

**From:** [Nicole Malone](#)  
**To:** [Jack Foley](#)  
**Cc:** [Anthony Hilton](#); [Connie Wu](#); [Jennifer Orr](#); [Andrew Finch](#); [Nicole Tyson](#); [REDACTED]  
**Subject:** RE: AA1000625 - Request for clarification - Qantas and Emirates application for re-authorisation - [SEC=OFFICIAL] [ACCC-ACCCANDAER.FID3329751]  
**Date:** Friday, 12 May 2023 3:19:24 PM  
**Attachments:** [image002.png](#)

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Confidential

Dear Jack

We refer to the Commission's email of 11 May 2023.

The Qantas Emirates alliance is not 'metal neutral', however the Restated MCA (as it has to date) will continue to provide a deep level of integration to closely align the commercial incentives of Emirates and Qantas, which ensures that each airline treats the other's customers as if they were their own and allows the airlines to provide the greatest benefits to passengers in terms of product and seamless service. This close alignment was recognised in the ACCC's 2018 Determination, where it concluded (at paragraph 91) that with respect to 'how strongly aligned Qantas and Emirates incentives are, the alliance is not metal neutral, however the alliance partners' incentives are still closely aligned.'

We are comfortable for this response to be published on the public register.

Kind regards  
Nicole

**Nicole Malone**  
Head of Legal – Competition & Consumer

Group Legal | Office of the CEO  
**Qantas Airways Limited**  
10 Bourke Road, Mascot NSW 2020



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**From:** Jack Foley <Jack.Foley@acc.gov.au>

**Sent:** Thursday, 11 May 2023 3:46 PM

**To:** Nicole Malone [REDACTED]

**Cc:** Anthony Hilton <anthony.hilton@acc.gov.au>; Connie Wu <connie.wu@acc.gov.au>; Jennifer Orr <jennifer.orr@acc.gov.au>; Andrew Finch [REDACTED]; Nicole Tyson [REDACTED]; [REDACTED]

**Subject:** AA1000625 - Request for clarification - Qantas and Emirates application for re-authorisation - [SEC=OFFICIAL] [ACCC-ACCCANDAER.FID3329751]

**OFFICIAL**

Dear Nicole,

To assist in our assessment of the Qantas and Emirates application for re-authorisation, could you please clarify whether the alliance between Qantas and Emirates is metal neutral?

Please could you provide a response in a form suitable for the public register by close of business on **12 May 2023**.

Please let me know if you have any questions.

Kind regards

**Jack Foley** (he/him)

Analyst | Competition Exemptions | Mergers, Exemptions and Digital  
**Australian Competition & Consumer Commission**  
Level 25 | 32 Turbot Street Brisbane QLD 4000  
T: 07 3811 9294 | [www.accc.gov.au](http://www.accc.gov.au)



The ACCC acknowledges the traditional owners and custodians of Country throughout Australia and recognises their continuing connection to the land, sea and community. We pay our respects to them and their cultures; and to their Elders past, present and future.