



Commerce Amendment Bill: airport services

Submission by BARNZ to the Transport and
Infrastructure Select Committee

15 June 2018

About BARNZ

BARNZ is the voice of the airline industry in New Zealand. Our 29 member airlines are a direct enabler of our \$14.5 billion tourism industry and deliver \$8 billion of our exports.

Our members connect New Zealand to the world.

Our job is to make sure that airline travel is affordable for all and that New Zealand's connections to the world continue to grow in a fair and sustainable manner.

We want infrastructure at the border and airports developed in an efficient way and with everyone paying their fair share.

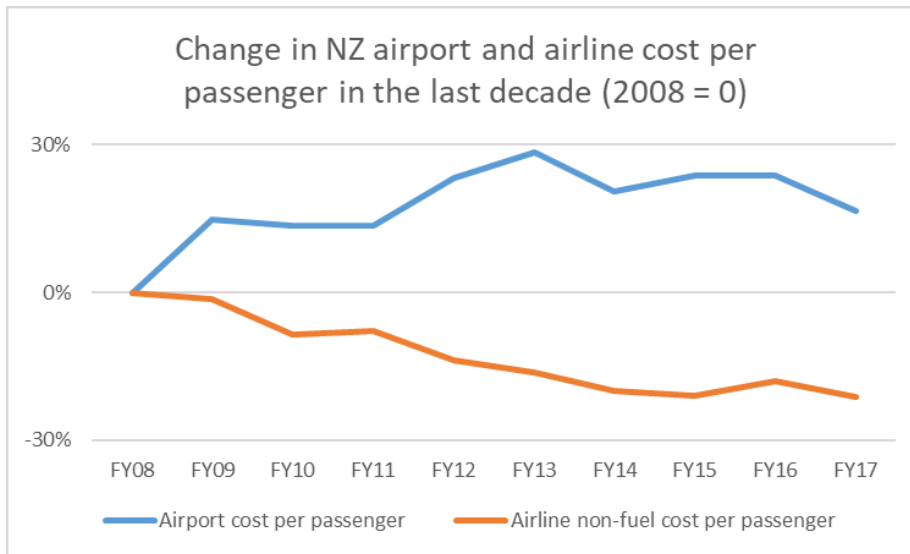
We are committed to ensuring that the right balance is struck between adequately protecting our borders and a seamless traveller experience.

We work closely with the Government, regulators, businesses, local communities and many other groups to help achieve these goals for our members and New Zealand.

Executive Summary

What is the problem? Why closer regulation of major airports is essential for New Zealand

1. Air travel and air connectivity matter more to New Zealand than most other countries, given our geographic position in the world. We need affordable, efficient air travel to connect New Zealanders to the world, promote our travel, trade and tourism sectors and generally secure our economic wellbeing.
2. Airlines are working hard to deliver more affordable and efficient travel. Excluding the cost of fuel (which is well known to be volatile), airlines globally and in New Zealand have been highly successful at finding efficiencies to keep the cost of travel down and passing these savings on to consumers – this is driven by fierce competition between airlines. But the monopoly airports have not been doing their bit: their costs have been going up, undermining the efforts of airlines to make travel more affordable for all.



Source: BARNZ and IATA analysis using airline annual reports and airport information disclosures

3. New Zealand’s airports are delivering record profits to their shareholders at the expense of the travelling public. For example, Auckland Airport has transferred \$2 billion of profits to shareholders in the past decade while investment in infrastructure has not kept up with demand, leading to current service problems. The Commerce Commission has recently found that Auckland Airport is not limited in its ability to extract excessive profits and its current charges are \$65 million too high.
4. If this continues, it will make New Zealand uncompetitive as an air travel destination. Airports are able to over-charge passengers because they can set prices as they see fit. They must ‘consult’ with their airline customers but airlines have no power in these consultations, because ultimately the airport can decide on their prices and service quality over the top of airline objections. There is a fundamental power imbalance at play here – between the monopoly price-setting airport and the price-taking airlines. There is also no ability for the regulator to intervene when airport prices are excessive. This means airports can price without regulatory constraint, even though they are monopolies.
5. BARNZ sees this problem of excessive airport charging as resulting directly from the current light-handed regulatory regime, which is simply not able to constrain airport profits effectively – ie there is a clear failure in the current regulation. The Bill is needed to at least establish a credible threat of further regulation if airports do not act reasonably.

