Ministry for the Environment
Wellington

Friday 25 October 2019

**Action for Healthy Waterways**

1. We welcome the opportunity to comment on the Bill.

2. We support many of the concepts in the discussion document. We also support the submission made by our subsidiary, the NZ Agricultural Aviation Association (NZAAA). The NZAAA submission provides a question by question response. Our purpose here is to make a few high level comments to support the detail of the NZAAA input.

**Aviation New Zealand: background**

3. Aviation NZ was established as an industry association in 1950 to encourage the safe development of aviation in New Zealand. Today, we have over 300 members and 1420 stakeholders.

4. Members range from large companies such as Air New Zealand, to medium sized companies (The Airwork Group, Oceania/Salus Aviation Group, Fieldair) to tertiary training institutions and a diverse range of small owner operated businesses.

5. Members include agricultural companies, air operators (fixed wing and rotary), aircraft designers and manufacturers, the UAV industry, airports, aviation trainers, emergency and medical services companies, helicopter companies, and parts manufacturers. These companies make up the Commercial General Aviation industry in New Zealand - they depend on aviation for their livelihood.

**General Comments**

6. **Align environmental, social, cultural and economic interests.** In our view, we have to take a national approach with ‘New Zealand’s interests’ being front and centre. We can’t have specific narrow interests derailing what is best for the country. Clearly aligning the various interests will be a challenge but the ‘national interest’ goal is noble and should take precedence.
7. **Recognise and build on programmes that are already achieving success.** As is clear from the NZAAA submission, there are some extremely good programmes developed by industry for industry. These include AIRCARE™, Growsafe and Spreadmark. Often, Government support has been provided to develop these programmes but the Government has declined to make them mandatory. This has discouraged companies from investing in them. There is a cost involved to achieve higher performance facilitated by the programmes but if Government work is awarded to companies that don’t meet the higher standards, there is little incentive to achieve them.

8. In our view, some existing programmes, as identified in 7 above, could be enhanced and made more fit for purpose in terms of new environmental requirements. This would be more cost effective than developing new programmes. Companies could then either comply with these enhanced standards or show that they have all the requirements to deliver to the same standards, they could be future proofed.

9. The enhanced programmes will need to be developed further. This will take time. However, with a longer term vision, training to achieve the new programme requirements can start sooner and the ongoing independent audit process will prove continuing compliance. Government support for enhancing these programmes and then requiring them would see many quick wins.

10. **Some flexibility may be required.** While we favour a national approach, in reality, there is considerable variation between regions. There should be a national approach but we need to recognise that some regions, because of the complexities of aligning all functions and given their current state, will take longer to come up to that national standard. This suggests that some local flexibility will be required.

**Conclusion**

11. We support the NZAAA submission while making some high level comments about alignment, building on existing proven programmes and retaining a little flexibility in how and when national goals may be achieved.

Yours sincerely

Personal details removed