

By email: iasc@infrastructure.gov.au

Director
International Air Services Commission
GPO Box 630
CANBERRA ACT 2601
AUSTRALIA

Friday, 12 January 2024

Dear Director

Indonesia – 20 November 2023 / Update: 10 January 2024

Queensland Airports Limited (QAL), owner and operator of Gold Coast Airport, supports Virgin Australia's application for an allocation of capacity for additional services between Australia and Indonesia.

QAL believes that permitting this additional capacity will provide greater options and improve consumer outcomes for those travelling between both the Gold Coast and Perth as well as Gold Coast to Bali.

Gold Coast to Perth is the longest domestic market in Australia and has historically been critically underserved as a Jetstar monopoly market. Over 280,000 passengers per annum travel between Perth and the Gold Coast/Northern New South Wales catchment, but in 2022 only 11 per cent of this volume was on the direct Jetstar service. 15 per cent of passengers connected from Gold Coast Airport via another port (i.e. Sydney) to Perth, with 74 per cent of the passenger volume travelling on direct services to or from Brisbane Airport.

Jetstar has historically varied the frequency of the direct service considerably, typically operating between three to seven flights per week according to seasonal leisure demand. Operational constraints also play a role in level of service, given the long sector length requires considerable crew and aircraft resource commitment. Jetstar has limited services only on Gold Coast-Perth between October 2023 and March 2024.

The consumer benefit through introduction of direct services at a consistent frequency would be considerable, particularly for non-leisure market segments where a stable schedule is desired. With the operational requirements of the longest domestic market in Australia, QAL agrees with Virgin Australia that introduction of year-round direct Gold Coast-Perth services would benefit from carriage of Indonesia through-traffic.

QAL is also supportive of the Virgin Australia application to provide additional capacity on the Gold Coast-Bali market, at complementary times to the existing direct Gold Coast-Bali

service, boosting competition on the Australia-Indonesia market and helping to reduce the cost of travel overall.

QAL thanks the IASC and welcomes the opportunity to provide comments.

Please feel free to reach out if you have any questions.

Yours sincerely

Adam Rowe
Chief Commercial Officer
Queensland Airports Limited