

3 May 2022

Darrell Channing
Director
Competition Exemptions
Australian Competition and Consumer Commission

Dear Mr Channing

Re: submission relating to Virgin Australia Airlines Pty Ltd application for authorisation AA1000608 – interested party consultation

Thanks for the opportunity to make a submission on this application by Virgin Australia to the Australian Competition and Consumer Commission (ACCC).

Background

Queensland Airports Limited (QAL) owns and operates the Gold Coast, Townsville, Mount Isa and Longreach airports. Pre-COVID-19, these four airports were responsible for facilitating about 8.4 million passengers annually and numbers are expected to return to those levels in the next two years.

Virgin Australia is one of QAL's most important partners and, in fact, on the Gold Coast, Virgin Australia is currently the number one carrier, delivering the most passengers for 2022 to date. Virgin Australia is also a key carrier for Townsville and Mount Isa airports – providing critical capacity and competition in these regional Queensland markets.

Application

In relation to this application by Virgin Australia, QAL considers that it would have the effect of increasing competition and delivering consumer benefit on markets served by QAL airports, in particular Gold Coast and Townsville airports. In summary, if Virgin Australia is able to operate in this way with partner carriers it will inject more competition into markets like the USA-Australia market – ultimately delivering more capacity and better pricing for customers.

Thanks again for the opportunity to make a submission. Please don't hesitate to call if you would like more information.

Yours sincerely

Chris Mills CEO Queensland Airports Limited