

A photograph of Earth from space, showing the curvature of the planet and the thin blue atmosphere. The sky is a deep, dark blue, and the Earth's surface is a lighter blue with some white clouds. The horizon line is visible, separating the dark sky from the bright atmosphere and the Earth's surface.

Submission form

New Zealand Space Policy Review Consultation

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How to make a submission

The space policy review consultation is an opportunity to share your interests in space and views on the values and policy objectives that underpin New Zealand's space activities and engagements.

You can make a submission either through this form or the survey linked below.

Submissions close by **31 October 2022**.

Submission form

This submission form can be accessed via the MBIE consultation portal at www.mbie.govt.nz/have-your-say/new-zealand-space-policy-review. To make a submission through this form you will need to:

1. Fill out the **submitter information** page within this document, including your name, email address, phone number and organisation. If you are representing an organisation, please ensure you have the authority to represent its views.
2. Fill out your **responses to the questions** within this document. You can answer any or all of these questions.
3. Please **send this submission form** either:
 - Via email: to spacepolicyreview@mbie.govt.nz; or
 - Via post: to: Space Policy Review, Ministry of Business, Innovation and Employment, PO Box 1473, Wellington 6140.

Submission survey

Alternatively, you can complete a submission on the same questions within this form using the following link: <https://www.research.net/r/spacepolicyreview>

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How feedback will be used

Your feedback will be collated into a summary of feedback report. This will assist the New Zealand government to create or amend space policies and to look at:

- *Creating a National Space Policy*: a document which outlines New Zealand's values and objectives on space, including for our international partners.
- *Articulating New Zealand's broad interests on space across multiple activities and engagements*: including at United Nations fora and with international space and security partners.
- *Developing future space strategies, policies and regulatory changes*: including adjusting our policies and regulations to meet advancements in space technology.
- *Future engagement on space policy with the New Zealand public*: including on any key areas of interest identified through the consultation.

Considering whether any legislative changes are required to the Outer Space and High-altitude Activities Act 2017.

MBIE has commissioned PublicVoice to produce a summary of feedback report on the space policy review consultation. PublicVoice will collate all submissions, and other feedback received through the course of the consultation.

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All feedback from the space policy review consultation will be collated by PublicVoice for the purposes of producing a summary of feedback report. MBIE will upload the summary of feedback report onto the MBIE website, and may also upload PDF copies of submissions received to MBIE's website in due course.

Private information

The *Privacy Act 2020* establishes certain principles with respect to the collection, use and disclosure of information about individuals by various agencies, including MBIE.

Any personal information you supply to MBIE in the course of making a submission will be used in the collation of feedback on the space policy review consultation, to facilitate the purposes outlined in the "how my feedback will be used" section above.

Release of information

Submissions remain subject to requests under the *Official Information Act 1982* and MBIE will consider you to have consented to the release of your submission in full, unless you clearly specify otherwise.

Release of your submission will include releasing your name in a list of submitters in the report, and as part of uploading submissions in due course to the MBIE website – www.mbie.govt.nz, and in the event of a request under the Official Information Act 1982.

If you do not wish for certain information in your submission to be released, please tick the relevant boxes on the next page and outline which parts you consider should be withheld, together with the reasons for withholding the information.

MBIE will take such objections into account and will consult with submitters when responding to requests under the *Official Information Act 1982*.

Submitter information

About you

Name: Linda Falwasser

Email address: linda@tawhaki.co.nz

Are you making this submission on behalf of a business or organisation?

- Yes No

If yes, please tell us the title of your company/organisation.

Tāwhaki Joint Venture

Would you like to be kept informed of the outcome of the Space Policy Review?

- Yes No

Are you happy for MBIE to contact you if we have questions about your submission?

- Yes No

Release of information

- Please tick this box if you do not wish your name and contact details above to be included in any information about submissions that MBIE may publish.
- Please tick this box if there is other information within your submission that you want to be kept confidential. If you have ticked this box, please state your reasons and grounds under the Official Information Act 1982 below, for consideration by MBIE.

Tāwhaki Joint Venture Submission

Tāwhaki is delighted to make this submission on the Aotearoa New Zealand Space Policy Review (Space Policy Review). In doing so, it wishes to acknowledge the work of the New Zealand Space Agency and Hīkina Whakatutuki – Ministry of Business, Innovation and Employment in preparing the Review Consultation Document, and providing the opportunity for this submission. Tāwhaki would also like to acknowledge the ongoing support that Hīkina Whakatutuki provides with respect to our own mahi.

