



Monday, 30 September 2019

Ms Marlene Tucker  
The Executive Director  
International Air Services Commission  
Via Email: [iasc@infrastructure.gov.au](mailto:iasc@infrastructure.gov.au)

**Re: Allocation of Australia's rights to land at Tokyo-Haneda Airport**

Dear Ms Tucker

Brisbane Airport Corporation (BAC) wishes to provide the following input to the International Air Services Commission regarding the current determination process for the recently gained landing rights at Tokyo-Haneda Airport (HND).

Brisbane Airport notes that the IASC criteria for assessing public benefit is stated as:

- Reasonable capability criteria, and
- Additional criteria, consisting of
  - Competition criteria
  - Tourism and trade criteria
  - Relevant information from Government agencies
  - Any other relevant consideration

**REASONABLE CAPABILITY CRITERIA**

At Brisbane Airport, Virgin Australia began international services in 2004, has carried over a million passengers on international flights every year for the last five years, operates an average of 8,400 international flights per year, and currently flies from Brisbane to 11 international cities across seven nations.

**COMPETITION CRITERIA**

This submission notes that further access for Australian carriers at Tokyo-Haneda airport is unlikely for the foreseeable future, and that the entry into Haneda Airport is a 'once in a lifetime' opportunity for Australia's airlines.

Therefore, the current Haneda Airport market entry opportunity will be the only opportunity to diversify market supply for the foreseeable future.

**TOURISM AND TRADE CRITERIA**

The importance of Queensland as a drawcard for Japan tourism visitation and trade cannot be overstated.

Queensland accounts for:

- 208,000 Japanese visitors per annum, (International Visitor Survey Data, March 2019)
- 47% of visitation from Japan to Australia, the highest in Australia;
- \$426.8 million in expenditure by visitors from Japan, growing at an average of 7.4% pa for the last five years

Brisbane Airport is the gateway to Queensland and a major hub for distributing international travellers across Australia. From a geographical viewpoint, Brisbane Airport's position in the direction of travel from Japan makes it Australia's best located major gateway to spread passenger traffic across Australia and thereby increase dispersal.

Importantly, Brisbane Airport has services to 51 domestic cities and towns across Australia, a greater number than any other Australian airport. This breadth of options for travellers represents a greater potential for distribution beyond BNE as a gateway than others.

In international trade, Japan is Queensland's second largest trading nation with \$12,180 million of exports and \$4,996 million of imports in 2018/19, according to ABS statistics. Japan accounts for 14% of all Queensland's exports and Queensland accounts for 21% of all Australia's exports to Japan. Please see attached, Queensland Trade Profile with further details.

#### **OTHER RELEVANT CONSIDERATION**

It is our belief that providing a slot for a Brisbane-Haneda operation will optimise Australia's national benefit from these newly gained national resources.

This view is based on the following:

- Greater growth of seats between Australia and Japan with new capacity entering the market
- Better balance of supply between Australia's gateway airports
- Better balance of Japanese inbound and Australian's outbound passengers on a Brisbane service, with accompanying greater economic benefit to Australia.

Brisbane Airport works closely with the Queensland Government in securing new air services, with both Australian carriers and several overseas airlines benefitting from the Attracting Aviation Investment Fund (AAIF) in recent years.

On this basis, Brisbane Airport is supportive of Virgin Australia's application for a Brisbane-Haneda slot, recognising that a new service from HND-BNE would generate greater economic benefits to Australia, than further capacity into Sydney.

Please contact me at any time if Brisbane Airport Corporation can be of further assistance in your deliberations.

Yours sincerely



Rachel Crowley  
**Executive General Manager**  
**Communications & Public Affairs**