

NZ Space Policy Review Submission Guide

Submissions due 31st October 

Guide prepared by Aotearoa's Peace Action groups

Overview

This month, MBIE is consulting on the [New Zealand space policy review consultation document](#).

Feedback from the space policy review public consultation will be collated into a summary of feedback report. This will assist the government to create or amend space policies and to look at:

- *Creating a National Space Policy*: a document which outlines New Zealand's values and objectives on space, including for our international partners.
- *Articulating New Zealand's broad interests on space across multiple activities and engagements*: including at United Nations fora and with international space and security partners.
- *Developing future space strategies, policies and regulatory changes*: including adjusting our policies and regulations to meet advancements in space technology.
- *Future engagement on space policy with the New Zealand public*: including on any key areas of interest identified through the consultation.
- *Considering whether any legislative changes are required* to the Outer Space and High-altitude Activities Act 2017.

Instructions

1. MBIE wants submissions to be made in a prescribed online format (available here: <https://www.research.net/r/spacepolicyreview>)
2. Enter your details (FYI these will be published on the MBIE website)
 - a. Under "company name" put Independent / N/A or your local organisation/ company if they endorse this submission.
3. Enter your responses, or use this template for guidance. The more personalised it is, the more likely they will treat submissions separately.

Submitted by Sonya Smith
Nuhaka Mahia whanau

Submission Guide

QUESTIONS

RESPONSES

<p>SECTION 1:</p> <p>Question 1. What are your interests and relationship to space? (Pick as many as apply)</p> <p>Please note any other interests and relationship to space below that you would like to share.</p>	<p>Tāngata Whenua, Grandparent and I am from Nuhaka Mahia an affected area.</p> <p>(if appropriate) I work in the health sector, which is relevant because I believe in the wellbeing of my community, Whanau ,Hapu and Iwi.</p> <p>I am a citizen of Aotearoa New Zealand and as such I believe in exclusively peaceful uses of space.</p>
<p>SECTION 2:</p> <p>To what extent do you agree or disagree that these values should apply to New Zealand's space activities and engagements?</p> <ul style="list-style-type: none">● Innovation● Responsibility● Stewardship● Partnership	<p>In 2005, beginning with resolution A/RES/60/66, the General Assembly began a new process for exploring and subsequently development transparency and confidence-building measures (TCBMs) in outer space activitiesAotearoa is part of this so why would this not form an essential part of our value base?</p>
<p>Are there any other values, or aspects of kaitiakitanga (guardianship), that you think should apply to New Zealand's space activities and engagements (for example, cultural values regarding space).</p>	<p>These values (innovation, responsibility, stewardship, partnership) have not been upheld in any meaningful way over the past 5 years. In particular:</p>

Stewardship is a pakeha concept. If we were to use Kaitiakitanga then there is a threefold approach.

1. Protection
 2. Preservation
 3. Restoration
- It is difficult to reconcile any space programme with environmental stewardship given the massive impact that launches have in terms of fossil fuel use and ecological damage. Aside from the launches themselves is the desecration of the landscape where launchpads sit, and the polluting of surrounding waters.

Partnership

- The experience of Tangata Whenua/Rongmaiwahine on the Mahia peninsula is disturbing. At the very least, Rocket Lab provided assurances that the facility would not be used for military purposes. This is clearly not the case

Rather than a values-based approach, a principles-based approach to a space policy would be more appropriate. Those principles should be

- Te Tiriti Justice
- Rangimarie / Peace
- Mana Tangata / Human Rights
- Kaitiakitanga / Ecological Care & Climate Justice
- Transparency

Cultural values regarding space include the need to keep it free from space junk that is polluting the night

	<p>sky and posing a risk to life on Earth.</p>
<p>Question 4. The New Zealand government supports a range of interests in space (economic, environmental, international, national security and regulatory) by pursuing the following key policy objectives:</p> <ul style="list-style-type: none"> · Growing an innovative and inclusive space sector · Modelling sustainable space and Earth environments · Promoting the responsible uses of space internationally · Protecting and advancing our national security and economic interests. · Regulating to ensure space activities are safe and secure <p>Are any of these key policy objectives of particular importance to you?</p>	<p>“Promoting the responsible uses of space internationally” and “Regulating to ensure space activities are safe and secure” to me means that activities in space cannot be used for war-making, cannot be used to target conventional or nuclear weapons, cannot be used for communications and information gathering that will be used harm an individual or a group of people.</p> <p>Responsible, safe use of space needs to be defined as for research and information/communication purposes that are not associated with weapons, combat communications, spying or other espionage activities by either government or private entities.</p> <p>No one can guarantee the safety of Whanau at Mahia or their livestock or assets i.e Homes/Farm/Forestry. The regulation must also encompass launch base safety.</p> <p>Mahia carries an extreme fire risk over the summer period, and this can spread rapidly via grass, structure or woodlot fires.</p> <p>The only mitigation to this offered by RL or Council is the Rocket launches point out to sea.</p> <p>The 35 year non notifiable consent does not have to be adjusted to a threefold launch pad activity despite different risks emerging. Small local bodies</p>

