

Submission by David Walker Chairman & Executive Director ITC Pacific Pty Ltd A11777

I have read through the ATAS Charter and Code of Conduct documents and taking into account the recent collaboration, as a result of COVID, of the three peak industry bodies (AFTA/CATO/A TEC), I would support a whole of travel industry approach. Whole of industry meaning travel intermediaries.

As defined in the Charter, an ATAS participant as a travel intermediary, is an entity that provides/sells a travel service on behalf of a travel (or product – my inclusion) supplier. This includes but not limited to, a travel agent, travel management company, aggregator, distributor, on-line travel agent, inbound tour operator, wholesaler and consolidator.

It does not specifically mention outbound or domestic tour operators.

A travel supplier is defined as an entity that provides transport, accommodation, tourist or travel business services of facilities, travel insurance, holidays, packages, or any other arrangements designated as travel arrangements by the AFTA board from time to time.

Maybe a definition of a **product supplier** would be any entity that supplies their owned source product.

Where the term Travel Agents is referenced, maybe 'Travel Retailers' is more appropriate within the context of the charter document, which clearly distinguishes Travel Agents as an intermediary retailer as opposed to an intermediary wholesaler/tour operator/ITO.

Overall the ATAS charter would be acceptable as a uniform, whole of industry charter that individual organisations such as CATO/SETO, AFTA and ATEC could put as a requirement of membership. In addition, the various bodies could have addendums that cover additional membership accreditation requirements specific to their sector.

I would support the renaming of ATAS to the Australian Travel Accreditation Scheme. Any role that AFTA previously played in administrating ATAS would have to be replaced by another governing body. (see attachment)

My suggestion here would be something like the 'Travel Intermediary Board of Administration'.

Board members would be CEO/MD's from AFTA, CATO/SETO and ATEC or their representative.

Under this would be ATAS who's board would be appointed by the Travel Intermediary Board of Administration. Under ATAS would be the ATAS Complaints Appeal Committee (ACAC) who's board would be appointed by the ATAS board and/or the Travel Intermediary Board of Administration.

Under some sections of the Charter the reference to travel agents should be replaced by the term travel intermediary entities/businesses.

I would see the Travel Intermediary Board of Administration appointing a CEO of ATAS who would have overall responsibility of the operation and ensure ATAS is aligned with the Travel Intermediary Board of Administration direction.

As per the Charter there would also be an ATAS Compliance Manager to assess applications.

Any reference to AFTA would be replaced by the Travel Intermediary Board of Administration who would also formally approve the ATAS Code of Conduct, Charter, commissioning relevant reviews, ensuring ATAS's effective operation (such as approving recommended fee levels), and consider any recommendations or reports from the ATAS CEO, Compliance Manager or ACAC.

I am also ok with the solvency indicators.

The Terms of Reference for the review I suspect would limit consideration of some of the above as the review is confined to the ATAS Charter and Code of Conduct.

David Walker
Chairman & Executive Director
ITC Pacific Pty Ltd