Introduction to Tāwhaki

Tāwhaki is a partnership established in May 2021 between Kaitorete Limited (representing Te Taumutu Rūnanga and Wairewa Rūnanga) and the Crown to create enduring opportunities and achieve positive outcomes for the whenua at Kaitorete (which extends from Banks Peninsula in Canterbury), and for whānau, hapū and the wider community.

Kaitorete has a long and rich history, previously known as a travelling route for Māori throughout Te Waipounamu, and a place that sustained ancestors for generations. Wairewa Rūnanga and Te Taumutu Rūnanga hold mana whenua and the rights and responsibilities as rangatira over this special location.

Tāwhaki has a dual kaupapa to:

- a) Heal and rejuvenate the unique whenua at Kaitorete – an area of significant cultural importance renowned for its mahinga kai, taonga species and history. It is home to numerous threatened and locally endemic plant, invertebrate, birds and reptile species, with internationally-recognised ecological value. The flora and fauna on Kaitorete are of particularly significant cultural importance to the Rūnanga.
- b) Advance Aotearoa’s aerospace industry – through the development of aerospace activities and research and development facilities on the whenua, there is the potential to generate significant and regenerative economic outcomes through job creation, capital investment and ancillary opportunities.

Through this dual kaupapa, whānau and hapū will be empowered to lead the healing and rejuvenation of Kaitorete and participate in Aotearoa’s growing aerospace industry. This kaupapa will be delivered by Tāwhaki through our four strategic pou:

- a) Tangata – through Kaitorete, we will maintain and grow the cultural capacity of whānau and hapū to ensure they remain firmly connected to Kaitorete and any future uses of the whenua.
- b) Taiao – Kaitorete is healed, rejuvenated, and nourished for future generations.
- c) Ara Tukutuku – Tāwhaki is a world leading Indigenous aerospace partner.
- d) Whakaptupu – Regenerative economic opportunities are created that enrich the lives of whānau and hapū, and contribute to the economic development of Ōtautahi and Aotearoa.

Much of this information is referenced in the Consultation Document including various references to Tāwhaki and our mahi. That acknowledgment of our work and role in the aerospace sector is appreciated however in Attachment A to this submission, we have provided some minor clarifications to those references to ensure accuracy and alignment with our approved Statement of Strategic Intent.

Overview of Tāwhaki's submission

Tāwhaki supports the establishment of an overarching national policy which articulates the values and objectives that underpin Aotearoa's engagements and activities in space. We trust that the feedback provided below will help to shape those values and objectives, as well as:

- highlight where legislative and regulatory change may be required to support those values and objectives, and the sector more generally;
- affirm the need to actively involve, and enable the participation of, Māori (in partnership) in the development of those values and objectives, and our space activities generally.

In respect of the second bullet point in particular, Tāwhaki considers that opportunities exist within the sector generally and within the policy document more specifically to ensure that our space activities and engagements appropriately reflect and benefit from te ao Māori, mātauranga Māori, and the kawa and tikanga that it encompasses. Providing opportunities to enhance Māori involvement in the space sector, and to ensure that Māori share in the social and economic benefits of Aotearoa's engagement and activities in space is, in our view, critical to the sustainable future of this industry.

To that end, it is recommended that:

- a) The unique influence of te ao Māori and mātauranga Māori in shaping Aotearoa's space activities and engagement should be recognised either through the existing values or as a key standalone value within the National Space Policy.
- b) A Māori Space Policy Advisory Group should be established to investigate and provide recommendations on how te ao Māori and mātauranga Māori are most appropriately reflected and/or implemented through the Space Policy objectives and in Aotearoa's activities in space more generally. This Group should be given a clear mandate and sufficient resource (including time) to undertake this work ahead of, and so as to inform, the drafting of the National Space Policy.
- c) The objectives within the Space Policy should subsequently be amended:
 - i. in accordance with the recommendations of the Māori Space Advisory Group;
 - ii. to set clear directions that those participating in space activities in Aotearoa will build their capability in respect of mātauranga Māori concepts as they apply to space, and will engage meaningfully with mana whenua in undertaking specific space projects;
 - iii. to identify a clear, robust pathway for supporting and enhancing Māori participation in all aspects of space and the space industry – from building the capability of tamariki and rangatahi in schools (through scholarships and specifically designed education programmes) through to specific career and partnership opportunities within the industry;

These initiatives would contribute to honouring the rangatiratanga of Māori through the Space Policy and through Aotearoa's ongoing engagement and activities in space.

