

Submission by

LocationTech⁺

to the

Transport and Infrastructure Select Committee

on the

Civil Aviation Bill

2 December 2021

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Members of Parliament
Transport and Infrastructure Committee
Parliament Buildings
WELLINGTON 6160

LocationTech Submission – Civil Aviation Bill

SUMMARY:

1. LocationTech thanks the Transport and Infrastructure Committee for the opportunity to submit on the proposed Civil Aviation Bill. This submission is in response to sections in respect to regulations and policy changes for remotely piloted or autonomous aircraft, and airport regulation.
2. In response to the proposed bill, LocationTech are pleased that the Transport and Infrastructure Committee are considering to repeal and replace the Civil Aviation Act 1990, and the Airport Authorities Act 1966 with a single, modern statute. LocationTech agree that the proposed bill sets out its intent to provide a platform for safety, security, and economic regulation of civil aviation.
3. LocationTech is happy to engage further with the committee to discuss our submission in detail and provide further assistance.

BACKGROUND:

4. LocationTech is a member of the New Zealand Tech Alliance. Tech Alliance is a group of independent technology associations from across New Zealand, that work together with a common purpose to connect, promote, and advance technology ecosystems in New Zealand to create a prosperous digital nation.
5. LocationTech is an association of organisations and individuals that represent the industries that utilise location (spatial) technology and intelligence. Our mission is to develop a strong voice for location technology and intelligence, to ensure the industry and government are aware and ready to adapt, change and take advantage of new technological opportunities.

COMMENT:

6. LocationTech support the Civil Aviation Bill proposed by the Transport and Infrastructure Committee.
7. This submission is in response to sections in respect to regulations and policy changes for remotely piloted or autonomous aircraft, and airport regulation.

Comments and suggestions regarding Remotely Piloted or Autonomous Aircraft:

8. LocationTech support the inclusion of incorporating amendments that relate to emerging technologies, including remotely piloted or autonomous aircrafts. Both the 1966 and 1990 acts are out of date and need to recognise the progression in technology, as well as account for future emerging technologies.
9. However, the proposed bill does not provide sufficient understanding or real-use cases of remotely piloted and/or autonomous aircrafts, nor the advice or research that supports the proposed regulations.

As there is an increased use of drones, used both within or beyond the restricted area of airports, further clarification is needed on the conditions surrounding their use.

10. Clarification is also needed with respect to the broader definition of remotely piloted or autonomous aircrafts. LocationTech suggest that the definition allows for legislation to capture current and emerging technology, to allow for innovation and development within this space. Not only will a broader definition allow for emerging technology, but it will allow businesses and airports to adapt to these changes to allow those operating the technology to comply with legislation.
11. As technology is evolving at a faster rate than legislation can adapt to, LocationTech suggest an adaptive approach, based upon overall objectives to capture future emerging technologies. However, there is a trade-off that is necessary to ensure that the proposed rules around managing and enabling this technology are balanced with the need for controlling and mitigating potential safety risks.
12. Consultation with organisations such as LocationTech, and the wider Tech Alliance, is encouraged to understand the future developments and innovations related to remotely piloted, autonomous aircraft and other technologies. To ensure New Zealand as a technological hub in future, it is imperative that we ensure legislation can enable innovation, while also ensuring the rules and regulations relating to such technologies are clear to the industry and users.

Comments and suggestions regarding Airport Regulation:

13. LocationTech support the introduction of a modern registration regime for airports to include a requirement to consult with government agencies on spatial plans. LocationTech also agree for some airports to include a requirement of an enforceable regulatory undertaking; for government agencies to collaboratively agree their requirements for space and infrastructure, and for airports to present a binding plan to the Secretary for Transport as to how they will meet those requirements.
14. LocationTech agree that airports, and the space relating to them, needs to be regulated. However, clarity is needed on what the requirements of an enforceable regulatory undertaking are. More consideration is needed on the impact of how private and local bodies operate; private and local body industries should be able to act within their own agency and remain, to an extent, self-regulating.
15. Further, there is concern in relation to spatial plans beyond airport jurisdiction. Increasingly, the land surrounding airports is being developed for uses that is not directly related to air travel, specifically commercial businesses including supermarkets, retail, and restaurants. More consideration is needed on the rules and conditions imposed on land and transport planning developments. This needs to consider the public interest and impact on travel to and from airports to ensure efficient journey times and to lower pressure on transport modes.

CONCLUSION:

16. Thank you for the opportunity to provide feedback. LocationTech is happy to engage further to discuss our submission and provide any further assistance.
17. If you have any further queries do not hesitate to contact me.

Yours sincerely,

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