

Department of Infrastructure, Transport,
Regional Development, Communications, Sport and the Arts
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ATIA Submission – Improving the reporting and publishing of data on airline performance and competition

The Australian Travel Industry Association (ATIA) welcomes the opportunity to provide feedback on the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts' consultation on *Improving the reporting and publishing of data on airline performance and competition*.

ATIA is the national industry association representing Australian travel agents, tour operators, consolidators and wholesalers, who are reliant on a reliable and competitive aviation sector to effectively serve consumers and support a strong and sustainable travel sector.

ATIA supported the Aviation White Paper process and, in our submission, emphasised the importance of stronger airline performance reporting, including improved transparency around delays, cancellations and competition across the aviation sector. ATIA supports efforts to improve transparency for consumers and industry, recognising the role that high-quality data and reporting plays in strengthening confidence and accountability across the aviation system.

As these measures are developed, careful consideration must be given to where reporting and publication functions are best placed, including how best to make use of existing institutional expertise and oversight capability. This will help ensure the information produced is consistent, meaningful, and able to support sustained oversight and public confidence in the aviation system.

Initiative 3 – Reporting on airline delay and cancellation

ATIA supports the proposal to include a new provision in the Air Navigation Regulation requiring airlines to record the reasons for flight delays and cancellations, and when requested, provide this information to the Department as part of regular reporting of flight data to the Bureau of Infrastructure, Transport and Regional Economics (BITRE). This support reflects the significant impact that delays and cancellations have on travellers and the broader economy.

Flight delays and cancellations are among the most visible and disruptive issues facing travellers, with significant flow-on effects for travel agents, tour operators, and the wider economy. Even a modest decline in passenger confidence can have substantial economic consequences. Research shows that a 5 per cent reduction in passengers due to cancellations results in approximately \$223 million in lost domestic tourism expenditure nationally each year, increasing to around \$892 million if 20 per cent of passengers choose not to fly.¹ Greater transparency around the causes of disruption is therefore critical to improving accountability, enabling informed consumer choice, and safeguarding the economic contribution of Australia's travel and tourism sector.

In terms of how this information is recorded and reported, ATIA considers the proposed alignment of delay and cancellation reason codes with the International Air Transport Association's (IATA) Airport Handling Manual (AHM) and Standard Schedules Information Manual (SSIM) to be a practical and appropriate approach. These frameworks are already embedded in airline operational systems and

¹ Reliability and Cancellation Trends in Australian Aviation, Dr Tony Webber, CEO of Airline Intelligence and Research, and former Qantas Chief Economist.

international reporting practices. Leveraging existing, globally recognised classifications will promote consistency, support meaningful comparisons, and minimise additional reporting burden for airlines.

ATIA also welcomes the proposal that reported delay and cancellation reasons may be subject to audit through the proposed consumer protection framework. The ability to verify reported data is an important safeguard that should support confidence in its integrity, discourage misclassification, and ensure reporting delivers accountability.

Initiative 16 – Supporting transparency and scrutiny

ATIA is supportive of the proposal to publish additional data on aviation competition indicators. Transparent and accessible information about market conditions is essential to building consumer confidence, enabling informed decision-making, and facilitating appropriate scrutiny in a sector that is highly concentrated and subject to limited competitive pressure.

In implementing these measures, careful consideration should be given to the most appropriate placement of reporting and publication functions. This includes leveraging existing institutional expertise to ensure outcomes remain meaningful, consistent, and accountable over time, while avoiding unnecessary duplication.

The Australian Competition and Consumer Commission (ACCC) currently undertakes quarterly monitoring and reporting on the prices, costs and profits of domestic air passenger transport services, under a direction issued by the Treasurer in November 2023. This direction remains in place until 31 December 2026, following an earlier monitoring period from June 2020 to June 2023.

ATIA welcomed the Government’s decision to re-implement domestic airline competition monitoring by the ACCC, and advocated for its reinstatement. Importantly, the ACCC has the established systems, specialist expertise and dedicated resources required to analyse aviation market data and undertake ongoing monitoring of the domestic aviation sector. The ACCC’s public reporting plays an important role in translating complex aviation market information into a form that is accessible and understandable to consumers and other stakeholders, supporting informed public scrutiny. These reports also provide government and stakeholders with a consistent, reliable evidence base in a market where competition remains constrained, supporting broader public policy development.

As the ACCC has itself observed, its monitoring activities have strengthened its understanding of the aviation sector, provided early visibility of emerging competition and consumer issues, and enabled it to respond more quickly as concerns arise and to be better informed when undertaking related investigations.

Given the highly concentrated nature of Australia’s domestic aviation market, ATIA considers ongoing independent competition monitoring to be essential. ATIA recognises that decisions regarding the continuation of the ACCC’s Domestic Airline Competition Monitoring and Reporting function beyond its current end date of 31 December 2026 are a matter for Government. Noting this, ATIA strongly supports the continuation of this function on an ongoing basis, given its role in supporting sustained transparency, strengthening regulatory oversight, and ensuring emerging competition and consumer issues are identified and addressed in a timely manner.

ATIA considers the ACCC to be the most appropriate body to lead aviation competition monitoring and reporting, given its statutory role, independence, and ability to act where competition or consumer concerns arise. While enhanced data publication by BITRE will provide valuable insights into airline performance, it should not be viewed as a substitute for the ACCC’s ongoing monitoring and public reporting. Any duplicative reporting arrangements would impose unnecessary additional costs on stakeholders and risk fragmenting the evidence base available to policymakers and the public.

ATIA supports a complementary approach, whereby enhanced data publication strengthens transparency, while ACCC monitoring provides ongoing independent scrutiny of competition conditions in Australia’s domestic aviation sector.

ATIA thanks the Department for the opportunity to provide feedback on the proposed initiatives. We would be pleased to provide further information or clarification if required.

Yours sincerely



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