

22 December 2014

Dr Richard Chadwick  
General Manager  
Adjudication Branch  
Australian Competition and Consumer Commission

By email: [adjudication@accc.gov.au](mailto:adjudication@accc.gov.au)

Dear Dr Chadwick

**A91470 & A91471 – Qantas & China Eastern - submission**

Thank you for the opportunity to comment on the alliance between Qantas Airways Limited and China Eastern Airlines Corporation Limited.

As a general proposition, Air New Zealand supports alliances between air carriers. For Air New Zealand, alliances are becoming increasingly important in the development of our international network and in the accessibility of long haul destinations. Air New Zealand therefore understands the basis on which the applicants are seeking to establish the proposed alliance.

A significant proportion of travel from the China is dual destination (ie stopping in both Australia and New Zealand), so a competitive China - Australia market is very important to Air New Zealand. We do not have any specific comments on the applicant's competition analysis or claimed public benefits, although we do agree with the applicants that the Australia - China (and New Zealand – China) passenger air services market is expanding rapidly, and that the region gives rise to particular social, political and economic factors. These factors should be taken into account when assessing the authorisation application.

Yours sincerely

  
**Stephen Jones**  
Chief Strategy Networks & Alliances