



7 February 2025

Ministry of Business, Innovation and Employment (MBIE)  
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Te Whanganui a Tara Wellington 6140  
AOTEAROA NEW ZEALAND

By email: [competition.policy@mbie.govt.nz](mailto:competition.policy@mbie.govt.nz)

### **IATA RESPONSE TO COMMERCE ACT 1986 REVIEW 2025**

The International Air Transport Association (IATA) is the global trade association for the world's airlines, representing some 330 airlines and over 80% of total air traffic. Our members include Air New Zealand, as well as several foreign airlines that operate services to Aotearoa New Zealand. We support many areas of aviation activity and help formulate industry policy on critical aviation issues.

The review of the Commerce Act 1986 (the Act) is timely and provides an opportunity to ensure Aotearoa New Zealand's competition settings are agile, responsive and fit for purpose and address regulatory gaps. In this context, IATA considers that the regulatory framework governing specified airports requires reform to address the significant implications of escalating airport charges for Aotearoa New Zealand's economy. Beyond the remit of the Commerce Act, as the Ministry would be aware, there have been significant additional financial pressures applied to the aviation sector over the past twelve months in respect of which IATA has made representations.

IATA supports the points and recommendations raised by the Board of Airline Representatives New Zealand (BARNZ) in their submission to the review. We agree that the Act ought to be amended so that any regulations passed can more flexibly apply for just one airport (i.e. not requiring all three regulated airports to be treated with identical legal and regulatory regimes). This will provide greater flexibility to the Commerce Commission to more effectively deliver the required regulatory outcomes based on the specific approach needed for each airport. We further agree that given its significant role as an international gateway and cross-ownership by Auckland Airport, Queenstown Airport should form part of the regulated airports framework.

IATA is committed to supporting the review through further deliberations if necessary. Should you require additional information, please do not hesitate to contact me at [Privacy of natural persons](#)

Sincerely yours,

**Privacy of natural persons**

Matteo Zanarini  
Area Manager South West Pacific

cc Richard Tan, IATA Regional Manager Airport and ATC Charges – Asia Pacific