

**Submission on the Proposed Decision of the Acting Minister of Transport of 1 December 2025**

**Air New Zealand and Air China**

Air New Zealand Limited (**Air NZ**) and Air China Limited (**Air China**) (the **Parties**) welcome the proposed decision of the Acting Minister of Transport to authorise the strategic alliance agreement (**Strategic Alliance**) (**Proposed Decision**). This submission does not contain any confidential information and can be published in its entirety.

The Acting Minister of Transport considers that “*the Strategic Alliance delivers net public benefits to New Zealand*”. Accordingly, the Strategic Alliance satisfies the statutory test for authorisation. The Proposed Decision recognises that the Strategic Alliance supports wider government objectives more generally, including that it aligns with the Tourism Growth Roadmap.

To recap, in the now ten years since it was first authorised, the Strategic Alliance has delivered and will continue to deliver benefits to the public. In addition to the benefits to the tourism sector, this includes the recovery of total capacity travelling on Alliance Sectors post-Covid, decreasing average fares, increased connectivity, and enhanced loyalty and frequent flyer programme benefits. Of note is that the Strategic Alliance has delivered public benefits whilst having no detrimental effect on competition to date. The Proposed Decision specifically acknowledges that the existence of the Strategic Alliance has not dissuaded other carriers from entering.

The Parties are also supportive of the proposed five-year term for reauthorisation. Five years provides the Parties with sufficient certainty to make long-term investment decisions.

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