

Thursday, 14 December 2023

Dear Mr Foley

Application for authorisation AA1000653 – Virgin Australia & Air New Zealand – Interested party consultation

Queensland Airports Limited (QAL), owner and operator of Gold Coast, Townville, Mount Isa and Longreach Airports, supports Virgin Australia's and Air NZ's application for authorisation under the *Competition and Consumer Act 2010* (Cth).

Gold Coast Airport is the fourth-largest gateway for traffic between Australia and New Zealand and is overall supportive of increasing competition on this critical market.

As Virgin Australia no longer has a presence in New Zealand (apart from point-of-sale Australia dominant Queenstown markets, which are excluded from this application), allowing this unilateral codeshare will increase the distribution potential of existing Air New Zealand capacity from Gold Coast Airport to New Zealand. QAL believes this will create demand conditions that could support additional capacity and resultant public good.

Over the longer term, however, QAL would be more supportive of increased Virgin Australia presence on Trans-Tasman markets generally. Continuation of this application for up to five years, in our opinion, may reduce the incentive for Virgin Australia to enter this market using their 'own metal', unless a bilateral codeshare or deeper arrangement was secured between the two airlines in place of the current application.

QAL is therefore supportive of the application for an authorisation period of up to three years, noting that after this timeframe it would be reasonable to expect that Virgin Australia would commence services in their own right.

QAL thanks the ACCC and welcomes the opportunity to provide comments.

Please feel free to reach out if you have any questions.

Yours sincerely,

Adam Rowe
Chief Commercial Officer
Queensland Airports Limited