

24 October 2023

Jo Lipscombe  
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Commerce Commission

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Dear Jo

### **Effective Date of Proposed Changes to Airport IM**

Air New Zealand welcomes the opportunity to make this submission on the Commission's proposed effective date of the proposed changes to the Airport IMs.

The original intent was that the proposed changes would become effective from the commencement of the FY26 disclosure year. The Commission is now proposing that these changes take effect on the day after which notice of the amendment determination is given in the NZ Gazette. The Commission notes that this would mean "the policy intent of those proposed IM changes would come into effect as soon as possible."

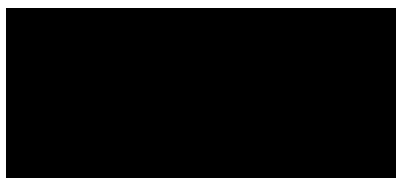
Air New Zealand agrees that it is desirable that the policy intent come into effect as soon as possible. The proposed changes, as per the Draft Decisions, reflect the most up-to-date policy evolution and market conditions, as well as international practice. While not determinative of airport target returns under Information Disclosure, the IM's provide a useful and objective yardstick against which airports can assess their own target returns and justify any departures. This is an important tool for ensuring that the purpose of Part 4 of the Commerce Act is being met.

It is noted that prices set by Auckland and Christchurch airports ostensibly under the 2016 IM will be in force through until FY27. Wellington Airport is currently consulting on pricing for the FY25-FY29 (PSE5) period. Having any changes to the IM come into effect as soon as possible will ensure that these can be assessed against relevant and up-to-date evidence.

Nothing in this submission is confidential.

Please contact me if you have any queries relating to any of the above.

Yours sincerely



Sean Ford  
Manager Aeronautical Suppliers