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**To:** [aviationconsumer](#)  
**Subject:** submission to: Aviation Consumer Protections – primary legislation [SEC=OFFICIAL]  
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## Step 1: Your submission

### Remain Anonymous

No

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Hobart Airport

## Upload attachments

### File uploads

- [hobart-airport-submission-aviation-consumer-protections-primary-legislation.pdf](#)  
(184.6 KB)

## Step 2: Contact details

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**Consultation name**

Aviation Consumer Protections – primary legislation

OFFICIAL

Hobart International Airport

# Aviation Consumer Protections

Submission to consultation on primary legislation

October 2025



**Hobart Airport**  
TASMANIA



This submission presents Hobart Airport's views on the development of aviation consumer protections through the establishment of an Aviation Consumer Protection Authority (ACPA) and an aviation consumer ombudsperson. Recognising the wide array of organisations shaping the passenger journey—ranging from airlines and airports to government bodies such as Airservices Australia and the Australian Border Force—Hobart Airport calls for a comprehensive and inclusive approach to consumer advocacy.

Our submission emphasises the importance of every participant effecting the customer journey, consumer education, and a balanced approach to process timeframes and cost recovery to ensure that travellers are supported when direct to customer resolutions are unsuccessful.

### Direct consumer relationship

Hobart Airport advocates for the inclusion of all entities with a direct consumer relationship in the proposed aviation consumer ombuds scheme, emphasising the importance of not excluding government bodies such as Airservices Australia, Australian Border Force (ABF) and Biosecurity Tasmania. These organisations are integral to the customer journey, with their activities impacting passengers at various stages of travel.

Airports and airlines play distinctive roles in facilitating passenger movement and service delivery, while other regulated entities operate within airports to ensure compliance and safety. Notably, ABF and Biosecurity Tasmania are responsible for border and biosecurity processes at Hobart Airport, directly interacting with travellers and influencing their experience. Security screening is another highly regulated activity, regulated by the Department of Home Affairs, and is vital for maintaining safety and efficiency within the aviation system. Together, these entities form a complex network of responsibilities and legislative requirements, making comprehensive consumer protection and clear communication essential for a seamless travel experience.

### Industry and consumer education

The proposed establishment of the ACPA and education of regulated entities is essential and supported by Hobart Airport. Established standards must be understood by the regulated entities and educational activities must transition into a phased enforcement approach.



In addition to education of regulated entities described above, the ACPA must establish a parallel education program to ensure consumers understand the complex roles and responsibilities of regulated entities under the Charter. Hobart Airport customer complaints are frequently (almost 50%) attributed to enquires that are passed onto airlines, ground handlers or concessionaires.

Consumer education would also guard against large volumes of complaint enquiries in the initial stages of the ACPA, that should go to the appropriate regulated entity. As noted in the Aviation Consumer Protection consultation paper, a not insignificant proportion of complaints directed to similar schemes are contacts from consumers who have not yet raised their enquiry with the direct service provider, such as the Energy and Water Ombuds in NSW example cited.

Consumer focussed education would contribute to greater understanding of the Australian aviation system and their rights as consumers. By empowering consumers with information, the ACPA and ACO can better direct their resources to legitimate dispute resolution where significant breaches of the Charter have occurred.

A common source of customer complaints at Hobart Airport is from interactions with security screening processes. This provides another opportunity for the ACPA to be the source of clear, consistent security screening information for the aviation network. While airports act as the screening authority and have the direct customer relationship, the consumer would benefit from accessing a single independent source providing information across the Australian aviation network on security screening expectations.

### Accessible travel

At Hobart Airport, we acknowledge that our local market has the highest proportion of people living with disability in Australia, at 28.8%.<sup>1</sup> We acknowledge that passengers with disabilities are especially impacted by delays, poor design, and inconsistent support throughout their aviation journey. Our position is that consumer protection should focus on making real improvements to accessibility, rather than adding layers of regulation that may blur accountability.

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<sup>1</sup> [Indicators — TasCOSS](#)



We support a new framework that aligns closely with upcoming aviation disability standards, so that technical requirements are managed by specialists, and clear pathways for complaints and service obligations are maintained within the Charter and Ombuds system.

By taking this approach, the industry and regulatory entities could aim to improve accessibility for all passengers, reduce duplication of work and costs, and deliver a smoother travel experience for people living with disabilities.

### Cost recovery and establishment

The cost recovery model must consider that the costs of administering the scheme must be balanced given industry's ability to absorb these costs, which may lead to reduced resources to support quality services, improved frequency and new routes.

Inclusion of the ANO in an overall ombuds office is supported.

We strongly support the concept of government co-funding, especially during the initial stages of establishing new consumer protection mechanisms. Smaller airports like Hobart face unique challenges, as many passenger complaints arise from government agency performance—such as air traffic control issues—which sit outside the control of airports and airlines. It would be unfair to expect airports, particularly those with limited resources, to shoulder the financial burden of resolving issues that originate from government agencies decisions or actions.

While government agencies such as Australian Border Force, and Biosecurity Tasmania do not have a 'direct customer relationship' according to the proposed scheme, they have a direct impact on the customer journey in the aviation system. If penalties are not considered appropriate for these agencies, monitoring and reporting as part of the ACPA is essential. This would ensure that consumer complaints that relate to these agencies can be incorporated into operational and policy improvements moving forward.

