

# **Submission to Aviation Consumer Protections Consultation – Subordinate Legislation**

29 October 2025

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## About the Justice and Equity Centre

The Justice and Equity Centre is a leading, independent law and policy centre. Established in 1982 as the Public Interest Advocacy Centre (PIAC), we work with people and communities who are experiencing marginalisation or disadvantage.

The Centre tackles injustice and inequality through:

- legal advice and representation, specialising in test cases and strategic casework;
- research, analysis and policy development; and
- advocacy for systems change to deliver social justice.

We actively collaborate and partner in our work and focus on finding practical solutions. We work across five focus areas:

**Disability rights:** challenging discrimination and making the NDIS fairer to ensure people with disability can participate equally in economic, social, cultural and political life.

**Justice for First Nations people:** challenging the systems that are causing ongoing harm to First Nations people, including through reforming the child protection system, tackling discriminatory policing and supporting truth-telling.

**Homelessness:** reducing homelessness and defending the rights of people experiencing homelessness through the Homeless Persons' Legal Service and StreetCare's lived experience advocacy.

**Civil rights:** defending the rights of people in prisons and detention, including asylum seekers, modernising legal protection against discrimination, raising the age of criminal responsibility to 14, advancing LGBTIQ+ equality and advocating for open and accountable government.

**Energy and water justice:** working for affordable and sustainable energy and water and promoting a just transition to a zero-carbon energy system.

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# Contents

- Recommendations ..... 1
- 1. Introduction.....4
- 2. Question 4: The Charter’s scope .....4
- 3. Question 5: Minimum standards required.....8
- 4. Question 8: Funding model ..... 12
- 5. Question 9: Assistance for delays or cancellation.....13



# Recommendations

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## **Recommendation 1: The Charter to include standards for access to information**

*The Charter should include standards for accessible information to apply to all information conveyed across the aviation journey. This should include any schedule changes to flights (not just disruptions, delays and cancellations), security screening, boarding information, connections, gate assignments and baggage. Additionally, in-flight information including about safety, instructions, in-flight services and entertainment, need to be provided in accessible formats.*

*Consumers should also have the right to access their personal information from airlines or airports (eg copies of recordings and/or transcripts of interactions with the consumer), including for the purpose of correcting or updating their information, or participating in a complaint process.*

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## **Recommendation 2: The Charter require airline booking processes be accessible**

*The Charter should require airline booking processes be accessible so people have a variety of options to book flights according to their preference – ie phone call, website, app – and not be disadvantaged as a result of the method they choose.*

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## **Recommendation 3: The Charter cover the provision of equipment and assistance to facilitate boarding and disembarking of passengers**

*The provision of equipment and assistance to facilitate boarding and disembarking of passengers should be included in the Charter, and if not provided satisfactorily by an airline or airport should be able to be subject to a complaint to the ACO.*

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## **Recommendation 4: The Charter set expectations about how journeys should be facilitated for people with disability**

*Where requested, a person with disability should be able to receive assistance from 'kerb to kerb', including on arrival at the airport to check-in for the departing flight, assistance to board, assistance in-flight, assistance with transportation between gates to make connections, and assistance with moving from the arriving flight to the kerb for pick-up. This should happen regardless of whether the assistance is provided by the airport or airline – airports and airlines should assign responsibilities between them to ensure this can occur.*

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## **Recommendation 5: The Charter include standards relating to the dignified and respectful treatment of passengers during security screening**

*Standards relating to the dignified and respectful treatment of passengers during security screening should be expressly included in the Charter. Alongside the Charter, the Government should reform and harmonise security screening across Australian airports to ensure consistency in relation to screening people with disability, and to comply with the guiding principles of Australia's Disability Strategy 2021-2031.*

***Recommendation 6: Disability aids and assistance requirements be addressed in a separate section of the Charter***

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*Disability aids and assistance requirements should be addressed in a separate section of the Charter, to differentiate it from ‘baggage’. This section of the Charter should include minimum standards to ensure passengers with disability have the right to assistance, as well as the right to safe and proper manual handling and handling/carriage of disability aids.*

***Recommendation 7: The Charter mandate a requirement for all airline and airport customer service staff (including contractors) to undergo disability awareness and inclusion training***

