



Australian Government

International Air Services Commission

DRAFT DECISION

The Route:	Indonesia
The Applicant:	Qantas Airways Limited (ABN 16 009 661 901) (Qantas)
Decision:	[2024] IASC 202d
Variation Of:	[2013] IASC 135, [2017] IASC 130, [2023] IASC 107, [2018] IASC 120, [2023] IASC 102, [2019] IASC 106, [2023] IASC 127, [2019] IASC 116, [2020] IASC 101, [2021] IASC 107, [2021] IASC 118, [2022] IASC 110
Public Register File:	IASC/APP/202361

1 The application and submissions

The application

1.1 Qantas Airways Limited (Qantas) applied to the International Air Services Commission (the Commission) on 20 September 2023, seeking to vary several Determinations to permit the utilisation of capacity to enable PT Garuda Indonesia (Persero) Tbk (Garuda Indonesia) to market and place its code on the following flights operated by Qantas:

Route	Qantas weekly services	Garuda weekly services	Timing Gap
Jakarta-Sydney	Daily (QF43)	4	5hrs
Sydney-Jakarta	Daily (QF44)	4	1hr
Jakarta-Melbourne	3 (357) (QF45)	3 (136)	1hr
Melbourne-Jakarta	3 (357) (QF46)	3 (247)	8hrs
Denpasar-Sydney	Daily (QF41)	4	2hrs
Sydney-Denpasar	Daily (QF42)	4	5.5hrs
Denpasar-Melbourne	5 (13567) (QF39)	4 (2457)	1hr
Melbourne-Denpasar	5 (13567) (QF40)	4 (1356)	11hrs

1.2 Qantas provided the Commission with a copy of the code share agreement with Garuda Indonesia, on a confidential basis. In its application, Qantas submits that the proposed code share arrangements expand the number and timing of services that may be marketed and independently priced by Garuda Indonesia to/from Australia, providing additional options and choice for consumers.

1.3 On 22 September 2023, the Commission invited submissions about the application in accordance with section 22 of the *International Air Services Commission Act 1992* (the IASC Act). Virgin Australia and a member of the public, Dr Ian Douglas, provided submissions to the Commission, on 6 October 2023 and 28 September 2023, respectively. In its submission Virgin Australia indicated that it would provide an additional submission if Qantas provided further information in support of its application.

1.4 In accordance with section 26 of the International Air Services Commission Policy Statement 2018 (Policy Statement), on 10 October 2023 the Commission wrote to Qantas inviting the airline to address the section 9 additional public benefit criteria of the Policy Statement in support of its application. The Commission also asked Qantas to demonstrate how its proposed code share arrangement with Garuda Indonesia would achieve the object of the Act, specifically by enhancing the welfare of Australians by promoting economic efficiency through competition in the provision of international air services, resulting in:

- a) increased responsiveness by airlines to the needs of consumers, including an increased range of choices and benefits;
- b) growth in Australian tourism and trade; and
- c) maintenance of Australian carriers capable of competing effectively with airlines of foreign countries.

1.5 Following receipt of Qantas' additional public benefit criteria response on 31 October 2023, in accordance with section 12 of the IASC Act and regulation 7 of the International Air Services Commission Regulations 2018 (the Regulations), on 3 November 2023, the Commission published a notice on its website inviting submissions about the application.

1.6 The Commission received a total of seven submissions¹. Virgin Australia and Sydney Airport opposed the application made by Qantas. The Commission considered all submissions received.

1.7 All material supplied by the applicant and submissions received are available on the Commission's website (www.iasc.gov.au).

The Determinations to be varied

1.8 The Determinations sought to be varied allocate a total of 20,076 seats of passenger capacity to Qantas to operate services between the major Australian international gateways (Sydney, Melbourne (including Avalon), Brisbane and Perth) and Indonesia, and unlimited passenger capacity from points in Australia except the major Australian international gateways and Indonesia.

1.9 The Determinations permit the capacity to be used by either Qantas or another Australian carrier which is a wholly-owned subsidiary of Qantas (which in this case is Jetstar Airways Pty Limited (Jetstar)) and for code sharing between the two carriers. Additionally, several of the Determinations permit the capacity to be utilised to offer code share services between Jetstar and KLM Royal Dutch Airlines (KLM).

1.10 A summary of the Determinations sought to be varied is provided at Appendix A to this

¹ Garuda Indonesia received 6 November 2023; (2) Member of the public: Dr Ian Douglas received 16 November 2023; (3) Virgin Australia received 22 November 2023; (4) Sydney Airport received 4 December 2023; (5) Garuda Indonesia received 11 December 2023; (6) Member of the public: Dr Ian Douglas received 19 December 2023 and (7) the Australian Competition and Consumer Commission (ACCC) received 6 February 2024.

draft decision.

2 Relevant provisions of the bilateral air services arrangements

2.1 Paragraph 7(2)(aa) of the IASC Act provides that the Commission must not allocate available capacity contrary to any restrictions on capacity contained in a bilateral arrangement(s).

2.2 Under the Australia-Indonesia bilateral air services arrangements, Australian designated carriers may enter into code sharing, blocked space or other cooperative marketing arrangements, as the marketing and/or operating airline, with another Australian airline(s), with an Indonesian airline(s) or with airline(s) of a third country, subject to certain conditions.

3 Overview of route performance and services operating on the Australia–Indonesia route

3.1 The Commission’s usual practice is to review performance of a route over a five-year period to inform its assessment of the likely impacts of airline proposals on public benefits. In view of the significant impact of the COVID-19 pandemic on air traffic to/from Australia between 2020 and 2022, the Commission considers that insights regarding route performance and trends over the past five years are limited.

3.2 For the year ending December 2023², data sourced from the Bureau of Infrastructure and Transport Research Economics (BITRE) indicates that passenger air traffic originating in Indonesia and arriving in Australia totalled 1,591,528 passengers (30,606 passengers per week). This compares to 1,636,718 passenger arrivals in the year ending December 2019 – prior to the impacts of COVID-19 on travel.

3.3 Australian residents comprise the highest number of travellers on the route, representing 85.9% of arrivals in the latest year.

3.4 Indonesia was ranked first in terms of Residents Returning to Australia over the year to December 2023, accounting for 13.6% of all Resident Returns. “Holiday” (86.0%) was the most important reason for travel in this category followed by “Visiting Friends and Relatives” (7.5%) and “Other” (2.2%).

