

Submission on developing the Aotearoa New Zealand Aerospace Strategy

Your name and organisation

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Overview of the Aerospace Strategy

- Question 1:** Do the four areas above provide the right basis for the Aerospace Strategy?
- Question 2:** What are the critical factors that you see for aerospace sector development?
- Question 3:** How would an Aerospace Strategy help you?

Please type your submission below. If applicable, please indicate the question(s) to which you are responding.

I would like to congratulate MBIE and the Government for the consultation paper. This strategy was first proposed in 2018. As an investor, director and consultant in New Zealand aerospace and advanced aviation companies over the past 10 years, it is heartening to see a vital piece of the puzzle articulated.

The draft Aerospace Strategy being put out for consultation is the start of an important framework to drive sector development towards “an ambitious 2030 Future State”. The goals largely cover what is required however a sustainable funding and investment model, and effective cross-government coordination and collaboration also need to be included as strategic goals.

However, the success of the future of aviation and space in New Zealand hinges on a clear and effective strategy that drive good private sector investment and government policy making decisions.

Other jurisdictions have achieved this with Government/ Aviation Authority/ Industry roadmaps which indicate (and do not bind) all parties to the progress of their industry jurisdictionally and supports national policies on the growth and development of the space and aviation industries globally.

There is also a broader social benefit that comes from this kind of forward planning. When industry and government can see the strategic path ahead, they are able to make better decisions around supporting the maximum benefit for New Zealanders, whether that is training and supporting a strong pipeline of talent, national security and foreign policy decisions and/ or supporting the many adjacent technologies that spring up around a labour and technology intensive industry like space and advanced aviation.

Area One - A strategy for building our aerospace sector

- Question 1:** Is the 2030 Future State set out in a way that enables New Zealand to build on its existing advantages to develop a leading place in the global aerospace economy?
- Question 2:** Will the 2030 Future State support your ambitions for growth and participation in the sector?
- Question 3:** What barriers are there to optimising sector growth?
- Question 4:** How could the government and the sector work together to achieve the 2030 Future State?
- Question 5:** How can the Government enable Māori ambitions for the sector?

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A lot of the success of the advanced aviation sector hinges on the capability and performance of the Civil Aviation Authority New Zealand. Protecting the independence of the organisation is in not a question. There is no desire to see that changed in any way. Every aviation company in New Zealand that wants to do well benefits from a strong safety focus. However, the evolution of advanced aviation and space development requires different capabilities and resourcing from the past century and there is a need to build different structures and accountabilities to meet that need:

- CAA NZ needs to be able to attract staff with the competencies and experience required to support certification of complex and novel aerospace systems.
- There needs to be a greater accountability to set, monitor and deliver on targets that advance aviation in Aotearoa New Zealand.
- More effective coordination across government departments (including tertiary education, education and training).
- A single aviation & space regulatory environment
- Greater investment in educating the next generation of aerospace professionals and regulators.

The split between the Ministry of Business, Innovation and Employment, Ministry of Transport and CAA NZ on advanced aviation technologies could be improved to ensure greater cooperation, accountability, and delivery.

Area Two - Building strong foundations (Three Pillars)

Question 6: What do you think of the Three Pillars and do you think they will support the 2030 Future State?

Question 7: What else would you like to see in the Three Pillars?

Question 8: What actions and initiatives could the sector focus on to support the Three Pillars?

Please type your submission below. If applicable, please indicate the question(s) to which you are responding.

All three Pillars broadly seem to fit with the overall concept of this document. Specific comments are as follows:

Pillar one - Unlocking Aerospace Potential:

- Ideally, further time bound work will be done to articulate who the beneficiary/ beneficiaries of this pillar is/ are, with clear timeframes and metrics. Each of the key stakeholders - either implicitly or explicitly involved in defining and delivering this strategy - needs to align with the overall timeline, by ensuring that individual strategies and associated legislation is complementary to this strategy document.
- This pillar will benefit from a Whole of Government approach to this pillar with key milestones and/ or missions that would involve industry, industry organisations, government, Tangata Whenua and Community.

