



JAPAN AIRLINES

Japan Airlines Co., Ltd.

GPO Box 686
SYDNEY NSW 2001
AUSTRALIA

14 November 2024

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

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 invitation published on the ACCC website for submissions from interested parties to comment on the application by the Board of Airline Representatives of Australia Inc. (BARA) as detailed above.

Japan Airlines fully supports BARA's request for a new authorisation to continue to undertake collective bargaining negotiations for essential aviation services on behalf of member airlines.

BARA's efforts to date, under ACCC authorisation, in negotiations with the major Australian airports and other aviation service suppliers has been critical in delivering more effective and efficient outcomes for many 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 and increased services to Australian consumers. Japan Airlines' presence in Australia is relatively small when compared to some other airlines, so we do not possess the ability to negotiate with multiple airports and service providers in an efficient manner. Without BARA's authorised ability to negotiate collectively, we would have little ability to provide meaningful input into the terms or costs at which we 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 superior commercial outcomes, this has also significantly

reduced the likely costs that we would otherwise have needed to incur to achieve similar outcomes acting individually.

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,

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Hitoshi Hanasaki

Vice President and Regional Manager Australia & New Zealand
Japan Airlines Co., Ltd.