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Adelaide Airport Limited submission to the Aviation Customer Rights Charter consultation

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Thank you for the opportunity to provide feedback on the Aviation Customer Rights Charter (**Charter**) Consultation Paper.

This submission is provided on behalf of both Adelaide Airport Limited and Parafield Airport Limited (“**together AAL**”) as operators of Adelaide and Parafield Airports. 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 five long-term institutional shareholders. Our shareholders are five 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 5<sup>th</sup> largest airport in Australia and in the past financial year we saw record passenger numbers, surpassing the previous records set pre-covid. Parafield Airport is South Australia’s principal general aviation airport and is one of the largest pilot training airports in the southern hemisphere.

## OVERVIEW

The consultation paper seeks comments on 6 proposed rights to be included in the Charter and our submission will briefly address each one of these individually.

Airports are an important part of the aviation customer experience and AAL strives to achieve our vision of being Everyone’s Favourite Airport. We do this in a number of ways including our accessibility programs, the purposeful design of our infrastructure and our supportive staff and volunteers. In 2024 we had 8,638,856 passengers through our terminal, and we received 577 complaints directly relating to our operations. This represents 0.006% (or 1 complaint every 14,972 customers) of our total customers.

Overall, we look forward to this scheme helping improve outcomes for customers and ensuring trust in the aviation industry. This will be best achieved through collaboration between all key players, with a customer centric approach that focuses on industry wide improvements. We recognise there will be times where financial compensation will be appropriate; however, this should not be the primary focus in isolation, nor should it be the impetus for the creation of the Charter. AAL is committed to continuous improvement, and we consider that this is best achieved through listening to our customers and working with all our stakeholders to deliver the best outcomes reasonably possible. The Charter is an opportunity to set out expectations for industry and an opportunity to educate customers about the complexity of the heavily regulated environment of Aviation.



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We request that following the implementation of the Charter, an initial review should be undertaken to ensure the performance objectives are being met and that the Charter is supporting customers in the way it was intended. We suggest this occurs after 12-24 months of operation to allow sufficient time to understand and assess the impact.

## **DISCUSSION**

The following section will address each of the proposed Rights under the Charter.

### **1. Be treated with dignity and respect, in an accessible and inclusive environment.**

AAL is supportive of this Right and supports a clear definition of dignity and respect to clearly set expectations around standards.

Values of accessibility, dignity and respect are deeply embedded into AAL and how we operate. They are at the core of our customer centric approach, and we are committed to continuous improvement in this area to ensure we are giving everyone the best possible experience when they come to our airport.

Where we find one of the biggest challenges in this space, in particular a disconnect between customer expectations and our legal requirements, is around security screening processes. Safety and security are paramount for us. We understand and take very seriously the need to properly screen passengers before they enter the sterile areas of our airport. We have also invested heavily in educating our security staff in customer service and how to navigate the challenges that can arise in the security screening process. Nevertheless, there can sometimes be a disconnect between customer expectations and legislated screening requirements. Examples include specific medical needs, disability and cultural dress or beliefs. AAL would welcome clear definitions about how the rights of dignity and respect should be applied in the context of compulsory security screening obligations as this will ensure a better experience for the customer and remove ambiguity where expectations can be misaligned with obligations. These definitions should be uniform across all airports. There are currently inconsistencies in interpretations especially where there is different screening equipment being used and this can lead to confusion and frustration for the customer.

### **2. Accurate, timely and accessible information and customer service**

AAL supports the inclusion of this in the Charter and will work together with our partners to ensure we meet or exceed the expectations of our customers.

Consideration should be given to clarifying which accessibility standards and languages other than English are the minimum requirements and how this relates to the size and operations of the airport. Airports should be able to determine the demographic of their customers and provide language options accordingly. Digital solutions should also be considered when reviewing airport compliance to this element if it is included in the Charter.

