



Submission to Parliament's Environment Select Committee

Conservation Reform Bill

2 July 2026

About us

1. The Aviation Industry Association (AIANZ or the Association) is the peak membership body that represents the interests of the commercial aviation industry in New Zealand. Founded in 1950, its overall goal is to support a safe, sustainable, and resilient sector in New Zealand. So, while safety is front and centre of everything we do, we also enable our members from an economic standpoint so the aviation sector can grow and innovate.
2. The membership of the organisation includes more than 220 operators from small to large who operate aircraft in many sectors of the industry. They include flight and ground training, agriculture, scheduled and charter air transport services, freight, search and rescue, surveillance, and tourism. Our membership also includes companies that service, maintain, design or manufacture for these sectors, including engineers. In more recent times, unmanned aerial vehicles (UAVs) or drones have become an important part of AIANZ's diverse membership.
3. The aviation industry in New Zealand plays a critical role in the country's economy. As an island nation, aviation is an important connector for domestic and international markets. Aviation also plays an important social role in the work that it does to support disaster relief, search and rescue activities and medical emergencies.
4. New Zealand has the most aircraft per capita in the world that are integral to our economy and for traversing NZ's terrain in a brief period. The high number of helicopters, for example, were vital to the swift response to Cyclone Gabrielle in 2023, the Kaikoura earthquake in 2016 and for responses in many other areas. There are 4,600 aircraft and 900 helicopters operating in New Zealand, representing about one aircraft for every 1,120 people and one helicopter for every 5,700 people.
5. Our role is primarily a policy one that is supported by evidence-based advocacy and lobbying to Government and their agencies. We support members in regulatory matters, advancing professionalism in all safety matters while being recognised as the voice of the country's commercial aviation industry.
6. The Association itself is organised into six divisions which are:
 - a. New Zealand Agricultural Aviation Association (NZAAA)
 - b. New Zealand Helicopter Association (NZHA)
 - c. Unmanned Aerial Vehicles Association (UAVNZ)
 - d. Training and Development (T&D)
 - e. Supply, Service and Engineering that includes the Aircraft Engineers Association (AEANZ)
 - f. Operations (including scheduled airlines and tourist flight operators).

Comment and analysis

7. The AIANZ welcomes the opportunity to comment on the Conservation Amendment Bill (the Bill) and in particular the parts of the Bill that relate to aviation. Our submission is informed by feedback from our members who operate in and around Department of Conservation (DOC) managed areas.
8. The Environment Select Committee may also receive submissions from individual aviation operators who have concerns with some parts of the Bill. As a peak body, we aim to balance the interests of all our members, but where necessary highlight what we think are aspects of the Bill that could make sustaining aviation operations challenging and difficult.
9. Like ground-based operators, aviation operators rely on concessions to operate in designated DOC areas, where they provide access for both domestic and international visitors for solely flightseeing activities or to connect up with land-based activities. The aviation operations are an important part of delivering economic benefits to the local regions and to NZ Inc.
10. Holders of aviation concessions for tourism purposes have mostly been Civil Aviation Authority (CAA) certificated operators. For the purpose of this Bill, the AIANZ is of the view that DOC should adopt a policy (with very limited exceptions) that requires CAA air operator certificates (AOCs) for tourism aviation concession holders in order to improve safety oversight and alignment with the country's aviation regulatory framework.

National Conservation Policy Statement

11. The National Conservation Policy Statement (NCPS) currently excludes aviation concessionaires from pre-approved activities. AIANZ believes concessions for aircraft take-offs and landings should be part of the pre-assessment framework for visitor areas, including certified aerodromes, like Milford Sound. Doing so would provide greater certainty and consistency for operators while still allowing DOC to manage environmental effects and visitor impacts through the discretionary concession process.
12. AIANZ believes there should be clearer wording in the NCPS that recognises aircraft operations in the zones or areas where such activity is expected to take place.

Insertion of new Section 12 (1)

13. A new *Section 12 (1)* is to be added to the Bill states that *"An aircraft must not land or take off from any site within a conservation area that is not a certified aerodrome."* Section 12(2)(a) goes on to state that it is however permissible if a concession has been granted for that activity. The section is unclear as it implies that landings and take-offs at certified aerodromes do not require a concession if they are in a conservation area. However, the explanatory note to the Bill states no change from the status quo is intended as the provision is "functionally the same as current section 17ZF".
14. Currently, operators require concessions for all take-offs and landings including at certified aerodromes. AIANZ believes clarity is needed for aircraft operations taking place on DOC land and when a concession is required.

15. Some current concessions for activities like the Great Walks, include an allowance for landing where the walk starts from a remote location and when the concession holder does not operate aircraft themselves but contracts the service to another operators. In the past, the approach by DOC has been inconsistent with some concessions needing an aviation operator to obtain a separate concession. This requires a more consistent approach.

Sum Up

16. The Association wishes to reinforce the importance of tourism and visitor-based activities that either rely partly or wholly on aviation. While AIANZ acknowledges the importance of protecting the DOC estate, aviation activities which sustain, and support tourism and visitor activity are critical to economic development for the whole country. It is important the system allows aviation to operate provided it is managed in a sustainable way.

A handwritten signature in black ink, appearing to read 'Simon Wallace', with a stylized, cursive script.

Simon Wallace
Chief Executive

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