3.5 Indonesia was ranked ninth in terms of Visitor Arrivals to Australia over the same period, accounting for 2.8% of all Visitor Arrivals. “Holiday” (47.1%) was the most important reason for travel in this category followed by “Visiting Friends and Relatives” (23.1%) and “Education” (11.9%).

3.6 During the period, 28.9% of arrivals originating from Indonesia (residents and visitors) were cleared at Melbourne. This was followed by Sydney with 25.5%, Perth with 24.2%, Brisbane with 10.9% and Adelaide with 6.3%.

3.7 The largest proportion of arrivals originating from Indonesia (residents and visitors) had a state of stay of Victoria (27.7%). This was followed by New South Wales (25.6%) and Western Australia (23.4%).

3.8 There are eight airlines³ operating direct international services between Australia and

² BITRE Indonesia-Australia international aviation data, year ended December 2023.

³ [Northern Summer 2024 timetable summary](#), Indonesia

Indonesia: Batik Air Indonesia, Batik Air Malaysia (Malindo), Citilink, Garuda Indonesia, Indonesia AirAsia, Jetstar, Qantas and Virgin Australia.

3.9 The Qantas Group (Qantas and Jetstar) currently⁴ operates up to 111 frequencies (24,909 seats) per week on the Indonesia route, most of which are operated by Jetstar (approximately 80%).

3.10 Of these, Qantas operates up to seven frequencies from Sydney to Denpasar and up to five frequencies from Melbourne to Denpasar. Qantas is the only Australian airline that operates services to Jakarta, with up to seven frequencies from Sydney and up to three frequencies from Melbourne.

3.11 Jetstar operates up to 14 frequencies from Adelaide, up to 10 frequencies from Brisbane, up to 21 frequencies from Melbourne, up to 21 frequencies from Perth and up to 14 frequencies from Sydney. Jetstar is the only Australian airline that operates on the Perth-Denpasar route, the Cairns to Denpasar route (up to four frequencies) and the Darwin-Denpasar route (up to five frequencies).

3.12 Qantas and KLM code share on Jetstar's services on the Australia-Indonesia route. Qantas also code shares on Jetstar Asia's services from Singapore to Jakarta, Denpasar and Surabaya.

3.13 Virgin Australia operates up to 49 frequencies per week on the Indonesia route (7,364 seats)⁵: up to 14 frequencies from Adelaide, up to 14 frequencies from Melbourne, up to seven frequencies from Brisbane and up to seven frequencies from Sydney. It is the only Australian airline that operates on the Gold Coast-Denpasar route (up to seven frequencies per week). Virgin Australia also code shares on Singapore Airlines services from Singapore to Jakarta.

3.14 Garuda Indonesia operates up to 17 frequencies per week between Indonesia and Australia⁶: up to seven frequencies from Denpasar to Sydney, up to seven frequencies from Denpasar to Melbourne, up to five frequencies from Jakarta to Sydney, and up to four frequencies from Jakarta to Melbourne. The following third country airlines also code share on Garuda Indonesia services between Australia and Indonesia: China Airlines, Etihad Airways, KLM, Oman Air, Saudi Arabian Airlines and Turkish Airlines⁷.

3.15 The Commission notes that in February 2024, Garuda Indonesia announced its plans to increase the number of services it operates to Australia from April 2024⁸, which is reflected in the airline's Northern Summer 2024 timetable⁹. The Commission also notes that from June 2024, the carrier will increase services from Denpasar to Melbourne from four to five frequencies and up to a daily frequency from July 2024. The carrier will also increase its services from Denpasar to Sydney to a daily frequency from July 2024.

3.16 The following tables set out services operated by Australian and foreign carriers (primarily Indonesian carriers) between each of the four major Australian gateway airports and other Australian airports to Denpasar and Jakarta by weekly frequency and seats:

⁴ International Airlines timetable summary [Northern Summer 2024](#), Indonesia, Qantas and Jetstar entries

⁵ International Airlines timetable summary [Northern Summer 2024](#), Indonesia, Virgin Australia entry

⁶ International Airlines timetable summary [Northern Summer 2024](#), Indonesia, PT Garuda Indonesia entry

⁷ International Airlines timetable summary [Northern Summer 2024](#), Indonesia, PT Garuda Indonesia entry

⁸ [Garuda Indonesia adding more flights to Bali, Jakarta - Executive Traveller](#)

⁹ International Airlines timetable summary [Northern Summer 2024](#), Indonesia, PT Garuda Indonesia entry

Table 1: Services operated by all carriers, Australian major gateways - Denpasar:

Denpasar	Brisbane frequency seats	Melbourne frequency seats	Sydney frequency seats	Perth frequency seats	Total frequency seats
Virgin Australia	7 1,232	14 2,464	7 1,218	- -	28 4,914
Jetstar	10 2,320	21 4,872	14 3,557	21 3,906	66 14,655
Qantas	- -	5 855	7 1,862	- -	12 2,717
Australian carriers	17 3,552	40 8,191	28 6,637	21 3,906	106 22,286
Garuda Indonesia	- -	7 2,009	7 2,009	- -	14 4,018
Batik Air Indonesia	- -	- -	- -	7 1,092	7 1,092
Batik Air Malaysia (Malindo)	7 1,323	7 1,323	7 1,323	7 1,260	28 5,229
Citilink	- -	- -	- -	7 1,260	7 1,260
Indonesia Air Asia	- -	- -	- -	32 5,760	32 5,760
Foreign carriers	7 1,323	14 3,332	14 3,332	53 9,372	88 17,359
Total	24 4,875	54 11,523	42 9,969	74 13,278	194 39,645

Table 2: Services operated by all carriers, other Australian gateways - Denpasar:

Denpasar	Adelaide frequency seats	Cairns frequency seats	Gold Coast frequency seats	Darwin frequency seats	Canberra frequency seats	Total frequency seats
Virgin Australia	7 1,232	- -	7 1,218	- -	- -	14 2,450
Jetstar	14 3,248	4 744	- -	5 930	- -	23 4,922
Australian carriers	21 4,480	4 744	7 1,218	5 930	- -	37 7,372
Batik Air Indonesia	7 1,134	- -	- -	- -	3 486	10 1,620
Foreign carriers	7 1,134	- -	- -	- -	3 486	10 1,620
Total	28 5,614	4 744	7 1,218	5 930	3 486	47 8,992

Table 3: Services operated by all carriers, Australian major gateways - Jakarta:

