

Australian Competition and Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2601

24 April 2026

By email: exemptions@accc.gov.au

Dear ACCC

RE: Singapore Airlines and Ors application for authorisation AA1000716

The Australian Travel Industry Association (ATIA) welcomes the opportunity to make a submission to the Australian Competition and Consumer Commission (ACCC) in relation to the application for authorisation from Singapore Airlines Limited and All Nippon Airways Co Ltd.

ATIA is the peak body representing travel agents, tour operators, consolidators and wholesalers. ATIA strives to promote and advocate for effective competition across the entire travel sector, which is critical for the effective operation of markets, so that businesses have the incentive to operate efficiently, price competitively and offer products valued by consumers. This in turn delivers benefits to the Australian community and economy through innovation, lower prices and improved product offerings.

The proposed authorisation would provide the applicants with legal protection from competition laws to coordinate certain operations on services between Japan and Singapore, Australia, India, Indonesia, and Malaysia, and engage in other commercial cooperation in respect of passenger air transport services between Japan and certain other countries in Asia and Africa.

ATIA recognises there may be a level of public benefit in the supply of international air transport services under the proposed authorisation and does not provide comment on this element of the application.

ATIA's comments in relation to this application are focused on the extent to which the proposed conduct may affect competition in the sale of international travel services.

Sale of international travel services

From ATIA's perspective, it is not clear on the face of the application whether the proposed conduct extends to matters relevant to the sale of international air travel services. In particular, it is unclear whether the application seeks to permit coordination or information sharing in relation to distribution strategies relating to agency arrangements, including commission structures. No evidence has been provided of the likely public benefit or detriment if such conduct is included.

Given this lack of clarity, ATIA requests that the ACCC confirm whether the definitions and scope of the proposed conduct are intended to include any coordination or information sharing in relation to agency arrangements, including commission structures and other terms of engagement with travel agents.

The absence of clarity on this point has limited ATIA's ability to assess the likely impact of the proposed conduct on competition in the sale of international air travel services and, in turn, the likely public benefit or detriment. ATIA reserves the right to make a supplementary submission should further information be made available.

Notwithstanding this, ATIA makes the following general observations in relation to competition in the sale of international air travel services. As a general principle, coordination between competing airlines in relation to distribution strategies and agency arrangements has the potential to lessen

competition in the market, including by weakening the role of independent distribution channels in facilitating comparison and substitution between competing airline products.

To the extent that such coordination extends to commission structures or other terms offered to travel agents, it may impair the ability of those channels to facilitate effective comparison between competing airline products. This may, in turn, affect the process by which consumers access, compare and purchase international air travel, with flow-on implications for pricing, service quality and choice.

In ATIA's view, any authorisation should be clearly confined so as not to permit coordination in relation to agency arrangements, unless and until it can be demonstrated that such conduct is necessary to achieve public benefits that outweigh the likely detriment. In the absence of clarity as to whether the proposed conduct extends to these matters, the potential competition impacts cannot be properly assessed.

ATIA thanks the ACCC for the opportunity to make this submission and would welcome the opportunity to comment further should the scope of the proposed conduct be clarified.

Yours sincerely

Ingrid Fraser

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