

Airways Revised Services Framework Consultation response by NZAF 18th June 2021.

Our apologies for the late submission due to the desire to speak with all our members at the NZAF meeting on 17th June.

We have read the Airports Assn submission and the Aviation NZ submission. We agree with points made by both Parties.

We have also read the letters from the Ministry of Transport to the Minister in 2019 and the recent letter in 2021 so are aware of the Ministries opinion that this is a good time to review the operating model and business structure for New Zealand's Aviation infrastructure that is supplied by Airways NZ Ltd. We are also aware that this issue of how we provide a basic navigation infrastructure was first raised in 2017 with a paper presented to New Southern Sky working group. Subsequently there have been several presentations and meetings with the Ministry promoting the need for a full review of the operating model of Airways NZ.

This has not been driven by any dissatisfaction of the products that our ANSP supplies but by a belief that as a major part of NZ INC infrastructure it should be treated as a service essential for regional connectivity in a similar manner to our roading or rail infrastructure.

With this in mind and recognising the disruption of our air transport services due to Covid, it would appear that this is the time for Industry, CAA, the Ministry and airways to come together and define what we want and need for the next 20 years from our ANSP. Once we have those basic services defined, we can then go about structuring the organisation we need to provide those services. We have a good starting point with the current Airways model which we can build on. However, it does need a major review and it seems that this current service framework consultation is just wasting time that could be used to progress to a model that will serve for many years to come.

To comment briefly on the consultation questions, in general it is our opinion that there was insufficient information given for a well-considered submission to be made. The following are our brief answers to your questions.

- Q 1. Airways provide the critical infrastructure, without which there would be a total collapse of the aviation sector. That is why the operating model needs to change and viewed as critical NZ INC infrastructure.

- Q 2. It is the time-line we want to extend so that a full industry wide workshop can be held. It probably should not be led by Airways.
- Q 3. We need to have a structured look at what is provided now and through industry led debate come up with what would be best for NZ INC.
- Q 4. Until the base services are defined this cannot be answered.
- Q 5. Again, we need to revisit the base services and establish those first.

We are not far apart in what we want but this is a perfect time to get the ANSP system defined for the next 20 or more years. We do not consider that this current Service Framework consultation should be progressed further at this time.

NZ Aviation Federation

18th June 2021