Dear [Redacted]

I refer to your request dated 23 April 2020, pursuant to the Official Information Act 1982, seeking:

"Copies of all information held by it and concerning Airways Corporation of New Zealand Limited's proposal to permanently close regional air traffic control towers at Napier (Hawkes Bay), Gisborne, New Plymouth, Rotorua and Invercargill airports and airfield services provided at Paraparaumu, Kapiti Coast Airport and Milford Sound Pīhopotahi Aerodrome."

Table 1 below lists the documents attached to this letter that fell within the scope of your request as well as the withholding ground that applies to each document.

Under the Official Information Act 1982, certain information is being withheld in part under the following sections:

- Section 9(2)(a), to "protect the privacy of natural persons"; and
- Section 9(2)(ba)(i): "where the making available of the information...would likely to prejudice the supply of similar information, or information from the same source and it is in the public interest that such information should continue to be supplied".
- Section 9(2)(g)(i): "maintain the effective conduct of public affairs through... the free and frank expression of opinions by or between or to Ministers of the Crown or members of an organisation or officers and employees of any department or organisation in the course of their duty".

There is also information contained in parts of this request that is considered out of scope.

In regard to the information that has been withheld under section 9 of the Act, I am of the opinion that there are no countervailing considerations that make it desirable, in the public interest, to make the information available.
You have the right under section 28(3) of the Official Information Act to make a complaint about the withholding of information to the Ombudsman, whose address for contact purposes is:

The Ombudsman
Office of the Ombudsmen
P O Box 10-152
WELLINGTON
The Ministry publishes our Official Information Act responses and the information contained in our reply to you will be published on the Ministry website. Before publishing we will remove any personal or identifiable information.

Yours sincerely

Tom Forster
Manager, Economic Regulation
<table>
<thead>
<tr>
<th>Document Number</th>
<th>Document Name</th>
<th>Date</th>
<th>Withholding grounds</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Email: RE: Minister Twyford feedback on aviation post-COVID</td>
<td>2 April 2020</td>
<td>Withheld in part under Section 9(2)(ba)(i) and out of scope</td>
</tr>
<tr>
<td>2</td>
<td>Email: Airways plans to close regional airport ATC Towers</td>
<td>8 April 2020</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Email: FW: emails to ministers office</td>
<td>9 April 2020</td>
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<tr>
<td>3a</td>
<td>Email: Airways’ cost reduction measures and future service changes</td>
<td>3 April 2020</td>
<td>Withheld in part under s9(2)(a)</td>
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<tr>
<td>3b</td>
<td>Email: Airways press release for today</td>
<td>6 April 2020</td>
<td>Withheld in part under s9(2)(a)</td>
</tr>
<tr>
<td>3bi</td>
<td>Picture: NZ airspace one</td>
<td>6 April 2020</td>
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<td>3bii</td>
<td>Picture: NZ airspace two</td>
<td>6 April 2020</td>
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<td>3c</td>
<td>Email: Airways statement - confidential</td>
<td>8 April 2020</td>
<td>Withheld in part under s9(2)(a)</td>
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<td>4</td>
<td>Email: FW: Questions</td>
<td>9 April 2020</td>
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<td>5</td>
<td>Email: RE: No surprises re Airways proposals on domestic air traffic management arrangements</td>
<td>9 April 2020</td>
<td>Withheld in part under s9(2)(a) and s9(2)(g)(i)</td>
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<td>5a</td>
<td>Word document: Airways Questions re reducing service</td>
<td>9 April 2020</td>
<td></td>
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<td>6</td>
<td>Email: RE: No surprises re Airways proposals on domestic air traffic management arrangements</td>
<td>9 April 2020</td>
<td>Withheld in part under s9(2)(a)</td>
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<td>7</td>
<td>Email: Regional tower closures by Airways - Clarifications from CAA and Airways, and collaborative work by airports</td>
<td>13 April 2020</td>
<td>Withheld in part under s9(2)(a)</td>
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<td>7a</td>
<td>PDF document: 200409 Regional ATS AeroStudty Guidance Draft Shared .pdf (Regional ATS Provision)</td>
<td>13 April 2020</td>
<td></td>
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<td>8</td>
<td>Email: OC200311 Removal of Airways Services from Regional Airports - Briefing Paper</td>
<td>16 April 2020</td>
<td>Withheld in part under s9(2)(a)</td>
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<td>8a</td>
<td>Briefing paper: OC200311 Removal of Airways Services from Regional Airports - Erbriefing Paper.pdf</td>
<td>16 April 2020</td>
<td>Withheld in part under s9(2)(g)(i)</td>
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<td>9</td>
<td>Email: RE: OC200311 Removal of Airways Services from Regional Airports - Briefing Paper</td>
<td>20 April 2020</td>
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Hi All

This is timely as I’ve just been on the phone with Airways (Katie Bhreathnach and Katie Wilkinson) where they have been updating me on some operational issues. The following is what was discussed:

- Significant drop in revenue for Airways, and are grateful for the steps taken by government to resolve this
- They have been considering how to configure their operations to meet the current and potentially new normal
- As a result their delivery model will have to change
- They have been doing short, medium and long term forecasts
- They need to cut their cost base by 30%, Air NZ their key customer needs Airways to cut costs and prices to Air NZ
- They have been undertaking a unit viability studies (Units are defined as regional towers and how airspace is chunked up)
- Some of the units may not be viable to provide service from (e.g. Gisborne, Invercargill etc)
- Some may have to have their services ceased temporarily
- Alternatives and avenues would be found that is appropriate to the level of traffic for those ports
- Airways is still working on this and will provide further details
- With regard to Milford, no planes are going there and so they have pulled their people from Milford
- They are going to remove service from Milford in the short term as it is unlikely that Milford will be viable as Air NZ have indicated that they will largely be a domestic airline
- Airways will consider returning to Milford at a later stage if the need arises
- Overall, Airways is looking at cutting 180 people from its workforce – this is likely to include all the Milford people as Airways can’t keep people on its book, when no service is being provided for the foreseeable future
- Airways will be talking to the CAA tomorrow and will provide us with detailed written information after that
- Airways will also talk to the Aerodromes and unions at some stage

Cheers
Tom
Hi Kirstie, couldn’t get you on the phone just now, but this is what I was going to say.

