

18 September 2013

Lois Hutchinson
Chief Executive
TAIC
PO Box 10-323
Wellington 6143

Dear Lois

Thank you for the meeting with Tim and yourself on 28 August 2013. Following on from that meeting we seek to confirm a number of matters discussed and seek your views in respect of others and raise one additional item.

First, to confirm we have extended an invitation to yourself or another member of TAIC to write a guest editorial for our weekly newsletter on in particular TAIC's new approach to accident investigation. This would be of interest to all our members and we give an undertaking that the commentary submitted to us will not be altered or amended in anyway. The guest commentary will be produced as it is written.

Secondly, we raised with you the concept of a formal appointment process of a person akin to an accredited representative and advisors to a person akin to an accredited representative in the context of accidents investigated by TAIC on shore in New Zealand.

In the New Zealand context a person akin to an accredited representative could be a representative of the manufacturer of the aircraft or the design organisation responsible for major components and or the power plant or a designated representative of the owner or operator of the aircraft/equipment or system the subject of the investigation.

We appreciate that presently you have the ability to call on what ever expertise deemed necessary however our proposal is that there would be automatic rights of representation. We accept that protocols would need to be put in place to ensure the accredited individual or individuals observed the appropriate procedures and the sanctity of the TAIC statute.

In New Zealand law we cannot see anything which would preclude you from operating in this manner as the TAIC Act in particular appears to permit the Commission to exercise considerable discretion.

The third matter we wish to raise with you is new and subsequent to the release of the report Inquiry 11-004 Piper PA31-350 Navajo Chieftain ZK MYS. In particular we wish to comment on the response of the Director of CAA on Page 26. The issue we are all grappling with is do the benefits of implementing the recommendation outweigh the costs and in the context of an environment where we as an Industry look to risk based regulation we wonder whether the Commission does not need to give consideration to such matters.

As indicated we do not perceive a widespread problem with present processes and protocols adopted for the particular type of aircraft. While we can clearly understand there are a number of learnings from the accident report we cannot see how a recommendation which would place New Zealand to the forefront of inspections of these systems would deliver substantial benefits relative to the cost of adopting such protocols.

We can understand purely on these grounds alone CAA would have substantial difficulties adopting such a change. Perhaps, and this is purely a suggestion, TAIC in making such recommendations could give greater reference to modern regulatory thinking and the variety of tools CAA has at its disposal.

As an Association we are respectful of TAIC and the role it plays in contributing to aviation safety. To that end please accept this last matter we raise as being more in the context of a "suggestion" as to how to achieve our joint and paramount safety goal than any comment on the recommendations.

As an aside for example our next conference to be held in Napier 20-24 July 2014 would welcome a presentation on the investigation.

Yours sincerely

Irene King
Chief Executive