Through its work in Kaitorete, Tāwhaki has already begun its journey towards these outcomes. There is a long way to go, but we are committed to our kaupapa and excited to continue building relationships with our partners, including Wairewa Rūnanga and Te Taumutu Rūnanga, Hikina

Whakatutuki – Ministry of Business, Innovation and Employment, Te Papa Atawhai – Department of Conservation, and our friends already undertaking brilliant work within the space sector.

In that context, Tāwhaki would welcome any opportunity to support the New Zealand Space Agency Hīkina Whakatutuki – Ministry of Business, Innovation and Employment in the further development of the Policy, including in implementing the initiatives that Tāwhaki has outlined above. If you have any questions about these, or would like to discuss these further, please do not hesitate to contact us.

“While we look to the sky, so must we keep our feet firmly in the whenua.”

Section 1: New Zealand interests in space

New Zealand’s association with space goes back centuries – the first Māori explorers navigated by the stars to Aotearoa New Zealand, and centuries later they were followed by European navigators whose instruments also looked to the stars. Today, our modern navigation systems are still guided from space.

New Zealanders rely on space assets to do everyday tasks, like banking, transporting goods, travelling by air, and talking with each other. As the world becomes more connected and digitised, our reliance on space to support our daily lives is only going to increase.

The New Zealand government pursues a range of cross-cutting interests in space – including economic development, national security, regulation, international relations, and environmental interests. These interests are often articulated in broader government policies, strategies and assessments and inform our approach to space policy interests.

Question 1. What are your interests and relationship to space? (Pick as many as apply below)

General interest in space	Work in the New Zealand space sector	Cultural connections to space	Academic involvement on space issues	Other (please explain in box below)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please note any other interests and relationship to space below that you would like to share.

As noted above, one of Tāwhaki’s dual kaupapa is to advance Aotearoa’s aerospace industry. Through the development of aerospace activities and research and development facilities on the whenua at Kaitorete, there is the potential to generate significant and regenerative economic outcomes through job creation, capital investment and ancillary opportunities.

We are currently investigating the types of space activities that could be compatible from Kaitorete, aligning with our dual kaupapa, uara (values) and pou (strategic priorities).

Section 2: New Zealand values in space

New Zealand’s values speak to who we are as a nation and how we act in the world. The following are values that the New Zealand government aims to reflect and promote through space activities, engagements and the use of space technologies. These values are informed by the concept of kaitiakitanga (guardianship) as a guiding framework to ensure that space, and its benefits, remain accessible for all.

- **Innovation** – We value innovation, science, and technology as means of advancing our knowledge about the universe, driving productivity in the economy and improving the wellbeing of New Zealanders. We also want to encourage innovation which is responsible, enables New Zealand to be a good steward of the environment, and enables collaboration with companies and other governments.
- **Responsibility** – Space is a unique domain which is shared by all states. We act responsibly to promote a peaceful, stable, and secure space environment and to inform responsible behaviours on Earth. This includes acting in accordance with the principles in the Outer Space Treaty and other international agreements and arrangements applicable to space, as well as New Zealand’s domestic law and policies. We also seek to influence the development of new international instruments, and develop norms and standards with like-minded countries, where there are gaps.
- **Stewardship** – Space offers a unique perspective that is crucial for understanding our environment, including to fight climate change, and better manage our natural resources. At the same time, we take care to act sustainably in space and on Earth to preserve the benefits of these environments for future generations.
- **Partnership** – We are better when we work together. Participation, Partnership, and Protection are key principles of Te Tiriti o Waitangi and we want to continue to engage with Māori on New Zealand’s space activities and engagements. The government works alongside New Zealanders and the space sector in developing policy and regulations that impact them; collaborates with international partners on economic, security and other interests; and within international institutions to promote New Zealand’s values.

Question 2. To what extent do you agree or disagree that these values should apply to New Zealand’s space activities and engagements?

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly Agree	Don’t know
Innovation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Responsibility	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Stewardship	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Question 3. Are there any other values, or aspects of kaitiakitanga (guardianship), that you think should apply to New Zealand’s space activities and engagements (for example, cultural values regarding space).

