



AVIATION CUSTOMER RIGHTS CHARTER CONSULTATION

The Qantas Group welcomes the opportunity to respond to the Aviation Customer Rights Charter consultation paper released by the Department of Infrastructure, Transport, Regional Development, Communications and the Arts in December 2024.

The Qantas Group supports the development of an Aviation Customer Rights Charter and acknowledges the Government's objective of clarifying the rights of aviation consumers. Given the important role the Charter will play in the Aviation Ombuds Scheme, it is critical that the final version is clear and delivers improved outcomes for consumers.

Aviation is a complex, safety-focussed industry operating in an environment subject to exogenous factors. While airlines always strive to deliver their schedules, delays and cancellations are an inevitable result of a complex operating environment. When there's a delay or cancellation that's within our control, the Qantas Group already provides customers with a wide range of support including options for a refund or re-booking on another flight, plus (depending on the circumstance) meal vouchers, transfers, accommodation and any other remedies required by law. We also offer a range of support in events beyond our control, including re-booking onto an alternative flight or a refund (Qantas) or travel voucher (Jetstar).

We know that on-time performance and reliability are central to the customer experience. We've worked hard to improve our operational performance and we've seen significant reductions in delays, cancellations and mishandled bags. Initiatives to improve operational performance include a focus on first wave flights, new group boarding procedures rolled out across the regional, domestic and international network and ongoing investments in technology to enable improved visibility of operations and decision making at our major hub airports.

We are continuing to invest in our fleet, operations, accessibility, and digital channels to further improve the experience for customers during disruptions. In FY24 the Qantas Group invested \$230 million in customer improvements, and there are 100 customer initiatives in progress in FY25. We have launched Request Tracker for complaints, refunds and missing points, rolled out the use of Uber vouchers for disrupted customers in key ports, implemented more generous refreshment policies during disruptions and enabled the tracking of checked baggage on eligible flights.

Qantas is looking to introduce easier and more intuitive booking management (including flight changes) on its website, deliver frequent releases of new Qantas App features and deliver enhancements to Jetstar's digital servicing (including online check-in). Initiatives to improve communications and processes during flight disruptions, additional automations for refunds and improved self-service and new Jetstar self-service features – including new 'help' website pages and mishandled baggage management – will also be delivered.

General Comments on the Draft Charter

To ensure the expectations of consumers, industry and government are aligned and the Ombudsperson can apply the Charter effectively, the drafting of the Charter should be specific, clear and consistent. There are several components within the draft Charter that will need clarification to avoid unintended consequences, ensure responsibility is shared appropriately and deliver improved outcomes for all aviation consumers.



The Qantas Group offers the following overarching comments in respect of the draft Charter. Detailed comments in respect of each of the rights contained within the draft Charter are set out at Attachment A.

Remedies

To ensure that expectations are managed and to avoid any unintended consequences, the provisions contained within Right 3 should apply only to events within an airline's control.

Qantas and Jetstar's Conditions of Carriage^{1 2} already clearly define events within, and beyond, our control. For both Qantas and Jetstar, events within our control include engineering issues, Qantas or Jetstar IT system outages, delayed delivery of baggage to the carousel due to resourcing issues, late cleaning/loading of catering to the aircraft, crew/staffing issues or any other circumstance that we can reasonably control. Events beyond our control include weather events, air traffic control issues, industrial action by a third party, security issues or any other unusual unforeseen circumstance which we cannot control and the consequence of which we could not have avoided. We suggest the Charter refers to an airline's Conditions of Carriage. In addition, the Charter should more clearly delineate the applicable remedies for delays and cancellations, as these are quite different.

Any remedies in respect of delayed, lost or damaged baggage in the Charter should refer to existing law. Baggage is already governed by a comprehensive set of legislation, including the *Civil Aviation (Carriers' Liability) Act 1959* (Cth) (CACL), Montreal Convention and Australian Consumer Law (ACL) provisions and carrier terms and conditions for domestic and international carriage (as applicable).

As noted in the Qantas Group's submission in respect of the design of the Aviation Industry Ombuds Scheme, indirect bookings made through travel agents (including online travel agents) and aggregator websites represent a significant proportion of bookings and passengers. As highlighted in A4ANZ's submission to the Ombuds Scheme consultation, the Australian Travel Industry Association (ATIA) in its submission to the Green Paper stated that "90 per cent of all corporate travel, and 70 per cent of all international travel is booked via a travel agent. Additionally, as ATIA noted in a submission to the Australian Senate inquiry into the *Airline Passenger Protections (Pay on Delay) Bill 2024*, "Travel professionals sold almost 23 million air tickets worth \$18.5 billion in 2023. This year, travel professionals have sold 13.8 million tickets worth \$10.7 billion so far (January to July)".³

As currently drafted, many of the expectations set out in the draft Charter cannot be supported for indirect bookings. Indirect bookings where no contact details are provided by the travel agent already present challenges during disruptions, with the airline unable to directly advise the customer of any delays or cancellations – as it is the travel agent that has the relationship with the customer, not the airline. For refunds or changes, the travel agent needs to request this on behalf of the customer – the airline cannot action this without the travel agent and the travel agent is responsible for returning the funds to the customer. ATIA has recently indicated that "Australian Travel Agents processed over 900,000 refunds last year"⁴ – refunds that would not be captured by the same protections of the Charter or the Ombuds Scheme if travel agents are not incorporated into the Scheme.

