



15 Nov 2024

**Mr David Hatfield**

Director Competition Exemptions – Mergers, Exemptions & Digital  
**Australian Competition & Consumer Commission (ACCC)**  
GPO Box 3131 Canberra, ACT 2601

By email: [exemptions@accc.gov.au](mailto:exemptions@accc.gov.au)



Dear Mr Hatfield,

**Re: Board of Airline Representatives of Australia Inc application for revocation of authorisation A91466 and substitution of authorisation AA1000682 – Interested party consultation**

We refer to your email letter inviting submissions in relation to the above referred application by Board of Airline Representatives of Australia Inc (BARA).

AirAsia Group supports BARA's request for a new authorisation to continue to undertake collective bargaining negotiations for essential aviation services on behalf of member airlines. Currently, six airlines within the Group are BARA members, namely AirAsia Berhad, AirAsia X, Thai AirAsia, Thai AirAsia X, Indonesia AirAsia, and Philippines AirAsia.

BARA's efforts to date under authorisation in negotiations with the major Australian airports and other aviation service suppliers has been critical in delivering more effective & efficient outcomes for airlines operating internationally to and from Australia and has resulted in improved overall commercial outcomes. As detailed in BARA's submission, airport charges and other essential aviation service charges are a significant and growing cost for airlines, and more cost-effective outcomes directly contribute to our ability to provide competitive airfares to Australian consumers, especially so for low-cost carriers such as ourselves. Without BARA's authorised ability to negotiate collectively, individual airlines would have little ability to provide meaningful input into the terms or cost at which they must acquire such essential aviation services.

Under the terms of the existing authorisation, BARA has been able to provide the expertise and resources necessary to effectively coordinate and represent the collective view of member airlines. In addition to achieving positive commercial outcomes, this has also reduced the likely costs that we would otherwise have needed to incur to achieve similar outcomes acting individually.

**AirAsia Aviation Group Limited**

Company No. LL03901

Registered Address:

Principle Place of Business:  
RedQ, Jalan Pekeliling 5  
Lapangan Terbang Antarabangsa Kuala Lumpur (klia2)  
64000 KLIA, Selangor, Malaysia

Level 5(A), Main Office Tower  
Financial Park Labuan Complex, Jalan Merdeka  
87000 Federal Territory of Labuan, Malaysia



Finally, the collective approach of BARA also facilitates a more collaborative interaction with suppliers which encourages both a more thorough exchange of information and improved infrastructure and service outcomes of benefit to all parties as a result.

Yours sincerely,

A handwritten signature in black ink, appearing to be "Michael Simionescu". The signature is fluid and cursive, with a large initial "M" and "S".

**Michael Simionescu**  
Group Head, Airport Partnerships & Incentives  
AirAsia Aviation Group