

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@acc.gov.au](mailto:exemptions@acc.gov.au), [REDACTED]

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).

Malaysia Airlines 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 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. Without BARA's authorised ability to negotiate collectively, Malaysia Airlines would have little ability to provide meaningful input into the terms or cost at which we must acquire such essential aviation services. In addition the cost of negotiating such agreements with all authorities would be both costly and time consuming for the airline and likely lead to higher costs that would be passed on to consumers via pricing.

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.

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. The ongoing negotiations on airport developments at most Australian airports are extremely complex in nature and without the expertise of BARA's team Malaysia Airlines believes the outcomes for our customers and Malaysia Airlines commercially would be significantly worse.

Yours sincerely,

*Giles Gilbert*

Giles Gilbert

Regional Manager ANZ and South West Pacific

Malaysia Airlines



**malaysia** airlines

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