



Stakeholder research 2022

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Objectives and methodology

This research was designed to measure **perceptions of the CAA's strategic performance** and the **quality of the CAA's stakeholder relationships** with a view of delivering insights to enhance stakeholder relationships and help guide the CAA's strategic decision-making on regulatory, service delivery, and communications fronts.



Online survey

1,992 stakeholders completed a 8 minute online survey. These stakeholders included representatives from the following sectors: air transport, agricultural aviation, other commercial and flight training, private and recreational, maintenance, RPAS, and aviation infrastructure.

The survey covered four key areas:

1. Being safe and feeling safe
2. The CAA's leadership and influence
3. Active regulatory stewardship
4. Professional regulatory practice.

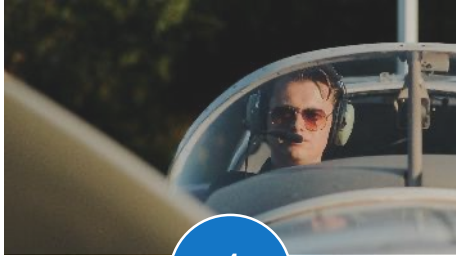
Qualitative research

Fourteen in-depth interviews were carried out with key stakeholders who were nominated by the CAA. These stakeholders included representatives from both commercial and recreational aviation, existing and emerging technologies, and a range of industry sectors. This enabled researchers to explore in-depth key issues and opportunities.

The qualitative research explored:

1. Stakeholder interactions and relationships
2. Perceptions of the CAA's role and activity, including:
 - active regulatory stewardship
 - risk response
 - the CAA as a leader and influencer
 - the CAA as an enabler for new technology and innovation.

Summary of findings



1

Most stakeholders feel safe and believe the New Zealand aviation system is safe. Around 80% feel and believe the system is safe compared around 5% who don't.

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2

Stakeholders feel that the CAA's senior leadership is committed to working with the sector. This is the open, collaborative, partnership approach that stakeholders are seeking.

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3

Stakeholders see partnership as one of the four cornerstones of efficient and effective regulation. The other three are: clarity, practicality, and stringency. They think describing the **intent** of a regulation goes a long way to achieving clarity and practicality – as it provides context for the interpretation of the regulation.

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4

The CAA's training and communications (Vector magazine, Advisory Circulars, and general information sharing) are held in high regard by stakeholders.

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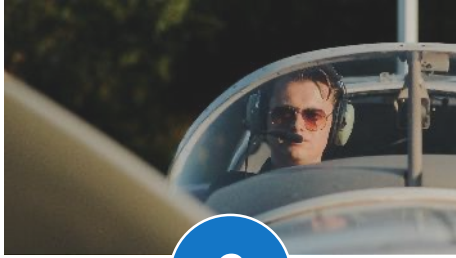


5

Stakeholders experiences with the CAA's 'on-the-ground' staff are mixed. Some very positive experiences and some very negative experiences. The negative experiences were often associated with an 'officious' manner and inconsistent decision making. Consistency of advice/decision making is one of the areas where stakeholders would most like to see improvement.

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Summary of findings



6

Being 'open and accountable for its actions' was the lowest rating aspect of the CAA's performance and hence a priority for improvement. This seems to be tied to the consistency of decisions and being able to explain them.

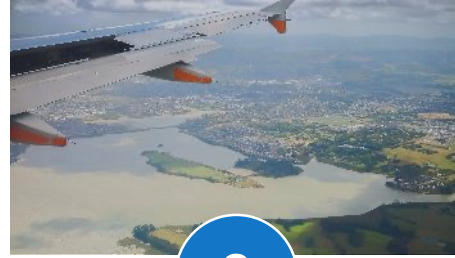
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7

The CAA's resourcing is a concern to stakeholders. Resource shortages are causing two issues for stakeholders: (1) delays in administrative processes which are costing stakeholders' opportunities, and (2) diverting resource away from future-focused projects (particularly technology related), which slows the pace of change within CAA.

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8

Stakeholders think the CAA is too slow to embrace new safety and aviation technology. They would like to see the CAA do three things to speed up adoption: (1) use current resources more efficiently (including borrowing ideas from overseas regulators), (2) engaging with experts to understand opportunities and risks, and (3) appropriately resource the area.

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9

Stakeholders would like to see the regulatory framework update so that it is fit for modern aviation. They would like the CAA to lead a collaborative effort to do the update.

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Detailed findings

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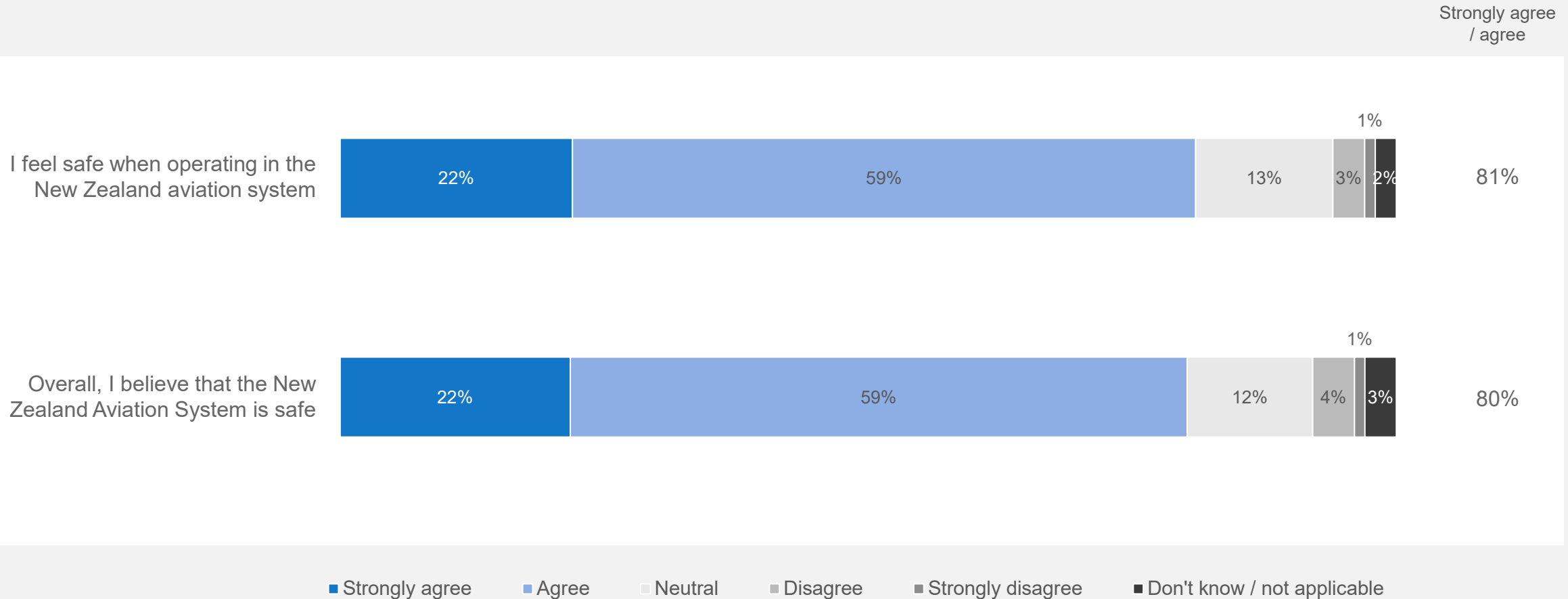


Being and feeling safe

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Most stakeholders feel safe operating within the New Zealand aviation system. There is room to strengthen these feelings of safety however – just 22% strongly agreeing they ‘feel safe operating in the NZ aviation system’ and ‘believe overall the NZ aviation system is safe’.

