



30 June 2021

Katie Bhreatnach  
GM of Customer and Regulatory Partnerships  
Airways New Zealand

By Email : [tracey.hall@airways.co.nz](mailto:tracey.hall@airways.co.nz)

Dear Katie

The AMEA currently has approximately 120 members at Airways, including members under the Airways international/Aeropath subsidiary business. Our members are primarily in the technology areas of the business but we also represent members in Aeronautical Procedure Design and Technical Documentation and Training.

The AMEA and its Airways based members support many of the submissions prepared as feedback on the Airways Service Framework review. We wholeheartedly believe in Airways' responsibility to fully engage with all stakeholders on any perceived issues or proposed changes and support the calls for more detailed assessments and full transparency. We support the calls for the consultation to be paused pending a stakeholder workshop, in order to properly confirm that all the appropriate financial assessments, risk assessments and any perceived benefits have been thoroughly investigated and that these have been balanced against **all** of Airways' responsibilities as an SOE. This is necessary in order to allow stakeholders to determine the impact of the proposed Service Framework changes and identify any challenges or value it may present, if any.

The AMEA members employed by Airways have taken great pride in their part of delivering a **safe** and efficient service and understand the value of Airways remaining the sole provider of all Air Traffic Services in New Zealand. We believe that Airways has inexplicably ignored the benefits of having one centralised provider of services, including the provision of Aerodrome Visual Navigation Aid Services (Airfield lighting) as a core service as there is an inseparable overlap with the technology involved in landing services.

The AMEA believes that the complexities introduced if the Service Framework Proposal is adopted in its current form would far outweigh any benefits to the stakeholders. It may in reality invite undesirable operational and safety challenges, if we look beyond simple pricing aspects. Airways should avoid conflating the drive to increase the profitability of what was already a high performing SOE, Covid-19 disruptions aside, with purported efficiency gains for the industry as a whole.

If the current regulatory model needs revising to meet modern requirements, then the AMEA believes that Airways should be seeking to champion sensible reform in collaboration with the Government and its industry partners, rather than potentially disrupting the entire field, at a time when this can ill be afforded.

**Bob Brough**

pp Suzanne Bovaird

A handwritten signature in black ink, appearing to read 'Bob Brough', is written over a horizontal line.

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