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*The Charter should mandate a requirement for all airline and airport customer service staff (including contractors) to undergo disability awareness and inclusion training, including requirements for delivery and frequency of the training, subject to consultation with disability representative organisations. Staff and contractors who provide manual assistance to consumers with disability or handle disability aids should undergo annual in-person and hands-on training, and demonstrate their knowledge through competency assessments or certification exams.*

***Recommendation 8: The Charter be expanded to include additional standards to address each element of the aviation consumer experience***

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*Additional standards to reflect the missing elements identified in our response to Question 4 should be incorporated in the Charter.*

***Recommendation 9: The Charter be amended to more adequately address the needs and experiences of people with disability***

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*The standards proposed in the Charter should be amended to more adequately address the needs and experiences of people with disability (as identified in our response to Question 5).*

***Recommendation 10: Terminology be clarified with respect to disability aids***

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*The Charter should specify the meaning to be given to words such as ‘damage’, ‘lost’, ‘delay’, ‘matter of urgency’ and ‘reimbursed’ with respect to disability aids. Uniform meanings would assist customers to receive consistent responses and resolutions across the aviation industry.*

***Recommendation 11: Annual levies be paid by all large entities***

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*Annual levies should be payable by all large entities that service over 1 million passengers per year (not just large airlines).*

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*Annual levies need to be appropriately calculated so the Framework is not over-reliant on variable per matter monthly levies and has sustainable funding.*

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*The setting of values for food and drink vouchers should account for higher food, drink and incidental costs likely to be incurred by people with disability. Reasonable incidentals may include the costs of support workers, assistive equipment, accessible transport to/from accommodation, medications, continence products and supplies related to a disability or medical condition including supplies related to assistance animals.*

***Recommendation 14: The Charter mandate that airlines inform consumers of the reason(s) for, and estimated length of, any disruption, delay or cancellation***

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*The Charter must mandate that airlines inform consumers of the reason(s) for, and estimated length of, any disruption, delay or cancellation to assist consumers to understand their rights to assistance.*

# 1. Introduction

The Justice and Equity Centre ('JEC', formerly the Public Interest Advocacy Centre), welcomes the opportunity to make a submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts' Consultation Paper on the subordinate legislation for the Aviation Consumer Protections Framework ('Framework').

We are a leading social justice law and policy centre. Our work focuses on tackling barriers to justice and fairness experienced by marginalised communities. We have a long history of involvement in public policy development and advocacy promoting the rights and equal participation of people with disability.

We have extensive experience in disability discrimination litigation and public policy development related to public transport. Equal access to air travel is a current priority for our work. We have represented clients in disability discrimination matters against airlines and airports in the Australian Human Rights Commission ('AHRC') and in the Federal Court of Australia. We also work on related law reform including as a member of the Department's Steering Committee and a co-design partner with People with Disability Australia and the Australian Federation of Disability Organisations on the co-design of the proposed Aviation Disability Standards.

As we explained in our submission to the Department's consultation on the primary legislation, consumer protections in air travel are of particular importance for people with disability – where airlines and airports fail to deliver services, people with disability may be disproportionately impacted and experience serious consequences.<sup>1</sup> The impact on people with disability must be better reflected in the scope of the Aviation Consumer Protections Charter ('Charter') and addressed in the standards it sets.

## 2. Question 4: The Charter's scope

**Do the proposed Charter standards cover the core elements of the aviation consumer experience relating to the delivery of airline services, airport services and airport accessibility services? Are there any missing elements?**

The JEC considers the entirety of the consumer experience – from booking a flight, arriving at the airport, checking in, clearing security screening, boarding the flight, arriving at the destination, collecting disability aids and baggage and leaving the airport – should be covered by the Framework. Accordingly, we consider the scope of the Charter must include all these elements of the aviation consumer experience.

### **Access to information in accessible formats**

While the Charter sets standards for the accessibility of booking information and complaint handling, the standard for accessible information should be broader to apply to all information

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<sup>1</sup> JEC, *Submission to Aviation Consumer Protections Consultation – Primary Legislation* (3 October 2025), 3.

conveyed across the aviation journey. As we recommended in our submission to the Aviation Customer Rights Charter, the type of information that should be subject to this right must also include any schedule changes to flights (not just disruptions, delays and cancellations), security screening, boarding information, connections, gate assignments and baggage. Additionally, in-flight information including about safety, instructions, in-flight services and entertainment, need to be provided in accessible formats.<sup>2</sup>

We also maintain our recommendation that a consumer should have the right to access their personal information from airlines or airports (eg copies of recordings and/or transcripts of interactions with the consumer), including for the purpose of correcting or updating their information, or participating in a complaint process.<sup>3</sup>

### **Booking information requirements**

The Charter should require airline booking processes to be accessible so people have a variety of options to book flights according to their preference – ie phone call, website, app – and not be disadvantaged as a result of the method they choose. We know from our work that people with disability do not have the same choice to book flights as people without accessibility needs – people with disability are often required to book over the phone rather than online and may be disadvantaged as a result of the lengthier process and/or not being able to access the same pricing or sale fares had they been able to book online.

