

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 13 June 2019 11:44 AM  
**To:** Civil Aviation Bill  
**Subject:** Civil Aviation Bill - Consultation on exposure draft - OPC comment

Kia ora,

Thank you for the invitation to provide feedback on the exposure draft of the Civil Aviation Bill before it is introduced to Parliament.

At this stage we only have one query about the current Bill with regards to privacy implications.

We note an inconsistency in the application of withholding grounds in clauses 74 and 92 of the Civil Aviation Bill. Clause 92 contains provision for the Director to refuse to provide prejudicial information to an individual, but only on the grounds of personal safety.

Clause 74 contains provision for the Director to refuse to provide information on the same withholding grounds as presently exist within the Privacy Act 1993.

We would be interested in hearing the policy justification for this perceived inconsistency in withholding grounds. We recognise that there could be a legitimate reason for doing so, however this is not referred to in the accompanying documents.

Kind regards,

[REDACTED]  
**Policy Advisor**

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