

# Submission to the Senate Rural and Regional Affairs and Transport Legislation Committee

**Inquiry into the Aviation Consumer Protection Bill 2026 and related bills**

**Submitted by: Hobart International Airport**

***24 April 2026***

## Executive summary

Hobart Airport welcomes the Australian Government’s objective to strengthen aviation consumer protections and restore confidence in the aviation system. We support enforceable minimum standards through the Aviation Consumer Protections Charter and an independent Aviation Consumer Ombuds Scheme to resolve individual disputes that cannot be resolved directly with the relevant airline or airport.

For the framework to deliver practical and equitable outcomes, the legislation and subordinate instruments must reflect the interconnected nature of the passenger journey and ensure that accountability and regulatory burden sit with the party that has operational control over the relevant outcome. Most aviation consumer complaints arise from matters within airline control such as scheduling, delays and cancellations, ticketing and refunds, baggage handling and passenger communications. Airports play an enabling role by providing infrastructure and facilitating movement through terminal precincts, but do not control these airline outcomes.

Hobart Airport is a mid-sized airport servicing Tasmania. In 2025, Hobart Airport welcomed 2.8 million passengers, and we are expecting growth to 3.5 million passengers by 2030<sup>1</sup>. We facilitate domestic services to seven Australian cities and international services to Auckland, New Zealand. This scale supports participation in the national framework but also means Hobart Airport has materially fewer corporate resources than the largest gateways. Subordinate legislation must therefore be carefully calibrated to avoid disproportionate burden on mid-sized and regional airports.

Hobart Airport seeks clarity on how the Scheme will manage common ‘misdirected’ complaints where consumers contact an airport about an airline matter. In our October 2025 submission on aviation consumer protections, Hobart Airport noted that customer complaints are frequently attributable to enquiries that are passed onto airlines and ground handlers. The Scheme’s rules should define when timeframes commence (‘when the clock starts’), the mechanics of referrals and hand-offs between regulated entities, and the safeguards that apply when transferring any personal or sensitive information between parties.

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<sup>1</sup> [Hobart Airport Master Plan 2022](#)

## Summary of recommendations

1. Clarify responsibility allocation so accountability follows operational control, and airports are not captured for airline-controlled outcomes or flow-on impacts that originate outside airport control.
2. Refine and constrain the scope of ‘airport services’ and ensure any scope expansion through rules/standards is subject to consultation and oversight.
3. Specify Scheme rules for triage and referral of misdirected complaints, including when timeframes commence and how privacy and consent are managed for information transfer.
4. Include ‘stop the clock’ provisions where resolution depends on third-party information, and express response and resolution timelines in working days to reflect operational reality.
5. Design subordinate legislation to scale—recognising resource limitations at mid-sized and regional airports and avoiding one-size-fits-all obligations.
6. Adopt a fair funding model: ongoing operating costs can be borne by industry, but establishment costs should not be borne solely by industry (Government co-funding is appropriate during establishment and transition).
7. Link levies and membership fees to complaint volume and regulatory effort, with tiers that prevent disproportionate cost burden for airports that generate relatively fewer consumer disputes.
8. Embed safeguards for commercially sensitive information in information gathering and sharing powers, including notification requirements prior to disclosure.
9. Support consumer education and clear complaint pathways so complaints reach the correct first point of contact, improving resolution speed and reducing administrative burden.

## 1. Introduction

Hobart Airport appreciates the opportunity to make a submission to the Senate Rural and Regional Affairs and Transport Legislation Committee on the Aviation Consumer Protection Bill Package (the Bills) introduced into Parliament in March 2026. We have participated in extensive consultation since 2024 and have provided multiple submissions to the Department on the Aviation Consumer Protections framework, the Aviation Consumer Protections Charter (the Charter), and the proposed Aviation Industry Ombuds Scheme (the Scheme).

Hobart Airport supports a stronger, clearer and enforceable consumer protection framework. We recognise that consumer protections must be trusted, clear and workable in practice. However, aviation is not a single-provider environment. Effective consumer outcomes depend on the coordinated performance of multiple participants across the system, including airlines, airports, and other entities that shape customer experience and operational outcomes.

## 2. Hobart Airport context

Hobart Airport is Tasmania's primary passenger gateway. We welcomed 2.8 million passengers in 2025 and expect growth to 3.5 million passengers by 2030. We facilitate domestic flights to seven Australian cities and international services to Auckland, New Zealand.