Being and feeling safe – online survey



These feelings were reflected in the qualitative research. At an overall level, stakeholders are generally comfortable with current safety levels.

Being and feeling safe – qualitative findings

Stakeholders feel that overall the New Zealand aviation sector is safe and that the CAA are effectively meeting this core responsibility.



One of the great things about the regulator is that, even though it might frustrate us, who want certain change, they never lose sight of the core task which is to protect the interests of the travelling public ... and that's what matters.

I guess they have a good understanding of aviation as a whole, and they, their surveillance, they're out there with surveillance, so they do see a lot and I know they're always watching. On the whole they're doing the things a regulator would do to ensure safety.

I feel safe flying in New Zealand, much safer than in other jurisdictions.

While stakeholders are generally comfortable with current safety levels, some attribute this more to the sector than they do to the CAA. These stakeholders see the sector as essentially self-regulating.

Being and feeling safe – qualitative findings

The stakeholders who see the sector as self-regulating, identified three gaps in the regulatory framework which they think could lead to unsafe operations.

1.

Gaps between the regulatory framework and modern safety technology

Stakeholders are frustrated when current regulations require them to use safety technology they see as old fashioned and out of date. The older technology can be less effective, more time intensive, and more expensive.

2.

Gaps between the CAA's interpretation of the regulatory framework and modern aviation technology

Stakeholders are concerned that slow approval processes and slow development of regulation can have significant financial impact on operators – they are losing money on equipment they have already invested in but can't use, or they are missing out on opportunities which new technology could offer them.

3.

Gaps between the CAA's interpretation of the regulatory framework and commercial pressures

Stakeholders think the CAA's understanding of commercial pressures can discourage safety improvements. For example, stakeholders identify an inconsistent approach to data privacy in the implementation of regulations. They feel that privacy is sometimes stated as reason to deny access to information which could improve safety. Other times they feel commercially sensitive information is required to be shared, which can discourage them from collecting that information.



We need to self regulate the sector, which is fine. You always need the combination of both but there's certain areas where you would actually hope the regulator would intervene and do something.

You have a sat phone that works anywhere on the globe and it's not good enough. You have to have a 1960s steam powered VHF radio installed and fitted to the aircraft.

I have an iPad. In the last few years, we've been able to get legitimate legal maps on the iPad, so I can now use that as my mapping rather than having to use the paper maps. Legally, I'm not allowed to use the GPS and there to plot my position on that map. Ah, I in theory, I suppose it's like the old paper maps, you'd have to put your finger that is where I am. I mean, everyone does it. I understand some of the concerns. But I think they all know that we all do use our GPS to help plug our position. But aviation is not the place to go if you're looking for the latest and greatest technology.

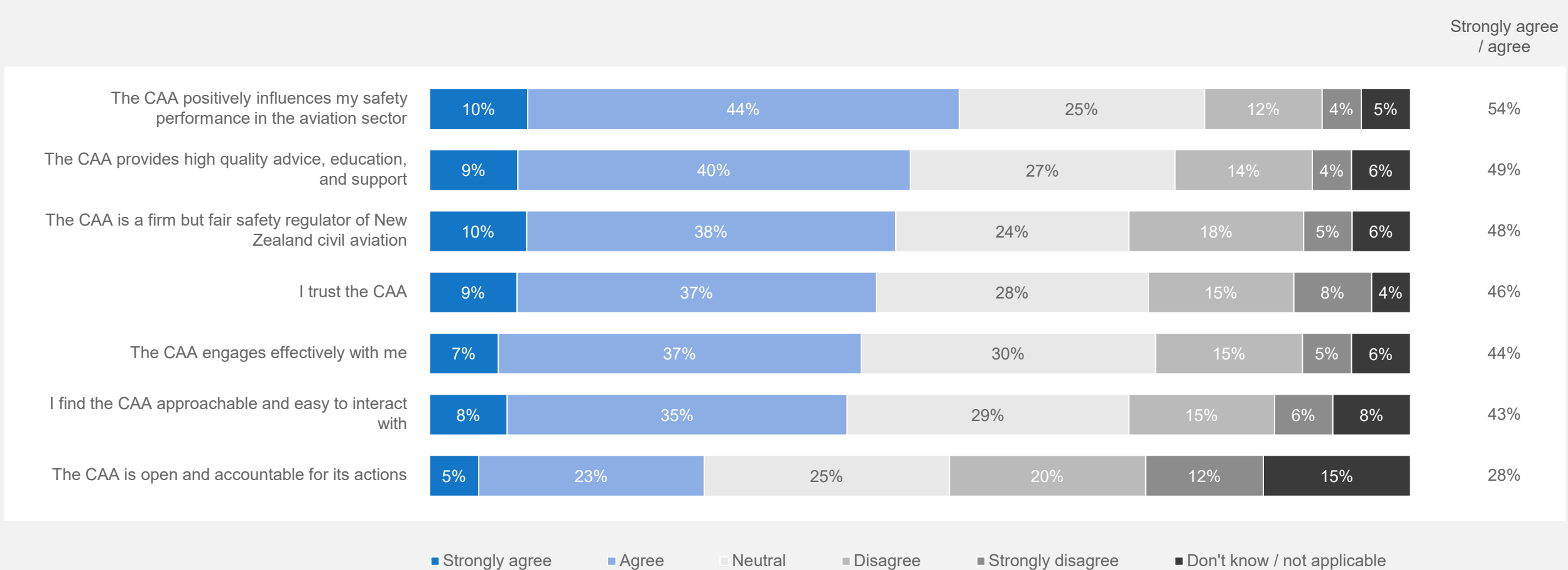


The CAA's leadership and influence

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Stakeholders are more positive than negative about almost all aspects of the CAA's leadership and influence. There is one exception to this – more stakeholders think the CAA is not open and accountable for its actions than think the CAA is open and accountable.

CAA leadership and influence – online survey



Stakeholders think that senior management are visible, approachable, and have developed good relationships with the sector.

CAA leadership and influence – qualitative findings

Strategic / leadership relationships

Stakeholders generally feel there is a commitment, at a very senior level, to listening to and working with the sector, recognising sector needs and moving forward in partnership. Stakeholders appreciate that Keith Manch has made a significant effort to get to know them, and other senior management are readily available and return calls.



