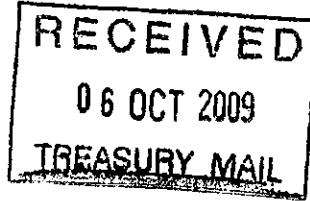




Aviation Industry Association of NZ (Inc)

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The Executive Director
National Infrastructure Unit
The Treasury
PO Box 3724
Wellington

The National Organisation in New Zealand of:
Aviation Education and Research Organisations
Aircraft Repair and Maintenance Organisations
Air Rescue/Air Ambulance Organisations
Aviation Fuel and Oil Suppliers
Flight Training Organisations
Aviation Service Providers
Air Charter Operators
Helicopter Operators
Agricultural Aviation
Aircraft Constructors
Aviation Suppliers
Airport Operators
Airline Operators
Aviation Insurers

Dear Sir/Madam

Infrastructure Facts and Issues

Thank you for the opportunity to comment on the consultative document.

The Aviation Industry Association represents the interests of commercial aviation in New Zealand from major scheduled operators to non scheduled fixed wing and rotary aircraft, engineering facilities and services that support the commercial sector.

Our comments are thus related to that portion of the paper on Air Services.

It is unclear as to where the line is drawn in respect of the term "Infrastructure" – for example the provision of air traffic information in the skyways is as critical to this industry as is the provision of good high quality roads, security of supply of electricity or any of the other infrastructure sectors highlighted in this paper.

However for the purposes of making this submission we have taken infrastructure to include the provision of services to the industry which are of a "national good" under this definition private aerodromes would be out but public heliports would be a "national good"

Taking this definition there are several sub sectors within aviation that the commentary overlooks. These are detailed as follows:

- Air traffic services including the provision of aeronautical aids, control towers, radar heads and other navigational beacons and monitors;
- The Metrological service including the provision of radar heads, weather stations, satellite information, geothermal monitoring
- The fuel supply line from Marsden Point to Wiri and the operation of the JUHI at Auckland airport
- Security of fuel supply to remote operating locations
- Heliports
- Deployment and use of military and civilian assets for civil defence emergencies

- Deployment of assets for air rescue air ambulance purposes.

We have attempted to rank these sub sectors from most probably included in the definition of infrastructure asset to those least likely to be included in the definition to give you an idea of the scope of the industry.

In terms of individual details in respect of the various sub sectors outlined above we would suggest that for Airways Corporation you contact Rob Irwin on Wellington 4711888; Norm Henry on 4700700; the fuel supply line – Wiri depot; fuel supply remote locations Shell Aviation or Air BP; Heliports – the Civil Aviation Authority; deployment of military and civilian assets for emergency purposes – the National Co-ordination Centre Maritime New Zealand.

We note that the paper concentrates on airports however there are several points:

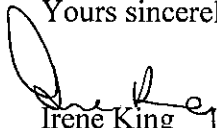
- Regional airports over time such as Tauranga, Napier/Hastings will become more important. Both of these are located in near or close proximity to ports which similarly over time are growing. Congestion and the ability to develop further will become constrained if not already constrained.
- Planning pressures are such that it is very unlikely that a complete “greenfields” airport would be capable of being developed in New Zealand. Airports are considered noisy neighbours and nobody wants them located in their “backyard”
- Should trans tasman air transport operations be considered domestic at any point in the near future and on ground processing an facilitation becomes minimal then the extent of over investment in terminals and possible underinvestment in runways at a number of regional airports will become obvious.
- Regulatory issues should also include environmental effects

The Transport Air Services portion of the paper overlooks the criticality of ensuring fuel supply both to Auckland airport – the point of primary distribution but also the maintenance and development of the network throughout New Zealand. Of recent years we have experienced both uncertainty and rationalization of the market. Understanding how fuel is distributed and the constraints around that distribution will be as critical to the development of air services and the means of facilitating those services whether it is Airports, ATS or Metservice.

For the shake of balance and the development of a comprehensive plan it is important to incorporate all aspect of our infrastructure and not simply airports. As the paper notes air services are not being compromised by the lack of airport infrastructure – in fact we are well served however the same may note be so in respect of some of the other infrastructural areas highlight. The paper also gives disproportionate emphasis to Airports where as the provision of appropriate fuel supply, airways and meteorological services are equally important.

We would request that the paper be expanded to cover these areas. We are certain that the respective providers would work with Treasury to ensure the information and data is accurate.

Yours sincerely



Irene King
Chief Executive