

1. Submission on developing the Aotearoa New Zealand Aerospace Strategy

Your name and organisation

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Organisation (if applicable)	Peace Movement Aotearoa

Overview of the Aerospace Strategy

- Question 1:** Do the four areas above provide the right basis for the Aerospace Strategy?
- Question 2:** What are the critical factors that you see for aerospace sector development?
- Question 3:** How would an Aerospace Strategy help you?

Please type your submission below. If applicable, please indicate the question(s) to which you are responding.

According to the first page of this document, the Aerospace Strategy will ... “set the overall broad direction for the sector, align activities across the government and the sector, and inform policy and regulatory development”.

We are therefore extremely concerned that “the overall broad direction for the sector” has three key deficiencies, as outlined below:

i) Peaceful uses of space: there is no reference to New Zealand’s commitment to peaceful uses of space, both generally as a member of the international community and specifically as a member of the Committee on the Peaceful Uses of Outer Space since 2016. The Committee was established in 1959 “to govern the exploration and use of space for the benefit of all humanity: for peace, security and development” and to promote “international cooperation in the peaceful uses of outer space”.

Furthermore the New Zealand Space Policy Review Consultation document refers several times to “peaceful, responsible and sustainable space practices”, and we can see no good reason why this has not been brought into the Aerospace Strategy.

ii) Disarmament, human rights and humanitarian law obligations: there is no reference at all to New Zealand’s domestic or international disarmament obligations, which is a particular concern with regard to prohibited weapons, including nuclear, biological and chemical weapons, as well as landmines, cluster munitions and other weapon systems with inhumane and indiscriminate effects that are prohibited by New Zealand law. Related to this, there is no reference in the draft Strategy to New Zealand’s obligations under humanitarian and human rights law.

iii) Disarmament policy: there is no reference to New Zealand’s disarmament policy, which includes both a commitment “to show leadership in the development of new rules, norms and standards around the use of outer space”, and a commitment to “new international law to ban and regulate autonomous weapon systems” - this is particularly pertinent to this Strategy given the references to “autonomous aerial vehicles”, to “safely integrate all forms of autonomous aerial vehicles” and, disturbingly, “significant work has already been undertaken to establish New Zealand’s leadership in this area, which we will progress further for 2030”.

It is absolutely crucial that the new Aerospace Strategy includes meaningful references to each of these areas to ensure that aerospace companies based in Aotearoa do not develop - or contribute to the development of - any technologies, aircraft or spacecraft that are contrary to any of New Zealand’s obligations and commitments, to ensure that space is only used for peaceful purposes.

Area One - A strategy for building our aerospace sector

- Question 4:** Is the 2030 Future State set out in a way that enables New Zealand to build on its existing advantages to develop a leading place in the global aerospace economy?
- Question 5:** Will the 2030 Future State support your ambitions for growth and participation in the sector?
- Question 6:** What barriers are there to optimising sector growth?
- Question 7:** How could the government and the sector work together to achieve the 2030 Future State?
- Question 8:** How can the Government enable Māori ambitions for the sector?

Please type your submission below. If applicable, please indicate the question(s) to which you are responding.

The vision of '2030 Future State' must refer to New Zealand's commitment to the peaceful use of space, and to consistency with New Zealand's disarmament, human rights and humanitarian obligations.

Further information about each of these is provided in our response above to questions 1-3.

Area Two - Building strong foundations (Three Pillars)

- Question 9:** What do you think of the Three Pillars and do you think they will support the 2030 Future State?
- Question 10:** What else would you like to see in the Three Pillars?
- Question 11:** What actions and initiatives could the sector focus on to support the Three Pillars?

Please type your submission below. If applicable, please indicate the question(s) to which you are responding.

The three pillars must with be within a framework that starts with an overarching commitment to the peaceful use of space, and to consistency with New Zealand's disarmament, human rights and humanitarian law obligations to ensure that aerospace companies based in Aotearoa do not develop - or contribute to the development of - any technologies, aircraft or spacecraft that are contrary to any of New Zealand's obligations and commitments to ensure that space is only used for peaceful purposes.

It would also be useful to include a reference (and link) to New Zealand's export controls on military and dual use goods and technology as an indicator of the areas of research, development and production that aerospace companies must not be involved in.

Area Three - Goals for 2030

Question 12: What do you think of the Goals for 2030?

Question 13: Are the goals framed in a way that will enable New Zealand to build on its strengths and comparative advantages to achieve the 2030 Future State?

Question 14: What activities and milestones can help us achieve these Goals?

Question 15: Where do you see yourself in realising these Goals?

Please type your submission below. If applicable, please indicate the question(s) to which you are responding.

As with our previous comments, the Goals must specify the peaceful use of space as the overarching principle - we suggest this be Goal One.

We have a particular concern about the reference to “**all forms** of autonomous aerial vehicles” in this section, in part because New Zealand’s disarmament policy includes a commitment to “new international law to ban and regulate autonomous weapon systems”. We suggest “all forms” be amended to read: “civilian autonomous aerial vehicles” or “autonomous aerial vehicles that are not part of a weapon system”, or words to that effect.

Area Four - Pathway to the 2030 Future State

Question 16: What policies, ideas, actions, and/or initiatives would you like to see in the Action Plan to help achieve the ambitious 2030 Future State?

Question 17: What would be the benefits of these actions and how would they help grow the New Zealand aerospace sector?

Question 18: How would you like to be involved in the delivery of the Aerospace Strategy?

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Question 16: The Action Plan must include the commitment to peaceful use of space, and to an aerospace industry that complies with New Zealand's disarmament, human rights and humanitarian law obligations.

Question 18: We would like to be involved with monitoring the Aerospace Strategy and its consistency with the peaceful use of space, and compliance with New Zealand's disarmament, human rights and humanitarian law obligations.

Thank you for this opportunity to comment on the Aerospace Strategy.