

## **Submission by David Walker – Chairman & Executive Director – ITC Pacific A11777**

**20 June 2025**

*As with my ATAS Charter 2022 submission, I continue to support a whole of industry approach to industry financial accreditation.*

*I offer the following comments regarding the current Australian Travel Accreditation Scheme (ATAS) Charter Version 7 – 29 August 2023.*

### **MEMBERSHIP**

#### **Membership**

- (b) Full ATIA members must be ATAS Accredited
- (c) Entities that choose **not** to be ATIA members may still apply to be **ATAS Participants** but must also demonstrate membership of an industry body, association or other relevant travel industry association. In the event of any conflict between the operation of any non-ATIA membership terms and conditions and this Charter, the ATAS Charter and Code provisions are to prevail.
- (d) *Individual who choose to be ATIA members are not bound by the ATAS Charter or Code of Conduct and are not eligible for accreditation*

*Currently 68% of the ATIA members are retail travel businesses.*

*ATIA needs to consider how this historic imbalance can be addressed to avoid a continued view that ATIA primarily represents retail travel businesses.*

1. *Increase the number of tour operator members, wholesale/consolidator, and corporate members*
  2. *Increase the number of Inbound/DMC members*
  3. *Highlighting and the promotion Membership categories should be the primary focus of ATIA not TTV. This would show better recognition and engagement with the various sectors within the industry.*
  4. *Encourage industry bodies, association or other relevant travel industry associations to become a member of ATIA.*
  5. *Consideration for Not-for-profit organisations to be offered free reciprocal membership*
- 2.5. Eligibility Criteria For an applicant to become an ATAS Participant to remain as such, all of the following eligibility criteria must at all times be satisfied:
- (a) **Meet the ATAS definition of a ‘Travel Intermediary’**
- For the purposes of ATAS, a ‘Travel Intermediary’ is an entity, domiciled, registered or incorporated in Australia, which sells a travel product on behalf of a travel supplier.
- A ‘Travel Intermediary’ includes, but is not limited to, travel management company, aggregator, distributor, online travel agent, inbound and outbound tour operators, wholesaler and a consolidator *and their employees?? (as per 2.1 (a) definition.*
- Reference to employees is not included in this clause 2.5 (a)*

Foreign companies may also become ATAS *participants* if they are registered under the Corporations Act 2001 (Cth), have obtained an Australian Registered Body Number

(ARBN) or Australian Business Number (ABN), and they sell travel products on behalf of a travel supplier.

(j) **Workforce Development**

*Retail Travel applicants* must ensure that 50 per cent of its consumer-facing staff holds a Certificate III – Travel, or equivalent. *(is this realistic for wholesalers/tour operators)*

(p) **Criteria 9 (start-up businesses only)**

An applicant who is a start-up business must provide the following:

(iii) Copy of your ASIC Company and Historical extract;

(iv) *Australian Taxation Office (ATO) Tax file number*

(v) Copy of your most recent bank account statements, (including the set-up of a client account); and

(vi) *Certificate of Currency for Professional Liability and Public insurance*

(vii) *Certificate of Currency for WorkCover*

(viii) *Copy of Terms & Conditions*

(ix) *Copy of Complaints Handling Procedures*

(v) Such other information as may be requested.

## 2.6. ATAS Participation Fee Structure for Full Member Membership

The ATAS participation Fee structure is based on the applicant's total transaction value (TTV), whether it operates in a single location or more than one location, and whether it operates online or offline or both.

Category	Number	Description
Category One	One	An entity with an annual TTV of less than \$1m (AUD)
Category Two	Two	An entity with an annual TTV between \$1m and \$2.5m
Category Three	Three	An entity with an annual TTV of between \$2.5m and \$5m
Category Four	Four	An entity with an annual TTV of between \$5m and \$10m
Category Five	Five	An entity with an annual TTV of between \$10m and \$100m
Category Six	Six	An entity with an annual TTV of between \$100m and \$250m
Category Seven	Seven	An entity with a TTV of more than \$250m and less than \$1billion
Category Eight	Eight	An entity with a TTV of more than \$1billion

*I suggest Category 1 is only for start-ups. If a business has not achieved \$1m in TTV by the end of their 1<sup>st</sup> year I question whether they should continue to hold an ATIA full membership.*

## 3 ATIA GENERAL COMMITMENTS

*There is regular reference to the 'Code' in the Charter and this is covered in the definitions section which states that the Code refers to the Code of Conduct, however consideration should be given to stating the full wording in each instance – that being Code of Conduct, as 'Code' is not specific and does not reinforce a reference to 'Conduct'.*

## 9 DEFINITIONS AND INTERPRETATIONS

**Entity** means a sole trader, partnership, trust or company (proprietary limited or limited). **It does not include** independent contractors, sub-agents, branch offices, or **persons employed by an entity.**

2.1(a) **A travel intermediary is an entity** that is domiciled, registered or incorporated in Australia, and provides a travel service on behalf of a travel supplier. This includes, but is not limited to, a travel agent, travel management company, aggregator, distributor, online travel agent, inbound or outbound tour operator, wholesaler and a consolidator, **and their employees**, industry body, association or other relevant travel industry association.

***There seems to be a contradiction here??***

***Additional Comments:***

- 1. There are a number of industry associations that now or will have their own accreditation that includes a financial assessment that duplicates ATAS financial assessment. Consideration should be given by ATAS to the recognition of these 'other' financial assessments that will allow those members to receive ATAS Accreditation.*
- 2. Does the Charter need to define that the financial assessment is now undertaken in-house or by other appointed external accountants.*
- 3. The industry is moving away from the term 'travel agents' to 'travel advisors'.*