

22 August 2025

Hon Chris Bishop  
Minister of Transport  
Parliament Buildings  
Wellington

Hon James Meager  
Associate Minister of Transport  
Parliament Buildings  
Wellington

Via: [alliances@transport.govt.nz](mailto:alliances@transport.govt.nz)

Dear Ministers

**Submission on behalf of Travel Agents' Association New Zealand (TAANZ)**

**RE: Airline Alliance Reauthorisation**

- Air New Zealand and Air China strategic alliance
  - Qantas Airways and American Airlines joint business agreement
1. TAANZ supports airline alliances where it delivers clear, measurable benefits for consumers. Alliances must not simply consolidate market power — they must result in more seats, more choice, and fairer prices for New Zealand travellers.
  2. Airline Capacity Adds Value to New Zealand: Alliances should showcase how increased capacity delivers wider benefits — supporting inbound tourism, enabling outbound travel options for New Zealanders, and strengthening cargo connectivity that underpins trade, exports, and supply chains. Together, these outcomes create significant social and economic value for New Zealand.
  3. TAANZ endorses the Ministry of Transport's assessment framework and application guidelines under the Civil Aviation Act 2023, which took effect on 5 April 2025. It is essential that any authorisation of airline alliances is assessed against consistent criteria, ensuring that public benefits—such as improved connectivity and increased capacity—clearly outweigh any potential reduction in competition.

**Key Recommendations**

4. **Seat Growth:** Authorisation should be conditional on a measurable increase in available seat capacity (ASKs), not just reallocation of existing services.

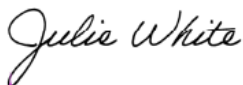
5. More Choice: Alliances should commit to adding new routes or increasing frequencies on existing ones, particularly to underserved markets.
6. Competition & Fares: Safeguards are needed to prevent aligned pricing that reduces competitive pressure. Consumers should see tangible fare benefits, including accessible promotional fares.
7. Monitoring: Annual reporting and a mid-term review should be required to ensure promised benefits are delivered.

#### In Summary

TAANZ strongly recommends that the Ministry ensure any reauthorisation is conditional on genuine, measurable consumer benefits. Without clear commitments, alliances risk reducing competition while delivering little additional capacity.

Thank you for your time and consideration.

Yours sincerely



**JULIE WHITE**

Chief Executive Officer

Travel Agents' Association New Zealand

[julie@taanz.org.nz](mailto:julie@taanz.org.nz)

#### About TAANZ

The Travel Agents' Association of New Zealand (TAANZ), established in 1962, is the peak body representing over 95% of New Zealand's travel agent industry, including travel agencies, travel advisors, and tour operators. TAANZ is dedicated to maintaining the highest standards of governance, financial integrity, and professional conduct. As a self-regulator, membership requires adherence to rigorous financial, ethical, and operational criteria, ensuring consumer confidence and protection when engaging with a TAANZ-accredited business. Through strong advocacy, industry leadership, and collaboration with government and stakeholders, TAANZ supports a sustainable, competitive, and resilient travel and tourism sector in New Zealand.