I think they've got the right leadership at the board and director level. They've got to continue to effect a change agenda. That's going to take time and the industry needs to be able to support that.

I do feel like we're treated with a fair amount of respect and trust in terms of what we're trying to achieve.

Whilst the CAA's leadership are establishing good relationships and setting the right goals and priorities, there is a feeling amongst some stakeholders that these are not being enacted fast enough and that there is not enough follow-through from the rank and file within the CAA.



I have great relationships with Keith and David, both formally and informally. It's the individual relationships, further down the empire that we continue to strike hurdles with.

There seems to be this tacit reluctance to really seriously work with industry ... Nothing's combative or nasty, but you just don't get any progress.

Stakeholders value their relationships with the CAA and want to work closely and collaboratively.

CAA leadership and influence – qualitative findings

How stakeholders want to work with the CAA

Safety is as important to stakeholders as it is to the CAA. Stakeholders are committed to investing the time, effort and money to ensure that their organisations, and the New Zealand aviation sector are moving forward safely. To that end, their ideal working relationship with the CAA is:

- a collaborative attitude and constructive approach from the CAA: problem solving, rather than punitive
- open communication and relationships in which they can have frank discussions
- recognition of the realities, pressures and opportunities for the sector
- a regulatory environment (rules and interpretation) that supports the use of new safety technology
- a regulatory environment that enables the use of new aviation technology, safely
- an operational and administrative structure that recognises sector needs, realities and time-frames.



I don't want a 'them and us', we can't have a 'them and us' because the whole safety system is based on people (not) being afraid to report. When something goes wrong you need to be comfortable to report it so that everybody else can learn from it.

I want them to be a partner in my business.

I want to go forward as a collaboration, that's what I want from the CAA.

CAA are recognising that there is an industry there and that people need to be heard and they need to be communicated with.

While some stakeholders are having inconsistent experiences with the CAA at the moment, there is a real sense that the CAA is moving towards the type of relationship that stakeholders are wanting.

Stakeholders want to see leadership from the CAA in two areas: (1) updating the current regulatory framework, and (2) developing new regulations to enable new technology to be used.

CAA leadership and influence – qualitative findings

Updating the regulatory framework

Stakeholders feel one of the major issues in aviation safety at present is the outdated regulatory framework. They feel the CAA needs to lead the way in developing a regulatory framework that meets the needs of modern aviation.

Stakeholders feel the CAA is well placed to bring all the relevant agencies, organisations and sector leaders together to drive the necessary changes, and would like to see them take a leadership role in both making this collaboration happen. They would also like to see the CAA borrow from overseas.



There's a whole heap of them there that are really good. They're under-resourced, you see them trying to change, to engage and enhance the relationship within the constraints of the 1960s rules and charter. It's a challenge.

I think if they could find a way to improve their capacity to make change, without compromising the safety gains we have, then that would be really useful. That would be a probably be a massive step forward. For aviation.

We are very disappointed that the new act is basically a rehash of what's been done before. It doesn't improve our ability to make rule changes, and AC changes, in a timely manner. So they are very constrained in what they can do, because of the regulatory environment they are sitting in. A rule at the moment is averaging anywhere between 12-14 years to achieve. That's how hopeless things are.

I wish they would borrow with pride ... they don't need to reinvent the wheel.

I think CAA's got a role to quarterback that conversation, to say 'how are we going to make this work'...

[Cont.] Stakeholders want to see leadership from the CAA in two areas: (1) updating the current regulatory framework, and (2) developing new regulations to enable new technology to be used.

CAA leadership and influence – qualitative findings

New technology

Aviation technology is certainly undergoing a period of rapid and exciting development. Whilst not all stakeholders are directly involved with this rapid change, those that are feel that the CAA is working hard to enable technology. They feel that New Zealand has been a leader in this area, and the CAA have to some extent supported this.

They feel they have a productive partnership with the CAA and feel the CAA recognise their economic needs. They also sense that the CAA has the willingness to work closely with them to achieve the regulatory environment they need. However they are frustrated by two things:

1. Resource limitations within the CAA – specifically the CAA’s resource challenges mean that the CAA are directing people and skills away from new technology, to fill the gaps in ‘business as usual’ operations.
2. Capability limitations – specifically that the CAA does not have the knowledge or capability internally to keep up with new technology, or a thorough enough understanding of stakeholders economic needs. They feel that the existence of the Emerging Technologies team and the appointment of a Director is a positive move, but that there needs to be more.



The world is not standing still around us, you’ve got to resource your ambition.

One of the biggest obstacles is the ability for the regulator to get engaged and approve (initiatives), and that slows things down.

If you want to bring a new aircraft into the country you’ll go broke trying to get it certified because of the amount of hoops you have to jump through. It shouldn’t be like that, they should simplify the process and rely more on data from overseas.

Some certifications are taking 18 months to get through. And there’s companies on the brink of bankruptcy waiting for certification sitting with the aircraft that can’t do anything, while you’re trying to go for an approval, and the requirements keep changing, or we want new types of training, or certification or standards created to help speed things up, or, or improve the performance of the sector, but they just don’t have the resources to do it, they claim. But we know that the truth behind that is actually they’re not putting the resources in the right place.

[Cont.] Stakeholders want to see leadership from the CAA in two areas: (1) updating the current regulatory framework, and (2) developing new regulations to enable new technology to be used.

CAA leadership and influence – qualitative findings

Stakeholders identified three key areas for the CAA become a consistent enabler for technological innovation:

1 Use current resources more effectively

Specifically by:

- working more closely with overseas regulators, sharing data and actively borrowing ideas, learnings, regulations and processes where appropriate
- finding ways to speed up processing times (e.g. better use of administrative data, more efficient processes, outsourcing, clarity around decision making up front) to make new technology economically viable
- ensuring the mandate for technological advancement is recognised within the CAA. This includes making sure the people with the skills are dedicated to emerging technologies rather than seconded to other areas within the CAA.

2 Engage with experts

- Listen and engage more, and more effectively with those who understand the new technology and the opportunities and risks it offers.
- Listen and engage more with those who understand the commercial applications of new technology.

3 Add resource

- Recruit and retain people with the right skills and mindset.
- Be sufficiently resourced to prioritise technological innovation.

Stakeholders' own words about what it will take for the CAA to become a consistent enabler for technological innovation.

CAA leadership and influence – qualitative findings



The challenge they have is that technology is moving, and they struggle to acquire the expertise that is necessary in a fast moving technology environment.

We need to borrow much more aggressively from overseas who have more resources and are closer to the new technology that is occurring.

We're talking a quantum leap here, moving from fuel burning products to zero emission. It's going to be a big big shock for the CAA, they're going to have to re-write the rules to make it work. And if they haven't got the capacity to do an audit how the hell are they going to embrace a whole new aviation sector?

And I don't think there's a bad intention, like I don't think they're out there to get us but because they don't understand the sector and how it works.





