



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

14 November 2024

Via email:

exemptions@accc.gov.au

Dear Mr Hatfield,

Board Of Airline Representatives' (BARA) Application for revocation of authorisation A91466 and substitution of Authorisation AA1000682

Singapore Airlines appreciates the opportunity to comment on BARA's application for re-authorisation to collectively negotiate on behalf of BARA member airlines.

Singapore Airlines has been a member of BARA since 1974. Under the current ACCC Authorisation, BARA has been able to provide a consolidated airline voice to Australian airport operators and service providers, facilitating robust negotiations to achieve better outcomes for all. BARA also provides consolidated feedback on long term airport investments, to ensure these are fit-for-purpose and cost efficient, as well as plays a critical role in ensuring that cost recovery for such investments through various airport charges is financially viable for the travel industry.

BARA's approach also encourages a collaborative interaction between airlines and airport service providers through the exchange of relevant information, to jointly identify and address areas for efficiency improvements, with the objective of improving passengers' experience.

Under terms of the existing authorisation, BARA has been able to provide the expertise and resources necessary to formulate and represent the collective view of its members. This has helped achieve superior outcomes which would not be possible if each airline acted individually.

Singapore Airlines wishes to underline the critical importance of BARA's role in providing a collective voice on areas that impact Australia's international aviation sector, and requests favourable consideration of BARA's application for a new authorisation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Louis Arul'.

Louis Arul
Regional Vice President South West Pacific
Singapore Airlines Limited

