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22 January 2026

Ms Jasmina Ackar
Director
International Air Services Commission

**Subject: Application for Variation to Determinations – China Southern Airlines (CZ)
Codeshare on Australia–New Zealand and Australia–Vanuatu Routes**

Dear Jasmina,

Virgin Australia International Airlines Pty Ltd presents its compliments to the International Air Services Commission (the Commission) and, pursuant to section 21 of the *International Air Services Commission Act 1992*, hereby applies for variations to the relevant determinations to permit the addition of China Southern Airlines (CZ) as a codeshare partner.

Overview of the Proposed Arrangement

Virgin Australia has entered into a codeshare agreement with China Southern Airlines under which China Southern Airlines will act as marketing carrier, placing its designator code on selected Virgin Australia-operated services. Virgin Australia intends to commence the proposed arrangement from March 2026, subject to receipt of all necessary regulatory approvals.

Proposed Routes and Frequencies

The proposed codeshare services would apply to the following routes, subject to operational requirements and seasonal variations:

Route	Proposed Frequency
MEL – ZQN – MEL	Between 4 and 7 services per week
SYD – ZQN – SYD	Between 3 and 10 services per week
BNE – ZQN – BNE	Between 3 and 16 services per week
BNE – VLI – BNE	Between 4 to 12 services per week (up to a max of 12 return flight) Min: 4 Services pw (728 seats per week) Max: 12 services pw (2184 seats per week)

A confidential **route-by-route annex** is attached for the Commission's consideration.



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Determinations to be Varied

Australia – Vanuatu Route

- Determination **[2023] IASC 109**
- Determination **[2023] IASC 110**
- Determination **[2024] IASC 111**

Australia – New Zealand Route

- Determination **[2017] IASC 113**

Virgin Australia seeks approval for China Southern Airlines to place its designator code on Virgin Australia-operated services under the above determinations.

Virgin Australia further requests that Determination [2017] IASC 113 be varied to remove the condition permitting codeshare arrangements with Etihad Airways on services to New Zealand.

Compliance with Determinations and Policy Framework

Virgin Australia confirms that the proposed addition of China Southern Airlines:

- does not increase or otherwise vary the capacity allocations approved under the relevant determinations;
- does not alter the commercial structure of the free-sale codeshare arrangements previously approved by the Commission;
- will be operated in full compliance with the applicable Australia–New Zealand and Australia–Vanuatu air services arrangements; and
- remains consistent with all conditions imposed under the existing determinations.

Public Benefit

The proposed codeshare arrangement is expected to deliver clear public benefits, including:

- enhanced connectivity between China, Australia, New Zealand and the South Pacific;
- improved access to regional and leisure destinations such as Queenstown and Port Vila;
- support for inbound tourism and regional economic activity; and
- increased consumer choice through more seamless one-stop travel options.



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Confidential Information

For the Commission's consideration, a copy of the confidential codeshare agreement between Virgin Australia International Airlines Pty Ltd and China Southern Airlines is provided. Virgin Australia respectfully requests that this document be treated as **confidential** and excluded from publication, as it contains commercially sensitive information.

Should the Commission require any further information or clarification, please do not hesitate to contact Ms Rabia Naseer, Regulatory Affairs Specialist, at rabia.naseer@virginaustralia.com.

Virgin Australia International Airlines Pty Ltd appreciates the Commission's time and consideration and looks forward to the Commission's favourable consideration of this application.

Yours Sincerely,

A handwritten signature in black ink, appearing to be "Henry Coles", with a long horizontal flourish extending to the right.

Henry Coles

Head of Airline Partnerships and International Relations