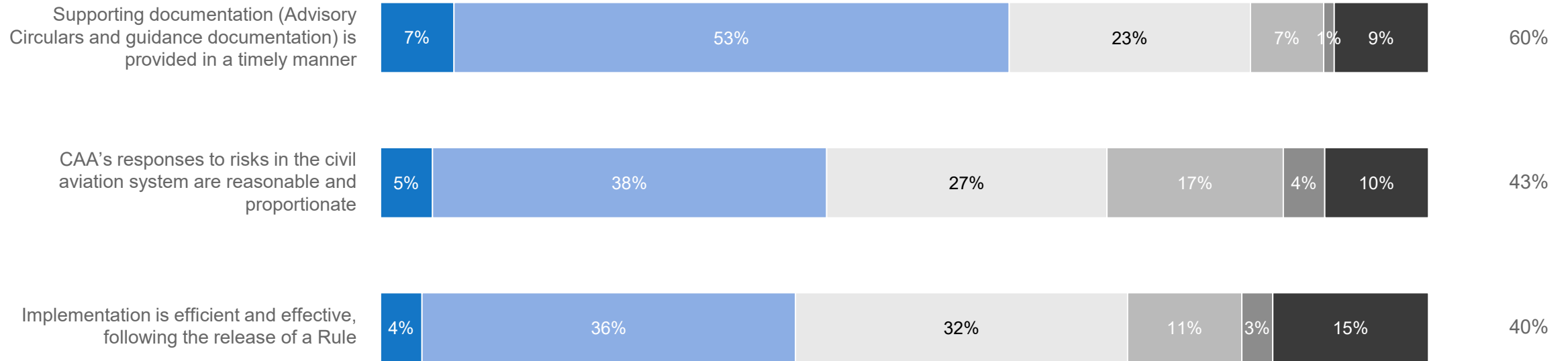
**Active regulatory
stewardship**

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More stakeholders are positive about the CAA's active regulatory stewardship than are negative. Stakeholders are most positive about the supporting documentation that the CAA provides and most negative about the CAA's responses to risks.

Active regulatory stewardship – online survey

Strongly agree / agree



■ Strongly agree
 ■ Agree
 ■ Neutral
 ■ Disagree
 ■ Strongly disagree
 ■ Don't know / not applicable

Stakeholders identified four interdependent cornerstones of effective and efficient regulation.

Active regulatory stewardship – qualitative findings

The four cornerstones of effective and efficient regulation



Clarity

Stakeholders want clarity on what they will be assessed on and a clearly defined process. At present they find that sometimes the CAA's staff are not interpreting or implementing the rules in a consistent manner and this can lead to situations that they feel are unfair, and sometimes to risk responses that they feel are disproportionate. They say that focusing on the **intent** of a rule is the key to clarity, rather than focusing solely on the words of a rule.



An example is when making amendments compliance certificate AC 43-9. (CAA) Need to be open about why they are making these changes, why is it needed. How it will improve safety.

When you get different inspectors or new people on the block, they start interpreting things differently. That's where you get the conflict, because you're used to interpreting it this way. And then suddenly, the new kid in town thinks this is how we should interpret it. And now the entire industry has to change just because of this one person's opinion. That's not a fair system. It's not a just system. I think if people had to put up with that from, you know, the NZTA with the cars or, or things like that, they would share our frustration.

[We need] a strong, independent, well resourced regulator that has appropriately broad powers, and provides really clear guidance around how it will exercise its regulatory function and powers.

Stakeholders think that partnership is the key to success when new rules are being developed.

Active regulatory stewardship – qualitative findings

Partnership

When a new rule is being developed stakeholders want to see strong consultation with the sector to ensure that:

- the new rule meets sector needs
- the sector understands why the new rule is being made, what problems it is designed to solve
- people know what to expect, and can prepare.

Some stakeholders feel the CAA performs well in forming partnerships with the sector. The replacement of the Auckland airport runway was cited as one really successful example. Another successful example was the change to the medical standards. The success factors for the change to medical standards were the long time frames and the clarity of the material (particularly the diagrams).

However, partnership with the sector is not always perfect. Stakeholders cite Part 101 and Part 102 rules as an example of rules with inadequate consultation and as a result are now having to be reviewed.



The more they can understand and embed themselves in the processes, the better place they are in, to be able to feel comfortable to approve them at place. When they have had people work closely with people across the sector, that's been really effective.

Why not assemble a team where CAA come from a regulatory viewpoint, and we come up with a small team. Sit down in a room, think about what's needed from regulatory viewpoint, and work out how that fits with what's practical for the industry. Senior management buys into approach, people less senior in the organisation act like they know best.

101 and 102 were recent examples (unmanned drones), it had to be quick because of fast moving unmanned aircraft, (but there was) not much consultation ... CAA came out with rule and said 'here it is'. Industry don't get a say, and present it as a fait accompli. The lack of industry consultation is reflected in the changes that are now needed in the rule.

The final two cornerstones of efficient and effective regulation are stringency and practicality. Qualitative participants frequently mentioned that focusing on the intent of a rule is the key to practicality.

Active regulatory stewardship – qualitative findings

Stringency

On the whole stakeholders feel day to day compliance is a manageable task, and the effort and input required from them is proportionate to the importance of maintaining a safe operation. They think that compliance being difficult is a good thing.



Compliance is probably hard in NZ, but that's good, because that's what we want. We want to be able to say that if we're certified in NZ that means something. It's important to us that it's a credible certification.

Practicality

Stakeholders stress the importance of a pragmatic, problem solving approach, with some flexibility in interpretation and implementation, in order to address issues with what some feel is an outdated regulatory framework.

Stakeholders feel that some flexibility is appropriate, given the need to recognise the uniqueness of different situations and to ensure a pragmatic, problem solving approach. Similarly to Clarity, stakeholders think that the key to practicality is to understand the **intent** of a rule, rather than solely focus on the wording of the rule.



We seem to be dealing with things that aren't related to safety. They're just related to rules.

There's a term in the industry called normalised deviance, and that becomes a normalised deviance, and you're a breach of the rule, you know, you're in breach of the rule, but it doesn't matter because the rule's an ass, okay, but you can't change it. But every now and again, one of the auditors will come along and pick up on that.

Stakeholders are very positive about the CAA's shift to an intelligence led, risk based approach.

Active regulatory stewardship – qualitative findings



Stakeholders feel that a move to an intelligence led, risk based approach is a move in the right direction.

They feel that this enables the CAA to 'focus on what really matters', which is beneficial to their operations, to safety and to the progression of aviation in New Zealand.

It's positive that (they're moving) to a more risk based regulatory model, because you put your emphasis on the areas where you're going to get the most return, and I wholeheartedly agree with that.

Focussing on the stuff that matters, focussing on the right outcomes rather than a very black and white, literal type approach.

Reaction to the introduction of Safety Management Systems was generally positive, although stakeholders did have some concerns about them.

Active regulatory stewardship – qualitative findings

Safety Management Systems

Some stakeholders feel that Safety Management Systems (SMS) have been a great step forward in safety in the New Zealand aviation sector and are finding the extra data and analysis these provide very useful for improving their safety practices and facilitating compliance. They appreciate the CAA's recognition of the effort and investment they have put into these systems, and the reward they are seeing in terms of fewer audits and more tailored re-certification.



