



**FEDERATED  
FARMERS**  
OF NEW ZEALAND

WELLINGTON

Lambton Centre  
Level 4, 117 Lambton Quay  
P O Box 715, Wellington  
6140  
New Zealand

5 October 2022

Ministry of Business, Innovation and Employment

**Submission: *Developing the Aotearoa New Zealand Aerospace Strategy***

Federated Farmers of New Zealand appreciates the opportunity to provide feedback on the Ministry of Business, Innovation and Employment's *Developing the Aotearoa New Zealand Aerospace Strategy* consultation document.

Our interest in the consultation centres around the proposed strategy's '*Goal Two – Safely integrate all forms of autonomous aerial vehicles*'.

We consider it appropriate for the Ministry to consider how best to integrate emerging technologies into existing systems. Our experience of human-operated unmanned aerial vehicles is, at best, mixed.

We appreciate the opportunities being explored in the use of unmanned aerial vehicles to support the farm business, whether for pasture and forestry scanning, locating missing livestock, or inspecting more remote or difficult to reach parts of rural properties. We are also aware of trials underway for more precise crop spraying applications.

Similarly, we are aware of continuing issues and concerns around the misuse of drones that intrude on the privacy and private enjoyment of rural properties. This is irrespective of whether there has been criminal intent behind the misuse of drones over private property without prior permission. The only recourse allowed for under the current system is that of Police intervention. This is more easily sought in urban areas than in rural and remote areas where it often takes some time for the Police to eventually arrive at the property.

We are aware of proposed measures previously consulted by Te Manatū Waka Ministry of Transport in their *Enabling Drone Integration* consultation. Similarly, we are aware of interventions proposed in the Civil Aviation Bill currently before Parliament. Neither effort, to our assessment, would appear to address problems and concerns around irresponsible drone use (autonomous or otherwise).

In considering how best to safely integrate autonomous aerial vehicles into the aviation system, we recommend the New Zealand Aerospace Strategy has regard for both the responsible and irresponsible use of such technologies.

We would appreciate an opportunity to meet with officials to discuss our points in more detail. Our submission on the *Enabling Drone Integration* consultation is attached for your information.

Yours sincerely,

**Mark Hooper**

National board member and transport spokesperson