

## **NZ AIRPORTS CROSS-SUBMISSION ON**

### **the proposed 2025 authorisation of the Air NZ - Air China alliance**

1. Thank you for the opportunity to provide a cross-submission regarding the proposed authorisation of an alliance between Air China and Air NZ on routes between China and New Zealand.
2. NZ Airports represents 49 airports across New Zealand<sup>1</sup>, including the international gateways to New Zealand, the domestic airports which make up the national air transportation network, and smaller airports focused on general aviation services. New Zealand's airports are essential infrastructure of national and regional significance that play a crucial role in the socio-economic wellbeing of our communities.
3. NZ Airports is disappointed that the Applicant's response to third-party submissions is not materially any more informative or detailed than the public version of its initial proposals for an alliance. The Applicant's response is mainly descriptions of why some submitters opposed or supported the application, with additional claims on how beneficially the previous alliances between the Applicants have operated. The Applicant's response does not provide verifiable data to rebut third parties' objections. The confidential version that the Ministry received may not contain any redactions but no party outside of the Ministry and the Applicants can assess how germane or accurate that information is.
4. No other aviation or travel industry participant can verify the underlying data or the alliance's past performance and so challenge the proposal's basic premises. The Applicants are in effect asking other parts of New Zealand's travel industry to take the proposal on trust and to have faith in the Applicant's worthiness.
5. NZ Airports is also disappointed that the Minister's proposed decision does not provide clearer or more reasoning. The Minister's public notice lacks explicit scoring or weightings of the pros and cons of the proposed alliance.
6. This proposal is one of the first to be evaluated under the new provisions of the 2023 Civil Aviation Act and the resulting Ministry of Transport's new evaluation process. As a result of being one of the first applications, it sets a precedent for the level of detail, the relevance and completeness of information for future applications.
7. NZ Airports had high hopes for the Ministry's work developing a comprehensive Assessment Framework for Airline Cooperation Agreements. We and our airport members expected the Assessment Framework operating

under a new Civil Aviation Act would greatly increase transparency from airline Applicants making their case for authorisation, and by the relevant Ministers justifying and explaining their decisions. Ministers could at least 'show their working' in reaching their decision.

8. As we noted in our first submission:

*'...it would be optimal to reinforce what 'good' looks like in the new regime for transparency with other airlines' alliance applications.'*

9. We hope that future applications and decisions reach a higher standard of transparency - and so contestability - based on data and argument.

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<sup>i</sup> Our member airports include Alexandra Airport, Ardmore Airport, Ashburton Airport, Auckland Airport, Chatham Islands Airport, Christchurch Airport, Dunedin Airport, Gisborne Airport, Great Barrier Airport, Hamilton Airport, Hawke's Bay Airport, Hokitika Airport, Invercargill Airport, Kapiti Coast Airport, Kaikohe Airport, Katikati Airport, Kerikeri Airport, Marlborough Airport, Masterton Airport, Matamata Airport, Motueka Airport, Nelson Airport, New Plymouth Airport, Oamaru Airport, Pauanui Airfield, Palmerston North Airport, Queenstown Airport, Rangiora Airport, Rotorua Airport, Takaka Airport, Taupo Airport, Tauranga Airport, Te Anau Airport Manapouri, Te Kowhai Aerodrome, Thames Aerodrome, Timaru Airport, Wairoa Airport, Wanaka Airport, Whanganui Airport, Wellington Airport and West Auckland Airport.