	<p>and unitary authorities do not have the capability to regulate such specialized activity.</p> <p>There is little mention of the failed missions and mid-flight explosion.</p>
<p>SECTION 3a: Growing an innovative and inclusive space sector</p> <p>OBJECTIVES The New Zealand government supports the growth of an innovative and inclusive space sector.</p> <p>This means:</p> <ul style="list-style-type: none"> • Promoting New Zealand’s natural advantage for conducting space activities, and research and development expertise across the space value chain • Partnering within New Zealand and internationally to increase research and development capabilities • Identifying opportunities to increase diversity in the space sector • Using cutting-edge space technology and space sourced data to support New Zealand’s values and interests 	<p>‘Innovation’ is not an acceptable goal if it is in the service of technology designed to damage and kill people. Just because we can do something, and make money out of it, doesn’t mean we should do it. Public policy should not support space activities designed to benefit weapons producers including weapons communications systems.</p> <p>Innovation and diversity for peaceful purposes is a great thing, but only when it is not used to justify support for the development and deployment of weapons systems, combat communications and spying activities.</p>
<p>Question 5. To what extent do you agree or disagree that these policy objectives will help the New Zealand government to grow an innovative and inclusive space sector?</p> <p>a. Promoting New Zealand’s natural advantage for conducting space activities, and research and development expertise across the space value chain</p>	<p>Neither agree nor disagree - provided it is not space activities and R&D for weapons and spying technologies.</p>
<p>b. Partnering within New Zealand and internationally to increase research and development capabilities</p>	<p>Neither agree nor disagree - provided it is not R&D for weapons and spying technologies.</p>

c. Identifying opportunities to increase diversity in the space sector	Neither agree nor disagree - provided it is not opportunities to increase diversity in the space sector for weapons and spying technologies.
d. Using cutting-edge space technology and space sourced data to support New Zealand's values and interests	Neither agree nor disagree - provided it is not opportunities to use data and technology in the space sector for weapons and spying technologies, in which case I would disagree.
Question 6. Do you have any comments on these policy objectives (e.g. any suggested change to how they are framed)? Is there anything missing?)	They seem too focused on business opportunities and not enough on ensuring the purposes of any NZ-derived activities are for strictly peaceful purposes.
Question 7. Are there any other policy objectives that you think would help the New Zealand government to grow an innovative and inclusive space sector?	They should include objectives to provide more leadership and advocacy at the international level to ensure ALL space activities are only for peaceful purposes.
Question 8. Do you have any questions or comments about what these objectives would mean in practice?	They seem like they have been written by and for the industry, rather than by and for public servants acting on behalf of the best interests of citizens of New Zealand and other countries, and the planet's environment as a whole.
<p>SECTION 3b: Modelling sustainable space and Earth environments</p> <p>OBJECTIVES The New Zealand government advocates for the sustainable use of space to ensure its benefits remain available to future generations. At the same time we seek to use space, and space technologies, to gain understanding and better protect our environment on Earth.</p> <p>Specifically this means:</p> <ul style="list-style-type: none"> • Encouraging inclusive, sustainable space collaborations within New Zealand • Assessing the cumulative impact of space activities on the Earth environment • Assisting with solving sustainability challenges through space data, including to better monitor or understand the Earth's environment 	

• Investing in New Zealand’s capability to retain, grow, access and use sustainable space technologies

Question 9. To what extent do you agree or disagree that these policy objectives will help the New Zealand government to model sustainable space and Earth environments?

a. Encouraging inclusive, sustainable space collaborations within New Zealand

Neither agree nor disagree, provided any collaboration is solely for peaceful purposes and does not contribute to the development of weapons systems or spying technologies.

b. Assessing the cumulative impact of space activities on the Earth environment

Strongly Agree, provided any activity is solely for peaceful purposes and does not contribute to the development of weapons systems or spying technologies.

c. Assisting with solving sustainability challenges through space data, including to better monitor or understand the Earth's environment

Agree, provided any activity is solely for peaceful purposes and does not contribute to the development of weapons systems or spying technologies.

d. Investing in New Zealand’s capability to retain, grow, access and use sustainable space technologies

Neither agree nor disagree, but any definition of ‘sustainable’ for a NEW sector must not create NEW emissions. If it create emissions then there is little justification for its existence, especially if it claims to be in service of the environment.