6. Importantly, under current law it would need a change in primary legislation to change the regulation that applies to airports, but for any other industry, new regulation can be applied by a Minister through an Order in Council. Also, the Commerce Commission has no clear path for an inquiry into regulated airports but does for all other industries. This is clearly wrong (it is due to drafting errors in the original Part 4 legislation) and we see no valid reason not to fix it.

Airlines' first preference is for negotiate/arbitrate regulation

7. The first preference of BARNZ and our member airlines is for this Bill to directly apply negotiate/arbitrate regulation to airports (ie regulations that require airports and airlines to negotiate in good faith, with an arbitrator to decide if the parties cannot agree). This is the best option because airports have already shown that they are willing and able to overcharge consumers, so there is no need for a further inquiry to prove it.
8. Moving straight to negotiate/arbitrate would also move New Zealand to the right model – where airports and airlines negotiate properly, with an arbitrator as a back-stop, and will ultimately reduce the need for regulatory oversight and political intervention on issues that could be handled commercially.
9. However, if negotiate/arbitrate is not applied, the approach in the Bill is still an improvement on the status quo. We next discuss why the Bill as drafted is a big improvement on the status quo and what changes we believe would strengthen it further.

Why the Bill puts downward pressure on airport prices

10. Importantly, the Bill as drafted does not impose any new regulation on airports – so if airports price appropriately in future they have nothing to fear.
11. What the Bill does is introduce a more credible threat of future regulation if airports do not set prices and provide services that are in consumers' interest. This will make it more likely that airports will set reasonable prices in future, reducing the cost of travel for New Zealanders and our visitors.

What happens if the Bill does not pass?

12. If this Bill is not passed, or is greatly watered down, then we expect airport charges to become even more unreasonable. This will be because airports will have seen a reluctance by Parliament to apply even the mild 'back-stop' regulation in the Bill, which will be seen as a green-light to set even more excessive prices in future.

What is the most important incremental improvement that can be made to the Bill?

13. If the Committee was to change just one part of the Bill, we believe it should require the Commission to review whether the current regulations are effective.
14. As drafted, the Bill clarifies that the Commission "may" review whether the current light-handed regulation that applies to airports (information disclosure) is effective at delivering good outcomes for consumers. BARNZ agrees this is helpful but the Bill should go further. The best way to provide strong oversight of airport operations, to make sure they are acting in consumers' interests, is to require the Commission to assess whether information disclosure is effective following each airport price setting decision (ie once every five years). If the Commission finds that regulation is not effective, then this assessment can then form the basis of an inquiry and recommendation to Ministers that stronger regulation is applied.

