

[REDACTED]

From: John Geary [REDACTED]
Sent: Monday, 22 July 2019 5:38 PM
To: Civil Aviation Bill
Subject: Submission on the exposure draft of the Civil Aviation Bill

22July

Ministry of Transport
PO Box 3175
Wellington 6140
Dear Sir / Madam,

I wish to support the submission from IQ Aviation.

FURTHER SUBMISSIONS :

1. That a provision be put into the new bill to ensure that exemptions OR alternate means of COMPLIANCE can be granted by the Director WITHOUT undue restrictions that cause unreasonable expense and delays.

Meaning that a SAFETY /COST / BENEFIT ANALYSIS should be considered, for the good of the Nation.

2. Government oversight of the CAA has to be less unwieldy, so as ensure that the powers granted to the Director are not abused. This could be via an ombudsman and PROPER CONSULTATION with industry peers.

Comments to Submission 1. :

The current CAA Act has provisions for the Director to grant Exemptions, Contained in Part 3 -37 Exemption Powers.

Experience with the current CAA Staff Culture is an Exemption that should have able to have been granted was refused.

“I wont do that - the Director is with me on that “ was the statement when the subject was raised.

The activity in question is able to be carried out in Australia under a “Process Certification”,

as well as in USA under a Parts Manufacture Approval.

There is no provision in the CAA of NZ rules to allow a simple operation to be approved, without so much expense and difficulty resulting that certification for it cannot be achieved.

I can obtain Australian certification to manufacture the parts under their Process Approval system,

so as to SAFELY service NZ industry requirements here in NZ with far less trouble and difficulty.

Small operators now have to source these parts from overseas at greater expense and delays – GOOD FOR NEW ZEALAND ??

Comments to Submission 2. :

At present it seems the Director has unlimited powers, court cases being appealed at great expense and appear ignored at times

by using “SAFETY” as an excuse and the CAA point of view staying in place.

In recent times we have seen an influx of university trained persons, and Royal New Zealand Air Force persons

who have inflexible attitude to problems they cause for the NZ aviation community, ie only “by the book”, never mind the subject.

I would suggest that they have no “real world” experience, this results in the difficulties many are seeing.

My experience/ qualifications:

Learnt to fly 1962

TEAL apprentice 1963 - became Air NZ - 15 years aircraft engineering to 1978

Flight engineer DAN Air London on DH Comet fleet 2 years

1980 self employed and Real Estate sales (saw the real world away from aviation)

1987 Ansett NZ engineering until 2001

Martin Aviation Services Ltd CEO Manager, 2002 to present Flight Control Cable Manufacturing (**under great difficulties**)

NZ Licenced Aircraft Maintenance Engineer

USA Airframe/Powerplant plus expired Australian Aircraft Maintenance Licence.

NZ Private Pilot still active

I am a very concerned New Zealander

– not for myself but the aviation sector which is being very badly treated by the very people who are looking after its safety,

however they should realise the impact they make or difficulties they cause affects all of New Zealand ‘Inc’

not just the folks and businesses they deal with, many of whom have departed the arena because of it.

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