Scope and Design of the Aviation Industry Ombuds Scheme

Consultation with the Department in December 2024 indicated that inbound services provided by foreign international airlines, airports handling less than one million passengers a year and travel agents are currently proposed to be excluded from the Ombuds Scheme. These material limitations on the scope of the Scheme would result in a significant number of consumers without recourse and may drive inconsistent customer experiences and frustration. They fundamentally undermine the objective of the Ombuds Scheme to protect the rights and improve outcomes for all aviation consumers.

¹ [Conditions of Carriage | Qantas AU LINK](#)

² [Conditions of Carriage - JQ | Jetstar LINK](#)

³ A4ANZ's submission to the Aviation Industry Ombuds Scheme consultation [LINK](#)

⁴ Travel Daily, Wednesday 26th February 2025.

If travel agents are not incorporated into the Scheme as members, it should be clarified how the rights of the Charter apply to passengers that have made indirect bookings through a travel agent or purchased through other indirect channels. Similarly, if inbound services provided by foreign international airlines are not incorporated into the scheme, the Charter needs to clarify whether and how the rights of the Charter apply to codeshare passengers.

The Qantas Group is concerned the piecemeal approach to consultation on the Aviation Industry Ombuds Scheme may have unintended consequences in circumstances where questions regarding the scheme membership and design and other ongoing initiatives identified in the Aviation White Paper (including the development of aviation specific transport standards) have direct implications for rights set out in the draft Charter.

Privacy

The Qantas Group agrees that the personal information of aviation consumers should be protected and that consumers should be made aware of how their personal information is collected, held and disposed of, regardless of who collects the information. However, as set out in our response to the Aviation Industry Ombuds Scheme consultation, we do not believe the Ombuds Scheme should accept privacy complaints. The Charter should reflect that any complaints related to privacy matters (that cannot be resolved by the airlines or airports) can be referred to the Office of the Australian Information Commissioner (OAIC) for resolution.

Implementation

We note that the final Charter will include guidance for industry and consumers. This guidance will be important to the interpretation and application of the Charter by the Ombudsperson. We would welcome additional consultation on any guidance material.

We believe that the Ombuds Scheme should play an integral role in educating consumers on their rights arising from the Charter and we would welcome a more detailed discussion on how this could be achieved. The Government could consider the model adopted in the United Kingdom where the UK government, in conjunction with industry and consumer groups, developed an Air Passenger Travel Guide which provides a summary of rights and responsibilities as an air passenger. The guide details what passengers can expect from the entire aviation ecosystem, including airlines, travel agents, tour operators and airports, and what to do if things don't go to plan, including guidance on how to complain.

We would be happy to discuss these comments in more detail and look forward to working with the Department on the subsequent phases of consultation on the Charter and Aviation Industry Ombuds Scheme.



ATTACHMENT A

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

Customer Commitment	Comments
<p>Airlines and airports will have a Customer Service statement or charter, which outlines their commitment to provide their services in a safe and dignified manner, and free from discrimination.</p>	<ul style="list-style-type: none"> • The Qantas Group supports the right for all aviation consumers to be treated with dignity and respect in an accessible and inclusive environment. • The Qantas Customer Charter⁵ sets out our commitment to customers. This includes our commitment to safety which will always be our first priority, the services we offer, including how we look after passengers in the event of delays, cancellations and delayed baggage, the support we offer for passengers with specific needs, the assistance we offer through our contact centres and how we protect personal information. • The Jetstar Customer Guarantee⁶ includes our commitment to safety, our commitment to provide the lowest fares with our 'Price Beat Guarantee,' the assistance we offer for customers to contact us, what we will do if a flight is changed and how we aim to resolve issues quickly. • The Qantas Group's Access and Inclusion Plan⁷ outlines our commitment to accessibility and inclusion for all our customers and employees with disability and notes the importance of treating customers with disability and their families with dignity and respect. • We support the right to provide services and in dignified, non-discriminatory manner, respecting personal identity and cultural dress or religious practice (including clothing). However, this should be subject to any safety and regulatory requirements.
<p>They will be communicated with in a respectful and non-discriminatory manner, regardless of their circumstances.</p>	
<p>Their personal identity, cultural dress or religious practice (including clothing) will be respected during the whole travel experience.</p>	

⁵ Customer Charter | Qantas AU [LINK](#)

⁶ Customer Guarantee | Jetstar [LINK](#)

⁷ Qantas Group Access and Inclusion Plan [LINK](#)