Adelaide Airport has staff and volunteer ambassadors clearly visible and accessible across our main customer points in the Airport and we have found this is an invaluable customer service tool as we build relationships and provide support and information. It is important to strike the right balance between utilising technology as a means of communication and providing face-to-face opportunities. They both play a key part when communicating with our customers.

### **3. Prompt and fair remedies and support during and after cancellations, delays and disruptions.**

In principle, AAL is supportive of the timeframes for response and investigation as suggested in the consultation paper (being acknowledgement of complaints within 1 business day and resolution in 30 days). Occasionally there will be more complex complaints which require more time to resolve and AAL supports the Charter specifying a target timeframe, but with the flexibility to allow for this circumstance.

When customers experience significant delays there is an opportunity for the airport to support the airline in caring for those customers affected. While the primary operational and financial responsibility should sit with the relevant party, it is reasonable to expect all parties work together to provide the best possible outcome for

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the customer. The goal of all parties should be for a positive customer experience, and that requires a framework that supports and rewards collaboration.

Consideration should be given to how complaints relating to government agencies or other parties not within the scope of the Charter will be managed, including, but not limited to, Home Affairs, Border Security, Airservices Australia as well as transport providers including taxi and rideshare. The journey through the airport and onto the plane is a single journey for the customer and it is highly unlikely they will differentiate between the service providers that support the various parts of that journey. It is important not to create unfair customer expectations or create two tiers of complaint resolution where some are within scope and therefore attract standards and remedies where others do not. A resolution may need commitments made from multiple parties - all parties, even though not included in the scope of the regime, need equivalent motivation to resolve issues in a full and timely manner.

#### **4. Safe and timely baggage handling and fair remedies for damage and delays**

Baggage handling is an area where there are different responsible organisations at different points along the process, and where there are significant delays or issues it could be a shared responsibility. AAL supports the inclusion of this in the Charter but asks there is clarification around roles and responsibilities at each point along the process to prevent confusion.

#### **5. The protection of customer's personal information**

AAL does not support the inclusion of this in the Customer Rights Charter. We are of the view this is already adequately covered by specific legislation and to duplicate this through the Charter creates a risk of contradictory requirements and confusion. AAL strongly suggests the enforcement and implementation of privacy requirements is already adequately covered by the Office of the Australian Information Commissioner and should not be part of the Charter.

#### **6. Provide feedback, make complaints and exercise customer rights without retribution**

AAL supports the inclusion of this in the Charter. We have a mature complaints management framework embedded across our business and we are continuously looking at ways to improve how we manage feedback. We look forward to the opportunity to contribute to best practice and learn from others in this area.

### **OTHER CONSIDERATIONS**

Some of the areas highlighted by the Charter are already subject to existing legislation or regulation, including but not limited to the following:

- Australian Consumer Law (Competition and Consumer Act 2010) – Regulates customer rights regarding cancellations, refunds, and service guarantees.
- Disability Discrimination Act 1992 – Ensures access and inclusion for travellers with disabilities.
- Privacy Act 1988 – Governs the handling of personal information.
- Australian Human Rights Commission Act 1986 – Protects individuals against discrimination.
- Airports Act 1996 – Regulates airport operations and responsibilities.
- Building Code of Australia (BCA) & Disability Transport Standards – Relevant to airport infrastructure accessibility.

To prevent contradictory requirements, duplication of resources and unnecessary regulatory burdens, the Charter and the Ombudsperson should consider how the Charter will interact with the existing laws and standards. A clear and easy to understand regulatory environment will deliver the best outcomes for customers as it will be able to be implemented quickly and more efficiently across the industry.

### **CONCLUSION**

Thank you once again for the opportunity to contribute to the establishment of the Aviation Consumer Rights Charter. AAL is committed to continuing to improve the experience of our customers. We understand the important role airports play in our community and our responsibility to continue to connect and shape South Australia. We look forward to continuing to work together on this and other related initiatives.

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Yours sincerely

**ADELAIDE AND PARAFIELD AIRPORTS**



Dermot O'Neill  
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