



Our reference: Let. 20241223

23 December 2024

Department of Infrastructure, Transport, Regional Development Communications and the Arts  
GPO Box 594  
CANBERRA ACT 2601  
AUSTRALIA

### **BARA Response to Flight Priorities Review; Draft AIP ENR 1.4-6**

The Board of Airline representatives Australia (BARA) is an industry association representing the interests of the majority of international carriers that serve Australia, providing ~60% of all international aviation capacity operated to Australia (Bureau of Infrastructure & Transport Research Economics (BITRE) CY2023 data). A list of current BARA members is provided as Appendix A.

BARA has consulted members who are broadly supportive of the contents of AIP ENR 1.4 – 6. However, members consider that the potential prioritisation of long-haul flights (under specific conditions) should not be limited to the stated regions (as drafted under 6.2 d(i)) but rather apply generally to all international flights to Australia.

The majority of international flights to Australia are long-haul (defined as over 6 hours duration) and even the closest international destinations are mid-haul operations (3-6 hours). BARA understands the intent of this amendment is to provide ATM controllers the regulatory flexibility to make the most appropriate decisions with respect to prioritising inbound international flights, such that associated downstream network and ATC disruption is minimised. As such, BARA considers that broadening the definition to capture a broader scope of international traffic to Class C terminal control areas (associated with BNE, MEL, PER & SYD) would facilitate a more equitable and practical outcome.

BARA thanks the Department for encouraging input and appreciates the opportunity to provide these comments. Please contact BARA should you wish for any further clarification on any point.

Yours sincerely

Stephen Pearse  
**Executive Director**

*Appendix A: BARA member airline list*



## Appendix A: Current BARA Airline members

- AIRASIA X
- AIR ASIA Berhad
- INDONESIA AIR ASIA
- PHILIPPINES AIR ASIA
- THAI AIR ASIA
- THAI AIR ASIA X

AIR CANADA

AIR NIUGINI

AIR MAURITIUS

AIR NEW ZEALAND

AIRCALIN

AIR VANUATU

ALL NIPPON AIRWAYS

AMERICAN AIRLINES

ASIANA AIRLINES

CATHAY PACIFIC AIRWAYS

CHINA AIRLINES

CHINA EASTERN AIRLINES

CHINA SOUTHERN AIRLINES

DELTA AIR LINES

ETIHAD AIRWAYS

EVA AIRWAYS

FIJI AIRWAYS

GARUDA INDONESIA

HAWAIIAN AIRLINES

JAPAN AIRLINES

LATAM AIRLINES

MALAYSIA AIRLINES

NAURU AIRLINES

PHILIPPINE AIRLINES

QATAR AIRWAYS

ROYAL BRUNEI AIRLINES

SCOOT

SINGAPORE AIRLINES

SOLOMON AIRLINES

SOUTH AFRICAN AIRWAYS

SRILANKAN AIRLINES

THAI AIRWAYS INTERNATIONAL

TURKISH AIRLINES

UNITED AIRLINES

VIETNAM AIRLINES

VIRGIN AUSTRALIA