



24 October 2021

Re: AA1000585 – The University of Adelaide & Ors – submission

Dear Australian Competition and Consumer Commission,

I write to provide a comment on the application for authorisation from The University of Adelaide, Flinders University and The University of South Australia to enable universities and other education providers to jointly establish and effect travel and quarantine accommodation arrangements to facilitate the return of international students to study on-campus at premises in South Australia.

The pandemic has left an estimated 140,000 offshore international students to be stranded in their home countries and not able to come to Australia due to border closures. CISA had overwhelming feedback that online studies just aren't working, additionally, this is not what international students paid for, they paid for quality, face to face education. Offshore students suffer a distinct lack of belonging to their university too, with a lot of them didn't even get to physically see how their campus look like. For those who have went back right before the pandemic, they want to be connected with their peers. A recent report also suggests overseas students suffered from poor mental health, especially if they came from a country with large amount of COVID cases. We have also seen universities forced to cut their staff due to lack of international student enrolment. There also has been cases of medical international students (non-final years) who must attend compulsory face to face practicals in Australia to progress through their studies and are unable to. They have now delayed their studies for two whole years and are looking at the possibility of it being delayed for another further year. There is a clear urgency of the need to bring back our international students.

After seeking further information from the applicant:

“Advice from the State Government indicates that the Commonwealth Government approval of our ISAP requires the sector to appoint a single travel management company (TMC) to support the implementation of our plan. As we understand it, the Commonwealth also requires the sector to use a TMC with sufficient capacity and with relevant experience in the current environment. Implementation details of the SA ISAP are not yet finalised and cannot be finalised until after we hear back from the ACCC. As such, it is important to note that no formal appointment of a TMC for the implementation phase of the ISAP has yet been made.

A Sector Reference Group (SRG), chaired independently by Study Adelaide, was formed in June 2021 with the purpose of bringing together potential sector participants to support the planning phase of the SA ISAP. Membership of the SRG was not limited to Study Adelaide members. Membership is sector-wide, and includes not only the three public universities, but also private higher education providers, pathway providers, VET and ELICOS providers so that all education providers with offshore students have the opportunity to participate in the SA ISAP program. The SRG has been together now for several months as the planning for implementation of the SA ISAP has been developed. In that forum a preferred TMC has been identified and discussed, based on the clear direction provided by the Commonwealth Government.

Discussions at the SRG have been focussed around ensuring a safe and efficient process for the return of our students, managed by a trusted service provider who knows the sector well and who understands



the specific complexities of planning and implementing air travel and logistics for large cohorts travelling together in the current ever-changing public health environment. Excellent relationships with multiple airlines and intimate knowledge of overseas government and transit regulations, and of Commonwealth and State Government preconditions and protocols have also been front of mind in these discussions, particularly in light of how quickly and frequently public health advice is changing.

Furthermore, given reports on how expensive it can be to secure international flights back to Australia at the moment on the open market we are also hopeful that through our selection we can secure a TMC who will in turn, through established relationships and relevant experience working with similar projects, be able to secure favourable fares for our students. Of course this is not guaranteed as there are many variables to take into consideration that will still need to be worked through, but it is our aim where possible. Regarding efficiencies, it is our intention that, via a TMC-designed and developed portal, a one-stop-shop for students will be created to ensure the offer and acceptance process is consistent across all participants and is as streamlined and simple as possible.

All SRG members are conscious of the tight timeframes that we are trying our best to meet in order to facilitate the return of as many students as possible in time for pre-requisite learning, industry placements and Semester 1 2022. We look forward to the ACCC decision expected in early November to allow us to move forward in earnest and at speed.”

We note “the ACCC may grant authorisation, which provides businesses with protection from legal action under the competition provisions of Part IV of the Act, if it is satisfied that the likely benefit to the public from the conduct outweighs the likely public detriment, including from a lessening of competition”.

After careful considerations of the importance of bringing back our offshore international students and the constrains in place by the Commonwealth Government on the SRG, to ensure the successful return of international students, **we believe it is essential that the applications be authorised fully**. The collaborative, pragmatic and consistent approach taken by the applicants, especially on the approach of the selection criteria of the TMC is important to ensure international students do not end up paying high travelling costs and are able to return to Australia safety.

Last but not least, we thank the opportunity given by the ACCC to allow our voices heard in this process.

Oscar Zi Shao Ong

National President

Council of International Students Australia

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