We also believe that the Aircraft Noise Ombudsman should continue to be funded under current government arrangements, given its roots in environmental regulation. Extending the levy to cover the ANO would act as a double-cost burden given that airports already invest heavily in community engagement through Master Plans, Major Development Plans, and Community Aviation Consultation Groups.



Indeed, the impact of aviation flight noise is contemplated during the significant engagement required to develop both Master Plans and Major Development Plans, a process to which airports must strictly adhere to and invest in. Beyond these processes, any aircraft noise issues and consumer complaints are more appropriately handled by Airservices Australia directly, and the ANO funded through existing government arrangements.

Additional costs associated with the ACPA and ACO risk diverting limited resources away from consumer-focused improvements to the passenger journey, such as better accessibility, customer service initiatives and facility upgrades. It is vital that smaller airports are supported in delivering quality experiences for passengers, rather than being encumbered by costs that do not directly relate to their operations.

Allocation of costs between annual levy and monthly activity driven levy should align with the principles of the Aviation Consumer Protections and incentivise regulated entities to improve customer experiences and complaint resolution. Hobart Airport supports a low annual levy, with most of the cost recovery managed through variable, per-matter levies. Further consultation as the subordinate legislation is developed is strongly encouraged, especially with a range of regulated entities in terms of scale and demographics of the markets that they serve.

## Process

From Hobart Airport's perspective, prompt acknowledgement and a timely initial response to complaints is achievable and remains our commitment. For most cases, aiming to address complaints within 30 days is reasonable and strikes an appropriate balance. However, there are instances where resolution depends on information or actions from third parties, such as airlines or government agencies, which are beyond our direct control. In these situations, it is essential that regulated entities can 'stop the clock' on the complaint resolution timeframe when awaiting third party information, so that the process remains fair and manageable for all parties involved.

While we can guarantee a timely and respectful response, definitive resolution may not always be possible within the prescribed period if third party involvement is required. Detailed processes, service levels, and escalation pathways should therefore be determined in subordinate legislation,

following broad consultation, to ensure practical and equitable outcomes for both airports and passengers.

As noted in the ACP consultation paper, the related (Initiative 3) *'show cause'* arrangement from the Aviation White Paper is being progressed separately. Reliance on regular reporting through BITRE<sup>2</sup> for this information holds the risk of creating undue delays in the resolution of disputes and must be considered when determining any process timeframes established by the ACPA.

The proposed complaint lodgement window of twelve months would create a significant burden on airports due to the significant increase in data retention to support such a timeframe. In Hobart Airport's case, an increase of server capacity to increase CCTV retention to meet the needs of the proposed scheme would cost an additional ~\$1 million, to increase from current settings. A more suitable lodgement timeframe would be up to 60 days, with criteria for dispensation beyond this. This allows regulated entities to manage data retention efficiently, and in line with current requirements, while enabling the ACPA to accept later lodgement according to prescribed criteria.

### Role of the Aviation Ombudsperson

From Hobart Airport's perspective, we support having a dedicated Ombuds for aviation, if its responsibilities are clearly set out. We believe passengers should first raise their concerns with the airport or relevant service provider before taking them to the Ombuds. This helps resolve simple problems quickly and without extra cost.

If a complaint needs to be escalated, there should be a clear process showing where to go, so that issues already handled by other authorities, like those under the Privacy Act or Disability Discrimination Act, are not repeated.

The Ombuds should focus on looking into complaints, keeping track of wider problems, and sharing findings and recommendations. Decisions about airports and airlines should be able to be enforced by the appropriate enforcement body, but when it comes to government agencies, the Ombuds' findings should be recommendations for improvement, in line with how Ombuds offices usually work.

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<sup>2</sup> [awp-aviation-white-paper.pdf](#)

We can learn from how things are done overseas. For example, the UK Civil Aviation Authority expects accredited dispute resolution bodies to finish cases within 90 days after getting all the needed documents. We think it's important to set clear rules for early acknowledgement of complaints and regular updates, and these should be included in supporting legislation. There should also be a fair way for either side to pause the process if more information is needed.

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In conclusion, Hobart Airport advocates for a pragmatic, fair, and clearly defined approach to aviation consumer protections that acknowledges operational realities and prioritises effective dispute resolution for all stakeholders. The following key points summarise our submission:

- Prompt acknowledgement and initial response to complaints is a priority, with a 30-day resolution target for most cases.
- Provision for either party to pause the complaint process if further information is required, ensuring fairness and transparency.
- Detailed complaint handling procedures and escalation pathways should be established in subordinate legislation after industry consultation.
- Extensive data retention requirements linked to a twelve-month complaint lodgement window pose significant operational and financial burdens; a 60-day window with criteria for dispensation is more appropriate.
- Support for a dedicated Aviation Ombudsperson, with clearly defined responsibilities and processes for escalation.
- Education for consumers by the ACPA should be prioritised, i.e. complaints should first be raised with the relevant airport or service provider, streamlining resolution and minimising unnecessary escalation.
- Enforceable decisions should apply to airports and airlines, while recommendations should guide government agencies.
- Cost recovery must consider the regulated entities' ability to absorb costs without diminishing resources available for improving customer experience.

These recommendations aim to balance consumer rights with operational practicality, fostering a more responsive and equitable aviation sector in Australia.



Should you require further information, please contact Erin [REDACTED]  
at [REDACTED].

ACP – Aviation Consumer Protections

ACPA – Aviation Consumer Protection Authority

ANO – Aviation Noise Ombudsperson

ACO – Aviation Consumer Ombudsperson