As a mid-sized airport, Hobart Airport is capable of engaging constructively with the proposed framework, but we do not have the same corporate scale, staffing base or systems maturity as the largest capital city gateways. The Committee's consideration of the Bills should therefore place particular focus on whether the legislation, and the regulations that will follow, appropriately reflect diversity in airport scale, operational models, and resourcing.

## 3. Design principles: targeted, proportionate and workable

### 3.1 Accountability should follow operational control

A central principle for the framework should be that accountability aligns with operational control. Where this principle is not maintained, there is a risk of misallocated responsibility, inefficient complaint handling and poorer outcomes for consumers. Airlines control the elements of the journey that most directly affect consumer outcomes, such as scheduling, delays and cancellations, ticketing and refunds, baggage handling and passenger communications. Airports, by contrast, provide enabling infrastructure and services, but do not control airline operations or commercial decisions.

Hobart Airport's experience is consistent with this distinction. In our October 2025 submission, Hobart Airport noted that customer complaints are frequently attributable to enquiries that are

passed onto airlines or ground handlers. This underlines the importance of keeping the Ombuds Scheme tightly designed so it does not inadvertently shift the dispute burden created by airline performance onto airports.

### **3.2 The framework must scale with airport size and capability**

The Committee should ensure the Bills provide a sound foundation for subordinate legislation that is calibrated to scale. Mid-sized airports face a heightened risk of disproportionate burden if regulations assume 24/7 service models, dedicated complaints units, or large-airport corporate systems. A one-size-fits-all approach can divert limited resources away from consumer-facing improvements and into administrative compliance.

## **4. Scope of the Scheme and risk of expansion**

The scope of regulated ‘airport services’<sup>2</sup> will be a key determinant of effectiveness and fairness. Overly broad definitions risk drawing airports into complaints that are not directly connected to airport-controlled services, particularly where issues are caused by airline disruption but manifest in the airport precinct (for example congestion in kerbside areas, terminal queuing, or car parks).

*A typical instance of this complaint arises when departures from Hobart Airport are subject to substantial delays or cancellations, leading to an increased number of passengers remaining in the departures area for extended periods. During these situations, the airport experiences a noticeable uptick in feedback regarding passenger comfort, with seating becoming highly sought after and, at times, difficult to obtain. Airports are designed to provide adequate seating capacity for normal peak travel periods; however, accommodating the unexpected surges caused by delays and cancellations would necessitate additional infrastructure investment, incurring further costs.*

Scope settings should also avoid gradual expansion through delegated instruments without robust consultation and oversight. Many airport services such as amenities, seating and signage are context-dependent and scale-dependent. Expanding complaint eligibility into these areas without careful calibration risks creating obligations that are impractical for mid-sized airports and inconsistent across the network.

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<sup>2</sup> Part 1, Division 2, section 12 Meaning of *airport service*

## 5. Operation of the Aviation Consumer Ombuds Scheme

### 5.1 Misdirected complaints, triage and referral pathways

Hobart Airport seeks clear and operationally workable Scheme rules for triage and referral of misdirected complaints. In practice, airports are a visible and accessible point of contact for travellers, and passengers will often raise complaints at the airport regardless of whether the underlying issue is within airport or airline control.

Hobart Airport's complaint handling experience indicates that a share of customer contacts relate to matters that must be passed onto airlines or ground handlers. In our October 2025 submission, Hobart Airport noted that customer complaints are frequently (almost 50%) attributable to enquiries that are passed onto other parties.

The Scheme should therefore define how responsibilities apply where a consumer first contacts an airport about an airline matter. Hobart Airport requests clarity on: (a) when a complaint timeframe commences ('when the clock starts') for each regulated entity; (b) what constitutes a compliant referral or 'handoff' from an airport to an airline; and (c) how the Scheme will treat responsibility where impacts are multi-party or 'flow-on' in nature.

### 5.2 Information transfer, privacy and safeguards for sensitive information

Effective triage will require sharing limited information between parties in some cases. However, Scheme rules must include safeguards for personal, sensitive and commercially sensitive information. Hobart Airport supports investigatory powers and information sharing where necessary for dispute resolution, but requests that safeguards be explicit, particularly for notification requirements and clear consent settings for any transfer of personal information from an airport to an airline as part of a handoff.

### 5.3 Practical timeframes and 'stop the clock' provisions

Hobart Airport supports prompt acknowledgement and timely initial responses to complaints. In our February 2025 submission on the Aviation Customer Rights Charter, Hobart Airport supported automated acknowledgement within 24 hours and suggested a flexible 2–3 business day window for an initial response.