Jakarta	Sydney frequency seats	Melbourne frequency seats	Perth frequency seats	Total frequency seats
Qantas	7 1,862	3 753	- -	10 2,615
Australian carriers	7 1,862	3 753	- -	10 2,615
Batik Air Indonesia	- -	- -	7 1,092	7 1,092
Indonesia Air Asia	- -	- -	4 720	4 720
Garuda Indonesia	4 1,148	4 1,148	- -	8 2,296
Foreign carriers	4 1,148	4 1,148	11 1,812	19 4,108
Total	11 3,010	7 1,901	11 1,812	29 6,723

Table 4: Services operated by all carriers, Australia - Indonesia

	Jakarta frequency seats	Denpasar frequency seats	Total frequency seats
Qantas	10 2,615	12 2,717	22 5,332
Jetstar	- -	89 19,577	89 19,577
Virgin Australia	- -	42 7,364	42 7,364
Australian carriers	10 2,615	143 29,658	153 32,273
Garuda Indonesia	8 2,296	14 4,018	22 6,314
Batik Air Indonesia	7 1,092	17 2,712	24 3,804
Batik Air Malaysia (Malindo)	- -	28 5,229	28 5,229
Citilink	- -	7 1,260	7 1,260
Indonesia Air Asia	4 720	32 5,760	36 6,480
Foreign carriers	19 4,108	98 18,979	117 23,087
Total	29 6,723	241 48,637	270 55,360

4 Requirements under the Act and Minister's Policy Statement

4.1 Qantas' application seeks to vary several Determinations to include a condition of a kind referred to in paragraph 15(2)(e) of the Act. In view of this, the application is a transfer application as so defined in subsection 4(1) of the Act, and has been assessed in accordance with section 25.

4.2 Subsection 25(1) provides that the Commission must make a decision varying the determination in a way that gives effect to the variation requested, subject to subsection 25(2). Subsection 25(2) states that the Commission must not make a decision varying the determination in a way that varies, or has the effect of varying an allocation of capacity if the Commission is satisfied that the allocation, as so varied, would not be of benefit to the public.

4.3 The Act does not define ‘benefit to the public’. However, section 26 of the Act provides that “[i]n assessing the benefit to the public of a variation of an allocation of capacity, the Commission must apply the criteria set out for that purpose in any policy statements made by the Minister under section 11”.

4.4 In accordance with section 11 of the Act, the Minister made the Policy Statement which came into effect on 28 March 2018. The Policy Statement sets out the criteria which the Commission is required to apply in assessing the benefit to the public of allocations of capacity.

4.5 Section 6 of the Policy Statement provides, in part, that the Commission is to perform its functions in a way that will achieve the object of the Act, that is, to enhance the welfare of Australians by promoting economic efficiency through competition in the provision of international air services by Australian carriers.

4.6 Section 18 of the Policy Statement which specifically deals with ‘transfer applications’ such as this one, provides in part that, in assessing whether the variation requested would not be of benefit to the public for purposes of subsection 25(2) of the Act, the Commission is to have regard to certain matters including the ‘reasonable capability criterion’ in section 8 of the Policy Statement and may have regard to any of the additional criteria set out in section 9 of the Policy Statement that it considers to be relevant.

4.7 Under the ‘reasonable capability criterion’ in section 8 of the Policy Statement, the Commission is to assess the extent to which an Australian carrier is reasonably capable of a) obtaining any licences, permits or other approvals required to operate on and service the route and b) using the capacity allocated under the determination.

4.8 The Commission finds that the matters specified in paragraph 18(2)(b) of the Policy Statement are not relevant to the variation under consideration. There is nothing to suggest that Qantas’ transfer application will or is reasonably likely to permit or encourage any form of speculative activity, and Qantas has exercised the allocation in question for a period of more than six months.

4.9 The Commission’s assessment of the Qantas application against the reasonable capability criterion in section 8 and the additional criteria in section 9 of the Policy Statement is detailed below.

5 Commission’s assessment against section 8 of the Policy Statement

5.1 In assessing the benefit to the public of an allocation of capacity, sections 18 and 8 of the Policy Statement require the Commission to assess the extent to which all Australian carriers that are, or would be, permitted to use the capacity allocated under a determination are reasonably capable of a) obtaining any licences, permits or other approvals required to operate on and service the route to which the determination relates; and b) using the capacity allocated under the determination.

5.2 The Commission notes that Qantas is an established international carrier currently operating on the Australia-Indonesia route, and therefore finds that the airline is reasonably capable of obtaining the necessary regulatory approvals and of using the capacity allocated under the determination.

6 Commission’s assessment against section 9 of the Minister’s Policy Statement

Competition criteria

Subsection 9(a): desirability of fostering an environment in which Australian carriers can effectively compete with each other and with foreign carriers on the route in question

6.1 Subsection 9(a) of the Policy Statement requires the Commission to consider the desirability of fostering a competitive environment “on the route in question”. Section 4 of the Policy Statement defines a ‘route’ as:

“the full set of entitlements available to Australian carriers under a particular bilateral arrangement. All combinations of origin, destination, intermediate and beyond points available to Australian carriers under the bilateral arrangement constitute a single route.”

6.2 The route in question is the Australia-Indonesia route. The Commission notes that the full set of entitlements available to Australian carriers are set out in Item 2 of this draft Decision.

6.3 As previously noted, there are eight airlines operating direct international services between Australia and Indonesia: Batik Air Indonesia, Batik Air Malaysia (Malindo), Citilink, Garuda Indonesia, Indonesia AirAsia, Jetstar, Qantas and Virgin Australia.

6.4 The proposed variation is to enable Garuda Indonesia to code share on Qantas’ services on the Sydney-Denpasar, Melbourne-Denpasar, Sydney-Jakarta and Melbourne-Jakarta city pairs, on a free sale basis.

6.5 The Commission notes that while the agreement between Qantas and Garuda Indonesia is prepared on a reciprocal basis, as indicated in Qantas’ application, Qantas does not initially intend to place its code on Garuda Indonesia’s services.

6.6 The application before the Commission does not address Qantas marketing and placing its code on seats operated by Garuda Indonesia on the Australia-Indonesia route. The Commission notes that this would not require the Commission’s approval, as it is outside the scope of the Commission's remit, which is to regulate the allocation and use of Australian capacity entitlements by Australian carriers provided for under relevant bilateral air services arrangements.

6.7 In its application of 31 October 2023, Qantas submits that the proposed code share arrangement will promote economic efficiency by fostering, encouraging and supporting competition in the provision of international air services between Australia and Indonesia. It further submits that the ability for Garuda Indonesia to expand its selling proposition by independently marketing and pricing additional services between Australia and Indonesia provides an increased range of choices and benefits for consumers.