Customer Commitment	Comments
<p>For a person with disability, airlines and airports will comply with the Disability Discrimination Act 1992 and Disability Transport Standards across their aviation journey.</p>	<ul style="list-style-type: none"> • The Qantas Group supports this right. • Qantas and Jetstar have prepared Disability Access Facilitation Plans to provide information to our customers with specific needs to comply with the Disability Discrimination Act 1992 and Disability Transport Standards. The Facilitation Plans have been developed taking into account the civil aviation safety requirements and other regulatory requirements we are bound by. • In addition, the Qantas Group's Access and Inclusion Plan outlines our commitment to accessibility and inclusion for all our customers. Our goal is to improve accessibility for our people, customers and community and we have developed a series of actions focused on removing barriers, preventing new barriers and improving access and inclusion for people with disability. The Plan identifies how we can create a more consistent and inclusive experience for people with disability throughout their entire journey, starting from when they book with us. The development of the Plan has been guided by people with lived experience. • We look forward to working with the Department to develop the Aviation Specific Transport Standards and understand how these standards will be incorporated into the Ombuds Scheme and Charter.
<p>Information provided by airlines and airports must be available to passengers in a range of accessible formats, including languages other than English.</p>	<ul style="list-style-type: none"> • The Qantas Group supports the need to provide information in a range of languages and formats. Qantas' website is currently available in seven different languages and Jetstar's website is available in eight different languages. At some airports information and notices may be provided to customers in alternative languages and formats. However, this is dependent on regulatory requirements, demographic requirements and infrastructure availability. Onboard, cabin crew have high language proficiency and often speak a range of languages as indicated by their name badges. In addition, Qantas, together with the support of Deaf Connect, has produced an Auslan video to help customers prepare for a flight and also offers safety cards in Braille format on most flights. • The Qantas Group would welcome additional guidance on the range of accessible formats, number of languages and the scope of information this right is intended to apply to. • This right should be subject to any safety and regulatory requirements.
<p>Airport and airline staff will be aware of how best to assist you if you have accessibility requirements or have medical issues requiring consideration, including implants and prostheses.</p>	<ul style="list-style-type: none"> • The Qantas Group supports the inclusion of this right within the Charter and considers this right should be extended to all agencies providing aviation services – including third parties and contractors – not just airports and airlines. • Qantas and Jetstar frontline staff already undertake disability awareness training. In September 2023, the Group became the first Australian airline to join the Sunflower Program – a global initiative to help better recognise customers with a non-visible disability.

Customer Commitment	Comments
	<ul style="list-style-type: none"> • While our frontline staff undergo significant training, our ability to best assist a customer is dependent on the information we receive as part of the booking process. For example, Qantas has a specific Accessible, Medical and Inclusion Request form and a Mobility Assistance request form, and this information helps us to understand and prepare for the support required. For Jetstar, customers can advise of their accessibility requirements when they make a booking online or via our contact centre. To support this outcome in the Charter, we would welcome a recognition that airlines are best placed to assist when information is provided to the airline as part of the booking process. As currently drafted, it is unclear if the right is intended to set an expectation related to training for airline and airport staff, or if this right is more broadly related to the provision of information through the assistance profile as contemplated in the Aviation White Paper. • The right should be subject to any privacy requirements – as not all staff may be able to receive all information provided. • It is unclear why only medical issues, including implants and prostheses are identified as requiring consideration – this right should apply broadly to any accessibility need.
<p>Security screening at airports will be delivered with dignity, free from bias and in line with requirements set by the Department of Home Affairs.</p>	<ul style="list-style-type: none"> • The Qantas Group supports the inclusion of this right within the Charter and considers this right should be extended to all agencies providing security screening – including third parties and contractors. All parties responsible for security screening should be required to undertake accessibility awareness training and – in a similar way to the right above – be aware of how best to assist with accessibility needs.
<p>Wayfinding will assist in the easy navigation of airports, through signage provided in multiple languages and formats, and buildings designed to assist those with accessibility needs.</p>	<ul style="list-style-type: none"> • The Qantas Group supports the inclusion of this right. • It should be recognised that wayfinding is more than signage. Airports should consider how design principles, emerging technology (including integration with airline systems), digital signage, lighting, colours and building materials might assist with improved wayfinding for those with accessibility needs. • It should also be noted that a number of airports are moving the ‘kerb’ away from the departures area of the terminal – in some cases by a significant distance. This is not within an airlines’ control and the airport will need to consider labour and infrastructure implications of these design decisions to assist those with accessibility needs.

