



The National Organisation in New Zealand of:
Aviation Education and Research Organisations
Aircraft Repair and Maintenance Organisations
Unmanned Aerials Systems Organisations
Air Rescue/Air Ambulance Organisations
Aviation Fuel and Oil Suppliers
Flight Training Organisations
Aviation Service Providers
Air Charter Operators
Helicopter Operators
Aircraft Constructors
Aviation Suppliers
Airport Operators
Airline Operators
Aviation Insurers

23 October 2012

Levy Consultation
ACC
PO Box 242

Consultation on proposed ACC levy Rates

This submission is made on behalf of the Aviation Industry Association (AIA).

The AIA supports the further and continued reduction in rates proposed for the aviation industry. In our view, if the cap was removed, the reductions would be more substantial. While we do not agree with a maximum capped reduction we understand that this is government policy and the Corporation is merely applying policy.

We support the addition of Civil Aviation Rule Part 115 to the levy category for Air Operations. In addition we would suggest removing the words "high risk" as this is an unnecessary and inaccurate descriptor of the levy group. The words "high risk" are quite contrary to the thinking in the sector namely although this group is more likely to have an accident the consequences relative to the regular public transport sector (ie the category applying to Rule Part 125/121/129) is low. The descriptor is unnecessary because the rule parts from the Civil Aviation Rules are clearly specified. Air Operations is a generic term which covers all of the members of the levy group.

We commend the extension of the Workplace Safety Discount scheme to all industries and wish to place the AIA's AIRCARE scheme to the forefront of your consideration.

AIRCARE is an integrated safety and environmental safety management programme available to all general aviation operators in New Zealand (ie the "Air Operation's high risk category"). The programme includes among a number of other elements best practice in the general aviation sector in respect of accident



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prevention accompanied by a formal assurance process. We attach the following documents:

- AIRCARE explained
- AIRCARE accreditation Rules

For more information you can go to www.aia.org.nz/AIRCARE

John Sinclair is the project manager for AIRCARE and he can be contacted on 027 324 2151 or 03 577 5679.

Underpinning AIRCARE is an independent assurance process. This process is managed under contract for the AIA by Navigatus an aviation risk management focused business. Operators can apply for a number of categories of accreditation but as a minimum they must all have a systematic method of managing risks including safety in the air and on the ground for all employees.

It would significantly reduce compliance costs if AIRCARE could, as a minimum, be recognized under the Workplace Safety Discounts scheme. We are also of the view that the AIRCARE assurance process could fulfill ACC audit requirements as the system is robust, independent and rigorous. However we appreciate that ACC's proposals at this stage do not extend as far as delegating to organisations the likes of AIRCARE the undertaking of audits on behalf of ACC. If this were to occur there would be further substantial reductions in compliance costs for this sector. In our view ACC should give consideration to such a proposal particularly for SME's

We would be very pleased to discuss AIRCARE further with representative of the Corporation. ACC were an original sponsor organisation of AIRCARE and it would be good to now relay the story of the success of the programme.

Yours sincerely



Irene King
Chief Executive

