



13 March 2026

Submission to the Productivity Commission  
Inquiry into the Determinants of Regional Airfares  
Response to Call for Submissions – Information Request 1

Via [On-Line Portal](#)

To Whom It May Concern

## Re: Inquiry into the Determinants of Regional Airfares

The Queensland Water Directorate (**qldwater**) is Queensland's central advisory and advocacy body for urban water (drinking water, sanitation, wastewater, networks), working with our members to provide safe, secure and sustainable water services to Queensland communities. We work actively with State and Federal Governments in the delivery of policy, regulation and programs that support Queensland's Water Service Providers (WSPs).

We represent all 73 Queensland WSPs with domestic connections: including all Aboriginal Councils, the two Torres Strait Island Councils, the council-owned Statutory Authorities in south-east Queensland (Urban Utilities and Unitywater) and two state-government owned corporations.

Water and sewerage services are essential services that underpin public health, environmental protection and economic development in regional and remote Australia. Safe drinking water and effective wastewater management support community health, environmental protection and the achievement of international commitments such as the United Nations Sustainable Development Goals relating to water, sanitation and sustainable communities.

In Queensland, these essential services are delivered by local governments. Councils operate hundreds of drinking water and wastewater systems across a state characterised by extremely large distances between population centres and service hubs.

Queensland is the most geographically decentralised state in Australia. According to the Australian Bureau of Statistics (ABS) Remoteness Area classification, over 85% of Queensland LGAs fall outside major cities. While most Queenslanders live in metropolitan and coastal regions, councils responsible for water and sewerage services frequently operate across large geographic areas with small and dispersed populations, highlighting the importance of regional and remote transport connectivity (including aviation) for service access, workforce mobility, and economic activity.

There are 370 water supply schemes and 265 sewage schemes across Queensland. Our members currently service 1,982,442 sewerage and 2,145,835 drinking water connections. These numbers are set to substantially increase with current and projected population growth and will require expansion and optimisation of existing wastewater treatment infrastructure and the construction of new infrastructure. Of these schemes, 254 are potable water schemes that service communities



classified as either Outer Regional, Remote or Very Remote according to the ABS Remoteness Area classification.

In this context, regional aviation plays a critical role in enabling the safe, reliable and compliant delivery of essential services (including but not limited to urban water) across remote and regional communities.

The Directorate welcomes the opportunity to provide a submission to the *Inquiry into the Determinants of Regional Airfares*. This submission specifically addresses **Information Request 1 – Why is Regional Aviation Important?**

**qldwater** provides this submission without prejudice to any submissions from our members or other urban water service providers.

## Economic and community benefits of reliable regional aviation

Reliable and affordable regional aviation supports the economic and social sustainability of regional communities. Access to regular air services enables:

- tourism and visitor access to regional destinations
- workforce mobility across regional labour markets
- workforce development and training of critical personnel
- business connectivity with major economic centres
- resilience building, especially during the high-risk weather season and resulting disaster events
- access to specialist services (including health and education) not available locally.

For essential service providers such as water utilities, aviation also supports the infrastructure systems that underpin regional economic development. Reliable drinking water and wastewater services are fundamental prerequisites for economic development - including housing, tourism, agriculture, mining and regional population growth.

Regional communities depend on the ability for specialists, regulators, trainers and service providers to travel efficiently to and from remote locations. Without this connectivity, the cost and complexity of maintaining essential services increases substantially. For communities across inland Queensland, aviation is therefore not a discretionary transport option but a core enabler of regional liveability.

## Regional aviation and productivity

Regional aviation significantly improves productivity by reducing the time and cost barriers associated with distance. Queensland's regional councils characteristically operate water and wastewater infrastructure across large geographic areas with small operational teams. Specialist support services such as NATA accredited laboratories, engineering expertise and foundational training, are typically located in major regional centres or capital cities where there is consistent demand for the services.



Without aviation connectivity, travel between many regional centres can require more than a full day of driving. This results in:

- significant loss of productive work time
- increased fatigue, safety and wellbeing risks for staff
- higher accommodation and travel costs
- reduced access to training and specialist services.

Efficient aviation connections allow council staff, regulators and service providers to travel between regional communities and major centres within workable timeframes. This enables essential service personnel to access training, attend regulatory meetings and obtain technical support while maintaining the continuity of day-to-day service delivery. Where aviation connectivity deteriorates, productivity losses are magnified across already resource-constrained regional councils.

## Regional aviation and essential service delivery

The safe provision of drinking water requires regular monitoring and laboratory testing to demonstrate compliance with public health regulations and ensure the safety of drinking water supplies. Under Queensland's drinking water regulatory framework, councils must transport water quality samples to NATA accredited laboratories within mandated holding times to ensure the validity of microbiological and chemical testing results.

For many remote communities, air transport is the only practical mechanism for meeting these holding times. Regional councils routinely rely on scheduled flights, which are often only once or twice weekly, to transport drinking water samples to laboratories where they can be processed within required timeframes. Access to NATA accredited laboratories in regional areas is highly limited, as the resourcing required to establish and maintain accreditation is beyond the capabilities and funding resources of remote and regional councils.