I think that the surveillance on us, for example, is lower than it used to be. I could be wrong, but it feels like it is. And that's just mainly because like I said, that does develop more of a trust and our operation and our ability to do things

However other stakeholders feel that there is a great deal of work still to be done to make reliance on Safety Management Systems appropriate. They stress the need to define 'operating and effective'. They are concerned that:

- reliance on Safety Management Systems without a clear definition of 'operating and effective' could lead to safety issues
- over-reliance on Safety Management Systems could mean the CAA aren't doing enough surveillance
- there is uncertainty and risk when choosing which Safety Management System to invest in. Stakeholders are concerned that they could spend significant amounts of money on a system which could then be obsolete if it does not fit the definition of 'operating and effective'
- some of the CAA's personnel do not sufficiently understand the Safety Management Systems and how to use the data they provide.

Stakeholders think the CAA could share data across the sector more effectively.

Active regulatory stewardship – qualitative findings

Data use

Stakeholders see data and data sharing as a significant opportunity to improve safety outcomes across the sector, particularly with the advent of Safety Management Systems. Some feel that the CAA use and share data well, and value the opportunity this provides for them to learn from others. Vector magazine is a useful vehicle for this, and stakeholders appreciate the Advisory Circulars.

Stakeholders would like to see more data fed back to them, to drive continuous improvement.



I just think it'd be really nice to have the data back the other way for us to make your own decisions for our own business around safety and current trends to say, 'Oh, look, there's been a spike in this, you should we have a look at that', feed it into our safety management system and see what spits out the other end.

Stakeholders have two concerns around the CAA's data use:


1. Inconsistent approaches to privacy. They feel that sometimes the CAA withholds data that could improve safety, and other times the CAA demands open source data which they feel is commercially sensitive and should be encrypted
2. Some are concerned that the CAA are not using data well enough and are not using it sufficiently to identify pattern and risks. They feel the CAA should be taking a much more active role in using data to identify and address risks. Further, these stakeholders are very concerned that the CAA have not acted appropriately on the risks that sector led data analysis has discovered.



All they need to do was make it closed source, encrypted data, but that didn't happen because of the lack of understanding of the reality. So it's had a negative impact on safety (because operators turn off the system) outside of where it's absolutely mandated that you have to use it.



If you knew the top five things that are killing people and causing accidents, why wouldn't you deal with the number one cause. (And) they want to deal with number five.

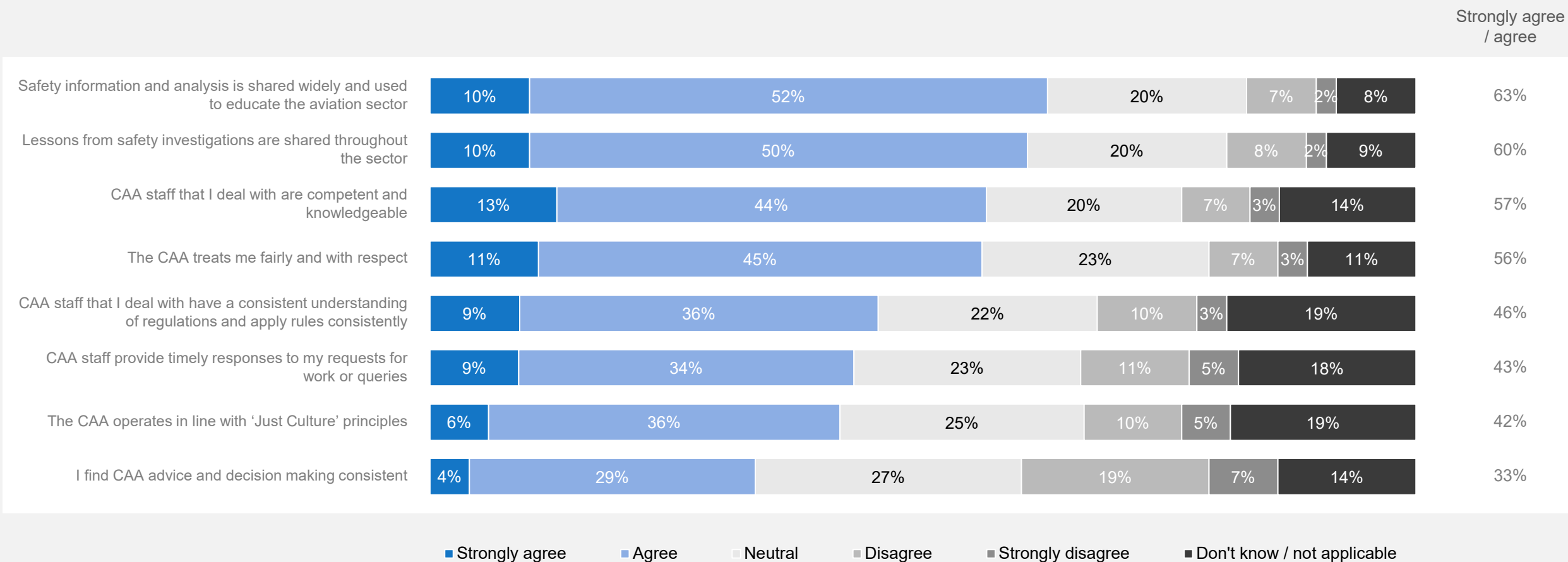


**Professional
regulatory practice**

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The sharing of information is the most highly regarded aspect of the CAA's professional regulatory practice. The consistency of decision making/guidance is the least well regarded.

Professional regulatory practice – online survey



At an operational level stakeholders are having both positive and negative experiences.

CAA professional regulatory practice – qualitative findings

Operational staff – the positives

On the ground, some stakeholders have recently had very good experiences with the CAA's inspectors and other staff members. In these interactions the CAA's staff have delivered experiences which have been collaborative. They have felt that their work in improving their safety systems is recognised and appreciated, and that the CAA are there to help ensure the safety and success of their operation rather than to 'find fault'. This is felt to be indicative of change in the right direction.



When we express some concern about anything, we know that (our contact) is going to do her best to find some solution to whatever their problem might be. She represents us in the way that we need that we need a good relationship with her and we really appreciate that. And she's not the only one either. We've got good relationships with I can't think of anybody, we've got a bad relationship with.

Having a regulator that's in partnership to create a safe system is great. You could pay huge money in consultancy fees for what CAA does.

We've just got our IOC renewed and it was a good experience ... I think they were impressed with how far we've come. It was very reciprocal; it just made the process so much easier knowing that it wasn't a witch hunt. They were transparent, they didn't leave us guessing ... Full credit to the guys at the coalface they did a really good job. They gave us really constructive feedback, and I actually ended up walking away from the process feeling like, for the first IOC renewal ever it was something worth going through.

[Cont.] At an operational level stakeholders are having both positive and negative experiences.