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

Customer Commitment	Comments
<p>They will be provided with clear, simple and transparent terms and conditions that are easily available and identifiable when purchasing airline tickets and/or using airport services, such as parking.</p>	<ul style="list-style-type: none"> • The Qantas Group supports the inclusion of this right. Terms and Conditions and Conditions of Carriage are available on Qantas and Jetstar’s websites and during the booking flow. By their very nature, terms and conditions, fare rules and conditions of carriage are complex. The Qantas Group has undertaken a significant amount of work to simplify and ensure transparency of these where possible. • Including ‘all fees’ within the conditions of carriage is not practical. For example, Jetstar works on a choice model where a customer can select from a range of options to best meet their needs, including baggage allowance, meal and seating options. Given the number of potential combinations that a customer may elect when booking a journey, we do not consider presenting all fees (and resulting options and combinations) in conditions of carriage is practical. Indeed, it could create more confusion when the best point of disclosure for a customer is at the time of purchase. We recommend that the Charter is clarified that common fees are provided on an airline website e.g. payment fees, refund fees and change fees.
<p>They will be provided with clear and easy to understand conditions of carriage (including all fees) by airlines, outlining their rights regarding delays, refunds, changes and cancellations.</p>	
<p>A customer service representative will be available at the airport and/or on the phone to assist.</p>	<ul style="list-style-type: none"> • The Qantas Group acknowledges the importance of the availability of the option to speak directly to a customer services representative. Qantas and Jetstar provide phone support 24 hours a day, 7 days a week for customers located within Australia. In addition, airline customer service agents will be available at the airport aligned to the flight schedule. However, a customer service agent may not be available throughout the day at an airport if, for example, we operate only one daily frequency to a port. • We note that technology now offers many ways through which customers can access accurate, timely information in a convenient manner. Qantas provides updates through multiple digital channels including Manage Your Booking, the Qantas App, email, SMS (where contact details are provided) and customers can subscribe to Qantas’ flight status alerts on our website to obtain the latest information on a flight. New features now available in the Qantas App alert the customer to ticketing issues such as missing passenger information or issues with payments and the App allows a customer to self-service to resolve these types of issues, or click-to-call which then connects the customer directly to our contact centre. Similarly, Jetstar communicates with customers via pre-departure emails, FAQs on our website, SMS for flight information as well as ‘Jess’ our virtual assistant. In addition, customers can use the Jetstar App, Manage Booking page or contact us via Live Chat – giving customers the freedom to choose a preferred method of communications. As part of our ongoing customer initiatives we will deliver easier booking management (including flight changes) on the Qantas website, new App features, additional automations for refunds and improved self-service and enhancements to Jetstar’s digital servicing, including new self-service features.

Customer Commitment	Comments
	<ul style="list-style-type: none"> We recommend this right acknowledges the range of options available to a customer to self-service or contact a customer service representative and the right is clarified to ensure that expectations regarding the presence of an airline customer services representative at the airport is clear.
<p>Information about delays, cancellations and disruptions will be provided to customers promptly after it is known by the airline.</p>	<ul style="list-style-type: none"> We understand how frustrating delays and cancellations can be for customers and in principle support the inclusion of this right in the Charter. When a delay or cancellation arises, Qantas provides updates through multiple digital channels including Manage Your Booking, the Qantas App, email and SMS (where contact details are provided) and customers can subscribe to Qantas flight status alerts on our website to obtain the latest information on a flight. For Jetstar if, on the day of travel, we have confirmed a delay greater than 45 minutes or we cancel a flight (and we are aware of the delay or cancellation more than two hours before the scheduled departure time), then we will advise the customer via SMS using the relevant contact details provided in the booking. For indirect bookings, we will also inform the travel agent. When customers are at the airport, digital communications are supplemented by the Flight Information Display Screens (FIDS) and PA announcements. At the airport Qantas and Jetstar have a policy of providing a public announcement every 20 mins. In addition, as part of our customer improvement initiatives, the Group is focused on further improving customer communications and processes during disruptions by providing additional transparency and communicating the reason for delays and cancellations. However, it is important to note that when an airline provides information about delays or cancellations varies, depending on when the disruption becomes known to the airline and if this is a delay or a cancellation. For clarity, we recommend that the Charter distinguishes between the requirements for delayed and cancelled flights, and the right refers to information provision during the operational window. In addition, any overlaps with Right 3 'If a flight is delayed, the airline should provide customers with regular updates on the status of the flight and the expected departure times' should be considered to ensure alignment. It is important to note that an airline's ability to communicate with customers about cancellations or delays is reliant on a customer providing correct contact details. Indirect bookings represent a significant proportion of airline bookings and for indirect bookings the provision of the passenger's contact details to the airline is not currently a mandatory requirement. As a result, our ability to communicate with the passenger is wholly reliant on the travel agent communicating updates. This limitation should be reflected in the Charter or provision of this information by travel agents mandated. In addition, the obligations of other service providers, including airports, Airservices and third parties, to provide information about delays and cancellations should be outlined in the Charter.
<p>Any call centre should include the capability for a customer call-back option or voicemail, to ensure</p>	<ul style="list-style-type: none"> The Qantas Group acknowledges that a customer's ability to speak directly to a customer services representative is important. As set out above, Qantas and Jetstar provide phone support 24 hours a day, 7

Customer Commitment	Comments
<p>customers are not on hold for excessive periods of time.</p>	<p>days a week for customers located within Australia. Qantas and Jetstar also provide multiple channels to provide updates, self-serve or click-to-call which includes estimated call wait times. In addition, we are undertaking significant investment and delivering ongoing technology enhancements to ensure there are convenient ways by which a customer can obtain information or manage their flight and therefore suggest the Charter should not prescribe specific solutions.</p>
<p>The airline and airport will have a customer service statement or charter which will outline their specific commitments to customers, including timelines for responses to queries or feedback.</p>	<ul style="list-style-type: none"> • The Qantas Group supports the inclusion of this right. • The Qantas Customer Charter and Jetstar Customer Guarantee outline our commitments to customers and what they can expect – including how to make a complaint, the expected process and, where applicable, any timeframes. Once the consultation on the Charter has been finalised, a review of the existing Qantas Customer Charter and Jetstar Customer Guarantee will take place. It is important to note that any airline charter will need to contemplate differential requirements across any jurisdictions that the airline operates to or from. Harmonisation of requirements is therefore welcome to avoid unnecessary complexity and reduce inconsistencies. • It is important to note that significant customer impacts arise when passengers are required to stay overnight at the airport as a result of a delay or cancellation, or when an airport is required to close and insufficient local hotel accommodation is available. We would welcome the Charter outlining clearer airport obligations in these circumstances. For example, in remote areas the requirement for terminals to remain open for safety reasons and the provision of beds, bedding and amenities if passengers are required to sleep in terminals. There is also a risk that airport charters may differ from airline charters – any conflicts may need to be addressed to ensure alignment noting that this will apply across multiple ports.

