

8<sup>th</sup> 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](mailto:exemptions@acc.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).

Scoot Pte. Ltd supports BARA's request for a new authorisation to continue collective bargaining negotiations for essential aviation services on behalf of its member airlines. As a low-cost carrier, our primary focus is on maintaining the lowest operational costs to deliver safe and economical passenger services, which in turn fosters economic prosperity for Australia and the destinations we serve.

BARA's efforts under the current authorisation have been instrumental in negotiating with major Australian airports and other aviation service suppliers. These negotiations have led to more effective and efficient outcomes for airlines operating internationally to and from Australia, ultimately resulting in improved commercial conditions. As highlighted in BARA's submission, airport charges and other essential aviation service fees represent a significant and escalating cost for airlines. Achieving more cost-effective outcomes is crucial for us to offer competitive airfares to our customers. Without BARA's collective bargaining authority, individual airlines like Scoot would struggle to exert meaningful influence over the terms and costs of essential aviation services.

The existing authorisation has enabled BARA to leverage its expertise and resources to effectively represent the collective interests of member airlines and our passengers. This collaborative approach not only leads to superior commercial outcomes but also significantly reduces the costs we would otherwise incur if negotiating independently.

Moreover, BARA's collective strategy fosters a more cooperative relationship with suppliers, promoting a thorough exchange of information and enhancing infrastructure and service outcomes that benefit all stakeholders involved.

Yours sincerely,  
Adam Kelly  
General Manager Australia  
Scoot Pte. Ltd