Submission on Proposed 12-Month Commercial Pilot Training Timeframe

A paper for the Aviation Council

March 2026

1. Purpose of this submission

This submission responds to your challenge for flight training organisations to deliver Commercial Pilot Licence (CPL) training within 12 months. It explains why a fixed 12-month limit is not realistic in New Zealand under current rules and funding settings, and why it will not reduce overall student debt. It also outlines practical changes that would improve training outcomes, access, and value for money for New Zealand.

2. Summary of key points

- Commercial pilot training in New Zealand normally runs over about 18 months in practice, once NZQA credit rules, weather, aircraft and instructor availability, and exam validity are considered.
- Once a continuous training "pipeline" is established, the length of the cycle (12 vs 18 months) does not change the number of pilots graduating each year; it only changes how much pressure is placed on each individual student.
- A 12-month limit does not significantly reduce student debt. The bulk of costs are fixed training and aircraft costs. Any savings from a shorter programme would be limited to a small reduction in living costs.
- A long-standing national funding cap of 450 EFTS (Equivalent Full-Time Students) in aviation, set by the Tertiary Education Commission (TEC), is now a major bottleneck to training capacity and fair access.
- Current policy settings are making pilot training increasingly elitist, excluding many capable New Zealanders, including a large proportion of Māori and Pasifika who are expected to make up around 40% of the workforce by 2030.
- Industry survey data (refer separate paper) show that around 80% of domestic graduate pilots gain employment in general aviation, tourism, agriculture and airlines, directly contradicting earlier Ministry of Education statements that graduates do not get jobs or go only into flight instruction.
- The main problems are funding caps, borrowing limits, NZQA credit and duration rules, exam expiry timeframes, instructor shortages, and New Zealand's weather – not a lack of commitment by providers.

We welcome the opportunity to work with you and agencies on solutions that address these real constraints rather than focusing on an arbitrary 12-month timeframe.

3. Why the 12-month timeframe does not reduce debt

You have suggested that compressing CPL training into 12 months will lower student debt. The sector strongly disagrees for these reasons:

1. **Fixed training costs are the main driver.**
   Aircraft hire, fuel, maintenance, instructor salaries, simulators, regulatory and exam fees are all fixed inputs that do not reduce simply because students fly more often in a shorter calendar period.
2. **Total flight hours and credits are unchanged.**
   CPL training must still meet Civil Aviation Authority (CAA) requirements for flight hours and syllabus content, and NZQA requirements for qualification credits. Squeezing the same hours into less time does not change the total price.
3. **Only a small share of costs are time-based living expenses.**
   The only meaningful savings from a 12-month programme are some reductions in rent and day-to-day living costs, and potentially a shorter period of lost income. These are marginal compared with total training costs and loan balances.
4. **Higher risk of failure and re-training.**
   A 12-month push increases pressure reduces flexibility to manage bad weather and personal issues and may lower pass rates. More failed exams and repeat training add extra cost and debt.

For these reasons, we ask that the "shorter equals cheaper" assumption is removed from policy discussions. Debt is driven by what must be achieved, not by compressing the calendar.

4. The training pipeline: why 12 vs 18 months is irrelevant to output

Pilot training operates as a continuous pipeline, not as a one-off "cohort" process. Once that pipeline is running:

- If training takes 18 months, graduates begin to emerge after 18 months and then flow out continuously.
- If training is compressed to 12 months, graduates begin to emerge after 12 months, but after the pipeline is established, the number of graduates per year is determined by intakes and capacity, not by the exact cycle length.

In other words, changing from 18 to 12 months does not increase the number of pilots produced each year once the system has settled. It mainly increases stress and risk for individual students, without improving long-term output.

We ask that the rationale for a fixed 12-month timeframe is clarified, including who is driving this requirement and what problem it is intended to solve.