Hobart Airport also cautioned that strict resolution timeframes risk creating unrealistic expectations and recommended benchmarks that recognise complexity, including that a high proportion (for example 80–90%) of matters be resolved within a reasonable period, with flexibility for complex cases involving multiple parties.

Where resolution depends on third-party information or action (for example, where evidence is held by an airline or another party), definitive resolution may not always be possible within

prescribed timeframes. In our October 2025 submission, Hobart Airport supported ‘stop the clock’ provisions when awaiting third-party information to ensure fairness and transparency.

Similarly, in our October 2024 submission on the Aviation Industry Ombuds Scheme, Hobart Airport suggested that airports and airlines be provided with forty-two working days to resolve a complaint directly with the passenger prior to eligibility under the Scheme, including the ability to pause timeframes when awaiting information from the complainant. Timeframes should be expressed in working days, recognising that many airports do not operate a 24/7 corporate service model.

## **6. Proportionality, data burdens and unintended consequences**

Subordinate legislation will be critical in determining the administrative load placed on regulated entities. Hobart Airport has previously highlighted that extended complaint lodgement windows can create significant operational and cost burdens by increasing data retention requirements.

In our October 2025 submission on primary legislation consultation, Hobart Airport advised that increasing CCTV retention to support a 12-month complaint lodgement window could require additional server capacity costing approximately \$1 million compared to current settings.

The Committee should ensure the legislative settings support a proportionate approach to evidence retention and complaint lodgement periods, with dispensation criteria for genuinely late complaints rather than default settings that impose substantial ‘always on’ data burdens.

## **7. Funding model, membership and fees**

### **7.1 Ongoing operating costs should be borne by industry, but establishment should not**

Hobart Airport supports the principle that ongoing operating costs of the Aviation Consumer Ombuds Scheme should be borne by industry participants, provided contributions are fair and align with the drivers of Scheme activity. However, Hobart Airport considers it inappropriate for industry to be required to fund the establishment of a new national scheme in full.

It is also important to recognise that, beyond direct scheme contributions, regulated entities will incur substantial costs to upgrade, refresh, or develop new systems, services, and infrastructure to comply with the new regulatory settings. These investments may include enhancements to data retention and management systems, improved complaint handling processes, and the establishment of new governance and reporting frameworks. Such requirements will place

additional financial and operational burdens on airports and other industry participants as they work to meet the heightened standards and expectations introduced by the scheme.

In our October 2025 submission on aviation consumer protections primary legislation, Hobart Airport strongly supported Government co-funding during the initial stages of establishing new consumer protection mechanisms. Establishment costs include governance, systems build, implementation guidance and transitional capability-building. Government co-funding during establishment and transition would support orderly commencement and reduce the risk that compliance costs displace investment in consumer-facing improvements.

## **7.2 Levy and membership fee design must reflect causation, scale and regulatory effort**

Fee design should reflect that most aviation consumer complaints arise from airline-controlled matters, and airports should not be required to subsidise Scheme activity generated elsewhere in the system. A tiered approach, scaled by passenger volume and informed by complaint volumes and regulatory effort would better align costs with Scheme demand and reduce the risk of disproportionate burden on mid-sized airports.

In our October 2025 submission, Hobart Airport supported a low annual levy with most cost recovery managed through variable, per-matter levies, while also cautioning that per-matter charging can create unintended incentives if not designed carefully and paired with safeguards against vexatious escalation.

## **8. Accessibility, consumer education and clearer complaint pathways**

Hobart Airport supports improved accessibility outcomes and clear, enforceable minimum standards for passenger experience. We note that Tasmania has the highest proportion of people living with some sort of disability in Australia<sup>3</sup> (30.5%), underscoring the importance of practical accessibility improvements.

The framework should also include a strong consumer education function. The national survey underpinning the Aviation Consumer Ombuds Scheme<sup>4</sup> found that most Australians self-report a low level of understanding of their air travel rights (79%), and many hold misconceptions about roles and responsibilities. For example, 62% incorrectly believed airports are responsible for baggage management and baggage complaints (which is generally an airline responsibility). This aligns strongly with the experience of complaints managed by Hobart Airport, with spikes in complaints correlating with extended baggage wait times.