- Airways have commenced consultation with five (I think) regional airports about service level reductions which amount to closing the ATC Towers. This is planned alongside the current redundancy consultations Airways is undertaking now, so it seems permanent. The locations are Invercargill, Gisborne, Rotorua, Hawkes Bay and New Plymouth.
- Temporary closure of the Towers can be understood given the negligible amount of air traffic expected in the short to medium term, but there is no indication of a plan for medium-longer term recovery of domestic air traffic.
- We can’t see a joined-up plan behind this action by Airways, which seems likely to be a barrier to regional economic recovery. Airports and airlines have started some collaborative discussions around post C-19 recovery of air travel and the visitor economy, and it is likely that domestic air transport will be a key stepping stone for national, Trans-Tasman and international flights.
- Airways don’t seem to be thinking about their role in the future recovery — or at least have a very narrow view of it, excluding regional and national economic and social interests.
- Airways is anticipating media coverage tomorrow, given the range of parties they are talking to at the moment. From what I have heard this afternoon, one or more regional Mayors and other stakeholders will be very unhappy about the impact on regions of the Airways action, as it essentially points to the regions being cut off from the air network when higher levels of air transport resume.

Finally — from the outside it seems Airways and Air NZ may be playing from the same songbook in terms of air transport expectations for the next 24 months and longer. The sooner any Government scenarios can be released and considered more widely (including the tourism sector), the better it will be for developing some shared understanding and an informed discussion. If we and individual airports are to consult with Airways over shut downs of parts of the network, we really need the information now.

Cheers
Kevin

Kevin Ward
Chief Executive

kevin.ward@nzairports.co.nz  www.nzairports.co.nz
Level 8, Midland Chambers
45 Johnston Street
Wellington 6011, New Zealand
RELEASED UNDER THE OFFICIAL INFORMATION ACT
Kirstie Hewlett
Deputy Chief Executive, System & Regulatory Design
Ministry of Transport – Te Manatū Waka
M: +64 21 668 159 | www.k.hewlett@transport.govt.nz
Enabling New Zealanders to flourish

From: Bhreatnach, Katie <Katie.Bhreatnach@airways.co.nz>
Sent: Thursday, 9 April 2020 12:58 PM
To: Kirstie Hewlett: <K.Hewlett@transport.govt.nz>
Subject: FW: emails to ministers office

Hi Kirstie,

Here are the emails which our Head of Public Affairs sent to the Minister’s office.

Working on the questions you sent through and will come back asap.

Katie

Emily Davies
Head of Public Affairs

Level 2, 6 Leonard Isitt Drive, Auckland Airport, Auckland 2022
PO Box 53093, Auckland, 2150
m. +64 (21) 815149
dll. +64 (9) 2577574
e. Emily.Davies@airways.co.nz
w. www.airways.co.nz

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delete the emails. Views expressed in this email may not be those of the
Airways Corporation of New Zealand Limited.
Hi [Name],

I hope you are well and managing this new way of working and living. I can confirm it’s certainly a challenge to parent twin babies while we’re both working full time!!!

Denise was delighted to receive your regards when we last emailed – she was excited to hear you’re working for Minister Twyford.

Following recent correspondence from Denise to the Minister, I want to keep you updated on how we are progressing, specifically regarding the measures we are taking in response to the profound impacts our industry is experiencing.

As our Chair referenced we have specific initiatives underway that will position Airways to provide appropriate service levels now as well as support the industry in its future recovery.

First, we are ensuring our business can survive while minimising our need to engage with the Government on future funding. We are working to reduce our cost base by 30% while ensuring we continue to meet our safety obligations.

These measures include:
- Halting most major capital programmes
- Ceasing all projects
- Reducing contractors
- A company-wide pay freeze and cancelling all incentive payments
- Sad to say, we expect 180 of our people will leave our business in the coming months through redundancy.
- Discussions are also underway with staff around options for reduced hours, early retirement, and voluntary redundancy.

Working in partnership with the industry we are also exploring new ways to support the pathway back to growth. Our intention is to ensure our operation is right-sized to support the future aviation industry by reviewing our current service levels and making safe and appropriate changes.

These include:
- Withdrawing from, or changing air traffic services at aerodromes that experienced consistently low traffic before the pandemic. In line with this we are actively reviewing airports such as; Napier, Paraparaumu, Gisborne, New Plymouth, Rotorua, and Invercargill.
- We have formally indicated to MoT our intention to withdraw from Milford Sound Piopiotahi...
Aerodrome, which has experienced low volumes for many years and will not see tourist traffic return for some time.

- We are undertaking an airspace design review with the expectation we can reconfigure controlled airspace to perform more flexibly and at a lower cost base.
- We are assessing technologies that could be deployed in the future to flex our service delivery in line with demand, without substantially increasing our costs.

Any changes to air traffic services will be subject to CAA approval. We are in active discussions with MoT, CAA, Air NZ and the airports on these changes and we will continue to update you as our plans evolve.

We want to reassure the Minister we are doing our part for NZ Inc. and the future viability of the aviation sector.

Please let me know if you have any questions.

Kind regards,

Emily

Emily Davies
Head of Public Affairs

Level 2, 6 Terminal 1 Drive, Auckland Airport, Auckland 2022
PO Box 53625, Auckland, 2050
m. +64 (21) 815149
d. +64 (9) 2572574
e. Emily.Davies@airnewzealand.co.nz
w. www.airnewzealand.co.nz
Hi [Name],

I hope you had a great weekend. Further to the note I sent you on Friday, please see below a press release we are issuing today in response to a number of media enquiries about traffic numbers. You might be interested in these before and after images of the NZ Oceanic airspace radar screen. Let me know if you have any questions.

Cheers,

Emily

Embargoed media release

6 April 2020

Flight data shows full impact of Covid-19 on New Zealand air travel

Two weeks of flight count data released by Airways New Zealand shows the full impact Covid-19 is having on air travel in New Zealand.

In the week following the Government’s March 23 announcement that the country would go into a four-week lockdown, scheduled airline traffic declined by 47% compared to the same period last year. In the past seven days, traffic has dropped 86% compared to the same week in 2019 – 6,000 flights reduced to just 982.

In normal circumstances New Zealand would expect a daily average of 703 international flight arrivals through March. In the week to March 28, there were 304 across the country. In the past seven days, just 50 international passenger flights entered New Zealand. Arrivals will continue to wind down as demand for repatriation flights ceases.

Domestic air traffic halved immediately following the lockdown announcement, down from about 8,500 flights weekly to 4,400. The suspension of domestic Jetstar and Air New Zealand services means 95% of domestic passenger flights have now stopped. The remaining aircraft still operating domestically are freight and medical flights.

