

From: [A.S Regulatory - inwards](#)
To: [Sonya Van De Geer](#); [Garrick Wood](#)
Subject: FW: Submission Against AirNZ/ Virgin Australia Codeshare
Date: Friday, 2 February 2024 8:32:01 am

From: [REDACTED] Julie [REDACTED]
Sent: Thursday, February 1, 2024 4:52 PM
To: A.S Regulatory - inwards <airservices@transport.govt.nz>
Subject: Submission Against AirNZ/ Virgin Australia Codeshare

To whom it may concern,

My submission is **against** the proposed AirNZ/ Virgin Australia codeshare.

My objection is a result of the very unfair treatment by Virgin Australia of their New Zealand customers who had Future Flight Credits issued after Virgin Australia went into voluntary administration. I would guess this would be many tens of thousands of New Zealanders who have been affected in this way, and totaling many millions of dollars.

As you are no doubt aware customers who had booked tickets prior to Virgin Australia going into voluntary administration in April 2020 were issued Future Flight Credits (FFC) by the new owners (Bain Capital). These credits expired on 31/12/2023 with New Zealanders having had very limited opportunity to use these credits before they expired. Set out below are my justifications as to why I believe it is now inappropriate for Virgin Australia to be allowed to potentially profit from a codeshare with Air NZ.

- 1) New Zealand customers had been hoping that Virgin Australia would reinstate flights between Australia and our four main centres (Auckland/ Wellington/ Christchurch/ Dunedin) before the Future Flight Credit expiry date, to enable New Zealanders a chance to use their credits on the flight routes they had originally booked pre-covid/ voluntary administration. It seems unjust that a little more than two months after the expiry of FFC's that Virgin Australia could be allowing their customers to book flights (and use other credits/ reward seats) between Australia and New Zealand on our national airline carrier.
- 2) The only airport in New Zealand that Virgin Australia currently flies into/out of is Queenstown, and this route only started in November 2022. For the majority of New Zealanders this is an impractical airport to get to in order to fly to Australia to use Future Flight Credits. Additionally this route was only operational from late 2022, giving New Zealanders only one year to try and book and complete travel from this airport before the expiry deadline of Dec 2023.
- 3) Virgin Australia continually maintained that customers had more than three years to use their Future Flight Credits, however this was not true for New Zealanders as our international border was only fully reopened without MIQ/self isolation from July 2022. This only gave New Zealanders 18 months in total to use our credits.
- 4) Virgin Australia deliberately made it difficult to use Future Flight Credits with many restrictions placed on them, including only a small number of seats on each flight being made available for FFC bookings, and certain routes within Australia and holiday periods having even fewer seats available for booking. Evidence of this is shown in the following news article <https://www.1news.co.nz/2023/08/30/why-kiwis-with-virgin-covid-credits->

[struggle-to-get-a-seat/](#). Additionally there were other nonsensical rules applied to FFC's that added to the barrier to use them (example: Virgin Australia made a plane change which meant seats booked were no longer available, and a \$500 credit refund was to be issued, however the rules were that the credit would not be applied until after the flight had been taken. This resulted in not being able to make use of these refunded credits for three months from April-July 2023, and once they were issued they still had an expiry of 31/12/23).

5) Virgin Australia states that they do not hold any of the funds customers paid for bookings made prior to April 2020; giving them justification to continue with their hard-line expiry date of 31 Dec 2023. However, FFC customers also do not have the money they paid for these bookings, and this money was paid to the brand that Bain Capital is now operating under. In my opinion Virgin Australia has not acted in good faith with the implementation of their FFC scheme, and particularly for their New Zealand customers.

5) There is also a lot of anecdotal evidence that Virgin Australia has a reputation for treating their customers badly with constant cancellations and poor customer service (<https://nz.trustpilot.com/review/www.virginaustralia.com>). Virgin Australia's questionable conduct could potentially have a negative impact on the Air NZ brand if this proposed codeshare were allowed to proceed.

In summary, I believe it is morally wrong for the reasons given above, for the New Zealand Government to approve a codeshare arrangement between Air NZ and Virgin Australia given the unreasonable way the new owners of Virgin Australia have treated their New Zealand customers holding Future Flight Credits. I personally would not fly Virgin Australia again, and if a codeshare were to be approved it would likely also affect my loyalty to and travel on Air New Zealand. I believe many other New Zealanders will also hold this view.

Yours sincerely

Julie Kayes