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

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).

South African Airways 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 South African Airways and other international operating carriers to and from Australia. These are improved outcomes we can certainly attest to. As per BARA's submission, airport charges and other essential aviation service charges are a significant and growing cost for all 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, individual airlines would not have the scale or resources to provide meaningful input into the terms or cost at which they must acquire such essential aviation services. This is of upmost importance to South African Airways, as with a relatively small footprint in Australia, such efficiencies assist us to ensure sustainability whilst operating to/from Australia.

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.

The collective approach of BARA also facilitates a more collaborative interaction with suppliers. This encourages both a more thorough exchange of information and improved infrastructure which leads to improved service outcomes for both customer and operator.

Yours sincerely,



Michael Hall
Country Manager Australia