“It is true that we are operating in an aviation environment unlike anything seen since the second world war,” Airways CEO Graeme Sumner says. “In December 2019, there
were 25 international carriers operating in New Zealand and now there is effectively one.”

Airways is forecasting domestic traffic to recover at a modest pace after the lockdown and for the rest of the year. However, the industry outlook expects international air traffic will take up to two years to recover.

“While the current reality is stark, we are looking ahead to recovery and will be working with the industry to find ways to support future growth,” Mr Sumner says.

Collapsing traffic levels mean Airways is now looking to reduce its cost base by 30% over the coming year, in consultation with staff and unions, the Civil Aviation Authority and airlines. The air navigation services provider expects that 180 of its people will leave in the coming months through redundancy. This is a 25% reduction of employees across all areas of its business.

“It’s essential that we can continue to provide a safe service during the pandemic and support the industry with an equally safe and cost-effective service when tourism and aviation does eventually recover,” he says.

The Government’s aviation support package announced in March included a $70m equity injection for Airways.

“While we are greatly appreciative, and this package has made a significant contribution to cushioning the blow, it cannot realistically offset the 95 per cent decline in revenue we are currently facing,” Mr Sumner says.

Ends.

For more Information, please contact:
Emma Lee, External Communications Specialist
P: 027 511 1123 E: emma.lee@airways.co.nz

Emily Davies
Head of Public Affairs

Level 2, 6 Leonard Isitt Drive, Auckland Airport, Auckland 2022
Hi [Name],

As I indicated in my email last Friday we are looking to withdraw from air traffic services at aerodromes that experienced consistently low traffic before the pandemic.

We have today commenced talking to our union, NZALPA and airport CEOs about a proposal to withdraw our services from seven aerodromes. A notice has also been sent to staff.

Please find below our reactive statement regarding the service changes we are proposing. We are not planning to issue this proactively, but expect to have to use it tomorrow as we anticipate it leaking.

Please let me know if you have any questions.

Cheers,
Emily

Starts:
Airways is considering withdrawing air traffic services at seven regional aerodromes where there are limited or no commercial flights operating due to Covid-19 travel restrictions. The air navigation services provider has now commenced discussion with the airports, airlines and staff.

Any changes would mean aircraft will still be able to fly safely to these locations. This includes freight, medical flights and future passenger services.

The air traffic control services under review are those provided from Airways’ towers at Napier, Gisborne, New Plymouth, Rotorua and Invercargill airports. The airfield flight information service (AFIS) provided at Kapiti Coast Airport and Milford Sound PIopiotahi Aerodrome are also being considered.

Air traffic volumes have collapsed as a result of the Covid-19 outbreak. Forecasts indicate the national network will only see up to a 60 per cent recovery over the next two years, with border restrictions expected to stay in place for some time.

The locations currently under review are those where air traffic had been low even before the outbreak, Airways CEO Graeme Sumner says.

"It is simply not viable to continue the same level of service at locations where there are no passenger flights," he says. "It's an unfortunate and stark reality, but our focus now needs to be on
supporting the long-term recovery of New Zealand’s aviation industry by ensuring our services are affordable and match the reality of the aviation sector now and into the future.

“We now need to consider operating different services at these airports or that they operate as uncontrolled airspace in the same way as other uncontrolled aerodromes in New Zealand that have no Airways service—including Kerikeri, Taupo, Whangarei and Timaru airports,” says Mr Sumner.

Pilots flying into these airfields use standard visual flight rules to stay separated before they reach an altitude covered by air traffic control radar.

Airways expects to commence a two-week consultation process with unions next week.

Ends

Notes for editors:
About AFIS:
Airways operates 17 air traffic control towers nationally and offers an airfield flight information service (AFIS) at Kapiti Coast Airport and Milford Sound Pupuclani Aerodrome. AFIS is used at aerodromes where there are very low traffic levels. It is different to air traffic control in that AFIS officers do not issue instructions to pilots. Instead they provide pilots with information they use to safely operate in and around an aerodrome.

Emily Davies
Head of Public Affairs
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e. Emily.Davies@airways.co.nz
w. www.airways.co.nz
Here you go Tom.

From: Bhreatnach, Katie
Sent: Thursday, 9 April 2020 2:06 pm
To: Kirstie Hewlett <K.Hewlett@transport.govt.nz>
Subject: Questions

Hi Kirstie,

Hope this answers the questions. Let me know if you need anything further.

Airways has offered to work with regional airports and the CAA to determine what the appropriate, affordable and safe service is for each of those aerodromes. The stark reality is that Air NZ, who fund Airways for flights to these Aerodromes, can no longer afford to pay us to provide full ATC services. (Aerodromes do not pay Airways for their services – airlines do. However, if aerodromes wanted to enter into a bilateral agreement with Airways that is a possible alternative).

Prior to Covid 19 there were 25 passenger airlines in NZ. Now there is one – Air NZ.

The traffic volumes at the seven aerodromes prior to Covid 19 could have justified alternative service provision to full ATC. Our forecasting has been done in collaboration with data provided by Treasury.

The sorts of alternative services Airways could provide include a flight information service, or a remotely provided approach service through procedures or surveillance technology. Another alternative could be that they become an uncontrolled airspace aerodrome – such as Taupo, Timaru, Kerikeri and Hokitika. Air NZ has not identified these changes as a barrier to continuing to operate passenger services at these aerodromes.

In looking to change the kind of service Airways provides to these aerodromes, there will be a regulatory process that will involve the relevant aerodromes and other stakeholders such as Air NZ. This will be managed by the Civil Aviation Authority.

Airways is working to reduce our cost base by 30%, and expect 180 people to leave Airways in the coming months through redundancy.
Airways has cancelled our capital works program and released all project managers. We have already released people from our corporate divisions. Reduction of our operational workforce is required to achieve headcount reduction and associated
savings, as people and technology make up the majority of our cost base.

On 09/04 Airways met with the seven affected airports and communicated the following position:
- We have signalled our intention to withdraw services as a first step, in direct response to the reduction in air traffic.
- We have commenced a consultation process with unions. This process has a 2 week duration, and withdrawal will need to align with this timeframe.
- On a separate timeline is working together with airports and CAA on what shape Airways services will take at affected airports in the future, and Airways has offered to take a lead on this process to support the relevant aerodromes.