One NATA accredited regional laboratory operated by a regional council reported to **qldwater** that several remote Queensland councils in western Queensland are solely reliant on air-transport of water samples for regulatory compliance testing. That laboratory extends its services to incorporate out-of-hours sample collection from the airport and sample processing to align with air service schedules to meet laboratory microbiological holding times<sup>1</sup>. Without the support from these air services, remote councils would struggle to meet required sample holding times for microbiology and wastewater analyses. This in turn, means that councils would be in non-compliance with regulatory requirements and could, in the event of a water contamination issue, put the health and wellbeing of their community at risk. Access to regional flights also provides a critical linkage with remote water service providers for rapid additional testing and troubleshooting support during water quality exceedance events.

Aviation is also critical for the delivery of specialist workforce training for water and wastewater operators. These roles require nationally recognised qualifications and ongoing competency development to ensure safe operation of treatment systems and compliance with environmental and public health regulations.

Specialist training providers are limited in number and often based in metropolitan centres. Aviation access allows trainers and assessors to reach regional communities and enables council staff to

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<sup>1</sup>holding time refers to the maximum allowable period between sample collection and the start of laboratory analysis to ensure the results accurately represent the microbial conditions at the time of sampling.



attend practical training where required. This training includes mandatory health and safety training such as confined space entry and working at heights.

Where flight availability or affordability becomes a barrier, training delivery becomes significantly more difficult and costly. A recent assessment of training gaps within a remote Queensland council showed that in addition to reduced workforce capability development and reduced opportunities for regional staff to obtain required qualifications, it is also impacting delivery of mandatory safety training.

## Role of regional aviation in Closing the Gap outcomes

Regional aviation also plays an important role in supporting service delivery and workforce development in Aboriginal and Torres Strait Islander communities. Many remote Aboriginal and Torres Strait Islander communities are located in areas classified by the ABS as Remote or Very Remote, where distances to major service centres are substantial and alternative transport options are limited.

In these communities, local councils or Indigenous councils are responsible for delivering essential environmental health services including drinking water supply, wastewater management and waste services. These services are fundamental to improving health outcomes and addressing long-standing disparities in environmental health conditions.

Reliable aviation access supports Closing the Gap outcomes in several ways:

- enabling specialist technical support to reach remote communities
- supporting training and skills development for local workers
- facilitating rapid response to infrastructure failures or public health risks
- enabling movement of critical equipment and testing materials.

Importantly, aviation also enables workforce development pathways for people living in remote communities. Training programs in water operations and environmental health aim to build local capability and create employment opportunities for Aboriginal and Torres Strait Islander residents.

Without reliable aviation access, delivering training and maintaining workforce capability in these locations becomes significantly more difficult (see also *Case Study 1: Training access in Doomadgee*). Regional aviation therefore contributes not only to service delivery but also to the development of local skills, employment opportunities and long-term community resilience.

## Aviation as a complement to other transport modes

In much of regional Queensland, aviation complements rather than replaces other transport modes.

Road transport remains important for freight and local travel, but distances between regional centres are often extremely large. Road travel may involve:

- journeys exceeding 10–15 hours
- significant fatigue risks for workers
- seasonal road closures due to flooding, fire and other climate events
- variable road conditions in remote areas.



Rail services are limited or absent in many parts of regional Queensland and cannot meet the time-sensitive requirements associated with regulatory compliance or specialist service delivery. Aviation therefore fills a critical gap by enabling:

- rapid movement of personnel between remote communities and service centres
- connection to national transport networks
- timely transport of samples, equipment and specialist staff.

For many regional councils, aviation is the only practical means of accessing specialist services within operational timeframes.

## Financial sustainability of regional councils

The cost and reliability of regional aviation must also be considered in the context of the financial pressures faced by regional councils.

Local governments deliver a wide range of essential services but receive only a small share of overall taxation revenue. At the same time, councils are increasingly required to deliver services that were historically provided by other levels of government.

Research commissioned by the Local Government Association of Queensland has estimated that cost shifting from other levels of government to councils has increased substantially, reaching approximately \$360 million per year across Queensland councils.

Many councils with small rate bases must therefore deliver complex essential services with limited financial capacity. Rising airfares or reduced flight availability can significantly increase the operational cost of day-to-day operations, delivering training, regulatory compliance and technical support.

Affordable and reliable regional aviation is therefore an important factor in maintaining the financial sustainability of essential service delivery in regional communities.

## Case Studies – Operational Impacts of Regional Aviation

The following case studies illustrate the practical role that regional aviation plays in enabling the delivery of essential services in regional and remote Queensland.

These examples demonstrate how the availability, connectivity and affordability of regional air services affect:

- workforce capability development and training access
- the productivity of regional service providers
- the ability to deliver services in remote Aboriginal communities
- the operational feasibility of travel between regional centres

Together, these examples highlight that the impacts of regional aviation extend beyond tourism and passenger mobility. For many regional councils responsible for delivering essential services such as drinking water and wastewater management, aviation access directly affects the ability to maintain workforce capability, regulatory compliance and service continuity in remote communities.