BARNZ submission

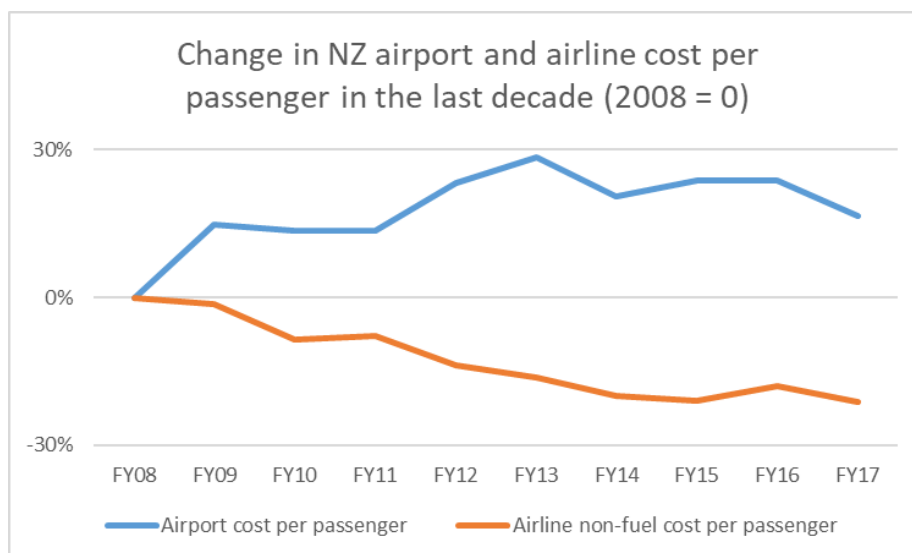
Introduction

15. BARNZ is pleased to provide this submission on the Commerce Amendment Bill on behalf of our member airlines, which are listed in the **Appendix**. Some members may also make their own submissions on the Bill.
16. We request the opportunity to present to the Committee on this Bill.
17. Our interest in the Bill relates to the sections on the regulation of airport services. We do not make any comments on the market studies or enforceable undertakings sections of the Bill.
18. BARNZ's contact person for this submission is:

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Airport charges affect New Zealand's economy and our connections to the world

19. Air travel and air connectivity matter more to New Zealand than most other countries, given our geographic position in the world. We need affordable, efficient air travel to connect New Zealanders to the world, promote our travel, trade and tourism sectors and generally secure our economic wellbeing.
20. New Zealand's international tourist industry is now worth \$14.5 billion per year and 99% of our international visitors arrive by air. This means the cost of airport services directly affects the success of our tourism sector.
21. Airlines are working hard deliver more affordable and efficient travel. Excluding the cost of fuel (which is well known to be volatile), airlines globally and in New Zealand have been highly successful at finding efficiencies to keep the cost of travel down and pass these savings on to consumers. This includes more efficient aircraft and new check-in technologies. These efficiencies have been driven by strong competition in the airline sector: we now have more than 30 different international airlines in New Zealand, providing direct routes to 47 international destinations. But as the chart below proves, monopoly airports have not been doing their bit: their costs have been going up, undermining the efforts of airlines to make travel more affordable for all. Regulation needs to do more to push airports to find more efficient ways of operating, so charges to consumers can be lower.



Source: BARNZ and IATA analysis using airline annual reports and airport information disclosures¹

22. In terms of efficiency, the true picture is even worse than the chart implies, because the decline in airport cost per passenger in FY17 is not an efficiency gain – it is due to some large increases in passenger volumes that the airports have not managed to keep up with in terms of spending and service quality.
23. Auckland Airport’s standard charges are \$47 per passenger for a return ticket on a typical short-haul international flight. Christchurch and Wellington’s charges are not too far behind. These costs get added to sizeable government taxes and levies, meaning that more than half the cost of a ticket can be going to airport and government charges. These costs risk making New Zealand uncompetitive with other international air routes, negatively impacting our economy and our global connectedness.

This Bill is needed to stop airports over-charging their customers and start delivering quality services

24. New Zealand’s airports are delivering record profits to their shareholders at the expense of the travelling public. As the headlines show, all three of our major airports have very profitable operations.

Auckland Airport lifts first-half profit by 17 per cent, tightens full-year guidance

16 Feb, 2018 10:27am

2 minutes to read

[Home](#). [About Us](#). [Media Centre](#). [Media Releases](#). 2017. Profit lifts 50% at Christchurch Airport.

PROFIT LIFTS 50% AT CHRISTCHURCH AIRPORT

Infratil reports record results from Wellington Airport

May 17, 2018

Auckland Airport lifts annual profit, expects growth on pricing changes

23 Aug, 2017 9:19am

2 minutes to read

¹ Costs comprise opex and depreciation. Airports included are Auckland, Wellington and Christchurch. Airlines included are those with the largest share of the NZ market: Air NZ, Qantas Group, Emirates, Virgin Australia, Singapore Airlines and LATAM. The index is based on weighted average costs: for airports, the weights are the share of FY17 passenger numbers; for airlines the weights are seats operated to Auckland in the year ending May 2018.