Media releases here too:


https://www.airways.co.nz/media-centre/media-statements/airways-reviews-air-traffic-service-levels-at-seven-regional-aerodromes/

Katie Bhreatnach
Group Head of Customer Management, Legal and Policy and Standards

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PO Box 55993, Auckland 2150

E. Katie.Bhreatnach@airways.co.nz
W. www.airways.co.nz

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Hi

Please find attached a response to the questions posed by the Minister.
If you have further questions, please let me know.
Cheers
Tom

Hi team,

Please see below, the Minister has a number of questions around Airways proposal to remove services from seven regional airports.

I have also included below a note that was provided by Graeme Harris earlier this week from the CAA’s view on this.

If possible, could MoT please provide answers to the below questions today?
Via email would be great.

Ngā mihi

Private Secretary (Transport)

Office of Hon Phil Twyford
Minister for Economic Development | Minister of Transport | Minister for Urban Development
Private Bag 1804.1 | Parliament Buildings | Wellington 6163 | New Zealand
Office Phone: +64 4 817 8704 Email: phil.twyford@parliament.govt.nz
From: Phil Twyford
Sent: Thursday, 9 April 2020 10:40 AM
To: [Redacted]
Subject: RE: No surprises re Airways proposals on domestic air traffic management arrangements

No worries.

As we discussed I'd like advice on the Airways proposal, that explains the practical and technical issues around moving away from air traffic services to not having any. I'd like to understand the economics of their proposal: principally how much are they trying to save by doing this? What is the value for money equation for these seven airports compared to the bigger metros? To what extent will the lack of air traffic services be a barrier to the resumption of Air NZ passenger services? What do CAA advise re safety issues at these seven airports? What is the cost barrier to resuming services? Is there a mothballing option rather than complete withdrawal?

[Redacted]

From: [Redacted]
Date: Monday, 13 April 2020, 9:30 AM
To: [Redacted]
Subject: FW: No surprises re Airways proposals on domestic air traffic management arrangements

Hi both,

Please see below an update from Graeme Harris regarding the CAA's work with Airways in light of the changes Airways is proposing to its operating model due to COVID.

Kind Regards,

From: Graeme Harris [mailto:Graeme.Harris@caa.govt.nz]
Below is a heads up for the Minister in case you think he will be interested. There may also be some media interest in announcements by Airways so your media staff might be interested.

Last Friday staff from the CAA met with senior managers from Airways. This meeting followed one between the CE of Airways and the Director. Friday’s meeting was for Airways to outline in some detail its intended approach to the provision of domestic air traffic management in response to COVID-19 impacts on the domestic aviation system.

What is Airways looking at in the short term?

In the light of Air NZ announcing its schedule for coming weeks, Airways is proposing to cease or reduce service delivery at all aerodromes it delivers services at (including Flight Information Services at Paraparaumu and Milford Sound) with the exception of Whenuapai, Auckland, Ohakea, Wellington, Nelson, Christchurch and Dunedin. It will be proposed that any remaining services at Dunedin and Nelson will be centred around the limited operations by aircraft exceeding 30 seat capacity now being conducted into and from those ports. Services at Whenuapai and Ohakea towers will continue ops normal under the terms of the contract Airways has with NZDF.

Regulatory approval required

Requests for the Director to assess cessation or amendment of service delivery at relevant airports will be submitted by Airways in the near future. In assessing the proposals the Director will consider the safety impacts and will require Airways consultation with the full range of stakeholders. The CAA will also focus on identification of the triggers that would necessitate the need for reassessment and possible reintroduction of services at a particular location.

The longer term

Airways also advised that in coming weeks it will also be working with airports, users (airlines large and small, training organisations etc), and other interested parties on the question of what appropriate levels of service will be beyond the immediate short term lockdown period and into the longer term. This work will not only focus on provision of services at airports but will include proposals to update the ‘sectorisation’ of non-airport en-route and other controlled airspace. This is a material piece of work that will involve significant stakeholder engagement and consultation processes. The driver here for Airways is potential savings via efficiencies through reduced staffing levels and having the
ability to deploy staff to manage air traffic across larger sectors (covering larger geographical areas) than is currently possible with the number of smaller sectors in place.

Process and considerations for responding to longer term proposals

Airways proposals – both short and longer term – will require substantive levels of assessment by the CAA and consultation with stakeholders. While Airways is seeking a timely response to its proposals, they have been advised that our ability to assess any proposals in a timely manner will be largely dependent on the quality of the safety cases submitted, and the degree to which they reflect a collaborative approach that addresses all stakeholder inputs and concerns.

Our role versus that of the MoT

The CAA is aware of policy work by the MoT on matters associated with regional air connectivity. There is potentially a link between Airways proposals and the MoT’s work and the Director will ensure that the scope of Airways consultation includes the MoT.

Media considerations

Airways will likely make a media release today (Monday 6 April), probably not around the detailed specifics above, but rather on broader decisions made by its Board to discontinue a range of project and programme work it had planned. In teasing this work it will be looking to lay-off up to 200 staff over coming weeks and months – with possibly more in the future. The longer term level of redundancies will likely be dependent on the Director’s decision-making about the level of service required at regional ports and on the ‘sectorisation’ issue. Mention may be made in that release however of the likelihood of regional tower service delivery changes.

Regards

Graeme

Graeme Harris
Chief Executive / Director of Civil Aviation
Civil Aviation Authority of New Zealand
Level 15 Acrion Centre | 55 Featherston Street | PO Box 3555 | Wellington 6011 | New Zealand
(303) +64 (4) 560 9104 | (EA) +64 (4) 560-9435
Airways Questions

Practical and technical issues around moving away from air traffic services to not having any

- Aerodromes do not pay Airways for their services - airlines do
- Air New Zealand is the primary user of air traffic control (ATC) services in New Zealand. As a result the majority of Airways’ cost to maintain services at aerodromes is met by Air NZ.
- Air NZ is no longer flying to these aerodromes and can no longer afford to pay Airways to provide full ATC services.
- Airways is open to enter into bilateral agreements to provide ATC services to those aerodromes who still want it.
- As part of moving away from ATC services, regulatory approval from the Director of Civil Aviation is required.

Economics of their proposal: principally how much are they trying to save by doing this?

- Airways in hoping that the measures taken would reduce its cost base by 30 percent.
- They hope to achieve this by
  - Halting most major capital programmes.
  - Ceasing all projects.
  - Releasing contractors.
  - A company-wide pay freeze and cancelling all incentive payments.
  - About 180 people are expected to be made redundant (Discussions are also underway with staff around options for reduced hours, early retirement, and voluntary redundancy).
- Reduction of the operational workforce is required to achieve headcount reduction and associated savings, as people and technology make up the majority of Airways’ cost base.