Tāwhaki endorses the identified values in principle, but considers that they should specifically recognise and be shaped by te ao Māori and mātauranga Māori, and the kawa and tikanga that it encompasses. That mahi should be led by a representative group with specific expertise in mātauranga Māori and tikanga, who are equipped with sufficient time and resource to undertake the necessary assessment and consultation to inform their recommendations.

Section 3: New Zealand's space policy objectives

The New Zealand government supports a range of interests in space (economic, environmental, international, national security and regulatory) by pursuing the following key policy objectives:

- Growing an innovative and inclusive space sector
- Modelling sustainable space and Earth environments
- Promoting the responsible uses of space internationally
- Protecting and advancing our national security and economic interests
- Regulating to ensure space activities are safe and secure

Question 4. Are any of these key policy objectives of particular importance to you?

All of these objectives are of particular importance to Tāwhaki. Actively driving innovation and inclusivity (particularly with respect to Māori of all ages) within the space sector is a vital part of our mahi, as is protecting and enhancing the mana and mauri of the whenua, te atea, and the surrounding areas. Achievement of these objectives could be compromised by inadequate regulatory framework which do not satisfactorily enable space activities or ensure that they are safely and appropriately controlled. This is a particular challenge where, as in this sector, technology is constantly advancing and our frameworks will need to keep pace with an agile regulatory approach. This may result in significant delays and costs which increase the risk that those seeking to develop new opportunities (and the potentially significant economic and social benefits such opportunities can provide) will not choose Aotearoa as a location to advance technology or contribute to the space economy.

Tāwhaki has begun investigating opportunities to improve these frameworks, and would welcome the opportunity to discuss this further with the Ministry.

Section 3a: Growing an innovative and inclusive space sector

OBJECTIVES

The New Zealand government supports the growth of an innovative and inclusive space sector. This means:

- Promoting New Zealand’s natural advantage for conducting space activities, and research and development expertise across the space value chain
- Partnering within New Zealand and internationally to increase research and development capabilities
- Identifying opportunities to increase diversity in the space sector
- Using cutting-edge space technology and space sourced data to support New Zealand’s values and interests

Question 5. To what extent do you agree or disagree that these policy objectives will help the New Zealand government to grow an innovative and inclusive space sector?

a. Promoting New Zealand’s natural advantage for conducting space activities, and research and development expertise across the space value chain

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly Agree	Don’t know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

b. Partnering within New Zealand and internationally to increase research and development capabilities

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly Agree	Don’t know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

c. Identifying opportunities to increase diversity in the space sector

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly Agree	Don’t know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

d. Using cutting-edge space technology and space sourced data to support New Zealand’s values and interests

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly Agree	Don’t know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Question 6. Do you have any comments on these policy objectives (e.g. any suggested change to how they are framed)? Is there anything missing?)

In respect of (a), it is considered that Aotearoa’s advantages for conducting space activities extend beyond our natural/geographic features. They also include matters such as our population size, and our unique indigenous history and knowledge, operational and manufacturing expertise. Protecting and promoting these characteristics will help grow innovation and inclusivity.

In respect of (b), Tāwhaki strongly supports partnership as a key value and objective which supports innovation and inclusivity. Alongside partnership with Māori, this objective could specifically recognise the importance of partnering with both the private and public “arms” of the space industry to build the capability of tamariki and rangatahi in schools, through to specific career and partnership opportunities within the space sector.

Tāwhaki also supports (c), but considers that a critical part of that mahi will be to build a comprehensive understanding of existing representation within the space sector. Without this, it will be difficult – if not impossible – to identify (and dismantle) any barriers to supporting and enhancing increased participation, and where investment will be best utilised to achieve that outcome. Increased diversity in the sector should also be delivered at every ‘level’ of involvement – including at a decision-making level.

Question 7. Are there any other policy objectives that you think would help the New Zealand government to grow an innovative and inclusive space sector?

A “fit for purpose” regulatory framework is considered essential for supporting innovation and retaining our most innovative space industry participants in Aotearoa, while also ensuring our taonga (including our whenua, te atea, and our moana) are protected and enhanced. Māori involvement in the development of that framework, and as part of the decision-making under that framework, would help ensure that it appropriately reflects and benefits from te ao Māori and mātauranga Māori, and would contribute to honouring the rangatiratanga of Māori.

Question 8. Do you have any questions or comments about what these objectives would mean in practice?