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

Customer Commitment	Comments
<p>If a flight is delayed, the airline should provide customers with regular updates on the status of the flight and the expected departure times.</p>	<ul style="list-style-type: none"> • We understand how frustrating delays and cancellations can be for customers and in principle support the inclusion of this right in the Charter. For any flight delays we aim to communicate regularly and – if we have the correct contact details – provide updates through multiple communication channels as detailed above. While we endeavour to provide regular updates during a delay, it is important that communications to customers are meaningful and that frequent updates or revisions to expected departure times do not compound delays. In addition, airport processes for example ‘silent terminals’ whereby passenger and flight announcements are limited should be considered. • An airline’s ability to communicate with customers about changes to expected departure times is reliant on customers providing contact details. For indirect bookings the provision of passenger contact details to the airline is not a mandatory requirement. As a result, our ability to communicate with passengers that have not booked directly with us, and for which we do not have contact details, is wholly reliant on the travel agent. This should be acknowledged in the Charter or provision of this information by travel agents mandated. • Regarding ‘status of the flight’ it would be helpful to clarify scope and if the expectation is to provide a reason for delay (as inferred by the introductory text to Right 3). The Qantas Group is focussed on further improving customer communications during disruptions by providing additional transparency and communicating the reason for delays and cancellations. However, if the reason for delay is to be included, an industry standard set of reasons should be established to ensure consistency for customers. This should also be aligned with any new performance reporting anticipated by BITRE. If it is the expectation of airlines to communicate the reason for delays, technology limitations and implementation timeframes will need to be considered. • This right overlaps with Right 2 ‘Information about delays, cancellations and disruptions will be provided to customers promptly after it is known by the airline.’ We suggest both rights are reviewed and aligned to avoid confusion regarding the information an airline is expected to provide.
<p>If a flight is disrupted or delayed for more than 3 hours, for reasons within the airline’s control, customers should, at no cost to the customer, receive: - Assistance to rebook with original or alternative airlines, without fees - The option to cancel time-dependent</p>	<ul style="list-style-type: none"> • The Qantas Group supports the Government’s desire to clarify the rights of aviation customers. For Qantas and Jetstar, when we cancel a flight, for an event within our control, we offer customers a range of options including a refund, rebooking or a flight credit, and during significant delays we provide meals, transportation and accommodation to impacted customers. • We recommend that this right refers to delayed flights or cancelled flights, rather than disruption. In addition, the rights related to a cancellation or delay greater than three hours, for reasons within an airline’s control,

Customer Commitment	Comments
<p>a flights with a full refund - Meals, meal vouchers/reimbursement or access to a lounge where food is available, where flights are delayed - Accommodation and transfers where a customer is required to remain in an away-from-home port overnight</p>	<p>should be clear and distinct and the right should refer to the airlines' conditions of carriage as events within and outside of control are clearly defined in Qantas and Jetstar's Conditions of Carriage. For Qantas and Jetstar, events within our control means engineering issues, Qantas or Jetstar IT system outages, delayed delivery of baggage to the carousel due to resourcing issues, late cleaning/loading of catering to the aircraft, crew /staffing issues or any other circumstance that we can reasonably control. Events beyond our control include weather events, air traffic control issues, industrial action by a third party, security issues or any other unusual unforeseen circumstance which we cannot control and the consequence of which we could not have avoided.</p> <ul style="list-style-type: none"> • 'Assistance to rebook' lacks clarity. It is important that rebooking is with an airline with which we have an agreement as we currently have ticketing agreements with several airlines and have the technology and internal systems in place to re-accommodate customers onto airlines with which we have agreements. We suggest the language of this right is clarified that the airline will take all reasonable steps to rebook on the same or partner airline or another airline with which it has an agreement and note the US DOT has similar requirements. • 'The option to cancel time-dependent flights' lacks clarity. If, when a flight is cancelled or is delayed for more than three hours for a reason within the airline's control and a customer does not accept the alternatives presented, the option to cancel with a full refund should be provided. • The rights related to delay should be confined to on the day of operations and the scope of services provided during a significant delay. During a delay of more than two hours, Qantas will provide meal vouchers and / or reimburse reasonable expenses, for Jetstar the same applies for a delay more than three hours. It is not possible for an airline to provide 'meals' or 'access to a lounge where food is available'.
<p>If customers have had to book a new flight with another airline due to their original airline not having a reasonable replacement flight, then the original airline will refund the cost of the original flight.</p>	<ul style="list-style-type: none"> • We recognise that flight cancellations and delays are frustrating, particularly for time-sensitive travel. However, to avoid any subjective interpretation related to 'reasonable replacement flight' and aligned to the right above - it should be clarified that this right only applies to cancelled flights or flights delayed more than three hours, for reasons within an airline's control and the customer has not accepted the alternatives presented by the airline, then the original airline will refund the cost of the original flight. • For the avoidance of doubt, we suggest that the scope of refunds is clearly defined (see below).
<p>Customers should receive a refund for a cancelled flight within 14 days of the cancellation being notified, regardless</p>	<ul style="list-style-type: none"> • The Qantas Group recognises that lengthy refund timeframes are frustrating for customers and supports this right in principle. The right should be clarified so it applies only to cancelled flights or flights delayed more than three hours, for reasons within an airline's control and the customer has not accepted the alternatives

