

From: [Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts](#) on behalf of infrastructure.noreply@govcms.gov.au
To: [aviationconsumer](#)
Subject: submission to: Aviation Consumer Protections – subordinate legislation (including the Aviation Consumer Protections Charter) [SEC=OFFICIAL]
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Attachments: [tff-aviation-consumer-protection-charter-submission.pdf](#)

OFFICIAL

Submitted on 24 October 2025

Submitted by: Anonymous

Submitted values are:

Step 1: Your submission

Remain Anonymous

No

Private Submission

No

Published name

Tourism & Transport Forum

Short comment

On behalf of Tourism & Transport Forum (TTF) CEO Margy Osmond, please find attached our submission regarding the Aviation Consumer Protections Charter – subordinate legislation. TTF continues to support the development of the Charter and its role to drive better operational practices that provide consumers with greater certainty and clarity regarding their travel experience.

Upload attachments

File uploads

- [tff-aviation-consumer-protection-charter-submission.pdf](#) (129.78 KB)

Step 2: Contact details

First name

Suzanne

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aviationconsumer@infrastructure.gov.au

Consultation name

Aviation Consumer Protections – subordinate legislation (including the Aviation Consumer Protections Charter)

OFFICIAL

24 October 2025

Aviation Ombuds Person
Department of Infrastructure, Transport, Regional Development,
Communications, Sport and the Arts

Via email: aviationconsumer@infrastructure.gov.au

Re: Aviation Consumer Protections Charter – Framework Consultation

Tourism & Transport Forum Australia (TTF) is the peak industry group representing the aviation, tourism, transport and related infrastructure sectors. On behalf of TTF Members, we welcome the opportunity to provide feedback to the proposed Aviation Consumer Protections Charter – subordinate legislation. TTF notes this relates to flights for the public transport of passengers only.

TTF continues to support the development of the Charter and its role to drive better operational practices that provide consumers with greater certainty and clarity regarding their travel experience particularly when flights are interrupted. Whilst TTF supports the development of the Charter it is important to delineate responsibility, implement realistic operational standards and prevent duplication of process and expense.

We must also acknowledge that over the period of consultation since the Aviation White Paper was developed extensive investment and technological advances are occurring across major airports and airlines in Australia. The result is vastly improved aviation performance and customer experience compared to the travel period that occurred immediately after the Covid-19 pandemic. It is critical that as a collective we do not lose focus on the importance of improving productivity by reducing, not adding duplication in the consumer protection arena.

This submission, as was detailed in our TTF Aviation Customer Rights Charter Consultation response, champions Governments focus on better consumer experiences for all passengers through the Aviation Customer Rights Charter as well as representing the key commercial realities that our members have raised. We offer recommendations that ensure the Charter not only meets its objectives but also incentivises best practice.

These sections include:

- Clear delineation of roles and responsibilities within the consumer experience
- Reflect reasonable standards
- Discuss shared cost recovery metrics

Thank you for considering our submission and recommendations. Please do not hesitate to contact Suzanne [REDACTED] Manager Government Relations & Policy [REDACTED] as we welcome the opportunity to discuss this further.

Yours sincerely

[REDACTED]

Margy Osmond
Chief Executive Officer
Tourism & Transport Forum

Aviation Consumer Protections Charter – Framework Consultation Tourism & Transport Forum Submission

Duplication

TTF wishes to begin our submission with a cautionary message regarding the introduction of an additional consumer protection entity. TTF and its Members remain very concerned that whilst the Consumer Protection Charter is a new policy to drive best practice and consumer protection, the introduction of the Aviation Ombuds Office (AOO) which contains the Aviation Consumer Ombudsperson (ACO) and the Aircraft Noise Ombudsperson (ANO) is bureaucratic duplication, it will cause unnecessary confusion for consumers and add costly expenses to passenger air transport. It is also noted that they are very different areas of responsibility and expertise and may not be suited to a single entity.

Regarding ACO our preference is greater regulatory role for Australian Competition and Consumer Commission (ACCC) that includes responsibility of individual complaints. This is a complaint resolution pathway that is already established, has mature process, procedure and personnel and is well understood by Australians.

Delineation of Roles

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?

Aviation is already highly regulated and prone to confusion due to the varied passenger booking purchase and travel journey and the variations between domestic and international consumer protection laws.

The proposal for charter standards across six categories will establish minimum standards but they must be considered with an improved productivity lens to reduce duplication, remove risk of confusion for consumers and be operationally realistic.