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<sup>3</sup> [Disability - Primary Health Tasmania](#)

<sup>4</sup> Aviation Consumer Ombuds Scheme Survey Report | BETA | April 2026

Confusion of this kind contributes to misdirected complaints, delays resolution, and increases administrative burden for airports and airlines alike. Clear, practical guidance for consumers on who is responsible for which parts of the journey, and straightforward complaint pathways, will improve timeliness and help ensure matters are directed to the appropriate entity early, reducing unnecessary escalation to the Ombuds Scheme.

## **9. Implementation and commencement: clarity in subordinate legislation**

Much of the framework's practical effect will be determined through subordinate legislation (regulations, instruments, rules and standards). Hobart Airport encourages the Committee to recommend phased implementation, with adequate transition time for regulated entities to establish policies, systems and training, and transparent consultation processes for levy settings and operational rules.

## **10. Conclusion**

Hobart Airport supports the objective of strengthening aviation consumer protections and establishing an independent mechanism for dispute resolution. The success of the framework will depend on ensuring that accountability follows control, scope remains targeted, complaint handling rules are workable in practice (including for misdirected complaints), and that the funding model is fair and proportionate.

With these refinements—particularly through carefully designed subordinate legislation—the framework can deliver meaningful improvements for aviation consumers while maintaining a sustainable and operationally workable environment for airports and other participants across Australia's diverse aviation network.



## About Hobart Airport

Hobart International Airport is Tasmania's primary passenger gateway, facilitating domestic and international air services and supporting the state's visitor economy, freight connectivity and essential services. For further information regarding this submission, please contact the Hobart Airport Corporate Affairs team.

## References to prior Hobart Airport submissions

- Hobart Airport, Response to the Aviation Industry Ombuds Scheme Consultation Paper, 17 October 2024.
- Hobart Airport, Submission to consultation on primary legislation – Aviation Consumer Protections, October 2025.
- Hobart Airport, Submission – Aviation Customer Rights Charter, 24 February 2025.

Should further information be required, please contact Erin McGoldrick, Head of Corporate Affairs at [REDACTED] or on [REDACTED].

## 11. Appendices

### Appendix A: Case studies

#### Example of a misdirected complaint.

**13 January 2026, a customer emailed Hobart Airport’s complaints department highlighting a prolonged wait time for baggage collection upon arrival.**

*.... I would like to express my concern over the length of time it takes for checked baggage to arrive. Today's (sic) flight JQ703 arrived at its parking location at around 12.01pm. Baggage carousel didn't start until 12.30, and it took three loadings for my bag to arrive at 12.42pm....*

This complaint was forwarded to the responsible ground handling company on the same day. Hobart Airport continues to advocate for airlines to increase ground handling resourcing during the busy summer period, as complaints such as the example provided increase during these periods.

**13 October 2025, a customer emailed Hobart Airport’s complaints department with a complaint about an airline check-in issue. The complaint was acknowledged and passed onto the appropriate airline within 72 hours of receipt.**

*I would like to file a formal complaint regarding the unprofessional and rude behavior (sic) of one of the staff members at the [REDACTED] check-in counter this evening.*

*At approximately 7:45 PM, I went to check in at the [REDACTED] counter. The male staff member of Asian appearance who was the first person on duty after the shift change asked me to weigh my luggage, and I did hear him. However, there was another person crouching in front of the baggage area blocking the space. I intended to wait until that person moved before placing my luggage on the scale.*

*The staff member could not see the situation and wrongly assumed I had not heard him. Instead of clarifying politely, he raised his voice in an extremely rude tone and loudly called out “Hello?” to me. I found this very disrespectful and unnecessary. When I signaled (sic) to him that there was someone blocking the area, he asked the person to move but never offered any apology for his behavior (sic).*



*This left me with a very unpleasant impression at the start of my journey. I expect your staff to communicate respectfully with passengers, not treat them rudely without understanding the situation.*

*I also understand that Hobart Airport is currently undergoing expansion and upgrades. While the facilities may become more modern and beautiful, the attitude of staff is what truly shapes each passenger's experience. If the staff remain rude, the investment in expansion loses much of its meaning.*

**Example of compliance burden triggered by extended evidence retention settings.**

Mandating a twelve-month window for lodging complaints would substantially increase the compliance burden for smaller airports, as they must retain extensive operational data for longer periods.

For Hobart Airport, accommodating this requirement would mean a considerable expansion of server infrastructure to store additional CCTV footage, resulting in an estimated extra cost of ~\$1 million. Given the airport's scale, the proportional impact of these expenses is far more acute than for larger airports.