6.8 In its submission of 22 October 2023, Virgin Australia states that under the proposed code share arrangements, Qantas and Garuda Indonesia would continue to hold 100% of capacity between Jakarta-Sydney and Jakarta-Melbourne. It further submits that with all of the existing capacity being operated by the two carriers, approval to code share is likely to raise barriers to entry by making it more difficult for a rival Australian carrier – like Virgin Australia – to successfully enter the Jakarta market if Australia-Indonesia capacity was made available in the future.

6.9 In its application of 31 October 2023, Qantas submits that while capacity has been fully allocated for third-fourth freedom services to/from Sydney, Melbourne, Brisbane and/or Perth, there is no limit on the number of passenger services that may be operated between all other points in Australia and Indonesia.

6.10 In its follow-up submission of 22 November 2023, Virgin Australia states that Qantas having the ability to code share with Garuda would also result in the two carriers gaining greater market power individually and collectively on the Indonesia route. The airline further submits that this development would likely reduce competitive forces within the market, acting as a potential disincentive for Qantas and Garuda to grow while also making it more difficult for competitors (including Virgin Australia) to expand their operations.

6.11 In its submission of 8 February 2024, the ACCC notes that a key competition concern is that Qantas and Garuda Indonesia are each other's closest competitor in the Australia – Indonesia air passenger services market and the proposed code share arrangement may soften competition between them. It may make it mutually profitable for Garuda Indonesia and/or Qantas to delay or limit the addition of capacity on city pairs where the underlying market conditions support profitable metal competition.

6.12 In its follow-up submission of 22 November 2023, Virgin Australia submits that the position of Qantas in the Australia-Indonesia market should not be viewed in isolation from its wholly-owned subsidiary Jetstar, as Qantas and Jetstar have the ability to coordinate schedules and pricing across the same routes that Garuda Indonesia and Qantas propose to code share on.

6.13 In its submission of 4 December 2023, Sydney Airport highlights its concerns about the impact of the proposed variation on competition, choice and cost for the travelling public. Sydney Airport notes that Garuda Indonesia is currently undertaking a significant fleet expansion and revitalisation process. If approved, the airport considers that Qantas' proposal will enable the airlines to further extend their dominance on the busy and significant Denpasar-Australia route.

6.14 In its application of 31 October 2023, Qantas submits that Garuda Indonesia has not yet returned to pre-COVID capacity levels on the Australia-Indonesia route, consistent with reductions in capacity across its domestic and international network. It considers that the proposed code share represents a pro-competitive expansion of Garuda Indonesia's ability to sell and market itineraries despite the challenges posed by the pandemic.

6.15 In his submission of 28 September 2023, Dr Douglas submits that if the variation is approved as requested, Garuda Indonesia will have less motivation to increase its own-operated capacity towards daily services and to increase competition on the Jakarta route.

6.16 In response, in its application of 31 October 2023, Qantas submits that any suggestion that the proposed code share would limit Garuda Indonesia's motivation to increase services between Jakarta and Australia, or any other services, does not adequately consider the current circumstances of Garuda Indonesia as a result of the pandemic, including its significantly reduced fleet size.

6.17 In its follow-up submission of 22 November 2023, Virgin Australia submits that Garuda Indonesia has the ability to redeploy capacity from other routes (as all airlines can do) if market conditions justify this, absent the proposed code share arrangement.

Commission's assessment against criterion 9(a)

6.18 As part of its assessment against criterion 9(a), the Commission needs to consider what the likely impact would be of the variation on other Australian carriers' ability to effectively compete with Qantas and Garuda Indonesia on the route, as well as with other airlines/foreign carriers.

6.19 The variation application before the Commission is for Qantas and Garuda Indonesia to code share on parallel services, that is, both airlines would place their code and sell tickets for each other's flights on the same city pairs. Under the proposed arrangements, code share services would be offered on Qantas' Sydney/Melbourne to Denpasar/Jakarta services. Based on the Northern Summer 2024 timetable, this is equivalent to up to 5,332 seats of capacity per week.

6.20 The Commission notes that it has allocated all of the available capacity under the Australia-Indonesia air services arrangements for Australian carriers to operate services originating from/terminating at Australia’s major gateway airports to Indonesia.

6.21 The Commission further notes that for the Northern Summer 2024 scheduling season, there remain 8,762 seats unutilised¹⁰, in each direction, by Indonesian carriers to operate services on the Indonesia-Australia route. This indicates that Indonesian carriers, including Garuda Indonesia, have considerable capacity to grow services.

6.22 With respect to Garuda Indonesia, the Commission acknowledges the impacts on the airline’s services brought about by the COVID-19 pandemic and that the airline has faced a relatively slow return to its pre-pandemic capacity on the route due to a range of factors, including aircraft availability.

6.23 The Commission further notes, as indicated in Garuda Indonesia’s submission of 11 December 2023, the airline plans to increase its fleet capacity in 2024, and will grow its services from Denpasar/Jakarta to Sydney/Melbourne to daily during the Northern Summer 2024 scheduling season.

6.24 The Qantas Group’s share of capacity operated by Australian carriers on the Australia-Indonesia route in the Northern Summer 2024 scheduling season is approximately 77%¹¹. The Group’s share of overall capacity operated by all carriers is approximately 45%, with Jetstar at 35% and Qantas at 10%¹².

6.25 For the Sydney-Denpasar route, Qantas’ share is 19% and for the Melbourne-Denpasar route its share is 7%¹³.

6.26 Garuda Indonesia’s market share on the Indonesia-Australia route is around 27%¹⁴ of all capacity operated by foreign carriers (primarily Indonesian carriers), and around 11%¹⁵ of overall capacity operated by all carriers on the route. The Commission notes that this represents an increase to services operated by the airline in the Northern Winter 2023-24 scheduling season, when Garuda Indonesia’s market share was around 20% of all capacity operated by foreign carriers (primarily Indonesian carriers) and around 8% of capacity operated by all carriers on the route¹⁶.

6.27 Virgin Australia’s share is around 13% of overall capacity operated by all carriers on the Australia-Indonesia route in the Northern Summer 2024 scheduling season¹⁷. On the Sydney-Denpasar route the airline’s share is around 12% and for the Melbourne-Denpasar route, its share is around 21%¹⁸.

6.28 If approved, the proposed variation would permit Garuda Indonesia to market and place its code on an additional 22 weekly Qantas-operated services between Jakarta and Sydney/Melbourne, and Denpasar and Sydney/Melbourne, resulting in an increase of Garuda Indonesia’s footprint on

¹⁰ [Growth Potential for Foreign Airlines – Northern Summer 2024](#).