Pillar Two - Future-Facing Government

- Civil Aviation Authority New Zealand (CAA NZ) continues to have challenges in meeting the growth and needs of the Aotearoa New Zealand's aerospace industry and its performance is therefore crucial to the success of the Aerospace strategy.
- It is worth noting that other jurisdictions (UK, Europe, Australia, Canada and the US) - and have all made concerted efforts to engage with industry and develop regulatory mechanisms to better engage with new technologies. That has not occurred to the same degree in New Zealand.
- This strategy should look to establish an Emerging Technologies Team that sits outside of the CAANZ (as with the UK CAA).
- Government has an important role to play in supporting the growth of the sector through procurement. In New Zealand there are strong manufacturing and adjacent application sub-sectors emerging, with cutting-edge research and development capability also growing in several universities across the country.

Pillar Three – Aerospace Nation

This pillar will benefit from a Whole of Government approach with key milestones and/ or missions that would involve industry, industry bodies, Government, Tangata Whenua and Community:

- The Ministry of Education and the Tertiary Education Sector are vital for practically achieving the pipeline of talent required to ensure that New Zealanders (and particularly our young people/ rangatahi) are able to access the diversity of roles that are available.

- MBIE/ NZTE and Callaghan Innovation all contribute to this and should be bought into the proposed goals/ milestones.

Social licence and Tangata whenua/ community engagement is still underdeveloped (both from a Government and industry perspective). It is increasingly important for this to be addressed as more aerospace and advanced aviation companies operate in Aotearoa.

It is also important that government and industry work together to establish clear expectations for a pipeline of talent that engages Tangata Whenua and supports rangatahi to access the opportunities that this emerging industry presents. All three Pillars broadly seem to fit with the overall concept of this document. Specific comments are as follows:

Area Three - Goals for 2030

- Question 9:** What do you think of the Goals for 2030?
- Question 10:** Are the goals framed in a way that will enable New Zealand to build on its strengths and comparative advantages to achieve the 2030 Future State?
- Question 11:** What activities and milestones can help us achieve these Goals?
- Question 12:** Where do you see yourself in realising these Goals?

Please type your submission below. If applicable, please indicate the question(s) to which you are responding.

The Goals seem to fit with Aotearoa New Zealand's principle areas of advantage. However, the goals and their descriptions are vague (use of 'could' and 'can', rather than 'should' and 'will') and there are no milestone dates to guide the activities (for example Goal Two: when does New Zealand plan for all forms of autonomous aerial vehicles to be safely integrated?).

It is acknowledged that Goal 3 links to the Space Policy and the consultation occurring there. It is important to note for both consultations that it is important that New Zealand's values are clearly expressed and adhered to - both in international policy development, and in the commercialisation of New Zealand space companies. No one company should be in a position where its commercial activities are dictating Government policy or foreign relations.

Area Four - Pathway to the 2030 Future State

Question 13: What policies, ideas, actions, and/or initiatives would you like to see in the Action Plan to help achieve the ambitious 2030 Future State?

Question 14: What would be the benefits of these actions and how would they help grow the New Zealand aerospace sector?

Question 15: How would you like to be involved in the delivery of the Aerospace Strategy?

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It is difficult to comment on what should be included in the action plan without more granularity about what is trying to be achieved and by when.

Any action plan needs to include:

- The Aerospace Strategy is an all-of-government strategy. To fully achieve this will require a programme management mechanism that ensures the individual parties are accountable to each other and to industry for delivery.
- Sustainable funding and investment model (including government procurement from New Zealand companies for aerospace projects)
- More tangible aerospace infrastructure investment (more projects like Tāwhaki)
- A roadmap to integrate the space and aviation regulatory systems
- A roadmap to build workforce development
- Closer collaboration between the regulators and industry underpinned by a true co-design process. Industry groups, such as Aerospace New Zealand and Aerospace Auckland, and collaborations, such as Project Tāwhaki, are vital fora to engage with and involve industry to support better policy and decision making.
- Effective and respectful engagement with Tangata Whenua.