Customer Commitment	Comments
<p>of the fare type, where an alternative flight has not been agreed.</p> <p>The refund should be to the full amount paid by the customer, including baggage charges, pre-purchased meals, extra leg room fees and any payment fees and charges.</p>	<p>presented by the airline. In addition, the responsibility for refunds and timeframes should be clarified and within the control of the airline.</p> <ul style="list-style-type: none"> • It is not within an airlines' control to ensure that a refund is received by the customer within 14 days. Financial institutions have differing processing times, with some forms of payment (particularly BPay and PayPal) lengthier and there are times when the original form of payment is no longer valid. For indirect bookings, the travel agent needs to request the refund on behalf of the customer from the airline in the first instance. Once processed by an airline, it is the travel agents' responsibility to remit these funds back to the customer, with the airline unable to control the timeframes. In addition, there may be complexities where the airfare was purchased with a travel agent and ancillaries were purchased directly with the airline. In this instance, the travel agent will need to instigate the ticket refund before the airline can process the ancillary product refund. • Notification to the customer is not a practical starting point for the refund period to commence. If a flight is cancelled for reasons within an airline's control, we will offer customers an alternative flight. A customer must choose to accept this alternative or the option to cancel and request a refund. For travel agent bookings, the travel agent needs to request the refund on behalf of the customer in the first instance. Therefore, the starting point for any refund period should be once the customer (or travel agent on behalf of the customer) requests a refund – rather than the point at which the passenger is notified (as the airline has no control over the duration of time a customer or travel agent may take in reviewing options). • Any timeframe for refunds in the Charter should acknowledge these complexities, implementation challenges and should be clear if it is business days or calendar days. • To manage customer expectations, any reference to refunds should refer to the airlines' conditions of carriage, fare rules or compensation and refund policy. Any exchange rate fluctuations should also be acknowledged.
<p>The default position of airlines will be the provision of a refund in the original form of payment (including cash, credit or flyer reward points), with a travel voucher only being issued if the customer chooses that option.</p>	<ul style="list-style-type: none"> • For delays greater than three hours or cancellations within our control, Qantas and Jetstar already offer refunds to the original form of payment, or travel credit if the customer chooses that option. • In line with the right above, it should be clarified that this right only applies to cancelled flights or flights delayed for more than three hours, for reasons within an airline's control and the customer has not accepted the alternatives presented by the airline. • The right should incorporate the ability for a customer to elect any alternative form of payment – not just travel voucher.
<p>If a flight has boarded but is disrupted through a delayed take-off for longer than 1 hour, subject to safety</p>	<ul style="list-style-type: none"> • While we recognise that delays once customers have boarded and are unable to disembark are frustrating, airlines have specific policies regarding customer support during a tarmac delay including access to amenities, the provision of catering and refreshments and announcements. We endeavour to provide access to some or

Customer Commitment	Comments
requirements, customers will be provided access to amenities, appropriate refreshments and regular information updates about the delay.	all of these customer amenities. However, this will be informed by safety requirements and may be subject to operational considerations and location. We note that the US DOT has similar requirements, however the provision of these services is expected after a 2-hour delay and is subject to safety and security considerations.

Proposed Right 4: Aviation industry customers have the right to safe and timely baggage handling and fair remedies for damage and delays

Customer Commitment	Comments
<p>Luggage will be safely handled through the aviation journey, from originating airport to plane to destination airport, including on the tarmac.</p>	<ul style="list-style-type: none"> • We recognise that delays and damage to baggage causes significant frustration to our customers, and we acknowledge the Charter should articulate customer rights in this respect. However, it is important to note that baggage is already governed by a comprehensive set of legislation, including the Civil Aviation (Carriers' Liability) Act 1959 (Cth), Montreal Convention, Australian Consumer Law provisions and carrier terms and conditions for domestic and international carriage (as applicable). As such, the Charter should be clear that any remedies (including monetary rewards) should be in line with existing law. • The Charter should be clear regarding the scope to which this right applies. For example, this should only apply to checked baggage that is the responsibility of the airline not, for example, carry-on baggage which remains in the possession of the customer. In addition, it is important to clarify that this right is subject to any safety or security screening requirements applicable e.g. requirements related to lithium batteries. • Airlines are reliant on functional airport baggage handling systems to be provided by the airport. Therefore, an airlines' responsibility in this regard should be limited to only the elements within an airline's control and the responsibilities of airport providers in respect of baggage should be clear.
<p>If luggage is temporarily lost by an airline, customers should be reimbursed for the necessary purchase of appropriate clothing and toiletries where this occurs away from the customer's home port.</p>	<ul style="list-style-type: none"> • The Qantas Group recognises delayed baggage is frustrating for customers and in principle supports the inclusion of this right. For delays of baggage after arrival at the destination, where a customer is away from the home port, Qantas and Jetstar reimburse reasonable expenses in accordance with our legal obligations. • If a customer's checked baggage is damaged, lost or delayed, the limits under Montreal Convention (incorporated into Australian law under CACL) should be applied for international carriage and for domestic carriage CACL or ACL as applicable, and carrier terms and conditions (which comply with existing rights under consumer law) should be applied. This should be acknowledged in the Charter. • It is important to note that, based on IATA standards, it is the final carrier that is considered the responsible carrier for making the mis-handled baggage report and providing remedies to the customer. To ensure that expectations are clear, we would recommend clarification to reflect this provision and ensure that proof of purchase is incorporated into the provision. • Airlines are reliant on functional airport baggage handling systems provided by the airport. The airports' responsibility for delays, mishandled baggage should be captured including baggage belt availability and sortation infrastructure.

