

17 December 2013

Hon Gerry Brownlee
Minister of Transport
PO Box 18041
Parliament Buildings
Wellington 6160

Dear Minister

Alcohol and Drugs - Safety Sensitive workers – Aviation

We are writing following the Carterton ballooning accident of 7 January 2012, and the recently released TAIC accident report in full support of Recommendation 7.5 of the TAIC report. Specifically we commend for your consideration rules being introduced which provide independent assurance that all aspects of aviation are free from alcohol and drug use.

We appreciate that TAIC's recommendation extends to other modes of transport and for maritime in particular, the introduction and extension of such rules may be challenging. However we do not consider that introducing rules for aviation should be held up simply because of the challenges such rules present in another transport mode.

Specifically, we seek your consideration and support for introducing rules because:

- They are already largely in place in comparable international aviation jurisdictions and New Zealand is the exception;
- Aviation is the primary mode of transport for international visitors to and from New Zealand and provides significant domestic connectivity;
- New Zealand's flight-seeing sector is an important and growing part of the international and domestic visitor economy;
- New Zealand and New Zealand's aviation brand will be further compromised should a third high profile aviation sector

accident occur, and no remedial rules, except in adventure aviation, have been introduced;

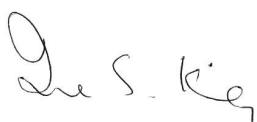
- Rules are already in place for adventure aviation – their extension to other operations is not as challenging;
- Many of our businesses already have voluntary programmes operating as an integral part of their employment contracts;
- The sector's profile is exceptionally high with the corollary being the possibility for significant reputational damage to New Zealand. For example, an aerial top dressing aircraft can hit a cow and the accident makes nation wide news on two key media outlets (Stuff and the New Zealand Herald) within two hours of the event whereas accidents in other sectors go largely unreported.

While we do not consider the use of alcohol and drugs is endemic for the reasons articulated above we consider it sensible that a rule is introduced.

In our view such a rule does not need to be overly prescriptive other than to require the development of a drug and alcohol programme acceptable to the Director for workers, the self employed and volunteers who discharge safety sensitive duties.

Thank you for your consideration and we look forward with anticipation to a quick resolution of this matter.

Yours sincerely



Irene King
Chief Executive