5. System constraints that prevent a 12-month CPL

5.1 NZQA credits and duration

- The New Zealand Diploma in Aviation (CPL) typically carries around 240 credits, which equates to about 2,400 hours of learning and assessment.
- NZQA guidance is that a full-time learner can usually complete about 120 credits per year – roughly 1,200 hours of learning.
- This alone implies a realistic duration of roughly 20 months for a 240-credit CPL diploma programme, even before weather or other disruptions.

Solution: To fit the full qualification into 12 months, either the number of credits would have to be cut (reducing funding and undermining the programme) or NZQA credit-per-year limits would have to change. This is a structural issue, not an efficiency issue.

5.2 Student loan allowance

- The student loan allowance of $35,000 per year or $70,000 for two years has been the same since 2013. Over time, inflation has seen actual tuition fees increase to an average of $120,000, meaning students and/or their families need to find at least $50,000 to support training.

5.3 TEC EFTS 450 cap

- The cap on the number of students has also been unchanged for at least a decade at a time and is set at 450 EFTS even when demand for places exceeds this number.
- Some students cannot study at all, even if they are willing to be self-funded, because TEC controls overall programme volumes.
- Training volume is capped administratively, regardless of industry need or employment outcomes.

We support a formal request for detailed information on how the 450 EFTS are allocated and on what basis, and we recommend that this cap be reviewed urgently.

5.3 Instructor shortages

- Providers report ongoing difficulty recruiting and retaining experienced instructors.
- Airlines and other operators attract instructors away, and immigration and visa settings can make it hard to bring in or keep skilled staff.
- Without enough experienced instructors, compressing training into 12 months risks diluting supervision and increasing safety risk or failure rates.

Solution: Instructor supply is a bottleneck that cannot be solved by setting a shorter training target. It requires coordinated action on pay, career pathways, and visa policy.

5.4 Weather and climate constraints

- New Zealand's weather is highly variable, with frequent low cloud, wind, and rain.
- VFR cross-country training, which is a key part of CPL, is often delayed or cancelled due to conditions beyond the control of schools or students.

- These delays quickly erode any 12-month timetable and push training into a more realistic 18-month window.

Solution: Increased use of simulators and IFR training can help but cannot fully remove the impact of New Zealand's climate. Any policy that assumes perfect weather is unrealistic.

5.5 Exam validity and regulatory time limits

- After alignment with Australian standards through the Trans-Tasman Mutual Recognition Arrangement, "lifetime" exam credit validity was removed.
- Students now have a limited window (currently two years) to complete licence requirements before exam credits expire.
- Weather delays, funding gaps, and personal circumstances cause many students to lose exam credits, forcing them to sit at extra cost.

These rules, combined with the 12-month proposal, create a high-risk environment where minor disruptions can derail an entire training plan and add to debt.

6. Funding caps, debt, and socio-economic access

6.1 Elitism and exclusion

The 450 EFTS cap and static funding models have several unintended consequences:

- Training places funded through loans and subsidies are severely limited.
- The remaining places are largely available only to students who can afford high fees and living costs without full loan coverage.
- This is driving an elitist shift in the pilot demographic, where only those from high-income backgrounds with family support can realistically access training.

This trend is particularly concerning given that Māori and Pasifika are projected to make up about 40% of the workforce by 2030. Current settings risk excluding many Māori, Pasifika and other under-represented communities from aviation careers.

We believe this is inconsistent with wider government goals on skills, regional development, and equity.

6.2 Debt and borrowing limits

- Many students now cannot borrow enough to complete their training, even if they are capable and committed.
- AIANZ has provided data and case studies to the Ministry of Education showing that borrowing constraints are a key cause of non-completion, but we have received no meaningful response. (refer flight training survey)
- Around 20% of students drop out before graduation primarily because funding or borrowing runs out, not because they fail academically.

The crisis is not that students are borrowing “too long” (12 vs 18 months); it is that they cannot access enough appropriately structured funding to complete at all.

