

QR/1120/24  
20 November 2024

**Mr. David Hatfield**

Director Competition Exemptions – Mergers, Exemptions & Digital  
Australian Competition & Consumer Commission (ACCC)  
Canberra ACT

Email: exemptions@acc.gov.au; [REDACTED]

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

Dear Mr. Hatfield,

I refer to your email correspondence inviting submissions in respect of the above application by Board of Airline Representatives of Australia Inc (**BARA**).

Qatar Airways is supportive of BARA's request for revocation of the existing authorisation and substitution of the new authorisation so as to continue to undertake collective bargaining negotiations for essential aviation services on behalf of its member airlines.

Under the current authorisation, BARA has engaged in negotiations with the major Australian airports and other aviation service suppliers, which has been critical in delivering more effective and efficient outcomes for airlines operating internationally to and from Australia, and provided improved commercial outcomes for the member airlines.

As detailed in BARA's submission, airport charges and other essential aviation service charges are a significant and growing cost for airlines, and BARA's efforts have lowered costs and directly contributed to our ability to provide competitive airfares to Australian consumers. Without BARA's authorised ability to negotiate collectively, individual airlines would have little influence on the terms or cost at which they must acquire essential aviation services, from what are often the sole suppliers of those 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 transaction and other costs that individual airlines would otherwise need to incur, acting individually.

BARA's collective approach also facilitates a greater ability to effectively contribute to the negotiation process with suppliers. That collective approach encourages consistent information provided to individual airlines from suppliers, and more efficient infrastructure investment and services outcome by member airlines, which is to the benefit of the flying public.

Thank you for the opportunity to contribute to this consultation. Should you require any additional information please do not hesitate to contact the undersigned.

Yours sincerely,

[REDACTED]  
**Justin Kestel**  
Regional Manager – Australia & New Zealand  
Qatar Airways