¹¹ Refer Table 4.

¹² Refer Table 4.

¹³ Refer Table 1.

¹⁴ Refer Table 4.

¹⁵ Refer Table 4.

¹⁶ Refer Table 4

¹⁷ Refer Table 4.

¹⁸ Refer Table 1.

the route.

6.29 The combined market share of Qantas and Garuda Indonesia would equal around 21% of capacity operated on the entire route¹⁹. For the Sydney/Melbourne – Jakarta route, their combined share is 100%²⁰. For the Sydney-Denpasar route, their combined share is around 39% and for Melbourne-Denpasar, the combined share is around 25%²¹.

6.30 The Commission notes that Virgin Australia is in a relatively stronger position to compete with Qantas and Garuda Indonesia on the Melbourne-Denpasar route in comparison to the Sydney-Denpasar route. However, as discussed in 9(b), Qantas has the ability to convert capacity operated by Jetstar, which has a 42% share of capacity operated on the Melbourne-Denpasar route²², to its own services.

Third country carriers

6.31 In its application of 31 October 2023, Qantas submits that established third country airlines, such as Singapore Airlines, serve the Australia-Indonesia market with a one-stop proposition. It further notes that while the routes offered by the indirect carriers may be less attractive in terms of travelling time, they provide alternative timings and options for travellers that are less time sensitive.

6.32 In its submission of 6 November 2023, Garuda Indonesia submits that much of the Australian market is taken through other countries' hubs which should be enjoyed by the two countries' flag carriers Qantas and Garuda Indonesia, via Jakarta and Denpasar. Therefore, the collaboration between the two airlines can increase the competitiveness of Indonesian and Australian airlines towards third country airlines.

6.33 In his submission of 16 November 2023, Dr Ian Douglas notes that indirect competition between Australia and Indonesia has low 'centrality' and offers unattractive alternative routes to both passengers and airlines. Passengers face significantly longer journeys, while airlines are either uncompetitive on price or face diminished yields carrying the passengers via lengthy backhauls.

6.34 The Commission notes that several third country airlines based in Southeast Asia provide indirect services between Australia and Indonesia over a midpoint in their home country. Direct services on the route provide significantly shorter average flight times, e.g. 6hrs20minutes from Melbourne to Jakarta, and 5hrs25minutes from Melbourne to Denpasar²³ than indirect services (Melbourne to Jakarta via Singapore 9hrs35minutes, Singapore Airlines, and Melbourne to Denpasar via Singapore 10hrs35mins, Singapore Airlines)²⁴. With up to 270 weekly non-stop services operated on the route to/from nine points in Australia in the Northern Summer 2024 scheduling season²⁵, the Commission considers that third country carriers are unlikely to exercise a competitive influence of note in the market.

6.35 Having considered the issues above, the Commission is of the view that while the proposed variation is likely to strengthen the position of Qantas and Garuda Indonesia on the Australia-Indonesia route, the arrangements are not likely to foster an environment in which Australian

¹⁹ Refer Table 4

²⁰ Refer Table 3.

²¹ Refer Table 1.

²² Refer Table 1.

²³ Using flights available for booking through flightconnections.com.

²⁴ Using flights available for booking through flightconnections.com, Singapore is the stop-over with the fastest journey time for services operated on the Melbourne-Jakarta route and Melbourne-Denpasar route.

²⁵ Refer Table 4.

carriers can effectively compete with each other and with foreign carriers on the route. The Qantas Group is the dominant Australian operator of capacity, currently providing 77% of seats on the route, with Virgin Australia the only other Australian competitor. Although there are multiple Indonesian competitors on the route, Garuda Indonesia is the single largest operator of capacity amongst them²⁶. Arrangements between these two dominant carriers that strengthen their market position through a combined network offering are likely to make it more difficult for Virgin Australia to compete with the Qantas Group and the various Indonesian carriers on the route, as well as discouraging new Australian airlines from entering the route. While these impacts would be most pronounced on the Sydney/Melbourne to Jakarta city pairs, where Qantas and Garuda Indonesia are the only operators, the Commission notes that Qantas and Garuda Indonesia together operate 183% more capacity than Virgin Australia on the Sydney/Melbourne to Denpasar city pairs²⁷.

Subsection 9(b): the number of carriers operating on the route in question and the existing distribution of capacity among Australian carriers (including through code sharing and other joint international services)

6.36 In considering the proposal against criterion 9(b), the Commission considered the number of carriers operating on the route in question and the existing distribution of capacity among Australian carriers in the context of the city pairs proposed to be operated as part of the code share arrangement.

6.37 The following table summarises the existing distribution of capacity allocations between Australian carriers on the Indonesia route:

Table 5: Existing distribution of capacity allocations between Australian carriers on the Australia-Indonesia route

Airline	Current Allocation (seats and %)
Qantas Group (Qantas and Jetstar)	20,076 (80%)
Virgin Australia	4,924 (20%)
Total allocation available under ASA	25,000

6.38 The Commission notes that all of the Determinations have previously been varied to permit Qantas to code share on Jetstar’s services, and vice versa. Additionally, several of the Determinations permit the capacity to be utilised to offer code share services between Jetstar and KLM, providing connectivity to KLM’s Denpasar-Amsterdam services.

6.39 Qantas is the only Australian carrier that operates on the Australia-Jakarta route and is the only direct competitor to Garuda Indonesia.

6.40 The Commission notes the following distribution of capacity (seats) among foreign carriers (primarily Indonesian carriers) operating on the Australia-Indonesia route in the Northern Summer 2024 scheduling season:

²⁶ The Commission notes that Citilink, which currently operates services on the Perth-Denpasar city pair, is a wholly-owned subsidiary of Garuda Indonesia.

²⁷ Refer Table 1.

Table 6: Existing distribution of capacity among Indonesian and fifth-freedom carriers on the Australia-Indonesia route

Airline	Current distribution (seats and %)
Batik Air Indonesia	3,804 (16%)
Batik Air Malaysia (Malindo)	5,229 (23%)
Garuda Indonesia	6,314 (27%)
Citilink	1,260 (6%)
Indonesia AirAsia	6,480 (28%)
Total	23,087

6.41 In its submission Qantas notes that its allocation of 20,076 seats per week is largely utilised by Jetstar, operating up to 63 return services per week to/from Australia’s four main gateways.