What is the value for money equation for these seven airports compared to the bigger metros?

- Airways has a pricing model that drives how it charges for its services.
- The traffic volume is the main driver of costs.
- The traffic levels of the seven airports does not justify a full ATC service.
- The traffic levels pre-Covid 19 would not have justified a full ATC service if worldwide best practice was followed.

CAA advice on safety issues at these seven airports?

- The CAA has not reached a view as Airways is currently consulting with its stakeholders.
- After consultation with its stakeholders, Airways may submit requests to the Director to accept cessation or amendment of service delivery at relevant airports.
- The Airways submission will be accompanied by a safety case which will detail all the risks and mitigation that will be put in place.
- In assessing the proposals the Director will consider the safety impacts on not only the airports but the overall network.
To what extent will the lack of air traffic services be a barrier to the resumption of Air NZ passenger services?

- The CAA, in its assessment of the safety case for cessation or reduction of service, will focus on identification of the triggers that would necessitate the need for reassessment and possible reintroduction of services at different aerodromes.
- As the traffic levels increase, Airways will also consider the type of service that is necessary for a particular aerodrome.

What is the cost barrier to resuming services?

- Airways will assess traffic volumes at the aerodrome before making a decision on the level of service to provide.
- There are different types of services that could be provided rather than a full ATC service.
- Airways will ensure that it adheres to best practice when determining the type or level of service to provide.
- The CAA would have a role in determining the type of service is required to ensure safety in the aviation system.

Is there a mothballing option rather than complete withdrawal?

- The traffic levels pre-Covid 19 would not have justified a full ATC service if worldwide best practice was followed.
- The CAA would have a role in determining the type of service is required to ensure safety in the aviation system.
See an additional bullet in red below.

Cheers
Tom

---

From: Tom Forster
Sent: Thursday, 9 April 2020 5:08 PM
To: [redacted]
Cc: Kirstie Hewlett <K.Hewlett@transport.govt.nz>
Subject: RE: No surprises re Airways proposals on domestic air traffic management arrangements

Hi

See suggested changes below. I have deleted the issue around the Ministry making a submission to Airways.

Cheers
Tom

---

From: Tom Forster
Sent: Thursday, 9 April 2020 4:33 PM
To: Tom Forster <T.Forster@transport.govt.nz>
Cc: Kirstie Hewlett <K.Hewlett@transport.govt.nz>
Subject: FW: No surprises re Airways proposals on domestic air traffic management arrangements

Hi Tom,

Thanks again for sending the content on Airways through earlier, can you please check that the below is accurate? The Minister wants the below lines sent to PMO ASAP.

1. Airways, the SOE who provide air traffic control services to airports, is consulting on their proposal to withdraw air traffic control services in seven regional airports (Napier, Paraparaumu, Gisborne, New Plymouth, Rotorua, and Invercargill, Milford Sound).

Airways will work with each of the airports to determine what the best level of service is for that airport

2. None of the affected airports currently have any scheduled passenger flights. It is likely to
be some time before any of these airports have multiple scheduled passenger services on a daily basis.

3. Airways' services are funded by the airlines. Air NZ is no longer flying scheduled services into these airports and as part of managing its cost base no longer wants to pay for Airways services it doesn't need.

4. Planes, without staffed air traffic control towers, can still safely fly in and out of these airports, using Visual Flight Rules, line-of-sight the surveillance system and ground based navigational aids. the nationwide digital navigation surveillance system. [Check with MOT that this is correct]

5. The Civil Aviation Authority as the safety regulator will consider and assess the Airways proposal once this is provided. As part of that process Airways will be expected to provide a safety case as to how any risks would be mitigated. Is considering its response to Airways proposals. The Ministry of Transport is considering the broader aviation connectivity implications. Both will be making submissions to Airways on the matter.

Kind Regards,

§9(2)(a)
Dear airport chief executives,

Over the long weekend, NZ Airports has been in discussions with the seven airports identified by Air New Zealand for tower closures, and we are currently pulling together the threads of those discussions to assist them to shape the process through the next steps and to lay the groundwork for future Air Traffic Management (ATM) services and recovery.

Key to the discussions was agreement by all the affected airports that the airports themselves should be driving the processes to identify appropriate ATM service levels at their airports and to gain regulatory approval for changes to current services. Preliminary contact was also made with Air NZ to discuss their requirements, in a generic (not airport-specific) sense.

I would draw your attention to three factors that may potentially become relevant for other airports in the near future.

1. It is not clear to us that the Air New Zealand closures will stop at the seven towers (Hawkes Bay, New Plymouth, Rotorua, Invercargill, Gisborne, Kauri Coast, Milford Sound) they have named to date. It seems at least possible that further announcements may soon follow as part of the cost saving and operational reconfigurations underway at Air New Zealand, and taking account of the very limited levels of air traffic. For this reason, you may wish to note the next two points.

2. The CAA worked through Easter Friday to produce some guidance around the regulatory processes they envisage around any proposal to reduce air traffic management (ATM) levels at regional airports. The CAA shares our view that the regulatory responsibility lies with the Part 139 certificate holder to apply to the CAA for any change in current ATM service levels. CAA will not accept change proposals from other parties. Their expectations include that the airport would consult with stakeholders including Air NZ and Airports in producing a different level of service. The CAA has taken a forward-looking stance and specifically provided for an immediate phase, a recovery phase, and a future steady state (new normal) operating environment. Our feedback to the CAA was that we had no substantive comment on their draft. The CAA guidance is attached for reference.

3. The initial Air New Zealand notification to the affected seven airports on Thursday left some uncertainty and doubt among the airports. This was compounded by the Air New Zealand announcements at the same time regarding redundancy consultations with their air traffic controllers over a short timeframe. There was considerable concern that decisions being made by Air New Zealand now will limit what airports could do when increased levels of air traffic return in the future. I transmitted this back to Air New Zealand late Thursday, and in response the email copied below was received on Saturday. The seven airports took some comfort from the additional clarifications in the email that the process to change the current service contract between the airports and Air New Zealand was expected to take several months, and that the need for a second workstream (Stream 2 in the chart below) to identify appropriate future service levels was recognized. However, the affected airports remain determined to take control of the assessment of their own needs, and the regulatory processes.

