fatigue and vehicle costs.

As an example, Bowraville is a small community of approximately 1,400 residents in the Nambucca Valley LGA with one of the highest proportions of Aboriginal and Torres Strait Islander residents of any town in New South Wales (ABS 2021). For a Bowraville resident seeking to travel to Sydney — whether for specialist medical care, legal proceedings, a Centrelink review, or access to employment opportunities — the journey is both lengthy and expensive. The nearest airport is Coffs Harbour Airport, approximately 55 kilometres away and around 50 minutes by road. From there, a one-way airfare to Sydney costs \$374 at near-term pricing or \$205 with advance purchase. Adding vehicle costs to the airport, and ground transport at the Sydney end, the total cost of a single-direction journey readily exceeds \$450. For a household on a low or fixed income — which describes a disproportionate share of Bowraville’s population — this cost is prohibitive for all but the most urgent travel. This is not a minor inconvenience; it is a structural barrier to essential services access that compounds existing disadvantage for one of New South Wales’ most vulnerable communities.

This submission recommends the Commission consider the compound access disadvantage faced by LGAs without airports, and the degree to which existing airport infrastructure in the region is underperforming its potential catchment, as a distinct policy matter warranting attention.

## Closing the Gap Outcomes

The Mid North Coast of NSW has a significantly higher proportion of Aboriginal and Torres Strait Islander residents than the NSW average. According to the 2021 Census, the Nambucca Valley LGA recorded an Indigenous population of approximately 12.8 per cent, the Kempsey LGA approximately 18.5 per cent — one of the highest rates in the state — and Coffs Harbour LGA approximately 7.5 per cent (ABS 2021). Individual communities within these LGAs, including Bowraville, Burnt Bridge, Eungai, and Bellbrook, have Aboriginal and Torres Strait Islander populations considerably above their respective LGA averages. These communities face compounding disadvantage: high rates of poverty, limited local employment, and now the additional burden of prohibitively expensive and logistically complex aviation access.

The National Agreement on Closing the Gap, signed in July 2020 by all Australian Governments and the Coalition of Peaks representing over 50 Aboriginal and Torres Strait Islander community-controlled peak organisations, establishes 17 socioeconomic targets to be achieved by 2031 across the priority areas of health and wellbeing, education, employment, and justice (Coalition of Peaks and Australian Governments 2020). A number of these targets are directly and materially affected by the cost and accessibility of aviation services on the Mid North Coast.

Target 1 of the Agreement calls for the closure of the life expectancy gap between Aboriginal and Torres Strait Islander people and non-Indigenous Australians by 2031. The Australian Institute of Health and Welfare’s Aboriginal and Torres Strait Islander Health Performance Framework (AIHW 2024) identifies access to specialist medical and preventive health services as a key determinant of this gap. Aboriginal Australians nationally are more than twice as likely as non-Indigenous Australians to be hospitalised for potentially preventable conditions — conditions that timely specialist intervention can avert. On the Mid North Coast, the pathway to specialist care routinely involves an air journey to Sydney. When that journey costs \$374 at near-term pricing — and when the household income of many community members is at or below the poverty line — the financial barrier to preventive and specialist healthcare is real and measurable. Deferred and avoided care compounds over time, widening precisely the health gap that Target 1 seeks to close.

Targets 3, 4 and 5 relate to educational outcomes, including children's access to early childhood education and young people completing Year 12 and tertiary qualifications. For Aboriginal students on the Mid North Coast seeking to progress into university or vocational training in Sydney or other metropolitan centres, the recurring cost of travel home for family connection, cultural obligation and personal support is a documented factor in university retention and completion rates (Behrendt et al. 2012). Airfares that are unaffordable on student incomes effectively penalise regional Aboriginal students for pursuing higher education away from their communities, and contribute to rates of non-completion that in turn affect employment and long-term wellbeing outcomes addressed throughout the Agreement.

Targets 10, 11 and 12 address the overrepresentation of Aboriginal and Torres Strait Islander people in the correctional and child protection systems. Community members involved in family law proceedings, child protection matters or criminal justice processes frequently face mandatory court appearances, mediation sessions or supervised contact arrangements in Coffs Harbour, Port Macquarie or Sydney. For families without reliable access to affordable transport — and for whom the cost of a last-minute airfare at \$374 is entirely out of reach — non-attendance at critical appointments can trigger adverse legal outcomes, including removal of children from family care, that are deeply counterproductive to the goals of Targets 11 and 12. The justice reinvestment literature consistently identifies transport access as a structural enabler of community-based alternatives to custody (Baldry and Cunneen 2014); aviation affordability is a component of that access architecture for remote and regional Aboriginal communities.

