

23 April 2026

Committee Secretary
Senate Standing Committees on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra ACT 2600

Sent by email

Dear Secretary

Submission to the Rural and Regional Affairs and Transport Legislation Committee

The Australian Human Rights Commission (Commission) welcomes the opportunity to make a submission to the Senate Standing Committee on Rural and Regional Affairs and Transport Legislation on the *Aviation Consumer Protection Bill 2026* (the Bill) and three related bills.

The Commission engaged closely to inform the development of the Aviation Consumer Protection Framework (Framework) over the past three years. This has included formal submissions to public consultations and ongoing discussions with the Department of Infrastructure, Transport, Regional Development, Communications, Sports and the Arts (Department).

While the Commission is supportive of the Framework being established, we remain concerned about the unresolved regulatory overlap in complaints handling between the Aviation Ombuds and the Commission. The Bill does not clearly address how the proposed aviation dispute resolution scheme will operate alongside existing anti-discrimination complaint mechanisms.

As Australia's National Human Rights Institution, the Commission has a long-standing complaints jurisdiction under federal discrimination law, including in relation to aviation services. In the absence of clear boundaries or coordination mechanisms, the Bill creates a real risk that the same complaint could be pursued in multiple jurisdictions, either at the same time or sequentially following an unsatisfactory outcome.

This lack of clarity is likely to result in duplication, inefficiencies and confusion for consumers, regulators and industry, as well as increased burden on respondents

and delays in resolving complaints. The Commission has consistently raised these concerns with the Department throughout earlier consultation processes, but they do not appear to have been resolved in the Bill. Addressing potential regulatory overlap by including protections against duplication would support better outcomes for consumers and industry. Any proposed information sharing arrangements will need to consider the significant statutory limitations the Commission has on what information can be shared with other bodies.

These issues and other outstanding concerns are discussed in more detail in the Commission's submission to the Aviation Consumer Protection Framework Consultation, dated 14 October 2025. We provide the submission to the Committee in the context of this inquiry.

We are available to discuss the issues raised in this submission with the Committee.

Yours sincerely



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Commissioner**

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