As an indigenous led entity actively involved in the space industry, Tāwhaki believes that it has a unique, important role to play in supporting the Ministry and the New Zealand Space Agency to implement these objectives. We would welcome the opportunity to discuss opportunities for Tāwhaki to provide practical assistance in this regard during development of the Space Policy and in the coming years.

Section 3b: Modelling sustainable space and Earth environments

OBJECTIVES

The New Zealand government advocates for the sustainable use of space to ensure its benefits remain available to future generations. At the same time we seek to use space, and space technologies, to gain understanding and better protect our environment on Earth. Specifically this means:

- Encouraging inclusive, sustainable space collaborations within New Zealand
- Assessing the cumulative impact of space activities on the Earth environment
- Assisting with solving sustainability challenges through space data, including to better monitor or understand the Earth's environment
- Investing in New Zealand’s capability to retain, grow, access and use sustainable space technologies

Question 9. To what extent do you agree or disagree that these policy objectives will help the New Zealand government to model sustainable space and Earth environments?

a. Encouraging inclusive, sustainable space collaborations within New Zealand

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly Agree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

b. Assessing the cumulative impact of space activities on the Earth environment

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly Agree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

c. Assisting with solving sustainability challenges through space data, including to better monitor or understand the Earth's environment

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly Agree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

d. Investing in New Zealand’s capability to retain, grow, access and use sustainable space technologies

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly Agree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Question 10. Do you have any comments on these policy objectives (e.g. any suggested change to how they are framed)? Is there anything missing?)

Tāwhaki supports these policy objectives in principle, and again, highlights the significant opportunity for te ao Māori and mātauranga Māori to shape what “sustainability” in Aotearoa’s space activities looks like. Aotearoa has a unique indigenous history and a body of knowledge that should play a vital role in the way we understand space and participate sustainability in activities relating to space. These objectives should reflect and benefit from that history and knowledge.

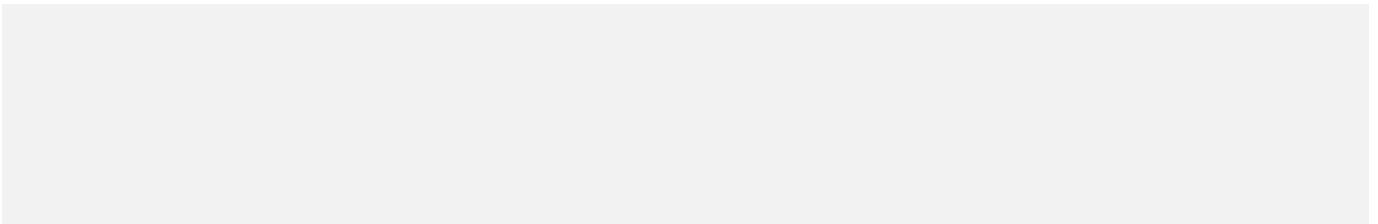
In respect of policy objectives (a) and (d), Tāwhaki recommends that specific consideration is given to:

- Government incentives to encourage sustainable access in the short term, and the development of a phased regulatory approach for compulsory sustainable space access from Aotearoa for the medium term;
- A medium-term focus on supporting sustainability developments in propellants.

Question 11. Are there any other policy objectives that you think would help the New Zealand government to model sustainable space and Earth environments?

Tāwhaki considers that a “fit-for-purpose” regulatory framework which specifically recognises the importance of, and addresses matters relating to, sustainability in space will be essential to achieving the broader objective.

Question 12. Do you have any questions or comments about what these objectives would mean in practice?



Section 3c: Promoting the responsible uses of space internationally

OBJECTIVES

The New Zealand government promotes the responsible use of space internationally. This means:

- Advocating for effective international rules, norms and standards in space
- Partnering with like-minded launch states to adopt peaceful, responsible and sustainable space practices
- Collaborating internationally to increase New Zealand’s influence and capabilities in the global space sector

Question 13. To what extent do you agree or disagree that these policy objectives will help the New Zealand government to promote the responsible uses of space internationally?

a. Advocating for effective international rules, norms and standards in space

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly Agree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

b. Partnering with like-minded launch states to adopt peaceful, responsible and sustainable space practices

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly Agree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

c. Collaborating internationally to increase New Zealand’s influence and capabilities in the global space sector

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly Agree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Question 14. Do you have any comments on these policy objectives (e.g. any suggested change to how they are framed)? Is there anything missing?

