

14 November 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

[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

Thank you for your email letter inviting submissions in relation to the above referred application by Board of Airline Representatives of Australia Inc (BARA). Nauru 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.

We believe that 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 the airlines operating internationally to and from Australia and has resulted in improved overall commercial outcomes. As was detailed in BARA's submission, airport charges and other essential aviation service charges are a significant and rapidly growing cost for airlines. More cost-effective outcomes directly contribute to our ability to provide competitive airfares to Australian consumers. 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 does an excellent job of providing 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 and the time that we would otherwise have needed to incur to achieve similar outcomes if acting individually.

Finally, the collective approach of BARA also facilitates a 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 read 'B. Gebers', written in a cursive style.

Brett Gebers (CEO)

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