Customer Commitment	Comments
<p>If luggage is damaged in the course of carriage, the airline will finalise a claim for damages in a timely manner.</p>	<ul style="list-style-type: none"> • If a customer's checked baggage is damaged, lost or delayed, the limits under Montreal Convention (incorporated into Australian law under CACL) should be applied for international carriage and for domestic carriage CACL or ACL as applicable, and carrier terms and conditions (which comply with existing rights under consumer law) should be applied. This should be acknowledged in the Charter. • In accordance with CACL, a complaint related to damage should be lodged within 3 days for domestic flights and 7 days for international flights. However, to enable a claim to be assessed customers are encouraged to lodge a Property Irregularity Report at the airport to ensure that the proof of damage is reported. • In our response to the Aviation Industry Ombuds Scheme consultation, and in line with similar global schemes, we have suggested an airline has 8 weeks to respond to a complaint is appropriate (see below).
<p>When any lost luggage is located, it should be delivered to the customer at the earliest possible time and at no cost to them.</p>	<ul style="list-style-type: none"> • The Qantas Group will attempt to deliver any lost baggage to a customer at the earliest opportunity and in principle support the inclusion of this right. To enable this, it is critical the customer makes a mishandled baggage report either in person, online, or via our contact centres at the earliest opportunity, to capture correct contact details and baggage information. • In certain circumstances we may be limited depending on the itinerary and final destination of the customer, availability of general freight services and any restrictions that need to be considered e.g. sanctions. We therefore recommend that the Charter reflects that lost baggage be delivered to a customer at the earliest reasonable time and airports should be required to support airlines in the timely return of lost baggage. In addition, it should be noted that the last operating carrier is responsible for the delivery of any lost baggage, per the conditions of carriage. • To ensure that lost baggage can be delivered to the customer at the earliest reasonable time, it is critical for us to have customer contact details including delivery address. For indirect bookings – particularly through travel agents – where no contact details are provided this can cause issues in returning baggage. This should be acknowledged in the Charter or provision of this information by travel agents mandated.

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

Customer Commitment	Comments
<p>Clear information about airline and airport handling of personal information will be available on their website.</p>	<ul style="list-style-type: none"> • The Qantas Group supports proposed Right 5. We acknowledge the importance of protecting the personal information of customers and agree that customers should be made aware of how personal information will be collected, held and disposed of, according to law regardless of who collects the information.
<p>Airlines and airports (including their contractors) will collect, handle and store any personal information, according to the law.</p>	<ul style="list-style-type: none"> • To ensure consistency with obligations under the Privacy Act, the same obligations apply to third parties and or contractors as they do to airports and airlines, so we query if a separate point for third parties is required and why this only incorporates a subsection of requirements. We suggest this can be simplified by redrafting third parties and contractors into the requirements as follows: <ul style="list-style-type: none"> ○ Airlines and airports (including their contractors and other third parties) will collect, handle and store any personal information, according to the law; ○ Airlines and airports (including their contractors and other third parties) will only store any personal information for the length of time that is necessary for the provision of the aviation service they are providing, or as authorised by law; and ○ Personal information supplied to an airline or airport (including to their contractors and other third parties) will be done securely, with minimal risk of compromise by unauthorised third parties.
<p>Airlines and airports will only store any personal information for the length of time that is necessary for the provision of the aviation service they are providing, or as authorised by law.</p>	<ul style="list-style-type: none"> ○ Airlines and airports (including their contractors and other third parties) will only store any personal information for the length of time that is necessary for the provision of the aviation service they are providing, or as authorised by law; and
<p>Personal information supplied to an airline or airport will be done securely, with minimal risk of compromise by unauthorised third parties.</p>	<ul style="list-style-type: none"> ○ Personal information supplied to an airline or airport (including to their contractors and other third parties) will be done securely, with minimal risk of compromise by unauthorised third parties. • Alternatively, if the provisions for third parties and contractors are identified separately, they need to replicate all other provisions (rather than a subset of those provisions, as is currently drafted) as these parties have similar broad rights and obligations under the law.
<p>Personal information, (for example, meal preferences) that are provided by an airline or airport to a third party for the purposes of providing a service will be transmitted securely, handled appropriately and disposed of promptly.</p>	<ul style="list-style-type: none"> • As set out in our response to the Aviation Industry Ombuds Scheme consultation, the Qantas Group considers that the Ombuds Scheme should not have a role to accept privacy complaints. For clarity, the Charter should reflect that concerns or complaints related to privacy matters (that cannot be resolved by the airlines or airports) can be referred to the Office of the Australian Information Commissioner (OAIC) for resolution.