25. We have seen clear examples of unjustified over-charging at all three major New Zealand airports:
- a. The Commerce Commission has recently concluded that Auckland Airport's current charges are not justified and the airports prices will over-charge consumers by \$65m over the years 2017-2022 and it seems the airport is not limited in its ability to extract excessive profits.²
 - b. A Commission review of Wellington Airport's pricing in 2013 found that their profits were excessive and unjustified, by an amount in the range of \$38m - \$69m.³
 - c. In its 2012-2017 pricing decision, Christchurch Airport was seeking excessive profits in the range of \$21-\$35m.⁴
26. A recent report by Frontier Economics for A4ANZ has found that:
- a. Since privatisation, Auckland and Wellington airports have together earned upwards of \$4 billion of excess returns (\$3.6 billion and \$400 million respectively) – across all airport operations, relative to what they would have earned had they set fair and reasonable prices.⁵
 - b. The EBIT and EBITDA margins of New Zealand and Australian airports at 79% are far above those of their global peers (around 50% higher than the average of comparable airports in other jurisdictions).
27. Today, Auckland Airport is investing in a large-scale expansion of its operations, much of which airlines support. However, the airport is paying for this while maintaining a policy of paying 100% of Net Profit after Tax (\$250 million last year) as dividends to shareholders. Importantly, in 2014 Auckland Airport undertook a 'capital return' where it gave \$454m to shareholders over and above the standard dividend returns. This was done just before the airport embarked upon its current large investment phase – that money could have been used by the airport to fund its investment, rather than charging passengers even more. Over the past decade, AIAL has transferred \$2 billion of profit to its shareholders rather than investing in terminal and other infrastructure. We believe this shows the complete failure of the current light-handed regulatory model.
28. Shareholders are not contributing to the expansion of Auckland Airport, even though they will be major beneficiaries of a larger airport with a larger passenger base. We do not believe any competitive business would act like this – the airport only gets away with it because it is essentially an unregulated monopoly.
29. Airports are able to over-charge in this way and minimise shareholder contributions to major projects because they can set prices as they see fit. They must 'consult' with their airline customers but airlines have no power in these consultations as ultimately the airport can decide on their prices and service quality over the top of airline objections. There is also no ability for the regulator to intervene when airport prices are excessive. This means airports can price without regulatory constraint, even though they are monopolies.

² <http://www.comcom.govt.nz/dmsdocument/16212>

³ <http://www.comcom.govt.nz/dmsdocument/11171>

⁴ <http://www.comcom.govt.nz/dmsdocument/11171>

⁵ These values are in 2017 dollars.

30. There is a fundamental power imbalance at play here – between the monopoly price-setting airport and the price-taking airlines. NZ airports are an outlier in this respect – for other monopolies in New Zealand, and other airports globally, there are tools in place for regulatory intervention to make sure that charges are reasonable. If the current light-handed regulation continues, it risks making New Zealand uncompetitive as an air travel destination.
31. The high airport profits have been earned at a time where real concerns are being raised about the quality of service at Auckland Airport in particular, New Zealand’s main gateway.

BUSINESS

Mike Hosking: Auckland International Airport is a national embarrassment

28 May, 2018 7:58am

Auckland Airport written off as 'simply not good enough'

JACKSON THOMAS
Last updated 20:09, May 29 2018



32. These concerns are being raised due to a range of service quality issues at Auckland Airport. For example: the domestic terminal that is well past its use-by date, leaking roofs at the international terminal, major traffic congestion problems and long waits for passengers in peak hour queues due to a lack of capacity.
33. Ultimately, we see these pricing and service quality outcomes because airports are profit-maximising monopolies with shareholders that expect monopoly rents. It is unsurprising that airport companies take advantage of the lax regulation currently in place to target excessive profits. Airports are too critical to New Zealand’s economic wellbeing for this to be allowed to continue.

The current regulations are not working well enough

34. The information above about airport profits and inefficiency demonstrates the current light-handed regulation is not working. In fact, we see these outcomes as clear-cut evidence of the failure of the current regulations.
35. In this section, we review what MBIE officials said about the current regime in the Regulatory Impact Statement (RIS) that supports the airport sections of the Bill. The RIS found that:
 - a. It is not clear whether the Commission has the power to review whether information disclosure regulation of airports is effectively promoting airport consumers’ long-term interests.
 - b. If there is a need to impose stronger regulation on airports, the current process for this is unnecessarily expensive and onerous (requiring a change to primary legislation).

- c. The combined effect of these issues is to weaken the regulatory threat which underpins the current light-handed regulation for airports. This creates a risk that airports could act contrary to consumers' interests with minimal fear of regulation.