### **Boarding and disembarking**

While the Charter contemplates prioritisation of passengers with additional needs for check-in and boarding, it is silent on the prioritisation of passengers disembarking. We are aware from our work that people requiring wheelchair assistance are often left waiting on the aircraft for unreasonable lengths of time after other passengers have disembarked, or are unable to disembark due to a lack of appropriate equipment at the destination airport (in one case we are aware of, a person was left on the plane for 1 hour). The provision of equipment and assistance to facilitate boarding *and* disembarking of passengers should be included in the Charter. If those are not provided satisfactorily by an airline or airport, that should be able to be subject to a complaint to the Aviation Consumer Ombudsperson ('ACO').

We are pleased the Charter requires airlines to coordinate the facilitation of passenger journeys for people with disability with airports, however, further expectations about how this should occur should be set out in the Charter. For example, and as we have said previously, where requested, a person with disability should be able to receive assistance from 'kerb to kerb', including on arrival at the airport to check-in for the departing flight, assistance to board, assistance in-flight, assistance with transportation between gates to make connections, and assistance with moving from the arriving flight to the kerb for pick-up. This should happen regardless of whether the assistance is provided by the airport or airline – airports and airlines should assign responsibilities between them to ensure this can occur.<sup>4</sup>

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<sup>2</sup> JEC, *Submission: Aviation Customer Rights Charter – Consultation Paper* (7 March 2025) 12-13.

<sup>3</sup> *Ibid* 19.

<sup>4</sup> *Ibid* 13.

## Security screening

The earlier draft Aviation Customer Rights Charter included the right to be treated with dignity and respect and noted this would mean '[s]ecurity screening at airports will be delivered with dignity, free from bias and in line with the requirements set by the Department of Home Affairs.'<sup>5</sup> This right has been omitted from the revised Charter.

As we outlined in our submission relating to the primary legislation, security screening is a core element of the aviation consumer experience and should be included as a regulated activity in the Framework.<sup>6</sup> It follows that standards relating to the dignified and respectful treatment of passengers during security screening should be expressly included in the Charter. This is particularly important for passengers with disability due to the privacy impacts and discriminatory nature of security screening processes, and limited disability awareness training for security screening personnel.

Alongside the Charter, we have also recommended the Government reform and harmonise security screening across Australian airports to ensure consistency in relation to screening people with disability, and to comply with the guiding principles of *Australia's Disability Strategy 2021-2031*.<sup>7</sup>

## Baggage

We remain concerned that mobility aids are captured in the Charter as part of 'baggage' requirements. In our submission to the draft Aviation Customer Rights Charter, we said '...disability aids should be distinguished from luggage, given the significantly different impacts on passengers whose disability aids are damaged, lost or misplaced.'<sup>8</sup>

Accordingly, we consider 'disability aids and assistance requirements' should be addressed in a separate section of the Charter. The language of 'disability aids' should be used for consistency with the *Disability Discrimination Act 1992* (Cth) and to acknowledge disability aids include any equipment that provides assistance to alleviate the effect of disability (not only mobility aids).<sup>9</sup> While the proposed Aviation Disability Standards are intended to prescribe specific standards to ensure accessibility, this section of the Charter should include minimum standards to ensure passengers with disability have the right to assistance, as well as the right to safe and proper manual handling and handling/carriage of disability aids.

## Disability awareness and inclusion training

Consistent with the recommendation we made in our submission to the Aviation Customer Rights Charter, the Charter 'should mandate the requirement for all [airline and airport] customer service staff (including contractors) to undergo disability awareness and inclusion training, including

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<sup>5</sup> Australian Government, *Aviation Customer Rights Charter Consultation Paper* (December 2024) 8.

<sup>6</sup> JEC, *Submission to Aviation Consumer Protections Consultation – Primary Legislation* (3 October 2025) 7-8.