This is an interim report on developments over the Easter weekend, and much work remains to be done both to shape a joint framework for regional airports to pick up the process and drive it from now on, and by the individual airports to identify their current and future requirements for ATM. Stakeholder engagement will also be an important element of the work -- several Mayors and Members of Parliament have expressed concern over Air New Zealand's actions. We envisage broadening the process to include input and advice from all airports as we move forward.

Kevin

Kevin Ward
NZ Airports

From: Longbottom, Beck<beck.longbottom@airnewzealand.co.nz>
Sent: Saturday, 11 April 2020 5:52 pm
To: Kevin Ward<kevin.ward@nzairports.co.nz>
Cc: Bhreathnach, Katie<katie.bhreathnach@airnewzealand.co.nz>
Subject: Clarification from Air New Zealand
Kia Ora Kevin and [signature].

Following our call on Thursday.

We have proposed to withdraw services. If Airways decides to proceed, we will notify CAA under rule part 172.163(a), with 90 days notice to withdraw.

In parallel, we will give airports notice that we will terminate our agreement either partially or in full.

Airports will then go through changes to 3.39 certification with the CAA.

Airports will need to produce an aeronautical study as part of this process, which Airways has expertise to assist airports to deliver. Otherwise, airports have the option of doing this without Airways assistance.

For clarity, below I have also outlined:

- The position Katie and I presented to affected airports on 08/04, and
- The high-level process and timeframes for withdrawing services, and establishing new, future-fit services.

I understand you have a meeting with Katie at 11:30am on Tuesday morning – I’m free to join and perhaps that call is an opportunity to discuss the below.

-Back

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**POSITION PRESENTED TO AFFECTED AIRPORTS 08/04**

- Airways is working to reduce our cost base by 30%, and expect 180 people to leave Airways in the coming months through redundancy.
- Airways has cancelled its capital works program, released all project managers and released people from our corporate divisions.
- Reduction of our operational workforce is required to achieve headcount reduction and associated savings, as people and technology make up the majority of our cost base.
- We have signalled our intention to wind down services as a first step, in direct response to the reduction in air traffic.
- We have commenced a consultation process with unions. This process has a 2-week duration, and withdrawal will need to align with this timeframe.
- On a separate front, we are working together with airports and CAA on what shape Airways services will take at affected airports in the future, and Airways has offered to take a lead on this process to support them.

---

**PROCESS AND ESTIMATED TIMELINE**

At a high level,ainmentment of the above entails the following activities:

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Stream 1: Withdraw current service

- Notify customers of intention (completed 08/04)
- Notice to withdraw under rule part 172.163(a)
○ Process between Airways and CAA
○ Start date is when proposal is confirmed
○ Duration 90 days

• Change to airport / Airways contract
  ○ Notify partial or total termination of contracts with affected airports at the same time as the notice to withdraw
  ○ Process between affected airports and Airways
  ○ Duration dependent on scope and time to negotiate and execute

Stream 2: Establish new service:
• Consultation with airports to complete an aeronautical study, model future flight volumes, design future-in-service, and agree the trigger point for activating it.
• Process between affected CAA and airports (with possible support from Airways)
• Start date and duration of all of the above to be agreed

Beck Longbottom
Head of Customer

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Your communications are important to us and we take appropriate measures to secure, store and access for information assurance. This electronic message together with any attachments is confidential. If you receive it in error, please delete, disclose, copy or retain it. (a) please contact the sender immediately by reply email and then delete the email. Views expressed in this email may not be those of the Airways Corporation of New Zealand Limited.
Regional ATS Provision

Background
The purpose of this document is to provide direction to stakeholders on a process by which any proposals for changes to currently required air traffic management services at specific locations can be developed for submission to the CAA for regulatory consideration. Any change to the level of service currently required at an individual location requires regulatory approval.

Any relevant proposals must be submitted to CAA by the aerodrome operator in question. This recognises the obligation that rests with an aerodrome operator to ensure the delivery of required services in accordance with the requirements of Civil Aviation Rule (CAR) Part 139.113. In addition, any proposals for change submitted to the CAA should meet the expectations regarding their process of development and content set out in Advisory Circular (AC) 139-15. Aeronautical Studies for Aerodrome Operators.

Consultation
The CAA expects that any proposal submitted to it by an aerodrome operator will incorporate consultative input from the airport’s stakeholders, including airlines and other airspace users.

In addition, once it has received any proposal, the CAA will also enter into an independent consultative process with stakeholders before final decision-making.

Proposals for change
Building on the guidance contained within AC 139-15, any proposals presented for each location should be guided by the 7 step methodology, and circumstances that exist in the immediate short term, during the anticipated recovery phase of the domestic aviation system and finally into any new steady state aviation environment.

Regardless of ownership, or of the collective input to associated aeronautical study, this process does not override the responsibility for effective management of change as articulated within a certificate holders SMS, rather it should enable/support the initiation of that change process.

Immediate phase: 1 to 6 months approx.

1. Single justification argument in the AC139-15 format, 7 steps. To be provided by the Aerodrome Operator

2. If any change in services levels is accepted this could be activated by NOTAM

Considerations on Immediate Phase:
- Could provide the ability to suspend ATS provision in the current environment, based on a safe if not safer resulting operating environment, and subject to regulatory approval allowing this to occur.
- Retains the ability to reinstate existing ATS in the mid to longer term.
Recovery Phase: 6-18 months?

1. Proposal for change to be presented by the individual aerodrome operator in question
   - The proposal could draw on identified common elements across any other similarly affected aerodromes
   - Identifies bespoke elements of the local operating environment
     - Approach services
     - Airspace considerations:
     - Operational profile: Current and predicted growth in traffic
   - Determines appropriate local operating environment proposal
   - Follows 7 step process of AC 139-15
     - Emphasis on effective consultation
     - Required effectiveness monitoring and review included in any intended implementation phase associated with a proposal for change.

Notes on Recovery Phase:
   - Potential for the recovery phase aeronautical study to be the Steady State proposal should that be considered appropriate by aerodromes
   - Should any proposed service level change be accepted monitoring and review processes will be required of the aerodrome operator to inform any need to consider a further differing level of ATS based on changes to the operational risk profile over the recovery period.
Steady State: 2 years onwards – new normal operating environment

1. Aeronautical Study
   a. Identifies Risk elements appropriate to the nominated aerodrome
   b. Identifies bespoke elements of local operating environment as the aviation system recovers
      i. Approach services:
      ii. Airspace considerations:
      iii. Operational profile: Current and predicted growth
      iv. Airspace considerations
      v. Operational profile
   c. Determines appropriate system solution
   d. Follows 7 step process of AC 139-15
      i. Emphasis on effective consultation
      ii. Required effectiveness monitoring and review included in any intended implementation phase associated with a proposal for change.