CAA professional regulatory practice – qualitative findings

Operational staff – the negatives

Stakeholder's experiences are not consistent throughout the organisation. Some key interactions on the ground have been disappointing for stakeholders and damaging to their perceptions and relationship.

Stakeholders describe recent audits in which:

- the auditors' manner 'autocratic' and 'officious'
- the auditor seemed to lack understanding of the aviation sector, modern safety processes and technology
- the auditor did not understand basic modern administrative technology such as tablets and online meeting
- the auditor was driven by personal opinion and biases
- the auditor was focussing on minutiae of outdated rules, rather than understanding and addressing the important factors which impact on safety.



All our ground crew have to be able to pipe up and go hey, there's something here I don't like, even if it's them that's made a mistake, and know no-one's going to go 'your sanctioned, your fired,' , but that wasn't what it was like last week ... it was like a school master with naughty children.

We discussed it, we said we'll look at what went right, what went wrong, it will be really immersive, then, out comes the rule book. So we'll just say what they want to hear and they'll go away.

There needs to be quite a bit of detraining to happen. If I was to give you a list of the CVAA staff we most have difficulties with. They come from the Airforce. They have a different way of doing things. It's very autocratic. There needs to be more training of those ex Airforce staff into the commercial way of doing things.

Inspectors should be willing to go out to the sector, see the issues they're facing, try to address those and ensure the safety of that sector. That's what they're paid to do. They're civil servants, not civil dictators. And I think that's, that's we you see some who have really, they understand that role. And they do it well, and others who I think like the power.

When individuals come into the organisation with strong individual views, and are conducting an audit it can have quite a big impact, so that is a challenge ... clarity on decision making criteria would help, they need to clarify the difference between personal views and organisational views.

The CAA's resource issues are causing delays which are, in turn, costing stakeholders the chance to pursue opportunities.

CAA professional regulatory practice – qualitative findings

CAA administrative processes

Stakeholders recognise that the CAA are under-resourced and people feel stretched. They see the impact of this situation in slow administrative processes. Some things have sped up recently (e.g., flight crew licenses are processed quickly), and stakeholders see efforts to change.

However stakeholders find that most processes within the CAA are still unacceptably slow. This causes difficulties in their operations and a great deal of frustration, costs them time and money and means individual operators and New Zealand as a whole miss out on valuable opportunities.

Stakeholders believe that these delays are also due to inefficiencies within the CAA: (1) staff who don't fully understand the CAA's existing process, and (2) and a reluctance to use modern administrative technology and practices appropriately (e.g. electronic signatures). Stakeholders identify a significant opportunity for the CAA to speed up administrative processes, and use intelligence based solutions to turn applications around much more quickly. This would free up resources for improving safety outcomes.



I believe this year they have gone through a significant restructure and there are a number of people trying to work out what their jobs are. And I believe those people are reaching out in the best way possible, to say 'hey look this is what we're thinking, can you help with this.

I'll give you another example, so Rocket Lab using a helicopter to catch the rockets on re-entry and are doing this and they, the company, put in an auxiliary fuel tank, which is called a turtle pack. And the turtle pack is just a platter of fuel in the back connected into the fuel system. It's certified for lots of different aircraft, including the aircraft that they're using. And that took CAA far too long to review the documentation. And the organisation that did the engineering work, has a delegation from the director to then be able to release it. But CAA wouldn't allow them to release that without their oversight. And they went through and effectively line by line. And the delays mean that they missed the ability to do the next phase of the trial, because CAA were too slow.

(CAA) staff members don't understand the system. Now, I'm not saying it's, it's perfect, it is quite complex, but you need to you need to understand.

Stakeholders are very complimentary about the CAA's training and are looking forward to seeing events ramp up again now that COVID restrictions are easing.

Professional regulatory practice – qualitative findings

Training


Stakeholders value the CAA's contributions to training highly. Some stakeholders feel that this has dropped off due to the COVID-19 restrictions and are keen to see training events re-established. Other stakeholders appreciate that online training initiatives are being established and feel this is very helpful for them and their stakeholders.

One stakeholder mentioned recent work the CAA has done to standardise the training syllabi, which he believes has been conducted very well:



An inspector was sent out to attend the training courses, and that's the right approach, because you're going out to see what happens, what practice looks like, and then work out, you know, how that should be reflected in some sort of regulatory reform as opposed to deciding regulations and enforcing it onto people without really understanding what they do.



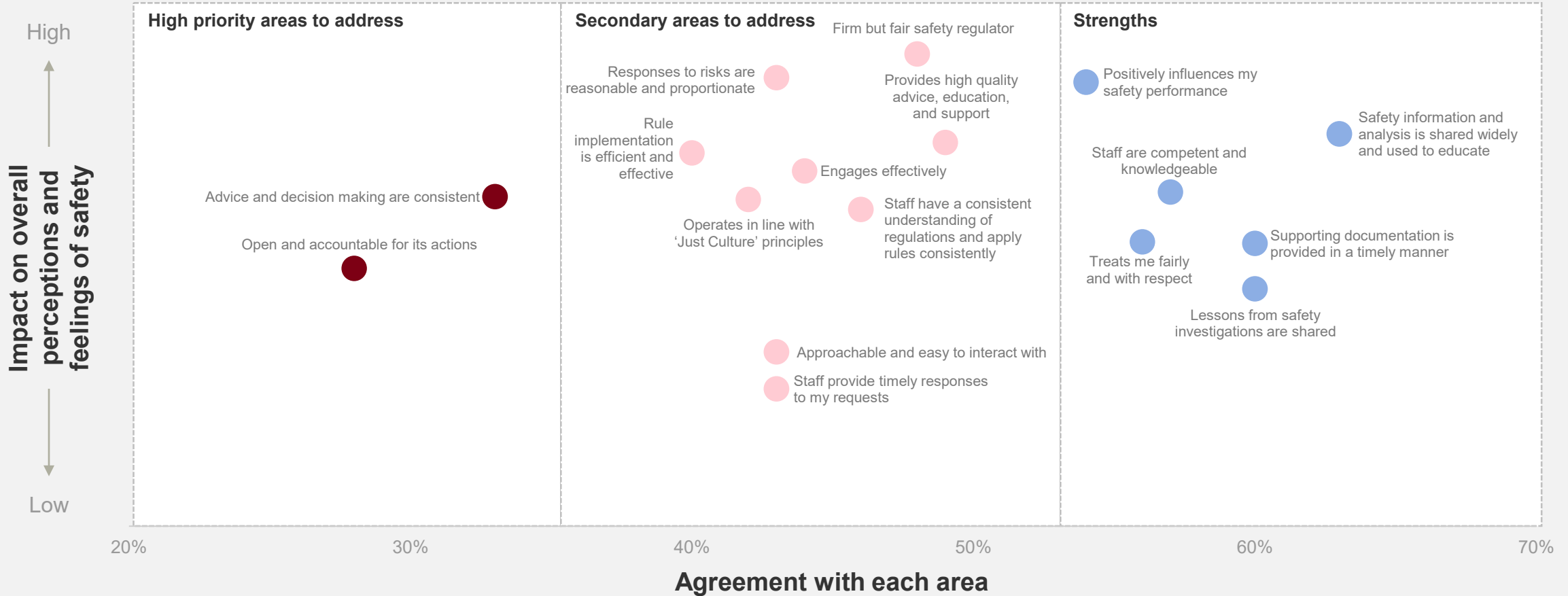
A photograph of an air traffic control tower. Two air traffic controllers, a man and a woman, are seen from behind, wearing headsets and looking at multiple computer monitors displaying flight data and maps. A large window in the background shows an airplane in flight over a cityscape.