The Commission's Terms of Reference specifically call for consideration of Closing the Gap outcomes, and the Annual Data Compilation Report confirms that progress against most targets is not on track (Australian Government 2023). This submission urges that the Commission treat aviation affordability not as a peripheral equity matter but as a substantive policy lever with direct implications for multiple Closing the Gap targets. Any fare subsidy or regulatory mechanism proposed as a policy response should be explicitly designed to ensure accessibility for Aboriginal and Torres Strait Islander residents, including through concession pricing structures available to Health Care Card and Centrelink concession card holders, indigenously-informed service design developed in partnership with community-controlled organisations, and targeted subsidy streams administered through existing community-controlled health and welfare networks where appropriate.

## Theme 5: Lord Howe Island and Norfolk Island — A Captive Market

**Terms of Reference addressed:** Examining any barriers to entry; identifying the impacts on regional economies including tourism; assessing the role for government intervention; considering access to regular and reliable air services.

### Lord Howe Island

Lord Howe Island is a UNESCO World Heritage-listed island approximately 787 kilometres off the NSW coast. With a permanent population of approximately 382 residents and a maximum tourist capacity of 400 visitors at any one time — set by the Lord Howe Island Act 1953 (NSW) — the island's aviation market is structurally captive.

The Webjet analysis reveals Lord Howe Island fares to Sydney of \$856–\$920 one-way across all four search dates, representing an estimated \$2.26 per kilometre on a return basis. This is the highest per-kilometre rate in the dataset and more than 13 times the metro average of \$0.17 per kilometre.

Eastern Air Services (trading as Lord Howe Island-based services) operates de Havilland Dash-8 aircraft under an exclusive arrangement. The absence of competition, combined with the island's passenger cap, creates conditions under which fares have consistently exceeded any reasonable cost-plus justification. Tourism to the island — which generates substantial export revenue for NSW and is integral to the island community's economic sustainability — is directly constrained by airfare levels. At \$920 one-way (\$1,840 return), a couple's air travel to Lord Howe Island represents a very significant component of a tourism budget.

The NSW Government regulates the route under the Air Transport Act 1964 (NSW), which provides a framework for service continuity but does not currently include maximum fare provisions. This submission recommends the Commission consider whether route regulation should be extended to include fare controls on Lord Howe Island services.

### Norfolk Island

Norfolk Island presents a different but equally concerning picture. With approximately 2,188 permanent residents and 32,232 tourist arrivals in FY2023 generating \$53.5 million in visitor expenditure (Tourism Research Australia 2024), Norfolk Island's economy is overwhelmingly dependent on aviation. Tourism accounts for approximately 36 per cent of the island's employment base.

The Webjet data shows Norfolk Island fares of \$474–\$594 one-way, equating to an estimated \$0.63 per kilometre on a return basis. While this is lower than the extreme rates seen at Coffs Harbour or Port Macquarie in per-kilometre terms — reflecting the greater distance — the absolute fare levels remain prohibitive for many travellers, particularly given the island's status as an Australian territory with a high proportion of residents on fixed incomes.

Norfolk Island is now served exclusively by Qantas. This leaves the island entirely dependent on a single carrier with no competitive tension on fares or service standards. The island's geographical

isolation and its status as an external territory of Australia under Commonwealth jurisdiction (following constitutional changes in 2016) creates a particular responsibility for the Australian Government to ensure aviation access is both affordable and reliable. Recognising this, the Australian Government has taken steps to underwrite the continuation of scheduled services to Norfolk Island to protect essential connectivity for the resident population (Australian Government Department of Infrastructure 2025). However, this underwriting has not been accompanied by corresponding fare regulation, meaning that residents continue to pay fares set by a sole operator in the absence of any market discipline. Norfolk Island residents seeking to access medical, legal or government services on the Australian mainland face financial barriers analogous to those faced by some remote Aboriginal communities — yet without the existing policy frameworks that have been developed for those contexts.

The Productivity Commission is invited to consider whether Norfolk Island's unique status as a Commonwealth Territory, combined with its complete aviation dependence, warrants specific policy mechanisms such as a Community Service Obligation (CSO) arrangement or a targeted resident fare subsidy.