Notes on Steady State:

• Should any proposed service level change be accepted monitoring and review processes will be required of the aerodrome operator to inform any need to consider a further differing level of ATS based on changes to the operational risk profile.

• Could be presented as part of the recovery phase proposal.
Aeronautical Study methodology in support of any change proposal

1. Initiation: Step 1
This step consists of defining the opportunity or problem and the associated risk issues, setting up the risk management team; and beginning to identify potential users who may be affected by any change. This will include early engagement with stakeholders – Airways/Aerodromes and other airspace users, potential development of ToR for the overall process.

The second step consists of defining the basic dimensions of the risk problem and undertaking an initial identification, analysis and evaluation of potential risks. This preliminary evaluation will help determine:
   • Whether a situation exists that requires immediate action;
   • Whether the matter requires further study prior to any action being taken, or,
   • Whether the analysis should be ended as the risk problem is determined not to be an issue.
   • What assumptions are necessary, and what is the associated risk to these assumptions

   These steps estimate the degree of risk. Step 3 estimates the severity of the consequences and step 4 estimates the probability of their occurrence.

4. Risk Evaluation: Step 5
   The benefits and operational costs of the activity are integrated into the analysis and the risk is evaluated in terms of the safety implications of the activity and of the needs, issues, and concerns of affected users.

5. Risk Control: Step 6
   This step identifies feasible risk controls and mitigations which will act to reduce either the probability of the event or the consequence of the event should it occur.

6. Action/Monitoring:
   Management of change in accordance with respective participant SMS.

7. Step 7.
   This step entails implementing the chosen risk control options, evaluating the effectiveness of the risk management decision process, and implementing an ongoing monitoring program. It should answer questions such as:
   • Are the initial assumptions still valid?
   • Has the overall risk profile behaved as expected?
   • What new risks are now present?
Please find attached the briefing on Airways.

Cheers
Tom
Removal of Airways Services from Regional Airports

<table>
<thead>
<tr>
<th>Reason for this briefing</th>
<th>To provide you with information on Airways' withdrawal from seven regional airports.</th>
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<tbody>
<tr>
<td>Action required</td>
<td>No action required, this is just for your information</td>
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<tr>
<td>Deadline</td>
<td>None</td>
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<td>Reason for deadline</td>
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</table>

Contact for telephone discussion (if required)

<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
<th>Telephone</th>
<th>First contact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tom Forster</td>
<td>Manager</td>
<td>022 066 3875</td>
<td></td>
</tr>
</tbody>
</table>

MINISTER'S COMMENTS:

Date: 16 April 2020  Briefing number: OC200311
Attention: Hon Phil Twyford  Security level: In-Confidence

Minister of Transport's office actions

- [ ] Noted
- [ ] Seen
- [ ] Approved
- [ ] Needs change
- [ ] Referred to
- [ ] Withdrawn
- [ ] Not seen by Minister
- [ ] Overlapped by events
Purpose of report

1. Airways Corporation of New Zealand Limited (Airways) recently announced that it is considering withdrawing full air traffic control services from a number of regional airports. This briefing provides you with information regarding the planned withdrawal.

2. The paper also discusses how the Airways proposal will impact the resumption of passenger services as well as regional air connectivity.

Background

3. Airways is a State Owned Enterprise (SOE) that operates key parts of New Zealand’s air traffic control system as a statutory monopoly under the Civil Aviation Act 1990.

4. Airways provides air navigation services and infrastructure, which are paid for by the aviation sector participants that use those services.

5. As an SOE, Airways’ principal statutory objective is to operate as a successful business and, to this end, to be:

   5.1. as profitable and efficient as comparable businesses that are not owned by the Crown

   5.2. a good employer

   5.3. an organisation that exhibits a sense of social responsibility by having regard to the interests of the community in which it operates and by endeavouring to accommodate or encourage these when able to do so.¹

6. Airways, as the holder of an aviation document, can be required to meet requirements and provide services that align with the Civil Aviation Act and rules made under it. The Civil Aviation Authority monitors Airways’ compliance with its aviation document. This is largely limited to ensuring safe operation of air services in compliance with the document.

Impact of COVID-19 on Airways

7. As a state-owned enterprise, Airways is fully self-funded through fees it charges airlines for its services, and other commercial business activities. Airways’ revenue is very closely related to the volume of air traffic it manages.

8. COVID-19 has had a significant impact on the aviation sector and most international airlines have ceased flying to New Zealand. Air New Zealand has also cut its domestic and international network by 95 percent. The grounding of flights throughout New Zealand and the loss of international air traffic has resulted in a sharp decline in Airways’ revenue.

9. As a result of the uncertainty of its future revenue, Airways found itself in a negative cash flow situation and was likely to remain so for the foreseeable future. However, the Government has provided Airways with $107 million of financial support. This funding is to provide resources for Airways to operate through the current downturn, enabling it to support airline customers through suspension of the air traffic services charge. We note that the amount provided to Airways NZ was based on a reduction of air traffic volumes, and that these volumes have reduced further. Also the amount provided for Airways was only for six months, it is likely Airways will be impacted for longer than this. Without Airways’ proposed changes, they would need to go back to Government and ask for more support.

Airways' response to COVID-19

Cost cutting measures

10. Collapsing traffic levels mean Airways is looking to reduce its cost base by 30 percent over the coming year. Reduction of the operational workforce is required to achieve headcount reduction and associated savings, as people and technology make up the majority of Airways' cost base.

11. Up to 180 people are expected to be made redundant. Discussions are also underway with staff around options for reduced hours, early retirement, and voluntary redundancy.

12. Airways also hope to achieve more reductions in its cost base by:
   12.1. halting most major capital programmes
   12.2. ceasing all projects
   12.3. releasing contractors
   12.4. cancelling all incentive payments
   12.5. a company-wide pay freeze.

Ceasing provision of air traffic services to regional airports

13. Airways has a pricing model that drives how it charges for its services. According to this model, the traffic volume is the main driver of costs.

14. Airways has been considering how to configure its operations to meet the current and potentially new normal which has significantly less traffic than before. This situation is likely to continue for a while due to the fact that borders may remain closed, with a slow recovery in international services predicted, and domestic services are not expected to return to pre-COVID levels for a while (many services will not start to resume to Alert Level 1).

