



05 December 2024

Airways New Zealand  
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**By email:** [submissions@airways.co.nz](mailto:submissions@airways.co.nz)

### **IATA Response to *Auckland Air Traffic Control Tower Replacement Consultation***

The International Air Transport Association (IATA) is the global trade association for the world's airlines, representing some 335 airlines, or over 80% of total air traffic. Our members include Air New Zealand, as well as many international airlines who operate services to/from New Zealand, and through your airspace. We support many areas of aviation activity and help formulate industry policy on critical aviation issues.

While acknowledging the changed circumstances over the last 24 months since the 2022 consultation, IATA would like to re-enforce the core principles listed below that formed our submission at that time.

1. In respect to Auckland Airports ATC Tower replacement options, IATA outlined in its 2022 submission that: The three options presented provide adequate scope for possible solutions for long-term replacement of the tower at Auckland Airport however should there be an additional interim option for short-to-medium-term coverage that considers extending the current facility until there is more known about the viability of a digital solution?

Additional detail would be helpful in considering the listed options including the proposed construction methods for the physical towers, expected lifespan of each option, and the operational impact delivered in terms of required resources to maintain the asset and deliver the air traffic services.

IATA also requested that further clarification was needed if the digital contingency system in Option 2 would be the same system used within the hybrid proposal or a separate system altogether.

Regardless of final solution selected, all presented options should demonstrate cost effectiveness and provide potential safety enhancements and no safety reductions.

2. In IATA's response to providing further feedback on Airways preferred approach for the replacement of the Auckland ATC Tower, IATA advised that reflective of feedback received from member airlines, IATA is of the opinion that Option 3 – Digital Tower should be explored as the preferred solution until and unless it is clearly demonstrated that the option is untenable due to safety or technical considerations. As well as advances in technology, we are aware that there has been significant progress in regulatory guidance, performance standards and experience in operations as a contingency tower solution in multiple locations globally. We recommend Airways NZ continue to closely study guidance and precedent set by EASA, UK, CANSO, Budapest Airport and the document ED-240A – 'Minimum Aviation System Performance Standards (MASPS) for Remote Tower Optical Systems' as initial suggestions.

IATA believes that given the organised traffic mix and disposition in Auckland (limited circuit traffic), a digital solution would be a viable outcome for service delivery if proven safe. As discussed in Airways' virtual briefing session on Friday 30th September, it is imperative that the NZ Regulator has in place all necessary rules and safety guidelines under which a digital tower service delivery can operate. Only if Option 3 is demonstrated as not meeting safety standards, then Option 2 – Hybrid Physical Tower could be pursued.



In respect to additional feedback on the changes highlighted to the Capital Plan in section 5.1 of the 2022 consultation exercise IATA highlighted.

Option 3 – Digital Tower provides significant savings compared to Options 1 and 2. It would seem good practice to pursue this option as preferred and then if proven unviable the lessons-learned can form part of the hybrid solution and only then need to incur additional cost if necessary.

IATA requested whether there are any tax advantages from the different options? For example, could early exploration of digital solutions be considered Research and Development for tax considerations? How different are the depreciation schedules of each option based on their differing life cycles?

IATA requested that it be clarified that if WiP is not part of the cost-base until the asset is delivered into service, and reason for the material figures allocated to the financial years prior to 2027? In terms of possible delays or cost-creep to deliver the final agreed solution, IATA requested clarification on how will allocation of project risk be determined particularly where cost-base has assumed operational from a date, but service delivery hasn't commenced?

It was understood through the 2022 consultation process that an evolution of the tower structure and location was required within this decade. IATA is concerned to note, as outlined in the consultation paper, that this process is suggesting that a solution must be found prior to the 2026 opening of Pier A1 development at Auckland Airport. This had not previously been indicated as a cause for concern or a factor in considering the tower replacement timeline. IATA and its members thus consider it prudent to enquire as to why this is only being considered as part of this consultation, and not the previous iteration.

IATA recognises that the preferred option continues to provide adequate scope for long-term planning, and factors in the cost and future digital opportunities that exist. We remain steadfast in our view that any such construction activity should demonstrate cost-effectiveness and provide potential safety enhancements and no safety reductions. While the timeline remains a point of consternation, we do appreciate the efforts that Airways has made to reduce the planned expenditure from NZ \$45.8m to NZ \$40.6m. We trust that this will be reflected in upcoming pricing periods, as indicated in the document. Additionally, we request that Airways work with airlines to optimize costs and share new assessments on the control tower replacement as they become available.

IATA appreciates Airways New Zealand allowing the aviation sector and associated stakeholders the opportunity to provide feedback on the proposal for the replacement of Auckland's Air Traffic Control Tower. In future, we would kindly request that Airways New Zealand includes the IATA South West Pacific team abreast of any consultations and developments by adding myself ([zanarini@iata.org](mailto:zanarini@iata.org)) and Chris Tudehope ([tudehopec@iata.org](mailto:tudehopec@iata.org)), Assistant Manager Industry Affairs to relevant mailing lists.

Should you require additional information, please do not hesitate to contact either of us.

Sincerely yours,

Matteo Zanarini  
Area Manager South West Pacific

cc. John Moore, Assistant Director, Safety and Flight Operations, IATA Asia-Pacific