Improving overall perceptions

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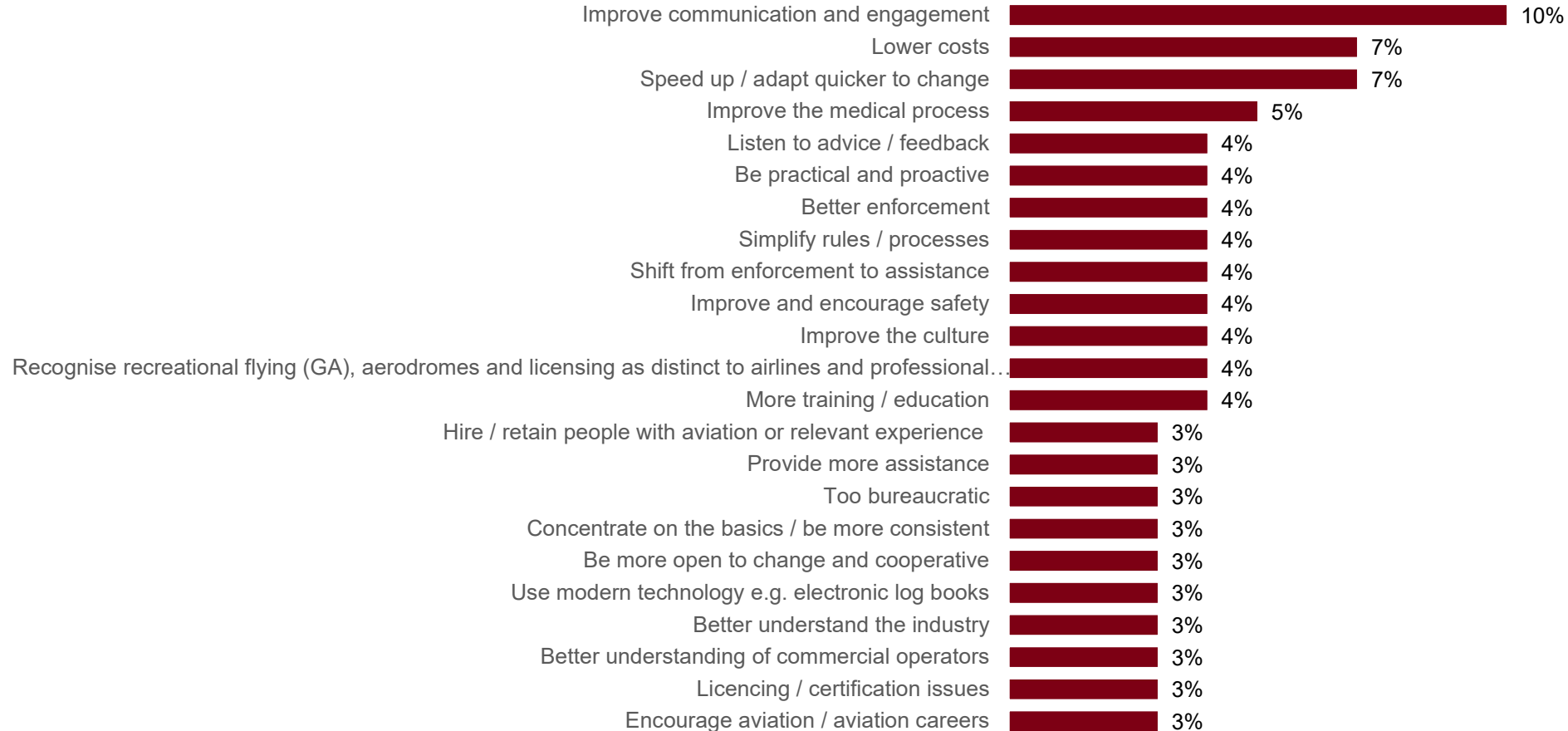
There are two areas which stand out as high priority areas for the CAA to address: consistency of advice and decision making, and being open and accountable. These areas have a high impact on stakeholders feeling of safety within the aviation sector but currently have relatively low performance.

Driver analysis – online survey



Stakeholders provided a wide range of suggestions when asked what the CAA could do differently or better. Themes most frequently mentioned include: improving communication and engagement, reducing costs, improving timeliness, and improving the medical process.

What do you think CAA could do differently or better? – online survey



Below are a selection of comments provided by stakeholders about improving engagement and communication.

Better engagement and communication – online survey



Start developing a communication strategy which provides information and status of primary issues to all of the industry. Communication from the director over the past 12 months has been abysmal. the industry is being left to ask questions and are often disappointed by the lack of reasonable answer. [Air transport, Maintenance]

Have a physical presence in the workplace. Re-establish industry relationships, stop looking out the window from Wellington. [Air transport]

Engage with industry on a good faith basis. Recognise that it does not have a monopoly on ideas, and that a new process is not always worse. Abandon a 'zero risk' mantra, recognising that zero risk means we would never drive anywhere and never develop anything new. Adopt some humility. Realise that learning while on the job should never come at the customer's expense. [Agricultural aviation, RPAS.]

Education and communication with the type of flying appropriate to that industry. Getting out and meeting people. Consulting with all operators not just Aviation New Zealand. [Agricultural aviation]

Safety management systems are dynamic, and require an engaged collaboration to be effective. The lack of genuine engagement with both pilots and AME's for years has left a trust gap which is "of aeromedical significance". It is great to see changes occurring now to remedy that, and all credit to these efforts. [Air transport]

More one on one conversations with clients to understand their activity or business better. [Private / Recreational]



Work closer with the industry and accept there is a vast amount of knowledge and experience in the GA sector. Listen to the NZ Aviation Federation executive when they make representations to the CAA on matters that impact on the GA sector. [Air transport, Agricultural aviation]

Create a more direct relationship with it's clients. [Private / Recreational]

Better surveillance activities, need to be more risk based in their decisions and with everything they do, more engagement required with industry, not enough education (particularly around SMS and risk), senior managers and executive lack industry knowledge and credibility (and therefore do not understand risks and issues). [Private / Recreational]

Engage in a more helpful way with their customers rather than talking about it and making promises, devising systems that don't work and so on. Get some staff out in the field who have real world experience and are there to help rather than just finding fault and threatening prosecution. [Other commercial and flight training, Private / Recreational]

Sector engagement, particularly with those key senior people within individual organisations. FOI assigned to that organisation could be more aware of common issues for that sector and potential areas of weakness that might manifest through safety events, and be proactive in offering support around those areas, such as maintenance for part 135 operators. Overall, more of a visible presence, which has taken a hit through lockdowns etc. Good to see some engagement through Zoom re overhead joins etc, but a large degree of this engagement seems to centre on abinitio or student pilot issues. [Air transport]

Below are a selection of comments provided by stakeholders about reducing costs.