7. Employment outcomes: strong evidence vs “radio silence”

An industry survey of New Zealand graduate pilots shows that:

- Approximately 80% of domestic graduate pilot’s secure employment in general aviation, tourism, agriculture, or airline roles within a reasonable period after graduation.
- Only about 20% fail to reach graduation, mainly due to funding gaps and borrowing limits rather than a lack of jobs.

This directly contradicts earlier Ministry of Education claims that pilot graduates do not get jobs. AIANZ has supplied this data to officials but has received little or no substantive feedback.

We request that the Ministry of Education formally acknowledge this evidence and update its advice so that future policy settings are based on current, accurate outcomes.

8. Quality, reputation and international positioning

The sector is committed to high-quality training and modern, internationally aligned syllabuses. However, policy decisions have affected New Zealand’s reputation, including:

- Uncertainty around domestic cadet programmes, which has made international partners cautious.

At the same time, initiatives are under way to:

- Modernise syllabuses and align with international standards.
- Improve data sharing through live dashboards of exam and flight-test performance, so providers can track outcomes and address issues quickly.
- Improve flight test scheduling and communication to reduce cancellations and delays.

We see significant potential to rebuild New Zealand’s standing as a premium training destination, but this requires stable funding, clear policy signals, and realistic timeframes, not arbitrary compression.

9. Data transparency and collaboration

The industry is investing in better data and coordination:

- Aspeq and other partners are developing dashboards that give schools real-time access to exam performance, making it easier to spot patterns and drive improvement.
- There is a strong push for controlled, well-explained data sharing so that statistics are not misused or misinterpreted.
- Providers are working together on an international training initiative and a unified New Zealand aviation brand to grow export training sustainably.

Government agencies can support this by:

- Recognising and using industry data in policy development.

- Engaging in joint planning aligns funding, regulation, and workforce needs.

10. Requests and recommendations

We recommend that you:

1. **Clarify the policy rationale for a 12-month CPL timeframe.**
   Explain what problem it is intended to solve and how it is expected to reduce debt, given that training hours and fixed costs are unchanged.
2. **Reconsider the 12-month target in favour of realistic, evidence-based settings.**
   Acknowledge that, under NZQA credit rules, CAA requirements, weather and current funding settings, around 18 months is a realistic minimum for most students.
3. **Review the TEC 450 EFTS aviation cap and its allocation.**
   a. Provide a transparent breakdown of how the 450 EFTS are allocated across providers.
   b. Update the cap to reflect current and future pilot demand, employment outcomes, and inflation.
   c. Allow more flexibility for providers to enrol self-funded students without being constrained by the funded cap.
4. **Address socio-economic barriers and support diversity.**
   a. Ensure funding and loan settings allow capable students from all backgrounds, including Māori and other under-represented groups, to access training.
   b. Consider targeted support or scholarships linked to workforce needs.
5. **Respond formally to the 80% employment evidence.**
   a. Acknowledge the strong employment outcomes for graduate pilots.
   b. Update Ministry of Education advice and programme classifications so that aviation is recognised as leading to real jobs.
6. **Work with industry on instructor supply and regulatory realism.**
   a. Review visa and immigration settings to support recruitment and retention of experienced instructors.
   b. Review exam validity periods and related rules to reduce unnecessary re-sits caused by weather and funding delays.
7. **Support ongoing collaboration and data sharing.**
   a. Engage with AIANZ, the Industry Skills Board, and flight training organisations on a joint plan that aligns funding, regulation and workforce needs.
   b. Use industry data and dashboards as part of a shared evidence base for decisions.

11. Conclusion

New Zealand's flight training sector is committed to producing safe, skilled commercial pilots who meet CAA and international standards and who can serve domestic and global markets. We share your concern about student debt and training efficiency.

However, compressing training into a fixed 12-month timeframe will not reduce total debt, will not increase long-term pilot output, and may undermine safety, access, and equity. The real constraints are funding caps, loan limits, NZQA rules, instructor shortages, and New Zealand's weather.

We ask to work with you and your officials on targeted changes to these settings so that New Zealand can train more pilots, from a broader range of backgrounds, without compromising quality or safety.

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