Tāwhaki supports these objectives, and considers that Aotearoa has the opportunity to become a world-leader in ethical, responsible, sustainable space exploration and use. Clarifying and strengthening our own unique values and objectives regarding our relationship to space is the first step in that process, which is why Tāwhaki strongly supports the development of the Space Policy. Having a clear understanding of, and being grounded in, those values and objectives will then enable identification of “like-minded” launch states, and support collaboration with the global space sector. In that regard, Tāwhaki considers that these objectives around international participation and partnership should be specifically linked to the values and objectives which guide our own relationship to space as a country.

Question 15. Are there any other policy objectives that you think would help the New Zealand government to promote the responsible uses of space internationally?

Ensuring a world-leading, fit-for-purpose regulatory system for space activities within Aotearoa, which will give Aotearoa better standing to promote responsible uses of space on the international stage.

Question 16. Do you have any questions or comments about what these objectives would mean in practice?

Section 3d: Protecting and advancing our national security and economic interests

OBJECTIVES

To sustainably grow our space sector by having due regard to our national interests we need to:

- Use space assets to protect and advance New Zealand’s national security and economic interests
- Manage the broad range of security risks in space to protect New Zealand’s space industry
- Collaborate with international space and security partners to pursue New Zealand’s national security and economic interests

Question 17. To what extent do you agree or disagree that these policy objectives will help the New Zealand government to protect and advance our national security and economic interests?

a. Use space assets to protect and advance New Zealand’s national security and economic interests

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly Agree	Don’t know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

b. Manage the broad range of security risks in space to protect New Zealand’s space industry

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly Agree	Don’t know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

c. Collaborate with international space and security partners to pursue New Zealand’s national security and economic interests

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly Agree	Don’t know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Question 18. Do you have any comments on these policy objectives (e.g. any suggested change to how they are framed)? Is there anything missing?)

Tāwhaki recognises, and affirms, the significant potential that the space industry and wider eco-system offers to Aotearoa, both in terms of its economic value for the country, our national security, and in supporting environmental and social outcomes that improve the wellbeing of our people.

As set out further below, Tāwhaki considers that any definition of Aotearoa’s national security and economic interests, the risks to those interests, and the basis for any collaboration with international partners should be directly informed by engagement with Māori and must honour commitments made to Māori under Te Tiriti o Waitangi, including active protection of Māori interests.

Question 19. Are there any other policy objectives that you think would help the New Zealand government to protect and advance our national security and economic interests?

Question 20. Do you have any questions or comments about what these objectives would mean in practice?

We would welcome an opportunity to discuss this with the Ministry in more detail, and consider that it is also a topic that could be worked through with the Māori Space Advisory Group.

Section 3e: Regulating to ensure space activities are safe and secure

OBJECTIVES

The New Zealand government regulates to ensure New Zealand space activities are safe and secure. This means:

- Facilitating the safe and secure use of emerging space technologies from New Zealand
- Clarifying what New Zealand space activities are inconsistent with the national interest
- Promoting and protecting New Zealand’s interests through permitting space technologies

Question 21. To what extent do you agree or disagree that these policy objectives will help the New Zealand government to ensure space activities are safe and secure through regulation?

a. Facilitating the safe and secure use of emerging space technologies from New Zealand

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly Agree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

b. Clarifying what New Zealand space activities are inconsistent with the national interest

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly Agree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

c. Promoting and protecting New Zealand’s interests through permitting space technologies

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly Agree	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Question 22. Do you have any comments on these policy objectives (e.g. any suggested change to how they are framed)? Is there anything missing?)

Tāwhaki supports these objectives, and considers that as part of (a) and (c) in particular any regulation of space activities must also:

- Account for and manage any adverse effects of those activities on the mana and mauri of our natural environments.
- Provide sufficient flexibility within any permitting regime to account for the fast-evolving nature of space technologies.
- Require engagement with mana whenua for specific space projects.

- Accelerate (through both procedural and substantive incentives) space activities which align with the values and objectives of the Space Policy.

Question 23. Are there any other policy objectives that you think would help the New Zealand government with regulating to ensure space activities are safe and secure?

As set out above, it is considered essential that any definition of New Zealand’s “interests” upholds and reflects the commitments made to Māori under Te Tiriti o Waitangi, and that concepts of safety and security in space are informed by te ao Māori.