6.42 The Commission notes that while Jetstar, a wholly-owned subsidiary of Qantas, operates the majority of the capacity allocated to Qantas on the Indonesia route, this does not preclude Qantas from redistributing its capacity allocation in the future to boost its own services, as the capacity is allocated to Qantas – not Jetstar.

6.43 The Commission further notes that Qantas has requested to vary nearly all of its capacity allocations held on the Indonesia route, rather than limiting its request to allocations covering a level of capacity that would support implementation of code share services on the proposed city pairs. The Commission notes that by varying nearly all of its Determinations, if approved, Qantas could increase its capacity operated on the Sydney/Melbourne to Denpasar/Jakarta routes, by transferring capacity used by Jetstar. This would further increase the market share of capacity to be operated under the proposed code share arrangement between Qantas and Garuda Indonesia.

6.44 The Commission notes that while code sharing does not directly increase physical capacity allocated to each airline, it has the potential to increase passenger throughput on specific routes and consequently the share of the overall market held by the parties to the arrangements.

6.45 The Commission notes that the Qantas Group holds 80% of the capacity available for Australian carriers under the bilateral air services arrangements, with Virgin Australia allocated the remainder of the entitlements. This reflects a longstanding and extensive Qantas Group presence on the Indonesia route, with Virgin Australia’s entry occurring in 2009²⁸. It further notes that the relative imbalance in this distribution is more marked than on any of the other routes on which both the Qantas Group and Virgin Australia compete and where capacity is subject to limits under the relevant air services arrangements²⁹. In addition, the Commission notes that there remains no further capacity available for allocation under the Australia-Indonesia air services arrangements. Consistent with the analysis undertaken by the Commission as outlined in 9(a), the Commission considers that the proposed variation would entrench the dominant position of the Qantas Group on the route and is likely to impair the ability of incumbent and prospective Australian carriers to offer commercially sustainable and competitive services on the route.

²⁸ [Determination \[2008\] IASC 120 issued to Virgin Australia, operating as Pacific Blue Australia/Virgin Blue Australia](#)

²⁹ [Determinations and Decisions - Routes Index | International Air Services Commission \(iasc.gov.au\)](#)

Subsection 9(c): the likely impact on consumers of the proposed allocation, including on cost of airfares, customer choice, product differentiation, stimulation of innovation by incumbent carriers and frequency of service.

6.46 In its application of 31 October 2023, Qantas stated that the proposed code share services with Garuda Indonesia would expand the number and timing of services that may be marketed and independently priced by Garuda Indonesia to/from Australia, providing additional options and choice for consumers. It further submits that this provides connectivity benefits as a result of the additional options for Garuda Indonesia to sell through journeys from domestic Indonesia and other international routes on a single airline code.

6.47 In its submission the ACCC notes that a free sale code share agreement allows the marketing carrier to sell an unlimited number of seats on the operating carrier’s service provided there is inventory available on the flight. This means there is limited incentive to compete on price in the marketing of the operating carrier’s inventory because the marketing carrier only pays for the seats it sells. The ACCC is of the view that, from a competition perspective, a hard block code share generally is preferable to a free sale code share since it maintains a greater degree of rivalry between the airlines in the marketing of the operating carriers’ services. However, both are inferior to ‘metal’ competition between operating carriers, where this is commercially viable.

6.48 The ACCC further notes that code share arrangements that have the effect of making it mutually profitable for airlines to delay or limit the addition of capacity on city pairs where the underlying market conditions support profitable metal competition could result in higher fares and reduced competitive pressures to improve service levels. It is not clear that Virgin Australia would provide a sufficient competitive constraint to make such behaviour unprofitable for Qantas and Garuda Indonesia.

6.49 In assessing the variation application against criterion 9(c), the Commission considered the benefit versus the detriment of the proposed variation on consumers.

6.50 The Commission notes that the code share arrangement would allow the airlines to offer increased frequency and a broader choice of flight timings without deploying additional aircraft, enabling Qantas and Garuda Indonesia to provide more options to their passengers.

Table 7: Qantas and Garuda Indonesia proposed code share services by route, Northern Summer 2024 flight schedules

Route	Qantas weekly services	Garuda weekly services	Timing Gap
Sydney-Jakarta	QF41 13:55 - 19:00 (daily)	GA713 11:45 - 16:30 (3.5.6.7)	2hrs10mins
Jakarta-Sydney	QF42 20:45 - 06:50+1 (daily)	GA712 23:55 - 09:45+1 (2.4.5.6)	3hrs10mins
Melbourne-Jakarta	QF39 14:55 - 19:15 (3.5.7)	GA717 15:30 - 19:45 (2.4.5.7)	35mins
Jakarta-Melbourne	QF40 21:00 - 06:25+1 (3.5.7)	GA716 01:55 - 11:15 (2.4.5.7)	4hrs55mins
Sydney-Denpasar	QF43 16:20 - 20:50 (daily)	GA715 10:05 - 14:35 (daily)	6hrs15mins
Denpasar-Sydney	QF44 22:10 - 06:05+1 (daily)	GA714 23:25 - 07:10+1 (daily)	1hr15mins
Melbourne-Denpasar	QF45 17:45 - 22:00 (1.3.5.6.7)	GA719 07:00 - 11:05 (daily)	10hrs45mins
Denpasar-Melbourne	QF46 23:05 - 06:35+1 (1.3.5.6.7)	GA718 22:05 - 05:30+1 (daily)	1hr

6.51 As Qantas and Garuda Indonesia operate a daily flight at similar timings on the Sydney-Jakarta route, the Commission considers consumer benefits of the code share are likely to be negligible with respect to that city pair. Where Melbourne-Jakarta is concerned, a code share arrangement between Qantas and Garuda Indonesia would provide increased schedule options, with

flights available on an additional four days a week for Qantas customers and three days a week for Garuda customers.

6.52 From mid-2024, Qantas and Garuda Indonesia will each operate a daily return frequency Sydney-Denpasar. Both carriers' flights depart Denpasar in the late evening, with a timing gap of around 1hr15minutes for the departures from Sydney. Given the largely parallel nature of the schedules, a code share arrangement would not provide travellers with enhanced options on this city pair. On the Melbourne-Denpasar route, Garuda Indonesia will operate a daily service from mid-2024, while Qantas operates five frequencies a week. As highlighted in Table 7, the Commission notes that there is a spread of timings for the carriers' departures from Melbourne, with Qantas operating in the evening and Garuda Indonesia in the morning. While there may be some benefit to both airlines' customers from the ability to offer schedule options on this city pair in one direction, this is likely to be minimal given BITRE data set out in Item 3 indicates that most passengers on the route are travelling for leisure purposes and are therefore much more likely to be driven by price. Further, the Commission notes that Qantas is already able to offer its customers access to alternative services on Jetstar on the two days a week it does not operate Melbourne-Denpasar, by virtue of the code share arrangement between those two carriers.

