

26 November 2024

Ms Tess Macrae
Director, Competition Exemptions
Australian Competition & Consumer Commission

Via online portal

Dear Ms Macrae,

BARA authorisation application – AA1000682

Thank you for the opportunity to comment on the authorisation application by the Board of Airline Representatives of Australia Inc (**BARA**).

Sydney Airport (**SYD**) supports BARA's application for re-authorisation.

SYD is in continuous dialogue with our airline partners and BARA on various issues including pricing, investment, infrastructure allocation, sustainability, efficiency, and improving service quality for passengers. BARA represents 30 of the 48 airlines that currently operate at Sydney Airport. SYD and BARA have a constructive and collaborative relationship, and a long history of being able to reach commercial outcomes, including most recently in the aviation industry's recovery in the challenging post-COVID environment.

BARA plays an important role in commercial negotiations with SYD, providing local representation for international carriers with limited presence in Australia to help streamline negotiations and facilitate faster outcomes. BARA also plays an important broader role in representing a unified airline voice on operational issues to improve the service, efficiency, and safety outcomes for international passengers at Sydney Airport. SYD supports BARA's continuation in these roles and considers that the re-authorisation may help facilitate public benefits such as:

- streamlined commercial negotiations on price and non-price terms of access to airport infrastructure;
- a unified voice on the operational needs of international carriers;
- improved service outcomes for passengers, including through supporting efficiency improvements with airlines at Sydney Airport (for example, less queuing, better on time performance, more predictable journey times for passengers); and
- improved noise and emissions outcomes for the aviation industry.

SYD also recognises that international airlines may have bespoke strategic, service, product or operational requirements. In this context, SYD often negotiates with airlines directly (outside of the BARA collective negotiation process) to meet airlines' bespoke needs. SYD supports the continuation of the conditions on authorisation set out in the application, including that no party is compelled to engage in collective negotiations and that BARA does not bind any members to the terms negotiated by BARA. Direct negotiations between an airline and SYD can lead to innovative commercial outcomes which benefit the airline, SYD and the travelling public. This is particularly so in the context where SYD competes with other airports (for example, MEL, BNE, AKL, and WSI) to attract airlines, routes, additional service frequencies, and passengers

SYD looks forward to continuing its engagement with airline partners individually and via BARA (if reauthorised) to achieve the best outcomes for passengers through service, efficiency and innovation.

If you have questions in relation to this submission, please direct them to Lisa Lucak (Head of Legal Services) at lisa.lucak@syd.com.au.

Sincerely,



Greg Botham
Group Executive, Aviation Growth and Group Strategy