<sup>7</sup> JEC, *Submission: Aviation Customer Rights Charter – Consultation Paper* (7 March 2025) 10.

<sup>8</sup> *Ibid* 17.

<sup>9</sup> *Disability Discrimination Act 1992* (Cth) s 9(3).

requirements for delivery and frequency of the training, subject to consultation with disability representative organisations. Staff and contractors who provide manual assistance to customers with disability or handle disability aids should undergo annual in-person and hands-on training, and demonstrate their knowledge through competency assessments or certification exams.<sup>10</sup>

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*Standards relating to the dignified and respectful treatment of passengers during security screening should be expressly included in the Charter. Alongside the Charter, the Government should reform and harmonise security screening across Australian airports to ensure consistency*

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<sup>10</sup> JEC, *Submission: Aviation Customer Rights Charter – Consultation Paper* (7 March 2025) 11-12.

*in relation to screening people with disability, and to comply with the guiding principles of Australia's Disability Strategy 2021-2031.*

**Recommendation 6: Disability aids and assistance requirements be addressed in a separate section of the Charter**

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*The Charter should mandate a requirement for all airline and airport customer service staff (including contractors) to undergo disability awareness and inclusion training, including requirements for delivery and frequency of the training, subject to consultation with disability representative organisations. Staff and contractors who provide manual assistance to consumers with disability or handle disability aids should undergo annual in-person and hands-on training, and demonstrate their knowledge through competency assessments or certification exams.*

### **3. Question 5: Minimum standards required**

**Do the proposed Charter standards reflect reasonable standards? Are there any operational or technical considerations that would affect the ability of airlines or airports to meet the proposed standards?**

While the proposed Charter standards generally reflect reasonable standards (subject to amendments we propose below), we are concerned the overall scope of the standards is too limited to properly protect consumer rights. The Charter should be updated to incorporate standards relating to the missing elements we have identified in Question 4. In addition, the Charter contains ambiguous terminology which may cause confusion regarding how key terms are to be interpreted.

#### **Incorporating additional standards**

To adequately protect the interests of consumers, it is important the Charter addresses each element of the aviation consumer experience. Additional standards to reflect the missing elements identified in our response to Question 4 should be incorporated in the Charter. Additionally, as we recommended in our previous submission,<sup>11</sup> the Charter should specify:

- Minimum standards regarding a screening officer's obligation to offer a private area to discuss a consumer's medical or personal circumstances prior to screening and following

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<sup>11</sup> Ibid 19.

any alarm during the screening process. Airports should be required to inform consumers about these rights prior to passengers being screened; and

- Specify airlines and airports' obligations to provide a consumer with access to their personal information, except where it would be contrary to law. Airlines and airports should provide access to personal information free of charge.

### **Amending proposed standards**

The standards proposed in the Charter should be amended to adequately address the needs and experiences of people with disability:

- **1.a. Conditions of carriage**

The reference to 'easily-understood standardised format' should be replaced with 'accessible format.' Guidance materials should particularise the minimum accessibility requirements for conditions of carriage, and should align with the proposed Aviation Disability Standards once they come into effect.

- **1.c. Information about accessibility**

The reference to 'information about accessibility issues' should be changed to 'information about accessibility needs', to avoid suggesting accessibility needs are issues, and to set the expectation that airlines and airports must meet these needs.

- **1.g. Changes to bookings**

We agree the Charter should enable free of charge corrections to booking errors prior to the day of travel. However, this should extend beyond simple typographical errors in passenger names to include changes to passenger names. People with disability who fly with a carer or support worker have incurred excessive fees to change names if their carer or support worker is unable to travel eg where the support worker is too unwell to travel. People with disability should be entitled to change the name of their carer or support worker up to 1 hour prior to departure for domestic flights, and 3 hours for international flights.

We are also aware people with disability may not know the name of the carer or support worker who will travel with them until closer to the day of travel, which may disadvantage people from booking far in advance or accessing sale fares. This is a further reason passenger names should be able to be changed as we suggest above.

- **2.g. Facilitation of passenger journeys for people with disability**

We are pleased the Charter contemplates the need for coordination between airlines and airports to facilitate the journey for people with disability but suggest two issues be clarified.

First, the standard could be clearer about the airline's obligation to facilitate the passenger journey, not just by coordinating with airports, but by having adequate internal processes (as airline staff also need to coordinate with each other).