6.53 Given the nature of the traffic and the number of Australian airports served directly from Indonesia, network connectivity is a lower order consideration than it might be on other routes. Although the majority of the traffic on the four city pairs will be point-to-point, some passengers will be travelling beyond the Denpasar/Jakarta and Sydney/Melbourne gateways. The Commission understands that connections are currently facilitated by interline arrangements that Qantas and Garuda Indonesia have in place with each other and other airlines, including Virgin Australia in the case of Garuda Indonesia. Interline agreements allow airlines to sell each other's tickets to passengers as part of a through journey, effectively allowing passengers to book single itineraries and to coordinate passenger services, such as check-in and baggage processes. In this context, the Commission is not persuaded that the ability to travel on a single airline code as proposed by the arrangements is likely to provide additional material benefit to consumers in practice.

6.54 The Commission notes that in the absence of approval of the proposed variations, Qantas and Garuda Indonesia will be able to continue offering interline services to their passengers. The two carriers could also code share on each other's respective domestic services. Qantas is also able to code share on Garuda-operated services beyond Indonesia, subject to any restrictions contained within the relevant bilateral air services arrangements. These elements of cooperative activity do not require the Commission's approval.

6.55 Overall, the benefits for consumers of the code share proposal appear limited. The total number of frequencies or capacity operated on the Sydney/Melbourne and Jakarta-Denpasar routes would not change. The Commission notes that the additional options with respect to schedule and product choice on the Melbourne-Jakarta route and northbound on the Melbourne-Denpasar route would benefit Qantas and Garuda Indonesia customers rather than travellers on the relevant city pairs more broadly.

6.56 There is also potential for competitive detriment to arise as a result of the proposed code share, which would produce adverse outcomes for consumers. Even though Qantas and Garuda Indonesia plan to price and sell their services independently, the arrangement may have the effect of reducing the incentive the airlines have to compete with each other. The Commission considers that, absent a code share arrangement, the carriers would be more incentivised to invest and take commercial risks to expand services in their own right and/or to offer a better schedule and product, rather than effectively being able to rely on the complementary services of the code share partner. It would also likely maximise downward pressure on airfares compared with a scenario with the code share.

6.57 The Commission considers that the reduction in competitive tension between the airlines on the Sydney/Melbourne to Denpasar/Jakarta route from the proposed arrangement is likely to result in higher airfare prices for consumers than would otherwise be the case, noting the ACCC's observation regarding Virgin Australia's limited ability to provide a sufficient competitive constraint. Additionally, for similar reasons, the arrangement is unlikely to stimulate innovation by the incumbent carriers or lead to increased frequency of services on the route, which would provide enhanced choices for consumers.

6.58 The Commission considers that the benefits of the code share arrangement do not outweigh the potential impact on competition on the route. The Commission notes that over time, the strengthened market position resulting from the code share arrangement between the airlines could lead to Qantas and Garuda Indonesia dominating notable portions of the Australia-Indonesia route. In addition to entrenching the carriers' monopoly position on the Sydney/Melbourne-Jakarta route, the code share arrangement would enable the airlines to gain a competitive advantage on key routes between Denpasar and Australia's two largest cities.

6.59 The Commission notes that while code share arrangements can provide benefits for travellers, it considers that on routes where the code share partners are the only airlines operating, this arrangement is likely to consolidate the market position of the airlines. The Commission considers that the strengthened partnership between Qantas and Garuda Indonesia is likely to make it more difficult for Virgin Australia to compete effectively and create higher entry barriers for other airlines wishing to enter the Australia-Indonesia market. The Commission considers that the absence of the proposed code share arrangement between the two airlines would create conditions more conducive to the establishment of services by new entrants or potential expansion by Virgin Australia, including on the Jakarta route.

6.60 In its submission, the ACCC expressed that a key competition concern is that Qantas and Garuda Indonesia are each other's closest competitor in the Australia – Indonesia air passenger services market and the proposed code share arrangement may soften competition between them. It may make it mutually profitable for Garuda Indonesia and/or Qantas to delay or limit the addition of capacity on city pairs where the underlying market conditions support profitable metal competition. The Commission notes that similar concerns were raised by other submitters.

6.61 The Commission agrees with the concern identified by the ACCC and other submitters. Under the proposed variation, there will likely be some limited benefits for passengers through connectivity and schedule options. However, in the Commission's view, the primary beneficiaries of the proposed cooperation would be the parties to the arrangements. The Commission agrees with the ACCC's concern that the proposed arrangement has the potential to reduce the intensity of competition between Qantas and Garuda Indonesia, in particular as the only competitors on the Sydney/Melbourne-Jakarta route, but also on the Sydney/Melbourne-Denpasar city pairs.

Subsection 9(d): the desirability of fostering own aircraft operations by Australian carriers over code share or other joint international air services involving the marketing, by an Australian carrier, of seats on flights operated by foreign carriers

6.62 The Commission did not consider this criterion as the variation sought does not raise a choice between fostering own aircraft operations as against the marketing, by an Australian carrier, of seats on flights operated by foreign carriers.

Subsection 9(e): the benefits of allocating the capacity to a given applicant over other competing applicants, having regard to any commercial arrangements that may be in place with other carriers.

6.63 The Commission did not consider this criterion as there are no ‘competing applicants’ for the capacity in question.

Subsection 9(f): any determinations, decisions or notifications made by the ACCC, or any determinations made by the Australian Competition Tribunal, in relation to an Australian carrier using capacity in all or part of the route.

6.64 The Commission is not aware of any determinations, decisions or notifications made by the ACCC or the Australian Competition Tribunal in relation to the Qantas Group using capacity in all or part of the route.

Subsection 9(g): any determinations, decisions or notifications made by a foreign agency that performs a comparable function to the ACCC or the Australian Competition Tribunal in relation to an Australian carrier using capacity in all or part of the route.

6.65 The Commission is not aware of any determinations, decisions or notifications made by a foreign agency performing a comparable function to the ACCC or the Australian Competition Tribunal in relation to the Qantas Group using capacity in all or part of the route.

Tourism and trade criteria

Subsection 9(h): the level of promotion, market development and investment proposed by each of the applicants

6.66 The Commission notes that the Indonesia route is the third largest market (after New Zealand and Singapore) for Australian travellers³⁰. Qantas and Garuda Indonesia are established carriers and accordingly have high levels of brand recognition and presence in the relevant markets. The Commission therefore attaches only minimal weighting to this criterion.