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

Customer Commitment	Comments
<p>Airlines and airports will improve their complaint handling systems, seeking to resolve customer complaints in the first instance and not require escalation to external complaints agencies.</p>	<ul style="list-style-type: none"> • The Qantas Group recognises the need for clarity and transparency in relation to our complaints processes. Information on how to provide feedback or make a complaint and the complaints process is readily available on Qantas and Jetstar’s websites. We query if improvements to complaint handling systems is a necessary inclusion in the Charter. Instead, the Qantas Group considers that airlines and airports should have a clearly communicated complaints mechanism that sets out the process, timeframes and how escalations will be managed, including the availability of a decision maker. If the existing drafting is maintained in the Charter, the minimum expected standard for a complaint handling system that an airline and airport is expected to provide should be clear. • While we acknowledge the desire to resolve customer complaints in the first instance, this may create a perverse incentive for matters that require escalation or subject matter expertise with a more complex understanding of the rights and obligations of a customer. In addition, reference to ‘resolve customer complaints’ needs to be clarified. An airline might resolve a customer complaint to be fair, reasonable and in line with the legal obligations of the airline, however this may not meet customer expectations. Instead, we recommend adopting the Airline Customer Advocate standard that refers to ‘finalising’ a customer complaint without requiring escalation to the Ombuds Scheme.
<p>A family member, carer, advocate or legal representative will be able to support and/or represent a customer.</p>	<ul style="list-style-type: none"> • Subject to consent being provided by the customer and any privacy obligations, Qantas and Jetstar allow a family member or carer to represent a customer. The right should be clear it is subject to privacy obligations and that any third party representing a customer is authorised to act on behalf of the customer and, where appropriate, any remedies accrue to the customer directly.
<p>Information will be supplied by the airline or airport on how to provide feedback or make a complaint, and how the complaint will be escalated if you are not happy with the response, including how to contact the Aviation Industry Ombudsperson.</p>	<ul style="list-style-type: none"> • The Qantas Group supports the inclusion of this right. Information on how to provide feedback or make a complaint and the complaints process is readily available on Qantas and Jetstar’s websites. The Qantas Customer Charter and Jetstar’s Customer Guarantee clearly articulate how to provide feedback or make a complaint – including the escalation process to the independent Australian Customer Advocate if we have been unable to resolve an issue. We suggest this right is clarified to state that information on how to provide feedback or make a complaint is supplied on an airlines’ website (as per Right 5).
<p>All feedback and/or complaints will be acknowledged by, and responded to, by the airline or airport in a reasonable</p>	<ul style="list-style-type: none"> • The Qantas Group recognises that acknowledging and resolving complaints in a reasonable timeframe is critical to customer satisfaction. For Jetstar, all ‘first’ contacts are made through voice or chat, therefore the complaint is acknowledged in the moment. If the agent is not able to resolve in the moment, a case is

Customer Commitment	Comments
<p>timeframe (with a target of 24 hours to acknowledge and 30 days to resolve).</p>	<p>created and the customer is sent an automated email with their case number that sets out an expected response time from a case working agent. Qantas accepts complaints in writing via a webform and provides customers with a case reference number that is sent via the email address and is provided instantly when the complaint is submitted. In addition, the Request Tracker in the Qantas App gives a customer visibility of complaint status within the complaints process.</p> <ul style="list-style-type: none"> • We note the AS 10002:2022 Guidelines for complaint management in organizations (ISO 10002:2018, NEQ) states “an organisation should ensure its complaint management system (CMS) acknowledges complaints within three days and provides regular updates to the complainant”. We suggest the right is clarified to ensure it applies to all complaints made through a formal channel and to recognise that an automated acknowledgement of a complaint within 24 hours is appropriate. It is important the complaint is captured through a formal channel to ensure that the airline has adequate opportunity to respond. • In our response to the Aviation Industry Ombuds Scheme consultation, the Qantas Group suggested an airline should have 8 weeks to respond to a complaint. The duration of time it takes for an airline to respond will depend on the level of information provided by the complainant, the complexity of the complaint, and the requirement to seek input or statements from front-line employees and involvement of other third-party service providers domestically and globally, including baggage providers and third party processed refunds. In line with other similar schemes globally, we consider 8 weeks from the date a complaint is lodged with the airline formally is an appropriate amount of time to respond or finalise a complaint (noting the commentary regarding ‘resolve’ above). If defined in days, it should be clear if this is calendar days or business days.
<p>Airlines and airports will facilitate the exercise of customer rights under the Charter without customers being concerned about retribution.</p>	<ul style="list-style-type: none"> • We query whether this right is necessary in circumstances where there is no evidence this is a problem to be addressed. Qantas and Jetstar have clear processes and ways in which customers can provide feedback and make complaints, including the ability to escalate any complaint to the Airline Customer Advocate. We do not believe that this provision needs to be articulated.