Second, in many cases this needs to occur earlier than '[a]t the time of passenger check-in and boarding'. A common issue we hear experienced by people with disability is that airlines are not aware of their accessibility needs (despite this being recorded at the time of booking). For example, where a consumer has requested specific equipment for transferring from their wheelchair (and that equipment is available for the airline to provide), coordination to ensure that equipment is available may be needed in advance of the person checking-in and boarding, to ensure the passenger's journey is facilitated and not disrupted.

- **Definition of 'flight disruption'**

The definition of flight disruption should be expanded to include situations when suitable assistance or accessibility services are not available to support people with disability (in addition to equipment).

The remedies for these types of flight disruptions should include accommodation, for example, where the lack of suitable equipment (or some other issue within the airline's control) means a person with disability is unable to board their flight, but the equipment would be available for a flight scheduled 6 hours away. This would be consistent with the remedies for passengers denied boarding through no fault of their own.

Full refunds (in lieu of re-booking) should also be offered if the purpose of the trip is no longer possible because of a 'flight disruption').

- **4d. Damage or loss of passenger mobility aids**

As above, we recommend adding a new section to the Charter for 'disability aids and assistance requirements'. We otherwise agree with the proposed standards for damage or loss but are concerned circumstances where a person cannot be supplied with a suitable temporary replacement disability aid are not sufficiently addressed. We have heard some people who use a customised disability aid would not be able to use a non-customised temporary replacement and would have no option but to return to their port of departure/home if their disability aid was damaged or lost en route to their destination. In these circumstances, airlines should reimburse the consumer for any costs of repair/replacement as a matter of urgency and arrange return flights at no cost to the passenger including any additional transport or accommodation expenses.

Due to the highly specialised nature of disability aids, we also maintain our previous recommendation that the Charter should specify a consumer is entitled to choose whether the repair or replacement is sourced by a supplier chosen by the consumer, or whether the airline or airport source the supplier.<sup>12</sup>

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<sup>12</sup> Ibid 17.

- **5a.iii. Complaint handling**

In addition to requiring airlines to provide contact information for the various complaint channels, we maintain our previous recommendation that each airline and airport operating in Australia should be required to appoint a Complaints Resolution Official ('CRO') who is responsible for resolving complaints about disability-related issues. The Charter should provide that disability-related complaints can be made to a CRO, to ensure prompt and proper resolution of such complaints.<sup>13</sup>

### **Clarifying terminology**

It remains unclear how the following terms in the Charter should be interpreted with respect to disability aids:

- 'damage' – damage of any type and level which occurs during transportation should be eligible (excluding pre-existing damage);
- 'lost' or 'delay' – a shorter period of time should apply for determining when a disability aid is considered lost or delayed (noting that 21 days applying to baggage generally would be inappropriate);
- 'matter of urgency' – specific time limits should be set for airlines to provide the remedies for damaged or lost disability aids outlined in 4.d. (not only reimbursement). As we noted in a previous submission, complaints in relation to damaged or lost disability aids may need to be addressed within hours;<sup>14</sup> and
- 'reimbursed' – the *Civil Aviation (Carriers' Liability) Act 1959* (Cth) ('CACL Act') currently caps the maximum liability for the destruction or loss of baggage by domestic airlines at \$3000, however the Government has committed to consult on options to amend the CACL Act to increase the maximum compensation entitlement for passengers who experience lost or damaged disability aids.<sup>15</sup> This amount needs to be updated prior to the Charter coming into effect.

As we raised in our submission to the draft Aviation Customer Rights Charter, 'the Charter is an opportunity for otherwise ambiguous terminology to be given a uniform meaning, rather than enable airports and airlines to individually dictate meaning. This would assist customers to receive consistent responses and resolutions across the aviation industry' regardless of the airline they chose and booked.<sup>16</sup>

### ***Recommendation 8: The Charter be expanded to include additional standards to address each element of the aviation consumer experience***

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*Additional standards to reflect the missing elements identified in our response to Question 4 should be incorporated in the Charter.*

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<sup>13</sup> Ibid 19-20.

<sup>14</sup> JEC, *Submission to the Aviation Industry Ombuds Scheme – Consultation Paper* (17 October 2024) 16.

<sup>15</sup> Australian Government, *Aviation White Paper - Towards 2050* (August 2024) 62.

<sup>16</sup> JEC, *Submission: Aviation Customer Rights Charter – Consultation Paper* (7 March 2025) 18.