36. BARNZ agrees with those conclusions. The weak regulatory threat is the reason why airports are able to keep making such excessive profits.

37. We understand that there is a broad consensus that these are problems. The previous Minister of Commerce and Consumer Affairs, Jacqui Dean, took a paper to Cabinet recommending the changes that have now appeared in this bill⁶ and MBIE's website indicates that in June 2017 the then government decided to strengthen the regulatory regime for airports under Part 4 by making these changes.⁷ There seems to be a clear view from both the current and previous government that these reforms are needed and there is a problem to be addressed. We are hopeful that all of the Committee will support the airport provisions within the Bill.

38. The RIS also concluded that the current regulations are working. BARNZ disagrees with this. The evidence of airport profits and poor service demonstrates consumer interests are not being protected. Also:

- a. If the current regulations were working, we would not have seen Auckland and Christchurch Airports overcharge customers by \$75 million in their 2017 pricing decisions or Auckland Airport charge customers \$50 million through the 'runway land charge' for the northern runway, which is not expected to be built until 2028 – so customers will be paying for an asset they cannot use.
- b. The assessment in the RIS is based on an incorrect view of what the "current regulations" are. The regulations worked to an extent in limiting airports' excessive profits in the previous airport pricing consultation round in 2012. But in 2012, the Commission was required to review whether the regulations were effective and provide this report to the Minister. The clause was a one-off and has now expired, so there is no basis to claim that current regulations are working as they have not been fully tested.

Preferably, the Bill would directly apply negotiate/arbitrate regulation to airports

39. Our vision is for an outcome where airlines are able to negotiate commercially acceptable deals with major New Zealand airports with little or no regulatory oversight required. In practice, as discussed above, airlines have no power in pricing negotiations (in fact they are not even negotiations, airports just "consult" and then make the final decision). The long-standing preference of airlines is for negotiate/arbitrate regulation to be applied. This type of regulation is already provided as an option in Part 4 of the Commerce Act and would require airports and airlines to negotiate in good faith and for an arbitration step to be in place if the parties could not agree.

40. The first preference of BARNZ and our member airlines is for this Bill to directly apply negotiate/arbitrate regulation to airports. We believe this is the best approach because:

⁶ <http://www.mbie.govt.nz/publications-research/publications/business-law/cabinet-paper-part-4-of-the-commerce-act-1986.pdf>

⁷ <http://www.mbie.govt.nz/info-services/business/competition-policy/part-4-of-the-commerce-act/airport-regulation/effectiveness-information-disclosure-regulation>

- a. Airports have already shown that they will seek to over-charge consumers and enrich shareholders at the expense of passengers. The case for imposing additional regulation is already clear.
- b. A negotiate/arbitrate regime would ultimately reduce the level of regulatory intervention that is required and create a genuine incentive for airports to negotiate with airlines thereby pushing airlines and airports into a more commercial relationship. This is because, once the arbitration mechanism is established, there would be less work for the regulator to do (ie the Commerce Commission would have less need to review airport pricing decisions, because either the parties will have agreed or an arbitrator will have decided what is reasonable).⁸
- c. We expect that arbitrations would be relatively rare events, at least after the first one or two have established a baseline of what is and is not justified, which parties can then refer to.
- d. It would avoid the need for any Commission inquiry, instead just applying regulation directly to airports.

41. BARNZ therefore recommends that the Committee supports amending the Bill to apply negotiate/arbitrate regulation to airports through this Bill, rather than enabling this type of regulation to be applied later following a Commission inquiry. We believe that approach would maximise consumer protection and minimise regulatory cost over time.

42. However, if negotiate/arbitrate is not applied, the approach in the Bill is still an improvement on the status quo. We next discuss why the Bill as drafted is a big improvement on the status quo and what changes we believe would strengthen it further, if negotiate/arbitrate is not applied to airports.

This Bill will create a more credible threat of regulation, which will encourage airports to act in their consumers' interest

43. Importantly, the Bill as drafted does not impose any new regulation on airports – so if airports price appropriately in future they have nothing to fear. BARNZ hopes that with the more credible threat of regulation, airports will now start to price reasonably and the additional powers created in this Bill will never need to be used.