TTF strongly advises that responsibility contained within the Charter may not rest solely with airports and airlines, the Charter must acknowledge the integration of other parties in the delivery of aviation services to passengers.

TTF recommends the following parties be included within the remit of the Charter.

- Airservices Australia (Airservices) – responsible for the safety and timeliness of all air traffic. Managing controller staffing levels, traffic congestion and weather conditions has a direct impact on arrivals and departures and does lead to delays, cancellations and miscommunications.
- Australian Border Force - responsible for immigration and customer processing. The breadth and significance of responsibility of this Government Department does result in passenger delays that are not controlled by airlines and airports.
- Third party bookings / Travel Agents – The agent – principal relationship of travel intermediaries (Global Distribution Systems, Content Aggregators, Consolidators, Online Travel Agencies, Corporate Travel Management Companies etc) must be carefully managed. Whilst they may sit outside of the new scheme, they are often responsible for the accuracy of original booking details, processing reservation changes and refunds and coordinating complaint resolution. TTF acknowledges that whilst excluding travel agents is consistent with other international schemes, we encourage mandatory inclusion of passenger contact details in every booking made by travel agents.

Without shared responsibility there will not be improvement in customer protection; there may be duplication and there may be confusion.

- Other third parties – the responsibility of ground handling and catering can play a role in the timeliness of passenger departures, flight transfers, airport exits and holistic customer experience.

Finally, TTF request that the Charter include a statement of customer responsibility and that this conduct is considered as part of any complaint resolution.

Charter Standards

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?

TTF agree that the consultation paper aims to establish clear minimum standards that improve consumer protection and drive improvement without duplication, confusion and unrealistic thresholds.

We suggest attention be given to ensuring terms are not subjective – this would be unmanageable for the regulated entities, particularly when you consider social and cultural interpretation. Thought to providing clarity through the detail of the subordinate legislation or use of ACPA-issued guidance is important and will allow for future refinement as the framework evolves.

TTF support accessibility services and the shared nature of these responsibilities by all regulated entities. We note the framework would cover accessibility services available at the airport and with airlines, including matters under the proposed aviation-specific disability standards. More streamlined practices across airports and airlines, better experiences for passengers, and more efficient complaint handling.

Again, TTF is requesting a more realistic complaint resolution timeline be considered. An eight-week (40 business day) timeframe aligns with the UK's dispute resolution scheme and is a realistic period to ensure customers receive fair consideration. We have previously highlighted the multiple parties and factors that are often part of a systematic investigation. Additionally, we recommend 90% resolution within 40 business days - particularly in the first 24 months of the Charters introduction.

Cost Recovery Metrics

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?

Whilst the Charter is primarily focused on airlines, who practically will generate most complaints under the framework, it is not reasonable for them to bear the entire cost. TTF reminds Government that the cost of air travel in Australia can be a barrier to growth of the visitor economy, this is particularly evident in regional Australia. Directing all cost recovery towards the limited regulated entities identified will have to be added to the cost of a passenger ticket. It is imperative that the Charter levies should be applicable across the expanded regulated parties. However, if government agencies such as Airservices Australia and the Australian Border Force are not included as paying members of the scheme, the government would need to directly fund the costs associated with complaints about their service.

TTF acknowledges that in the consultation commentary smaller airports and airlines will be challenged to contribute to the costs associated with the framework. However, we believe it is contentious to impose

significant subsidies on larger players. Without Government support there will be a wider divide between the customer service and complaint resolution depending on which location and by which airline a passenger is deemed poorly treated.

TTF supports a combination of a scaled levy that includes an annual levy payable by all and a Variable per matter levy - a user pays metric that aligns a fee to an eligible complaint. General matters and ineligible complaints (an important element to reduce duplication and improve clarity and communication) should be covered by the Annual levy base fee and /or Government on a per matter basis. Whilst not administratively simple, the combination will incentivise prompt resolution of complaints and result in customer service improvements.

Again, we encourage consideration of a 24-month introductory period to ensure a smooth roll out and economically sensible fee structure for Government and the aviation sector who generally operate under long-term agreements that govern how charges are set and recovered. Obvious commercial impacts include immediate compliance expenses such as system upgrades, staff training, and process changes without the ability to recover those costs in the short term.

Providing flexibility for the Minister to extend the timeline if needed would further support a smooth and coordinated rollout should also be considered.

Importantly this period can also be used to implement reporting systems to support the monitoring of compliance, performance improvement and genuine transparency and accountability across the entities. Published data with integrity will be critical to the Charter's successful outcomes.

Thank you for your consideration.