## Theme 6: The Role of Government and Policy Settings

**Terms of Reference addressed: Identifying policies and regulatory settings that may contribute to higher regional airfares; assessing the role for government and the most efficient forms of government intervention; considering international comparisons and best practice.**

### Current Policy Landscape

As noted in the PC's call for submissions, several states and territories have implemented fare support mechanisms including Western Australia's Regional Airfare Zone Cap Scheme (capping fares at \$199 or \$299 one-way), Queensland's Local Fare Scheme, and various Tasmanian island subsidies (Productivity Commission 2025, Table 2). New South Wales has no comparable scheme for mainland regional routes, despite hosting some of the most expensive per-kilometre routes in Australia.

The Australian Government's support for regional aviation — through the Regional Aviation Access Program, the Remote Air Services Subsidy Scheme, and enroute charge subsidies — is primarily directed at very remote communities (Australian Government Department of Infrastructure 2025). The Mid North Coast, despite its relative geographic accessibility, has not benefited from these mechanisms, which are calibrated for communities with no road alternative rather than communities where road alternatives exist but impose substantial time and cost burdens.

### Policy Options for the Commission's Consideration

This submission proposes the following policy options for the Commission's consideration, informed by domestic and international evidence:

## NSW Airfare Zone Cap Scheme

The Western Australian Regional Airfare Zone Cap Scheme provides a compelling template for NSW. By capping one-way personal travel fares at \$199 for Zone 1 routes (within 1,000 km of Perth), the WA Government has demonstrated that state-level intervention can materially improve fare equity without eliminating commercial viability for carriers (Government of Western Australia Department of Transport 2024). A comparable NSW scheme, covering routes to Coffs Harbour, Port Macquarie and potentially other Mid North Coast routes, could be structured as a joint state-federal initiative and would directly address the pricing inequity identified in this submission.

## Competitive Stimulus and Route Development Grants

A targeted route development grant program — offering short-term financial support to carriers establishing or expanding services on uncompetitive regional routes — could replicate the conditions that have produced competitive fares at Ballina without ongoing subsidy dependence. International evidence from the European Union's State Aid Guidelines for regional airports and routes, and the New Zealand Regional Essential Air Service programme, supports the effectiveness of time-limited entry incentives in stimulating sustained competition (Fageda et al. 2018; Majeed, Breunig and Domazet 2024; Carmona Benitez and Lodewijks 2008).

## Regulated Maximum Fares on Monopoly Routes

For routes that cannot support multiple carriers — including Lord Howe Island and potentially Port Macquarie — regulated maximum fares under existing or expanded state transport legislation would provide a directly effective consumer protection mechanism. NSW's Air Transport Act 1964 already provides the regulatory framework; the issue is political will to extend its scope to fare capping. Regulated maximum fares have been successfully applied on essential community routes internationally, including in Norway's Public Service Obligation (PSO) aviation network, where 56 routes are subject to competitive tender with service and price obligations (Bråthen and Halpern 2012).

## Mandatory Fare Transparency Reporting

A low-cost, high-impact intervention would require airlines operating regional routes to report quarterly to BITRE (and publish) the average fare paid per route, load factors, and the proportion of seats sold below defined price thresholds. The ACCC's existing Domestic Airline Competition monitoring report (ACCC 2025) provides a partial template; its extension to include price distribution data would substantially improve the evidence base for both consumer decision-making and policy review.

## Restoration of Scheduled Services to Underserved LGAs

The four Mid North Coast LGAs without scheduled services — MidCoast, Kempsey, Nambucca Valley, and Bellingen — represent a large catchment population (approximately 164,000 residents) currently without direct aviation access. The Commission is invited to consider whether Commonwealth or state investment in the upgrading and reactivation of Taree Airport (serving MidCoast) for scheduled RPT services, combined with commercial incentives, could deliver material equity outcomes for this population. Taree Airport currently operates as a general aviation facility and would require limited capital investment to support scheduled turboprop operations.

## International Comparisons

International comparisons provide instructive lessons for Australian policy design:

- Norway: The Norwegian PSO system provides the most developed model of regulated regional aviation. The government issues competitive tenders for PSO routes, specifying minimum frequency, aircraft capacity, and maximum fares. The system sustains 56 routes that would otherwise be commercially unviable, at a cost substantially below the economic impact of aviation loss to affected communities (Bråthen and Halpern 2012).
- New Zealand: The Essential Air Services programme provides government support for air services to communities of national importance, with a framework that balances minimum service obligations against commercial cost recovery. New Zealand's experience is particularly relevant given comparable geographic challenges and market size.
- United States: The Essential Air Services program subsidises commercial air service to small communities that would otherwise lose scheduled service. While the US program has faced criticism for high per-passenger subsidy costs, its core principle — that geographic equity in aviation access is a legitimate policy objective — is directly applicable to the Australian context (US Department of Transportation 2023).
- Canada: The Remote Passenger Transportation Program provides subsidies for air travel in northern and remote communities, recognising that market failure in thin regional markets requires government correction rather than passive acceptance.

