



PUBLIC VERSION

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BY EMAIL ONLY

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Dear Ms Wu

**Qantas Airways Limited & Emirates (AA1000625-1)] (the Application)
Response to ACCC's request for information dated 27 February 2023 (the Request for Information)**

Emirates appreciates the opportunity to respond to the Request for Information and our response is set out below.

Capitalised terms in this submission have the same meaning as set out in the Application.

1. Confidentiality

This submission includes material which is confidential to Emirates, and confidentiality markings are included below. A public version of this response will be provided in due course.

Highlighting code:

Emirates confidential information to be redacted (IN BLACK) from public version

2. Response to Information Request

2.1 The ACCC asked Emirates to respond to the following enquiry:

Please provide a detailed explanation and further information to substantiate paragraph 3.18 of Emirates' submission dated 5 November 2022 that, absent the Proposed Conduct [START EK CONFIDENTIAL:

[REDACTED]

END EK CONFIDENTIAL].

2.2 Emirates maintains that without the alliance, it would face significant challenges in reinstating and sustaining services between Sydney and Christchurch and in the absence of the

reauthorisation it would be forced to either downgrade the aircraft it operates or potentially eliminate the Christchurch extension. More specifically:

- (a) While the Sydney-Christchurch extension carries a mix of passengers travelling point-to-point, and to/from Dubai and beyond, it also relies on many connections with Qantas to/from Australia and Asia.
- (b) Without the ability to coordinate through the alliance, the flight options (itineraries / destinations / timings) available to all three groups of passengers would inevitably reduce and negatively impact the viability of the service.
- (c) Prior to the pandemic, Qantas ticketed [START EK CONFIDENTIAL [REDACTED] END EK CONFIDENTIAL] of the passengers and accounted for [START EK CONFIDENTIAL [REDACTED] END EK CONFIDENTIAL] of the revenue on Emirates' flights between Sydney and Christchurch in CY2019. A breakdown of these details is attached to this submission. As the Sydney-Christchurch service resumes, Emirates expects the same or similar support from Qantas and without it, the operation would not be sustainable [START EK CONFIDENTIAL [REDACTED] END EK CONFIDENTIAL].
- (d) Pursuant to the existing Authorisation, the ACCC also has access to financial data relating to the Sydney-Christchurch operation. A consolidated excel of this data is attached to this submission for ease of reference. As can be seen from the data, [START EK CONFIDENTIAL [REDACTED] END EK CONFIDENTIAL] the ability to leverage the alliance with Qantas allowed Emirates to sell passenger itineraries that it otherwise would not have been able to, especially for connections through the domestic Australia network. This ability, combined with the financial performance on the trunk Dubai-Sydney has allowed Emirates to maintain its capacity on the Dubai-Sydney-Christchurch route [START EK CONFIDENTIAL [REDACTED] END EK CONFIDENTIAL].

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] END EK CONFIDENTIAL]

We trust that the above response satisfies the ACCC's Request for Information.

Yours faithfully

[REDACTED]

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[REDACTED]