***Recommendation 9: The Charter be amended to more adequately address the needs and experiences of people with disability***

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*The Charter should specify the meaning to be given to words such as ‘damage’, ‘lost’, ‘delay’, ‘matter of urgency’ and ‘reimbursed’ with respect to disability aids. Uniform meanings would assist customers to receive consistent responses and resolutions across the aviation industry.*

## **4. Question 8: Funding model**

**If different cost recovery levies are applied to regulated entities based on the nature or size of their operations, what metrics should be used to differentiate them?**

As we said in our submission on the primary legislation, while we recognise the rationale for recovering the costs of activities carried out under the Framework through levies imposed on regulated entities, our concern is the intended funding structure of the regulator could impede its enforcement agenda or result in increased costs for consumers.<sup>17</sup>

Consumers should not end up bearing the cost of airlines not improving their performance, and not effectively providing information to consumers on their rights including complaint pathways and processes. This is also relevant in considering models for cost-recovery for ineligible complaints, referrals and general inquiries.

We generally support Option 1 in Figure 6 in the Consultation Paper which serves to recover annual levies from large entities that service over 1 million passengers per year, and recover variable per matter levies from all entities. We consider this strikes an appropriate balance between the policy objectives of encouraging competition and incentivising good behaviour, and recognises that most activities will arise from complaints about large entities. Given we recommend the framework be expanded to include complaints about security screening, we consider annual levies should be payable by all large entities (not just large airlines) as security screening is likely to generate a number of complaints and activities relating to airports under the Framework.

So the ACO and regulator can operate effectively, annual levies need to be appropriately calculated so the Framework is not over-reliant on variable per matter monthly levies, has sustainable funding, and can be responsive to developments that may increase the need for regulator activity.

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<sup>17</sup> JEC, *Submission to Aviation Consumer Protections Consultation – Primary Legislation* (3 October 2025) 11.

### ***Recommendation 11: Annual levies be paid by all large entities***

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*Annual levies should be payable by all large entities that service over 1 million passengers per year (not just large airlines).*

### ***Recommendation 12: The Framework be supported by sustainable funding sources***

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*Annual levies need to be appropriately calculated so the Framework is not over-reliant on variable per matter monthly levies and has sustainable funding.*

## **5. Question 9: Assistance for delays or cancellation**

**For each of the duration/situation timeframes listed in Table 4 (1 to 3 hours, 3 to 6 hours, 6 to 12 hours and more than 12 hours) what are reasonable values for food and drink vouchers per meal, and how many food and drink vouchers should affected passengers receive?**

The travel allowances for accommodation, food, drink or incidental expenses set each financial year by the Australian Taxation Office<sup>18</sup> may be a helpful reference to guide the setting of values for food and drink vouchers for passengers who are subjected to disruptions, unreasonable delays or cancellations to flights. However, as people with disability or medical conditions may have higher food/drink/incidental costs, or specific support needs associated with eating/drinking, these costs should be payable by airlines as well and should be accounted for in the Framework. This would ensure people with disability do not unfairly bear out-of-pocket costs associated with a disruption, unreasonable delay or cancellation in their travel plans. Reasonable incidentals may include the costs of support workers, assistive equipment, accessible transport to/from accommodation, medications, continence products and supplies related to a disability or medical condition including supplies related to assistance animals.

Additionally, as consumers are not always provided with sufficient information to properly understand their rights, the Charter must mandate that airlines inform consumers of the reason(s) for, and estimated length of, any disruption, delay or cancellation. The Charter currently requires airlines to provide information to support consumer awareness and understanding of disruptions<sup>19</sup> but clarification that this extends to all disruptions, unreasonable delays and cancellations is required. Information about the reasons for, and estimated duration of, disruptions, delays and cancellations will assist consumers to understand their rights to assistance including access to vouchers, transport and accommodation and to hold airlines accountable if these entitlements are not made available.

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<sup>18</sup> Australian Taxation Office, *Income tax: reasonable travel and overtime meal allowance expense amounts for the 2025-26 income year* (TD 2025/4)

<<https://www.ato.gov.au/law/view/document?docid=TXD/TD20254/NAT/ATO/00001>>

We note this Determination is based on business-related travel and different allowances based on salary is irrelevant in this context.

<sup>19</sup> Australian Government, *Aviation Consumer Protections Consultation Paper* (September 2025) Appendix B, 3.a.ii.

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