

9 June 2021



Airways Pricing Consultation  
Airways Corporation of New Zealand

Email: [Tracey.Hall@airways.co.nz](mailto:Tracey.Hall@airways.co.nz)

Dear Tracey

### **Proposed Revised Airways Service Framework**

Thank you for the opportunity to comment on the Proposed Revised Airways Service Framework.

The Civil Aviation Authority is New Zealand's aviation safety and security regulator. We have provided comments so far as they relate to this role, while recognising the unique relationship we have with Airways as both regulator, and as a key partner in supporting a safe aviation system.

### ***Charging airports directly for services***

It appears that the key change proposed by the new framework is to distinguish between services for which Airways hold a statutory monopoly (area control, approach control and flight information services) and services for which it does not (primarily aerodrome control services and aerodrome flight information services). The proposed new framework contemplates charging airports directly for services outside of its statutory monopoly.

We understand how the current statutory framework and the need to ensure services are provided in an efficient and pro-competitive way has driven this change. However, Airways currently holds a special position as New Zealand's sole air navigation service provider. We consider that with that special position comes responsibilities for ensuring its services are offered in a way that balances commercial imperatives with the need to provide a safe air navigation network. This is particularly relevant now, as all parts of the aviation system are struggling with the effects of COVID-19 and need to support one another to ensure a safe and effective recovery.

Taking this into account, if this proposal goes ahead, Airways may want to consider steps to ensure a smooth transition to the new service framework. This transition should recognise the financial pressures that our Airports are currently under, and the important role Airways plays in supporting a safe aviation system through the COVID-19 recovery.

***Airport categories***

On a more technical point, we noticed the proposed airport categories listed on page 13 of the Proposed Revised Airways Service Framework includes a reference to a “CAA designation”. The Civil Aviation Authority do not designate airports into groups for air traffic service purposes, even after assessing aeronautical studies. We request that Airways remove reference to this within the proposed framework.

Thank you again for the opportunity to comment on the proposal. If you would like to discuss any aspect please of this submission, please don't hesitate to contact us.

Your Sincerely



John Kay

**Deputy Chief Executive – System and Practice Design**