44. What the Bill does is introduce a more credible threat of future regulation if airports do not set prices and provide services that are in consumers' interest. Airlines are pleased to see this change introduced - we have been waiting for it for many years. The Bill does this by making three inter-linked changes to the current legislation:

- a. The Bill gives the Commission clear powers to review whether the current regulation that applies to airports (Information Disclosure) is effective.
- b. The Bill enables the Commission to carry out an inquiry into Auckland, Wellington and Christchurch Airports to determine whether additional regulation needs to be applied to them to protect consumers. The Commission can then make a recommendation to the Minister of Commerce.

⁸ Our reading of section 531(5)(a) of the Commerce Act is that the Commission is not able to appoint itself as the arbitrator.

- c. The Bill enables the Minister of Commerce, in consultation with the Minister of Transport, to then impose regulation on airports by Order in Council (following a Commission recommendation).

45. These three changes will create a much more credible threat that more regulation can be imposed on airports, and quickly. This will make it more likely that airports will set reasonable prices in future, reducing the cost of travel for New Zealanders and our visitors.

46. To provide more detail on some of these points:

- a. The Commission already has some powers to review airport pricing decisions, but these powers are limited and it is not clear that the Commission could review whether information disclosure is effective – this puts it at risk of legal challenge if it did choose to review this, which is a further reason why the current regulatory settings do not provide a credible threat.
- b. There is already an inquiry process in Part 4 of the Commerce Act, but this is designed for businesses and industries that are not currently regulated. The Commission is required to assess whether there is limited competition in the market and whether the firms have market power. For airports, this is entirely unnecessary as they are already regulated as monopolies under the Act so clearly there is no competition and the airports do have market power. The Commission indicates that the cost of an unnecessary inquiry could be \$1 million. The streamlined inquiry process in the Bill is much better suited to the question of how airports are regulated.
- c. The ability to impose regulation by Order in Council is not new. In fact, this is something that Ministers can do for any other industry in New Zealand (following a Commission inquiry). But due to a drafting error in the original Part 4 legislation, Ministers would need primary legislation to apply additional regulation to airports. In this instance, giving Ministers the power to apply new regulation to airports by Order in Council is simply correcting the original legislation.

47. So, in other words, today it would need a change in primary legislation to change the regulation that applies to airports, but for any other industry regulation can be applied by the Minister through an Order in Council. Also, the Commerce Commission has no clear path for an inquiry into regulated airports but does for all other industries. This is clearly wrong (and results from drafting errors when Part 4 was originally prepared) and we see no valid reason not to fix it.

The test for applying additional regulation to airports is appropriate

48. BARNZ supports the test in the Bill that the Commission will have to consider when deciding whether to recommend that additional regulation is applied to airports. This test (in new section 56G(2)) is to assess the benefits (in terms of meeting the purpose of the legislation) of imposing additional types of regulation against the costs of imposing those types of regulation.

49. We think this is clearly the right question to ask – do the benefits outweigh the costs? If they do then the presumption should be that additional regulation is applied. If they do not, then it would be unlikely that additional regulation would be recommended by the Commission or applied by the Minister.

50. We do not think it is necessary to apply additional tests or criteria to this assessment, because the Commission should have scope to consider the matters that it believes are most relevant and not be

constrained by legislation that may inadvertently drive focus onto the wrong criteria or otherwise unnecessarily constrain the matters the Commission may consider.

51. We also do not think there is any need for the benefits to “materially exceed” the costs of regulation. Auckland, Wellington and Christchurch Airports are already subject to light-handed regulation under Part 4 as natural monopolies. Much of the cost of regulation (ie to publish annual disclosure information) has already been incurred by the companies involved and the decision has been taken by Parliament that it is in the public interest for these companies to be regulated. The threshold for applying additional regulation to those companies does not need to be more than assessing the benefits versus the costs of that additional regulation.

If the Bill does not pass, we can expect airport charges to get even higher

52. If this Bill is not passed, or is greatly watered down, then we expect airport charges to become even more unreasonable. This is because:
- a. There will still be no credible threat of regulation to prevent airports setting excessive prices
 - b. Airports will have seen a reluctance by Parliament to apply even the mild ‘back-stop’ regulation in the Bill, which will be seen as a green-light to set even more excessive prices in future.