Question 10. Do you have any comments on these policy objectives (e.g. any suggested change to how they are framed)? Is there anything missing?)

A NEW sector must not create NEW emissions. If it create emissions then there is little justification for its existence, especially if it claims to be in service of the environment.

<p>Question 11. Are there any other policy objectives that you think would help the New Zealand government to model sustainable space and Earth environments?</p>	<p>Any space-related activities must be able to demonstrate how they are reducing, not increasing gross greenhouse gas emissions.</p>
<p>Question 12. Do you have any questions or comments about what these objectives would mean in practice?</p>	<p>General claims about contributing to sustainability and climate change responses are not good enough. We know enough about the issues as it is, what we need now is action that doesn't increase greenhouse gas emissions. Don't use methane monitoring initiative to justify this industry's existence.</p>
<p>SECTION 3c: Promoting the responsible uses of space internationally</p> <p>OBJECTIVES The New Zealand government promotes the responsible use of space internationally.</p> <p>This means:</p> <ul style="list-style-type: none"> • Advocating for effective international rules, norms and standards in space • Partnering with like-minded launch states to adopt peaceful, responsible and sustainable space practices • Collaborating internationally to increase New Zealand's influence and capabilities in the global space sector 	
<p>Question 13. To what extent do you agree or disagree that these policy objectives will help the New Zealand government to promote the responsible uses of space internationally?</p> <p>a. Advocating for effective international rules, norms and standards in space</p>	<p>Strongly Agree - provided NZ promotes an exclusively peaceful use of space, which is currently not the case.</p>
<p>b. Partnering with like-minded launch states to adopt peaceful, responsible and sustainable space practices</p>	<p>Strongly Agree - provided NZ promotes an exclusively peaceful use of space, which is currently not the case.</p>
<p>c. Collaborating internationally to increase New Zealand's influence and capabilities in the global space sector</p>	<p>Strongly Agree - provided NZ promotes an exclusively peaceful use of space, which is currently not the case.</p>

	<p>Returning to our Geo political stance needing to be front and center. When taking a Nuclear free stance Aotearoa gained more kudos and clout than aligning to a superpower.</p> <p>Aotearoa are in a unique position to align and advocate as a collective of pacific nations to avoid having to choose one side over another</p>
<p>Question 14. Do you have any comments on these policy objectives (e.g. any suggested change to how they are framed)? Is there anything missing?)</p>	<p>Don't allow launches that contribute to weapons systems development and spying technology.</p>
<p>Question 15. Are there any other policy objectives that you think would help the New Zealand government to promote the responsible uses of space internationally?</p>	<p>Don't allow launches that contribute to weapons systems and spying technology.</p>
<p>Question 16. Do you have any questions or comments about what these objectives would mean in practice?</p>	
<p>Section 3d: Protecting and advancing our national security and economic interests</p> <p>OBJECTIVES</p> <p>To sustainably grow our space sector by having due regard to our national interests we need to:</p> <ul style="list-style-type: none"> • Use space assets to protect and advance New Zealand's national security and economic interests • Manage the broad range of security risks in space to protect New 	

<p>Zealand's space industry</p> <ul style="list-style-type: none"> • Collaborate with international space and security partners to pursue New Zealand's national security and economic interests 	
<p>Question 17. To what extent do you agree or disagree that these policy objectives will help the New Zealand government to protect and advance our national security and economic interests?</p> <p>a. Use space assets to protect and advance New Zealand's national security and economic interests</p> <p>b. Manage the broad range of security risks in space to protect New Zealand's space industry</p> <p>c. Collaborate with international space and security partners to pursue New Zealand's national security and economic interests</p>	<p>Space policy should include more than NZ national security and economic interests, it needs to include the security and wellbeing interests of the most vulnerable populations on the planet, and non-human life on Earth.</p>
<p>Question 18. Do you have any comments on these policy objectives (e.g. any suggested change to how they are framed)? Is there anything missing?)</p>	<p>Space policy should include more than NZ national security and economic interests, it needs to include the security and wellbeing interests of the most vulnerable populations on the planet, and non-human life on Earth.</p>
<p>Question 19. Are there any other policy objectives that you think would help the New Zealand government to protect and advance our national security and economic interests?</p>	<p>Space policy should include more than NZ national security and economic interests, it needs to include the security and wellbeing interests of the most vulnerable populations on the planet, and non-human life on Earth.</p>
<p>Question 20. Do you have any questions or comments about what these objectives would mean in practice?</p>	<p>NZ needs independent space policy, not decisions that serve foreign powers interests and have a de facto perceived benefit to NZ.</p>

