

26 October 2025

Adelaide Airport Limited submission to the Aviation Consumer Protections – Subordinate Legislation consultation

Submitted via email to aviationconsumer@infrastructure.gov.au

Thank you for the opportunity to provide feedback on the Aviation Consumer Protection Subordinate Legislation.

This submission is provided on behalf of both Adelaide Airport Limited and Parafield Airport Limited (“**together AAL**”) as operators of Adelaide and Parafield Airports and can be read in conjunction with the previous submission on the consultation for the Primary Legislation.

In principle AAL is supportive of:

- improving customer experience and trust in the aviation industry,
- simplifying complaints handling processes to deliver more transparency for the community and the sector,
- working alongside the aviation industry and government agencies to ensure customer experience meets and, where possible, exceeds expectations,
- clearly defined and articulated expectations which remove ambiguity and balance the intersection of potentially conflicting areas across airports, airlines, government agencies and other service providers.

AAL is a privately owned company supported by four long-term institutional shareholders. Our shareholders are large superannuation funds who have held ownership since privatisation. These funds manage the retirement savings of many Australian families, making them indirect investors in our airports; and our performance as a business directly impacts the lives of many Australians. We have been the custodian of the long-term leases of Adelaide and Parafield Airports from the Commonwealth Government since May 1998. Adelaide Airport is the aviation gateway to South Australia. We are the 5th largest airport in Australia and in the past financial year we saw record passenger numbers, surpassing the previous record set in FY24. Parafield Airport is South Australia’s principal general aviation airport and is one of the largest pilot training airports in the southern hemisphere.

OVERVIEW

This submission responds to the questions outlined in the consultation paper, applying our focus on enhancing the customer experience. At Adelaide Airport, we are committed to delivering seamless, connected and easy journey for our customers and elevating their experiences.

We welcome the discussion around Aviation Consumer Protections as an opportunity to strengthen outcomes for passengers and build trust across the sector. The greatest benefits will come from collaboration between airports, airlines, government agencies, and other stakeholders, with a practical, industry-wide focus. AAL remains committed to continuous improvement and believes the best results are achieved by listening to customers and working with all parties to deliver fair, balanced, and effective solutions.

We also recommend consideration again be given to broadening the scheme to include other agencies, including Commonwealth Government departments, who are also responsible for areas that impact customer experience. If they are not included in the formal scheme, we suggest they voluntarily adopt other measures like a customer service charter or similar as a commitment to upholding key areas of service delivery.



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DISCUSSION

As there is repetition in the answers to the individual questions, the following section broadly addresses the individual consultation questions relating to the subordinate legislation.

Our submission focuses on:

- the practical implementation of the proposed Charter standards;
- operational considerations for airports; and
- the importance of establishing a fair and sustainable framework for cost recovery.

We also suggest a phased implementation or adequate time for industry to adopt any changes needed to meet new requirements. These changes will add a financial burden and must be managed appropriately.

AAL is broadly supportive of the proposed Charter standards, which capture the key elements of the aviation customer experience. We acknowledge the intent to provide clarity and ensure consistency across the sector and agree that defining the responsibilities of airlines, airports and accessibility service providers is fundamental to building trust and improving outcomes for travellers. Whether this is best defined by the commercial relationship owner or how the services are delivered in practice is best determined on a case by case basis.

It will be essential, however, to ensure that key terms are clearly defined and that the Charter standards do not duplicate existing obligations under related legislation, particularly the aviation-specific Disability Standards under the *Disability Discrimination Act 1992* (Cth) and the Disability Standards for Accessible Public Transport 2002. These frameworks are already the subject of ongoing work to clarify ownership of different parts of the customer journey, and any overlap may create unnecessary complexity or confusion for both customers and operators.

Equally important will be managing customer expectations around remedies and responsibility, particularly in circumstances where disruption or inconvenience results from factors beyond the control of the airline or airport. This includes adverse weather, government agency operations, or other external events. Clear communication about the limits of the Charter's remit will be critical to maintaining transparency and consumer confidence in the system. It will also be important to define whether delays relating to security screening are included under the scheme, for example where a screening failure has occurred and an evacuation of the sterile area and re-screening of passengers is required.

AAL supports the standards proposed and notes that many of these expectations are already reflected in our current operations. We also support the intent to clearly identify responsible parties and establish defined processes for customer response and escalation. However, we recognise that some complaints are inherently complex, and additional time may occasionally be required to investigate or resolve them. The framework should allow for flexibility in such cases, while still providing customers with certainty about next steps if they remain dissatisfied after the investigation has concluded.

Regarding the proposed cost recovery arrangements, AAL considers that any levy or contribution mechanism should only be introduced once the scheme has been in operation for a sufficient period, ideally 18 to 24 months, to allow for meaningful review of its effectiveness, administrative costs, and impact on industry participants. We recommend that the Commonwealth fund the initial establishment and operation of the scheme during this period, with a subsequent review to determine a fair and evidence-based cost recovery model.

On the matter of compensation for delays, AAL supports the provision of food and drink vouchers for affected passengers but notes that it is difficult to prescribe fixed values or quantities. The cost and availability of food and beverage options vary significantly between airports, outlets, and times of day. A more flexible approach based on reasonable access to refreshments appropriate to the duration of the delay would better reflect operational realities and customer needs.