To make the Bill even more effective, the Commission should be required to assess whether current regulation is working

53. The Bill clarifies that the Commission “may” review whether the current light-handed regulation that applies to airports (information disclosure) is effective at delivering good outcomes for consumers. BARNZ agrees this is helpful but the Bill should go further. New Zealand’s major airports are critical to our economy and global connections and there should be regular reviews of whether the regulation that applies to airports is effective.
54. The best way to achieve this is to require the Commission to assess whether information disclosure is effective following each airport price setting decision (ie once every five years). If the Commission finds that regulation is not effective, then this assessment can then form the basis of an inquiry and recommendation to Ministers that stronger regulation is applied. This could be achieved through adding the following wording to section 53B:

The Commission must, as part of a summary and analysis of any airport disclosure relating to a change in airport prices, include an analysis of how effective the information disclosure requirements imposed on the goods or services are in achieving the purpose of this Part.

55. We do not believe this additional task should be very onerous for the Commission, because efficiencies can be found in their current reviews. For example, at the moment the Commission’s approach is to carry out two sets of reviews – one following each price setting decision (but without assessing whether current regulation is effective) and one into airports’ historical disclosure publications. We believe these could be merged into a single review, done once every five years, for each airport that also considers whether the current regulations are effective.
56. We also do not believe that assessing whether current regulations are effective would create significant additional workload for the Commission, because this should just be a straightforward step from the conclusions already reached. For example, in the recent Draft Report into Auckland Airport’s pricing, the

Commission concluded that Auckland Airport was not limited in its ability to extract excessive profits from consumers. Having reached that conclusion, it should not be very difficult (or expensive) to then conclude that current regulations are not effective at limiting excessive profits.

Other recommended improvements to the Bill

57. In this section we outline other changes that should be made to improve the Bill.
58. As drafted, there is no specified timeframe in the Bill for the Minister to make a decision on whether to impose regulation following a Commerce Commission inquiry (new sections 56I and 56J). If there is no specified timeframe, the risk is that the Ministerial process may take a long time, creating uncertainty for airports, airlines and passengers as to what the future arrangements will be. BARNZ recommends a maximum timeframe of four months is applied to the Minister's consideration and decision under sections 56I and 56J. The timeframe should be able to be extended if the Minister requests further advice from the Commission under section 56I(3).
59. Any regulation that is applied to airports through this new process should not automatically expire after 20 years (section 56K(2)). Regulation will only have been introduced after a Commission inquiry and recommendation to Ministers and then a Ministerial decision; this will not be a decision taken lightly. However, we support a review of the regulations after 20 years to determine whether they need to remain in place or to be removed.
60. To ensure the new legislation is working, we recommend the Bill also requires the Minister of Commerce to assess the effectiveness of the changes being made within the next five years. By 2023, Auckland, Wellington and Christchurch Airports will all have reset their prices under the new regulatory settings in the Bill. A review at that time is necessary to identify if the changes have indeed promoted better outcomes in airport price setting, or if a different approach (such as negotiate/arbitrate) is needed.
61. The wording of section 56H(2)(c)-(e) could clarify that the provisions mentioned in these sections will change over time. In other words, the regulation can be expected to last 20 years so the "material provisions of the negotiation process and arbitration process" and the "default price path and quality standards" will be reviewed and amended over that time. We suggest that the wording of this clause makes it clear that the recommended material provisions of each type of regulation are those that would be applied initially, but these may be amended in future determinations made by the Commission under section 52P of the Act.

Appendix: List of BARNZ members

Full membership

Air Calin

Air New Zealand

Air Tahiti Nui

American Airlines

China Airlines

China Southern

Fiji Airways

Hong Kong Airlines

Korean Air

Malaysia Airlines

Qantas Airways

Sichuan Airlines

Tasman Cargo Airlines

Tianjin Airlines

Virgin Australia

Air China

Airwork

Air Vanuatu

Cathay Pacific Airways

China Eastern Airlines

Emirates

Hainan Airlines

Jetstar

LAN Airlines

Philippine Airlines

Qatar Airlines

Singapore Airlines

Thai Airways International

United Airlines

Associate membership

Menzies Aviation (NZ) Ltd

OCS Group NZ