



21 August 2026

Mr Jim Wolfe
Assistant Secretary

International Aviation

Department of Infrastructure, Transport, Regional Development, Communications, Sport
and the Arts

GPO Box 594

Canberra ACT 2601

E| Jim.Wolfe@infrastructure.gov.au

Dear Jim,

**Re: Comments on proposed bilateral air services discussions – Argentina,
Denmark/Norway/Sweden, Finland, Saudi Arabia, South Africa and Thailand**

The Queensland Tourism Industry Council (QTIC) welcomes the opportunity to comment on the Department's proposed discussions with Argentina, Denmark, Norway, Sweden, Finland, Saudi Arabia, South Africa and Thailand, as set out in your correspondence to the Australian Chamber – Tourism on 3 July 2026.

QTIC supports the position put by the Australian Chamber – Tourism, including the importance of addressing bilateral capacity ahead of time and the case for liberalising each of the six arrangements. This submission sets out Queensland-specific considerations for each market.

Queensland context

Queensland operates three international airports, in Brisbane, the Gold Coast and Cairns, and is preparing to host the 2032 Olympic and Paralympic Games. The Queensland Government's Destination 2045 strategy targets doubling visitor expenditure to \$84 billion by 2045. Its \$75 million Connecting Queensland Fund exists specifically to secure new international routes and additional frequencies ahead of the Games, working with airports, Tourism and Events Queensland, airlines and industry partners. The Queensland Government has already secured seven new international routes through this Fund. QTIC asks that the Department's consideration of these six markets take Queensland's gateways and the 2032 timeline into account on the same basis as growth drivers already under consideration elsewhere in the network.

Finland

Finland is a strong opportunity as Finnair has confirmed a daily Helsinki–Bangkok–Melbourne A350 service from October 2026. Finnair's decision shows bilateral capacity is only one part of route development: the service is being supported by Victorian Government destination marketing through its Industry Partnership Program. Any updated Australia–Finland arrangement should preserve the fifth-freedom flexibility via Bangkok that underpins this route, so Brisbane remains genuinely available for a second Australian gateway or additional frequency as the relationship develops.

Saudi Arabia

Brisbane has capacity to support premium long-haul Gulf traffic, with onward links across

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Europe, Africa and the Middle East. Combined with Queensland's tourism growth and Saudi Arabia's own aviation and tourism expansion, QTIC considers this supports preserving Brisbane as a serious option for future direct services under any updated Australia–Saudi Arabia arrangement.

Thailand

QTIC supports the shift from seat-based to services-based capacity measurement, which gives airlines more flexibility to match aircraft size to demand. Cairns currently has no nonstop Bangkok service, with current schedules requiring an intermediate stop. In determining how existing entitlements are converted, QTIC asks that the Department consider whether the resulting framework supports the development of services to regional gateways such as Cairns and the Gold Coast.

South Africa

Queensland has a sizeable South African-origin population and associated visiting-friends-and-relatives and tourism demand, which QTIC sees as a potential long-term market for direct connectivity. QTIC supports the broader liberalisation proposed, including fifth-freedom opportunities.

Argentina

Argentina is a growing market and key gateway to connect the broader South American region. Additional bilateral capacity with Argentina will make it feasible for airlines to relaunch Australia routes or codeshare arrangements to improve access to the region. Queensland's remote and island tourism operators rely heavily on working holiday makers, so improved connectivity has longer-term relevance to tourism and labour mobility under the Australia–Argentina Work and Holiday Program.

Denmark, Norway and Sweden

QTIC supports liberal capacity and traffic-right settings that preserve future opportunities for direct or connecting services between Scandinavia and Queensland.

QTIC would welcome the opportunity to discuss any of these points further.

Yours sincerely,



Natassia Wheeler
Chief Executive Officer

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