Section 3e: Regulating to ensure space activities are safe and secure

OBJECTIVES

The New Zealand government regulates to ensure New Zealand space activities are safe and secure. This means:

- **Facilitating the safe and secure use of emerging space technologies from New Zealand**
- **Clarifying what New Zealand space activities are inconsistent with the national interest**
- **Promoting and protecting New Zealand's interests through permitting space technologies**

Question 21. To what extent do you agree or disagree that these policy objectives will help the New Zealand government to ensure space activities are safe and secure through regulation?

a. Facilitating the safe and secure use of emerging space technologies from New Zealand

b. Clarifying what New Zealand space activities are inconsistent with the national interest

c. Promoting and protecting New Zealand's interests through permitting space technologies

Disagree.

Define 'safe and secure' – you currently permit launches that contribute to weapons systems development and spying technology – these provide security to some stakeholders, but not to everyone.

Question 22. Do you have any comments on these policy objectives (e.g. any suggested change to how they are framed)? Is there anything missing?)

Have a policy that doesn't allow launches that contribute to weapons systems and spying technology.

Question 23. Are there any other policy objectives that you think would help the New Zealand government with regulating to ensure space activities are

Include objectives that mean launches that contribute to weapons systems and spying technology will not be permitted.

safe and secure?	
Question 24. Do you have any questions or comments about what these objectives would mean in practice?	Companies, politicians and bureaucrats can justify nuclear weapons on the basis that they add safety and security (to some groups), so you need to be far more specific to exclude ANY weapons systems development and any technology associated with spying for public or private actors.
<p>Section 3e(i): Regulating in line with our national interests</p> <p>Under the Outer Space and High-altitude Activities Act 2017, the Minister for Economic and Regional Development may decline a licence or permit if they are not satisfied that it is in the national interest. The Minister may take into account when considering the national interest: economic or other benefits to New Zealand; risks to national security, public safety, international relations or other national interests; risks that cannot be mitigated by conditions of the licence or permit; and any other relevant matters.</p> <p>As part of policy to inform the language in the Act, Cabinet has agreed to principles that will inform the consideration of national interest for space activities, as well as what is not in New Zealand’s national interests. These principles are:</p> <ul style="list-style-type: none"> • Responsibility: that space activities from New Zealand should be conducted with due care and in such a way as to promote an orbital environment where actors avoid causing harm or interference with the activities of others. • Sustainability: New Zealand should promote sustainable space practices that preserve the benefits of space for future generations. • Safety: space activities from New Zealand should be conducted in a way that does not jeopardise human safety (including the safety of people in space). • Aligning with New Zealand’s values and interests: space activity from New Zealand should uphold the policies and values supported by New Zealanders and align with broader policy settings. 	

The following space activities are not in New Zealand’s interests; i.e. the Minister will not authorise space activities:

- **that contribute to nuclear weapons programmes or capabilities**
- **with the intended end use of harming, interfering with, or destroying other spacecraft or space systems on Earth**
- **with the intended end use of enabling or supporting specific defence, security or intelligence operations that are contrary to government policy**
- **where the intended end use is likely to cause serious or irreversible harm to the environment.**

Question 25. Are there any comments you would like to make about these criteria that inform consideration of the national interest?

“space activities from New Zealand should be conducted in a way that does not jeopardise human safety” - it’s kind of meaningless if it provides for current launches that contribute to weapons systems development and spying technology. We need to go beyond the national interest, to the global interest - this industry serves powerful, wealthy individuals, companies and countries - so fix the policy to ensure it serves the most vulnerable everywhere, NOT the most powerful.

Question 26. What questions do you have about how the national interest is considered in practice?

Why is this consultation so limited in scope in terms of how it has engaged citizens and the focus of the questions?

<https://www.mbie.govt.nz/have-your-say/new-zealand-space-policy-review>