Through Tāwhaki, investigations are currently underway to develop Kaitorete as a gateway to high-altitude and space. Tāwhaki is ready to work in partnership with the New Zealand Space Agency and Ministry to ensure forward thinking and timely development of regulation for emerging space technology to match the ambitions of Tāwhaki and for any of our potential future partners, including space activities not yet considered under Outer Space and High-Altitude Activities Act 2017, such as crewed space flight.

Question 24. Do you have any questions or comments about what these objectives would mean in practice?

Section 3e(i): Regulating in line with our national interests

Under the Outer Space and High-altitude Activities Act 2017, the Minister for Economic and Regional Development may decline a licence or permit if they are *not satisfied* that it is in the national interest. The Minister may take into account when considering the national interest: economic or other benefits to New Zealand; risks to national security, public safety, international relations or other national interests; risks that cannot be mitigated by conditions of the licence or permit; and any other relevant matters.

As part of policy to inform the language in the Act, Cabinet has agreed to principles that will inform the consideration of national interest for space activities, as well as what is not in New Zealand's national interests. These principles are:

- **Responsibility:** that space activities from New Zealand should be conducted with due care and in such a way as to promote an orbital environment where actors avoid causing harm or interference with the activities of others.
- **Sustainability:** New Zealand should promote sustainable space practices that preserve the benefits of space for future generations.
- **Safety:** space activities from New Zealand should be conducted in a way that does not jeopardise human safety (including the safety of people in space).
- **Aligning with New Zealand's values and interests:** space activity from New Zealand should uphold the policies and values supported by New Zealanders and align with broader policy settings.

The following space activities are *not in New Zealand's interests*; i.e. the Minister will not authorise space activities:

- that contribute to nuclear weapons programmes or capabilities
- with the intended end use of harming, interfering with, or destroying other spacecraft or space systems on Earth
- with the intended end use of enabling or supporting specific defence, security or intelligence operations that are contrary to government policy
- where the intended end use is likely to cause serious or irreversible harm to the environment.

Question 25. Are there any comments you would like to make about these criteria that inform consideration of the national interest?

Tāwhaki supports the principles agreed by Cabinet. Upholding and ensuring compliance with commitments made under Te Tiriti o Waitangi is also considered to fall squarely within the "national interest", and should be explicitly identified as such. Licences or permits which would put those commitments at risk should not be authorised.

Question 26. What questions do you have about how the national interest is considered in practice?

Attachment A – references to the Tāwhaki Joint Venture

The approved text below summarises the Tāwhaki Joint Venture and describes Tāwhaki's dual kaupapa. It is provided to update and replace the content referencing Tāwhaki included on page 31 of the New Zealand Space Agency Space Policy Review consultation document.

Tāwhaki

Tāwhaki is a partnership established in May 2021 between Kaitorete Limited (representing Te Taumutu Rūnanga and Wairewa Rūnanga) and the Crown to create enduring opportunities and achieve positive outcomes for the whenua at Kaitorete (which extends from Banks Peninsula in Canterbury), and for whānau, hapū and the wider community. Tāwhaki has secured 1,000 hectares of land on Kaitorete, and has a dual kaupapa to:

- a. Heal and rejuvenate the unique whenua at Kaitorete – an area of significant cultural importance renowned for its mahinga kai, taonga species and history. It is home to numerous threatened and locally endemic plant, invertebrate, birds and reptile species, with internationally-recognised ecological value. The flora and fauna on Kaitorete are of particularly significant cultural importance to the Rūnanga.
- b. Advance Aotearoa's aerospace industry – through the development of aerospace activities and research and development facilities on the whenua, there is the potential to generate significant and regenerative economic outcomes through job creation, capital investment and ancillary opportunities.

In line with the values and objectives outlined in this document, Tāwhaki is an example of the Aotearoa space sector in:

- *Innovation*: developing aerospace (space and advanced aviation) activities and research and development facilities that can generate significant, sustainable economic opportunities through jobs, capital investment and adjacent sectors that serve the aerospace economy.
- *Partnership*: a commercial joint venture between Kaitorete Limited and the Crown. Kaitorete Limited is represented by two Ngāi Tahu Rūnanga who are mana whenua for Kaitorete: Te Taumutu Rūnanga and Wairewa Rūnanga.
- *Stewardship*: protecting and rejuvenating the environment of Kaitorete for future generations.

For more information about Tāwhaki, visit: www.tawhaki.co.nz