Subsection 9(i): route service possibilities to and from points beyond Australia or foreign gateways

6.67 Qantas submits that the proposed code share arrangements provide connectivity benefits as a result of the additional options for Garuda Indonesia to sell through journeys from domestic Indonesia and other international routes on a single airline code.

6.68 The Commission notes that Garuda Indonesia operates international services to: China, Hong Kong, Japan, Malaysia, Netherlands, Singapore, South Korea, Thailand and Qatar³¹ in addition to its extensive domestic network in Indonesia.

6.69 However, the Commission notes that these connectivity options do not represent new routes between Australia and or points beyond or behind Indonesia, noting Qantas provides its customers with through options to these destinations via its existing extensive code share and interline network with its airline partners, including Garuda Indonesia. In addition, as noted previously, the Australia-Denpasar/Jakarta route is principally a point-to-point market, with limited through-traffic carried by airlines to and from points beyond Australia and/or foreign gateways.

³⁰ BITRE Indonesia-Australia international aviation data, year ended December 2023.

³¹ [Destination - Garuda Indonesia \(garuda-indonesia.com\)](https://www.garuda-indonesia.com)

Subsection 9(j): the availability of frequent, low cost, reliable air freight movements for Australian importers and exporters

6.70 The Commission notes that the proposed variation would not result in any change to freight movements available for Australian importers and exporters. The Commission therefore did not consider this criterion in its assessment of the variation application.

Relevant information obtained from Government agencies

Subsection 9(k): any information that the Commission has obtained from Australian Government agencies or statutory authorities that the Commission considers to be relevant

6.71 The Commission has had regard to information obtained from BITRE³² in relation to the route. It has also considered the submission of the ACCC, referred to throughout this document.

7 Summary of the Commission's findings

7.1 The Commission finds that while it is likely that the proposed variations would result in some marginal consumer benefits including improved single carrier connectivity and schedule options, the Commission considers that the likely public benefits are limited and are substantially outweighed by the likely public detriment that would follow from the proposed variations.

7.2 The Commission also finds that the variations are likely to consolidate the dominant market positions of Qantas and Garuda Indonesia on the Australia-Indonesia route. If this occurs, the Commission considers that it will make it more difficult for other Australian carriers to compete effectively, as well as for new airlines to enter the route.

7.3 There is also potential for competitive detriment to arise as a result of the proposed variations, which the Commission finds would produce adverse outcomes for consumers as the arrangement may have the effect of reducing the incentive the airlines have to compete with each other. Over time, this can be expected to lead to public detriment in the form of higher airfare prices and/or a reduction in aspects such as product, schedule and frequency of service.

7.4 The Commission considers that without the proposed variations, Qantas and Garuda Indonesia would be more incentivised to invest and take commercial risks to expand services in their own right and/or to offer a better schedule and product, rather than effectively being able to rely on the complementary services of the code share partner. This would also likely maximise downward pressure on airfares compared with a scenario with the code share arrangements in place.

7.5 The Commission considers that vigorous competition between the two airlines operating on parallel city pairs is desirable to continue fostering a competitive environment in the Australia-Indonesia market, and an environment in which Australian carriers can effectively compete with each other, and with foreign airlines on the route. The Commission therefore finds that the proposed variation is not conducive to such an outcome.

7.6 The Commission finds that the likely public benefits of the proposed variations are substantially outweighed by the likely public detriment that would follow from the proposed variations. For these reasons, the Commission is satisfied that the variations would not be of benefit to the public, within the meaning of the Act. Accordingly, the Commission must not make a decision approving the variations.

³² BITRE provides economic analysis, research and statistics on infrastructure and transport.
[2024] IASC 204DD

8 Decision [2024] IASC 204d

8.1 In accordance with section 25 of the Act, the Commission, having conducted a review, proposes to make a decision not to vary Determinations [2013] IASC 135; [2019] IASC 116; [2020] IASC 101; [2021] IASC 107; [2021] IASC 118; [2022] IASC 110; [2023] IASC 102; [2023] IASC 107 and [2023] IASC 127 which allocate capacity to Qantas on the Indonesia route, in the manner requested by Qantas.

Dated: 24 April 2024



Genevieve Butler
Chairperson



Jane McKeon
Commissioner

Appendix A: Determinations sought to be varied and associated conditions

Determination	Capacity Allocated	Conditions
[2013] IASC 135	Unrestricted passenger capacity to and from all points in Australia, except Australia's major gateway airports, and points in Indonesia	The capacity may be used by Qantas or its wholly-owned subsidiary, Jetstar may provide code share services with KLM ³³ .
[2019] IASC 116	744 seats of capacity per week	The capacity may be used by Qantas or its wholly-owned subsidiary, Jetstar. Jetstar may provide code share services with KLM.
[2020] IASC 101 (as varied)	670 seats of capacity per week	The capacity may be used by Qantas or its wholly-owned subsidiary, Jetstar. Jetstar may provide code share services with KLM.
[2021] IASC 107	100 seats of capacity per week	The capacity may be used by Qantas or its wholly-owned subsidiary, Jetstar. Jetstar may provide code share services with KLM.
[2021] IASC 118	1,300 seats of capacity per week	The capacity may be used by Qantas or its wholly-owned subsidiary, Jetstar. Jetstar may provide code share services with KLM.
[2022] IASC 110	1,260 seats of capacity per week	The capacity may be used by Qantas or its wholly-owned subsidiary, Jetstar. Jetstar may provide code share services with KLM.
[2023] IASC 102 ³⁴	1,250 seats of capacity per week	The capacity may be used by Qantas or its wholly-owned subsidiary, Jetstar. Jetstar may provide code share services with KLM.
[2023] IASC 107 ³⁵	14,468 seats of capacity for the exercise of third and fourth freedom rights	The capacity may be used by Qantas or its wholly-owned subsidiary, Jetstar. Jetstar may provide code share services with KLM.
[2023] IASC 127 ³⁶	284 seats of capacity per week	The capacity may be used by Qantas or its wholly-owned subsidiary, Jetstar. Jetstar may provide code share services with KLM.

³³ KLM means 'KLM Royal Dutch Airlines'

³⁴ Renewal of Determination [2018] IASC 120

³⁵ Renewal of Determination [2017] IASC 130, as varied by Decision [2023] IASC 208

³⁶ Renewal of Determination [2019] IASC 106