

Ministry of Business, Innovation and Employment
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12 October 2022

Subject: Submission to the consultation document: Developing the Aotearoa New Zealand Aerospace Strategy, September 2022

To Whom It May Concern

Swoop Aero would like to thank the Ministry of Business, Innovation and Employment (MBIE) for the opportunity to provide feedback on the draft of the Aerospace Strategy for Aotearoa New Zealand (the Strategy).

As an Australian aeromedical logistics company with a growing presence in New Zealand, and an industry partner in the Airspace Integration Trial Programme (AITP), we take the ongoing development of the aerospace sector in the country very seriously.

Swoop Aero supports the development of an Aerospace Strategy for Aotearoa, New Zealand. Such a strategy would provide the aerospace sector with a clear understanding of the Government's role, its strategic directions and priority areas to achieve the stated goals.

Importantly, it would provide some level of certainty on the Government's commitment to the sector, which would consequently help inform key commercial decisions and foster domestic and international investment in the sector. This is one of the main barriers to further growth and stability in the sector.

A flourishing aerospace sector has the potential to unlock significant economic, innovation, and environmental benefits for New Zealand and New Zealanders.

However, while we support MBIE in taking a step in this direction, it is difficult to see how the proposed Aerospace Strategy would help achieve this. Swoop Aero believes there are a series of issues with the draft approach as currently outlined.

1. Background

There is no context or background on the current state of the sector or an identification of the stakeholder groups that are part of this sector ('who').

2. Rationale

The 'why' we need this Strategy is not clear in the document. Without a well-established rationale, it is difficult to define and implement a series of objectives and goals.

3. Definitions and concrete examples

There is a single definition in the document - i.e. 'aerospace' - which is rather broad. The aviation and space worlds are inherently complex and difficult to understand; making them more accessible through definitions and concrete examples to illustrate Area 2 (Three Pillars) and Area 3 (Goals for 2030) is essential.

4. Evidence, quantification, and correlation

The Strategy is not supported by any data that would illustrate Area 2 (Three Pillars) and Area 3 (Goals for 2030) and help quantify the benefits.

There is no correlation or linkages between the 'What' (i.e. Area 2/Three Pillars) and the outlined Goals.

5. Goals

The four proposed Goals are very narrow and it is not explained how these would contribute to the development of the aerospace sector in New Zealand or even more generally, how these would benefit New Zealand and New Zealanders. By aiming too narrowly, the Strategy is unable to support any specific parts of the sector and will not be able to bring the New Zealand public on board to secure the social licence that is key to the success of the aerospace industry in Aotearoa.

6. Action Plan

Outlining a clear pathway for the aerospace sector's development is key to providing clarity to the sector about steps the Government will take to ensure risks are addressed and benefits are realised for New Zealand and the sector as quickly as possible.

Establishing a sector-government taskforce is a great start but it is difficult to provide any feedback in the absence of a clear proposal on the plan itself or on the composition of this group.

7. Where does the Strategy fits in the bigger picture

Finally, it is unclear how this strategy fits in the ongoing work happening across Government on emerging technologies, space and aviation, with no indication or references to other workstreams.

We appreciate the opportunity to be able to respond to this matter and are happy to discuss any of the points raised above in more detail.

Kind Regards

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Chief Regulatory Officer

Swoop Aero