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Steve Webber
Acting Assistant Secretary, Aviation Industry Ombuds Scheme, Transport Group
GPO Box 594
Canberra, ACT, 2601

Hobart Airport Submission – Aviation Customer Rights Charter

Hobart Airport appreciates the opportunity to provide feedback as part of the consultation on the **Aviation Customer Rights Charter** within the **Aviation White Paper** process. We support efforts to enhance passenger rights while ensuring a fair and practical framework that considers the operational realities of airports and airlines.

Response to Proposed Right 1: Aviation industry customers have the right to be treated with dignity and respect, in an accessible and inclusive environment.

We acknowledge and support the intent behind this proposed right, as all aviation customers should be treated with dignity and respect within an accessible and inclusive environment. However, several operational and logistical factors must be considered to ensure the practical and effective implementation of such a right.

1. **Customer Service Charter and Sub-Contractor Considerations**

If a customer service charter or statement is to be introduced, it must account for the complexity of operations within the aviation industry, including the roles of sub-contractors. A staged approach would be necessary to allow airlines and airports to renegotiate and adjust service level agreements within existing contracts. Without such a transition plan, ensuring compliance with the proposed right across all stakeholders could be challenging.

2. **Clarification on Accessibility of Information**

The proposal's reference to information being available in accessible formats and multiple languages requires further clarification. Specifically, it is unclear whether this applies solely to the customer service charter or to all customer-facing information. Greater specificity is necessary to evaluate the regulatory impact and feasibility of implementation.

3. **Training for Staff on Accessibility**

While training for staff to facilitate greater accessibility is supported, the development of such training would require clear guidance and resources to address the diverse needs of passengers. To avoid disproportionately burdening smaller and mid-sized airports, Commonwealth funding would be essential in supporting the development and delivery of such training initiatives.

4. **Wayfinding in Multiple Languages**

Any implementation of multilingual wayfinding should be proportional to the airport's size and the proportion of international travellers. Introducing multiple language wayfinding at airports with minimal international traffic could inadvertently make navigation more challenging for the majority



of users. A flexible, needs-based approach would be necessary to balance accessibility with operational practicality.

5. **Customer Service Assistance for End-of-Line Airports**

As an end-of-line airport with no direct airline staff available on-site, Hobart Airport supports the proposal that an airline customer service representative be accessible via phone. Terminal Duty Managers at Hobart Airport frequently assist passengers who lack direct airline support in Tasmania. Ensuring remote customer service options would provide a necessary support mechanism for passengers traveling through smaller or regional airports.

While the principles outlined in the proposed right are commendable, careful planning, staged implementation, and adequate funding will be essential to ensure practical and equitable outcomes across the aviation industry.

Response to Proposed Right 2: Aviation industry customers have the right to accurate, timely, and accessible information and customer service.

Hobart Airport supports the intent of this proposed right but emphasises the need for a balanced framework that considers both passenger expectations and operational realities.

1. **Passenger Responsibilities and Education**

Many passenger frustrations arise from a lack of understanding of the roles of airlines, airports, and government agencies, leading to misdirected complaints—particularly regarding baggage handling, flight delays, and security screening. Clear consumer education initiatives should be integrated into the Charter to clarify:

- The distinct responsibilities of airlines, airports, and government agencies.
- Appropriate and easy to understand complaint pathways to improve resolution efficiency.
- Passenger rights and responsibilities, including the role of travel agents and insurance.

Consumer awareness campaigns at airports, on airline websites, and through government channels would enhance understanding and reduce frustration.

2. **Complaint Resolution and Expectations**

Strict resolution timeframes risk creating unrealistic expectations. While an automated acknowledgment within 24 hours is reasonable, a flexible 2–3 business day window for an initial response allows for more practical complaint handling.

A resolution benchmark of 80–90% within a reasonable period would ensure most cases are addressed while allowing flexibility for complex issues requiring coordination across multiple entities.

3. **Proportionality and Practicality**

Obligations must be practical, particularly for smaller airports with limited resources. The Charter should support ongoing service improvements without imposing excessive burdens. Recognising existing effective practices while allowing for proportional implementation will ensure fair and effective service delivery.



Response to Proposed Right 3: Aviation industry customers have the right to prompt and fair remedies and support during and after cancellations, delays, and disruptions.

Hobart Airport supports the principle of providing fair and timely support to passengers during disruptions. However, it is essential to clarify the responsibilities of different aviation stakeholders to ensure realistic and effective implementation.

1. Disruptions outside of airport control

Many disruptions are caused by factors outside airport control, such as air traffic control constraints overseen by Airservices Australia (AsA). The Charter should acknowledge these distinctions and provide appropriate avenues for passengers to seek remedies from the responsible government agencies.

2. Accessibility and Support at Airports

Passenger support varies based on airport size and resources. While larger airports may offer extensive accessibility services, regional airports like Hobart face challenges due to limited infrastructure and staffing. The Charter should take a proportional approach, ensuring that accessibility expectations align with each airport's operational capacity.

3. Airline Accountability for Disruptions

Airlines, as the primary service providers, must take responsibility for cancellations and passenger accommodation. Too often, airlines shift these burdens onto travellers, particularly in regional areas where accommodation and transport options are limited. Best practices from international regulations, such as EU Regulation 261/2004 and Canada's Air Passenger Protection Regulations, mandate airline responsibility for meals, accommodation, and rebooking during significant delays. Australia should consider similar measures to improve passenger support.

4. Clarifying Responsibilities

Unclear responsibilities lead to passenger frustration and misdirected complaints, delaying resolution. The Charter should clearly define the roles of airlines, airports, and government agencies to enhance transparency and efficiency in addressing disruptions.

Response to Proposed Right 5: Aviation industry customers have the right to the protection of their personal information.

Hobart Airport supports strong privacy protections for aviation customers. However, privacy regulations are already governed by the **Privacy Act 1988**, which sets strict requirements for handling personal data collected through Wi-Fi, parking systems, lost property claims, and customer inquiries.

With a national review of privacy laws currently underway, it is important to ensure consistency and avoid unnecessary duplication of regulations. Privacy protections should remain under the **Privacy Act 1988** to maintain a streamlined and effective regulatory framework.

Response to Proposed Right 6: Aviation industry customers have the right to provide feedback, make complaints, and exercise their rights without retribution.

Hobart Airport supports the right for passengers to provide feedback and make complaints; however, the Charter must establish clear and fair expectations for all parties involved.

1. Clear Complaint Pathways



Passengers should be informed of the correct first point of contact for their concerns to prevent misdirected complaints. Too often, airports are involved only after other parties, such as elected officials, have been contacted, creating inefficiencies in resolution.

2. Reasonable Response Timeframes

The proposed 24-hour acknowledgment and 30-day resolution timeframe is not feasible for airports that do not operate 24/7. A more practical standard would define response times in **working days** to account for operational realities, particularly for smaller airports with limited resources.

3. Ensuring Fairness and Staff Safety

Complaint resolution should not apply in cases of abusive or inappropriate behaviour. Aviation employees must be protected from harassment, and any future Ombuds Scheme should include safeguards to prevent misuse by passengers seeking to intimidate staff. Establishing clear expectations for respectful engagement will help ensure fair and efficient complaint handling.