

The General Manager
Adjudication Branch
Australian Competition and Consumer Commission
P O Box 1199
DICKSON ACT 2602

Ref: C2004/436

Applications for Authorisation lodged by the Department of Industry, Tourism & Resources relating to the preferential/ exclusive treatment of accredited tourism businesses (A90912 and A90913)

Dear Sir / Madam,

We are responding to your request for submissions by interested parties to the above applications.

The AITT, established in 1966 is a forum concerned with professional development across all sectors of Travel & Tourism & Hospitality. The institute was instrumental in developing the concept of professionalism in the retail travel sector and an active participant in the introduction of Travel Agency Licensing.

In fact, the industry led the drive towards licensing and accreditation of individuals and along with other travel industry bodies notably the Australian Federation of Travel Agents, established the Australian Travel Training Review Panel which operated as a committee of Travel Training Australia.

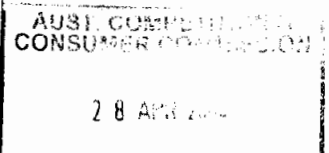
As the industry developed and grew we have been concerned at the competencies of the trainers and the variability in skills of the tourism graduates. The result was that we developed a National Industry Framework Recognition System that identified jobs within the Retail Travel Sector; the skills & relevant levels for those jobs; skills for industry trainers and accredited curriculum. This was an industry forerunner to the Australian Quality Training Framework.

The Institute's attempt to do this was the inclusion of a (L) category membership of the Institute in the Victorian licensing criteria.

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An ongoing concern of the Institute remains the degree of variance between states and for some time we have sought both State and Federal governments to establish national criteria for eligibility across Australia. If we have national training competencies, then surely we can have national standards of performance

It is our opinion that both the consumer and employees would be better serviced by such a standard being set. Consumer because they could be assured of a national level of competence held by those who provide the service and take their funds. The employee, because with national qualifications, they could more easily demonstrate their competencies to an acknowledged standard.

Subsequent to the establishment of the Travel Agents Act 1986 and the Travel Agents Regulations 1997, a number of reviews have been proposed and we are currently aware of a "national Co-operative Scheme for the regulation of Travel Agents" being conducted by the Department of Consumer and Employment Protection, Government of Western Australia.

While we support this application, we strongly urge you to make contact with Gerard Milford in WA on and at least seek consistency across the decisions of the departments even if they do not exactly overlap.

Yours sincerely

Clíodhna M Rae
Federal Secretariat & Victorian Chair

23/04/2004.

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