## Case Study 1 – Training access in Doomadgee

Doomadgee Aboriginal Shire Council is a remote community in north-west Queensland, located more than 1,000 kilometres from the nearest capital city and with limited road access during the wet season.

Water and wastewater operators in communities such as Doomadgee require nationally recognised qualifications and ongoing competency-based training to ensure the safe operation of drinking water and wastewater systems. These roles are critical to protecting public health and maintaining compliance with drinking water regulations. Access to this training is heavily dependent on regional aviation.

In practice, trainees in Doomadgee often need to travel to locations such as Cairns, Innisfail or Hughenden to attend practical training or assessment activities. However, limited flight availability and seat capacity can make this travel difficult to arrange. In some instances, there may be no available seats on connecting flights for extended periods, even when planning months in advance.

Alternative options are impractical. Driving to training locations can require more than 19 hours of travel across remote roads that may be closed during seasonal flooding.

Airfare and access constraints are pushing Registered Training Organisations to shift toward online or blended delivery models; however, these approaches cannot fully replace the practical, competency-based training required for water and wastewater operations. Online learning often results in lower completion rates, reduced peer interaction and limited opportunities for hands-on skill development. These limitations are particularly significant for Indigenous and remote learners, where language, literacy, numeracy and digital support needs are better addressed through face-to-face training, and where internet connectivity is frequently unreliable, low-bandwidth or unavailable.

These constraints delay training completion, extend qualification timeframes and reduce opportunities for workforce development in remote communities. This directly affects the ability of councils to develop local skills and build sustainable employment pathways for Aboriginal workers in essential service roles.

## Case Study 2 – Gulf flight connectivity

Regional aviation networks in northern Queensland often operate on circular or multi-stop flight paths servicing several remote communities on a single route.

While this approach provides connectivity to multiple locations, it can create complex travel patterns that significantly increase total travel time between communities. For example, councils located in the Gulf region may need to travel to a neighbouring council to attend training or regional meetings. However, the available flight network may require travellers to follow the entire circular route through several communities before reaching the destination. This means that a journey between two geographically nearby communities may require multiple flight legs and extended travel time (including overnight stays).

In some cases:

- flight schedules operate only once per week
- connections require overnight stays



- seat availability is limited due to demand from government agencies and essential service providers.

Where aviation connectivity is limited or poorly aligned with operational needs, councils may face difficult choices between:

- extended travel times that remove staff from operational duties for multiple days
- costly travel arrangements involving several flights and overnight stays
- or cancelling training and regional collaboration activities altogether.

These inefficiencies reduce workforce productivity and increase the cost of delivering essential services in remote regions.

### Case Study 3 – Specialist training delivery in Charleville

Delivering accredited workforce training to regional councils often requires specialist trainers to travel long distances to remote locations.

A recent training delivery example involved a trainer travelling from Melbourne to Charleville in south-west Queensland to deliver accredited water industry training to regional council staff. Although commercial flights to Charleville are available, connectivity between interstate and regional services created significant logistical challenges.

The scheduled direct flight to Charleville did not align with arrival times for interstate flights from Melbourne, making same-day connections impossible without long layovers or overnight stays. Alternative travel via Roma was technically possible but required extended transit times. When combined with interstate travel, the journey could exceed 12 hours of total travel time, effectively consuming an entire working day.

These travel constraints created several operational impacts:

- loss of productive working time
- increased trainer costs associated with time spent in transit
- fatigue risks affecting safe delivery of training
- additional accommodation requirements to manage fatigue and scheduling constraints
- restrictive baggage allowances limiting transport of training equipment.

When these factors were considered, the apparent cost advantage of commercial air travel was reduced. In some circumstances, charter flights became competitive when accounting for lost productivity, scheduling constraints and equipment transport requirements.

This example demonstrates that the existence of a regional flight route does not necessarily equate to functional connectivity. Misaligned schedules and indirect routes can significantly increase the time and cost associated with delivering specialist services to regional communities.

For sectors responsible for essential public infrastructure, these inefficiencies can ultimately reduce access to workforce training and increase the cost of maintaining critical services.

## Conclusion

For regional and remote Queensland communities, aviation is a critical enabling infrastructure.

Affordable and reliable regional air services support:



- the safe delivery of drinking water and wastewater services
- workforce training and capability development
- regulatory compliance and environmental protection
- economic activity and regional development
- service delivery in remote Aboriginal and Torres Strait Islander communities

For councils responsible for delivering essential water and sewerage services across vast geographic areas, regional aviation is a vital operational lifeline.

Ensuring reliable and affordable regional aviation services is therefore fundamental to maintaining community health, environmental protection and the long-term sustainability of regional and remote Queensland communities.

The Directorate would welcome the opportunity to provide any further information or data.

Yours sincerely

Dr Georgina Davis  
Chief Executive Officer