15. A unit viability study has been completed (units are defined as regional towers and how airspace is chunked up), this has been complemented with short, medium and long term forecasts of traffic volumes.

16. Airways has concluded from the study and forecasts that some of the units may not be viable to provide service from for the foreseeable future, and has proposed to cease providing air traffic control services at Hawke's Bay, Gisborne, New Plymouth, Rotorua and Invercargill airports. The airfield flight information service (AFIS) provided at Kapiti Coast Airport and Milford Sound Plopiotahi Aerodrome are also proposed to be withdrawn.

17. The locations currently under review are those where air traffic had been low even before the COVID-19 outbreak.

18. Airways believes it can find alternatives and avenues that are more appropriate to the current and expected levels of traffic for these ports, or that they operate as uncontrolled airspace in the same way as other uncontrolled aerodromes in New Zealand that have no Airways service — including Kerikeri, Taupo, Whangarei and Timaru airports. It intends to work with each airport over the next couple of weeks on what this might look like.
Regulatory requirements for air traffic services

What is the process for determining what services should be provided

19. Airways has looked at pre-COVID services, current services, and forecast services as part of its unit viability study. It is now working with each of the airports to determine what the best approach might be at each airport.

20. Airways holds an aviation document and is regulated by the CAA for the services it provides. The CAA would have a final decision on whether or not Airways can cease providing services from the proposed airfields.

21. After consultation with its stakeholders, Airways may submit requests to the Director of the CAA to accept cessation, or amendment, of service delivery at relevant airports. To enable the CAA to make a decision, the Airways submission must be accompanied by a safety case which will detail all the risks and mitigation that will be put in place if the service is to be withdrawn.

22. In assessing the proposals the Director will consider the safety impacts on not only the airports concerned but the overall aviation network.

23. In the case of the AFIS services, Airways has a contract with the aerodrome operators (Milford Sound and Kapiti). In this case the responsibility is on the aerodrome operator to provide the AFIS as required by the Director of CAA in accordance with Rule Part 139: Aerodromes Certification, Operation and Use.

Impact of Airways’ decision on passenger services and regional air connectivity

Resumption of services

24. The CAA, in its assessment of the safety case for cessation or reduction of service, will focus on identification of the triggers that would necessitate the need for reassessment and possible reintroduction of full air traffic control services at different aerodromes. This will largely be governed by the level of traffic into those aerodromes.

25. Airways will also assess traffic volumes at the aerodrome before making a decision on the type and level of service to provide.

26. The CAA would have a role in determining the type of service required to ensure safety in the aviation system. Once traffic reaches a certain level, and if safety is likely to be compromised without a full air traffic control service, the CAA can require Airways to provide a full service.

27. The costs of providing service would be determined by the Airways pricing model and paid for by the airlines.

Will removal of air traffic control towers services harm regional air connectivity

28. There are different types of services that could be provided safely rather than a full air traffic control service. Airways and CAA will need to adhere to good practice when determining the type or level of service to provide to an aerodrome depending on the level of traffic to that aerodrome.

29. Many other countries, and airports in New Zealand, manage different approaches to air traffic management with traffic involving a range of planes and the general aviation sector, with no impact on current, or future, regional connectivity.
30. As stated above, if at any time issues arise in the future because traffic increases, or safety is not managed then a full air traffic control service can be resumed.

31. Regional air connectivity is more likely to be impacted by reduction in services from COVID-19.

Other Airways Issues

32. Prior to COVID-19 Airways was in the process of consulting with airports on the provision of power and lighting at airfields. Airways has reached the view that Airways' expertise is not in this area and its skills and resources should be focussed on its core role which is the future needs of New Zealand's airspace and providing safe and efficient air traffic management services.

33. Airways was working in partnership with each airport, either directly or via NZ Airports Association, to transition out of owning and maintaining power and lighting services. Airways has put this work on hold given current impacts on the sector.

34. As part of the New Southern Sky² project, the CAA, the Ministry of Transport and Airways together with key aviation stakeholders have been working on where Ground Based Navigation Aids (GBNA) should be located to ensure a safe aviation system.

35. GBNA's are used for navigation by aircraft flying under instrument flight rules (IFR). The modernisation of aviation in New Zealand, entails the predominant use of satellite positioning for performance-based navigation (PBN). One of the benefits of this is that many expensive to maintain and ageing GBNA's will no longer be required. In future, GBNA's will only be needed as an alternative to satellite navigation should something go wrong with the satellite service or an aircraft's equipment.

36. The GBNA review concluded that Airways should continue to maintain all GBNA's at all controlled airports.

37. Prior to COVID-19 there were plans to reconvene the GBNA panel to provide advice to Airways. The Ministry will continue to engage with the CAA and Airways through the reconvened GBNA panel to ensure that in managing its cost pressures, Airways continues to provide sufficient GBNA's to ensure regional air connectivity and that there are enough navigation aids around the country to ensure the continued safety of aviation in New Zealand.

² The Government's programme for the modernisation of airspace and air navigation in New Zealand
Kia ora koutou,

The Minister read the Airways paper over the weekend and had the following comments:

**Minister’s comment:** I would like to know when CAA is going to communicate their view on the safety aspect. We also said we would set up a call for me with Denise Church and Graeme Slemmer to ask them to push out the decision timeline to give the airports more time. Was there no timeline on the material Airways sent through?

The meeting has been arranged for tomorrow and the Office has the timeline.

I would like to see some traffic volume scenarios for the next 1 - 2 1/2 years for each of the affected airports. And then for Airways to say what level of service they would expect to provide for each of those scenarios, and what would be the trigger to move from one level of service to another. I would then like safety and aeronautical advice from CAA, Air NZ, and independent experts on those scenarios.

I think it would be worth raising this at officials to discuss the timeline for this work and when MoT thinks it could be done. I imagine the Minister will want to know prior to the end of the consultation period so he can raise any concerns with the shareholding Minister prior to Airways making any concrete decisions.

Kind Regards,

From: Tom Forster [mailto:t.forster@transport.govt.nz]
Sent: Thursday, 16 April 2020 5:12 PM
To: [REDACTED]
Cc: Kirstie Hewlett <K.Hewlett@transport.govt.nz>
Subject: OC200311 Removal of Airways Services from Regional Airports - Briefing Paper

Please find attached the briefing on Airways.
Cheers
Tom

MINISTRY OF TRANSPORT

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