## Summary of Recommendations

This submission respectfully urges the Productivity Commission to consider the following recommendations in its final report to the Treasurer:

#	Recommendation	Rationale / ToR Alignment
1	<b>Establish a NSW Regional Airfare Zone Cap Scheme</b>	Modelled on WA's successful scheme; address systematic pricing inequity on CFS, PQQ and other Mid North Coast routes. Aligns to ToR: government intervention, improving access and pricing outcomes.
2	<b>Introduce a targeted Route Development Grant for low-cost carrier entry to CFS and PQQ</b>	Replicate the Ballina competition effect on uncompetitive routes. Aligns to ToR: barriers to entry, competition levels, affordability.
3	<b>Mandate quarterly route-level fare transparency reporting by all RPT carriers</b>	Improve the evidence base for policy and consumer decision-making. Aligns to ToR: airfare determinants, composition of factors.
4	<b>Extend NSW Air Transport Act 1964 fare regulation to Lord Howe Island</b>	Protect a captive community from unregulated monopoly pricing. Aligns to ToR: government intervention, access to services.
5	<b>Investigate a Community Service Obligation for Norfolk Island</b>	Address the unique access vulnerability of this Commonwealth Territory. Aligns to ToR: access to reliable services, government role, Closing the Gap.
6	<b>Assess feasibility of reactivating Taree Airport for scheduled RPT services</b>	Address the compound access disadvantage of MidCoast, Kempsey, Nambucca, Bellingen LGAs. Aligns to ToR: service levels, regional economic impacts.
7	<b>Mandate disclosure of proportion of seats available at advertised minimum fares</b>	Reduce deceptive advertising and improve consumer clarity. Aligns to ToR: demand drivers, pricing transparency.
8	<b>Commission a dedicated study of Aboriginal and Torres Strait Islander aviation access on the Mid North Coast</b>	Ensure Closing the Gap objectives are specifically addressed in aviation policy design. Aligns to ToR: Closing the Gap outcomes.
9	<b>Implement a uniform national aviation security levy</b>	Replace airport-specific security charges with a uniform national levy applied to all passengers regardless of airport location, fully funding aviation security nationally with distribution based upon actual airport costs incurred. Aligns to ToR: airfare determinants, composition of factors.
10	<b>Enhanced Patient Assisted Travel Schemes</b>	Reform PATS to fully reimburse actual airfare costs rather than notional public transport equivalents, removing financial barriers to medically necessary metropolitan care access. Aligns to: affordability, access to services, government role.

# 11. Conclusion

The communities of the Mid North Coast of New South Wales — encompassing more than 335,000 residents across six local government areas — and the island territories of Lord Howe and Norfolk Islands face a consistent and demonstrable inequity in aviation access compared to metropolitan Australians and to regional communities that benefit from competitive markets.

The Webjet fare data presented in this submission, sourced on 3 March 2026, provides a contemporaneous empirical basis for findings that are consistent with the historical trend data compiled by BITRE and presented in the PC's own background materials: regional routes are priced at multiples of the per-kilometre rate for metro routes, and this disparity is not structurally inevitable — it is a product of market concentration and the absence of competitive pressure.

The natural experiment provided by Ballina (Byron Gateway Airport) — where Jetstar competition has produced per-kilometre rates comparable to metro routes — is perhaps the most compelling evidence available to the Commission. The residents of Coffs Harbour and Port Macquarie do not face fundamentally different structural costs from those at Ballina. They face a market that has not attracted the competitive entry that Ballina has, and they are paying substantially and inequitably for that absence.

This inquiry is an important and timely opportunity to establish an evidence-based foundation for durable policy reform. This submission calls on the Productivity Commission to give full weight to the evidence of pricing inequity on the Mid North Coast, to make specific and actionable recommendations for intervention, and to ensure that geographic equity in aviation access is recognised as a matter of national economic and social policy significance.

Submitted in good faith on behalf of the communities of the Mid North Coast of New South Wales.

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**THIS SUBMISSION HAS BEEN PREPARED WITH THE ASSISTANCE OF AI IN THE RESEARCH, ANALYSIS AND DRAFTING**