

22 December 2025

Hon James Meager
Associate Minister of Transport
Parliament Buildings
Wellington

Via: alliances@transport.govt.nz

RE: Strategic Airline Alliance Reauthorisation - Air New Zealand and Air China

Dear Minister

1. The Travel Agents' Association of New Zealand (TAANZ) welcomes the opportunity to comment on the Proposed Decision (1 December 2025) regarding the reauthorisation of the strategic alliance between Air New Zealand and Air China.
2. TAANZ supports the proposed reauthorisation, on the basis that the alliance delivers greater choice, improved connectivity, and additional seat capacity for New Zealand consumers — outcomes that align directly with the public interest tests under the Civil Aviation Act.
3. This submission should be read in conjunction with TAANZ's earlier submission on airline alliance reauthorisations, which sets out our overarching position and principles in detail.

Consumer Choice and Capacity Benefits

4. TAANZ's primary test for supporting airline alliances is whether they result in tangible, measurable benefits for travellers. In this case, we agree with the Ministry's assessment that the alliance is likely to:
 - Support additional seat capacity between New Zealand and China
 - Improve schedule coordination and network connectivity
 - Enhance choice and flexibility for both inbound and outbound travellers
 - Strengthen New Zealand's access to a strategically important long-haul market
- 5 For consumers, additional capacity and coordinated services translate into more options, better availability, and improved resilience — particularly important in long-haul markets that remain capacity-constrained.

Alignment with Public Interest Outcomes

- 6 TAANZ agrees with the Ministry's conclusion that the public benefits of the alliance outweigh any potential competitive risks. Increased air capacity delivers wider benefits, including:
 - Greater support for outbound travel by New Zealanders
 - Improved access for inbound tourism
 - Enhanced cargo and trade connectivity, supporting exporters and supply chains
- 7 These outcomes align with TAANZ's long-standing view that well-regulated airline alliances can enhance competition at the network level, rather than diminish it, when accompanied by appropriate oversight.

Importance of Ongoing Monitoring

- 8 Consistent with our previous submission, TAANZ supports continued monitoring and reporting requirements to ensure that promised consumer benefits are delivered in practice.
- 9 We encourage the Ministry to maintain clear expectations around:
 - Delivery of additional or maintained capacity
 - Ongoing consumer benefits
 - Transparency and accountability over the authorisation period
- 10 TAANZ supports the reauthorisation of the Air New Zealand / Air China alliance as proposed. We agree with the Ministry's assessment that the arrangement is likely to deliver greater choice and additional seats for consumers, while supporting broader economic and connectivity outcomes for New Zealand.

We appreciate the opportunity to engage on this process and remain available to provide further input as required.



JULIE WHITE
Chief Executive Officer
Travel Agents' Association New Zealand
julie@taanz.org.nz