Reducing costs – online survey



Reducing costs for GA participants, including audit fees etc. [Air transport, Other commercial and flight training, Private / Recreational]

More flexibility with ADSB installations in aircraft such as gliders. Allow installation by appropriately qualified GNZ engineers and to use non TSO'd equipment the same as overseas. Current equipment (and installation) costs will mean most gliders will never install ADSB which is a safety concern. [Private / Recreational]

Review their pricing structure which is excessive in comparison to other government bodies providing similar services. E.g. hourly rate, processing fees. [Private / Recreational]

Assisting operators in a meaningful way. Reduce compliance cost (time is the biggest cost). Accept the 90% of operators as the professionals they are. [Air transport, Agricultural aviation]

Make it so that pilots learning on a Class 2 Microlight i.e. Vans RV-12 can do there PPL's in that type of aircraft. Currently the cost to operate a C172-152 is too astronomical for most young pilots to learn. [Private / Recreational]

Start understanding the practical realities of GA. Institute a substantial reduction in the exorbitant fees charged for compliance. Get rid of the absolute rip off Safety Levy for starters. What are the all the other charges for, if not for safety? [Air transport]

Change examination costs, far too expensive. Faster turnarounds with rating/ licence application. Engage better with the operators and try to change the image of the CAA. [Maintenance]



Our voluntary organisation has CAA Delegation powers to issue pilot certificates on behalf of CAA (this is unique). Effectively the organisation is part of CAA and doing the work for them (like an internal department), yet the organisation is charged \$284 per hour for being Audited, and for making any changes to operational procedures in the Operational Manual. In reality this is a cost barrier to safety or organisational improvements, organisations may well hold off or wait to back up multiple operational improvements and submit annually rather than throughout the year or not submit at all to keep costs down. Our voluntary not for profit organisation is currently undergoing a proactive approach programme to safety and is dismayed by these costs. [Air transport]

Participation levy charged to individual and not aircraft owner. [Private / Recreational]

conform more to accepted practices from overseas, especially with the gear to use for ADSB. other countries allow cheaper options for gliders and microlights . we seem to be the only country not to do this. [Private / Recreational, RPAS]

SMS (while great in theory) has not been implemented in a practical or affordable manner for small businesses. CAA do not practice what they preach (i.e. they say it is "scalable", however do not seem to have the ability to put this into practice themselves). SMS auditors do not understand small business and serves no purpose in enhancing aviation safety at all. rather, they are a detriment to it because they are so pedantic and unpractical. [Air transport, Private / Recreational, Maintenance]

The additional fees that have crept in over the years have made maintaining a licence less affordable. [Air transport]

Below are a selection of comments provided by stakeholders about improving timeliness.

Speeding up processes – online survey



Much too slow to process Part 102 Certification applications, wait time currently up to 18 months. Very poor consultation with affected industry sector, esp. when that sector had offered solutions to the problem. [RPAS]

Where do I start? Endless paperwork, very very slow processing of change, myopic management of detail (the rollout of ADS-B in gliders would be a great example), the veil of safety used to stymie any progress...and on and on. [Private / Recreational]

Helping participants operate safely AND efficiently - too often the rules lag technology changes. They are just too slow to adapt to changes that the industry is experiencing. And their people aren't keeping up to date with these changes from a knowledge and experience point of view. [Other]

Takes too long to add aircraft and make simple amendments to ops specs which in turn adds unnecessary financial pressure to Businesses because they are unable to react quickly to opportunities that may arise at short notice. [Air transport]

More timely accident investigations. [Private / Recreational, Maintenance]

Speedier enforcement procedures to those that blatantly get caught abusing CAA rules or falsifying documents. We have one case still pending after two years. Not a good look for a regulatory body to be so ineffective against persons or person, review procedures for enforcement, especially by whom and by when. [Air transport]



CAA seems fragmented and under resourced when viewed from a industry user perspective. [Other commercial and flight training]

Adapt quicker to changes. Regulations around carriage of flight attendants, personal electronic devices, some Part 174 requirements and various other changes across the floor, have taken too long to change. They're not fit for purpose as the world has changed quicker than the regulator. IOSA adapts quickly, airlines follow suit very quickly... but the regulator doesn't. Working on this would be a huge benefit. [Air transport]

They are hugely inefficient in some of their internal processes. It currently takes about 18 months to process a Part 102 exposition. I know of several SMEs on the brink of bankruptcy waiting for approvals to come through. None of them are doing anything that is novel where there are not already established standards that can be used. Their RPAS team is under-resourced as the CAA still sees RPAS as something on the side rather than a core focus for its activities. [Other commercial and flight training, RPAS]

Do tasks like certification in a timely manner currently at 9 months and waiting - cant run a business cos I am still waiting for them to read my exposition. [RPAS]

Get onto issues with pilots much faster. In my experience, CAA has taken issue with my flying once, and it was 6 months after the issue that I heard from them. When an issue is passed on to an investigator it should be dealt with much quicker. I was very nervous that I might not have been being totally honest due to the time passed between the flight taking place and the issue being raised. [Private / Recreational]

Below are a selection of comments provided by stakeholders about improving the medical process.

Improving the medical process – online survey



The Medical Department could improve their culture when dealing with Pilots medical issues. [Private / Recreational]

Medicals - could be more flexible, it seems that pilots will try to avoid healthcare or treating medical issues, with one good example of this being mental health, specifically depression/feeling down. It seems that the CAA will need to find a way to ensure safety while making sure that someone won't be afraid of ending their career for needed treatment. [Other commercial and flight training]

Allowing medical standards to be upheld by individual avmed doctors and not to be second guessed by those in the CAA medical department. [Private / Recreational]

Medical process lags behind other developed nations. Diabetes etc CAA UK/US/Canada/Australia. [Private / Recreational]

Get rid of the 6 monthly medical for over 50 cpl/atpl. Move yearly instructor renewals to two years. [Other commercial and flight training]

Revamp the medical unit, and change the approach to medical examiners. Consider joining with CASA medical, as we probably don't need a separate civil aviation medical system for both Australia and NZ. [Private / Recreational]

Become accountable. Medical section is a disgrace. Unbelievable arrogance and incompetence. Recent court cases against CAA exemplify this! Outsource to panel of Avmed doctors. [Air transport]



Electronic lodgement process for medicals funded by clients. [Other commercial and flight training, Private / Recreational, Other]

Medicals, especially support and understanding around mental health issues. [Private / Recreational]

It would be good to have an on-line system for recording medical exam information and production of certificates. [Aviation infrastructure]

Applying for Aviation Medicals & renewals could be performed in an easier process adding more panel certified doctors in various countries. [Air transport]

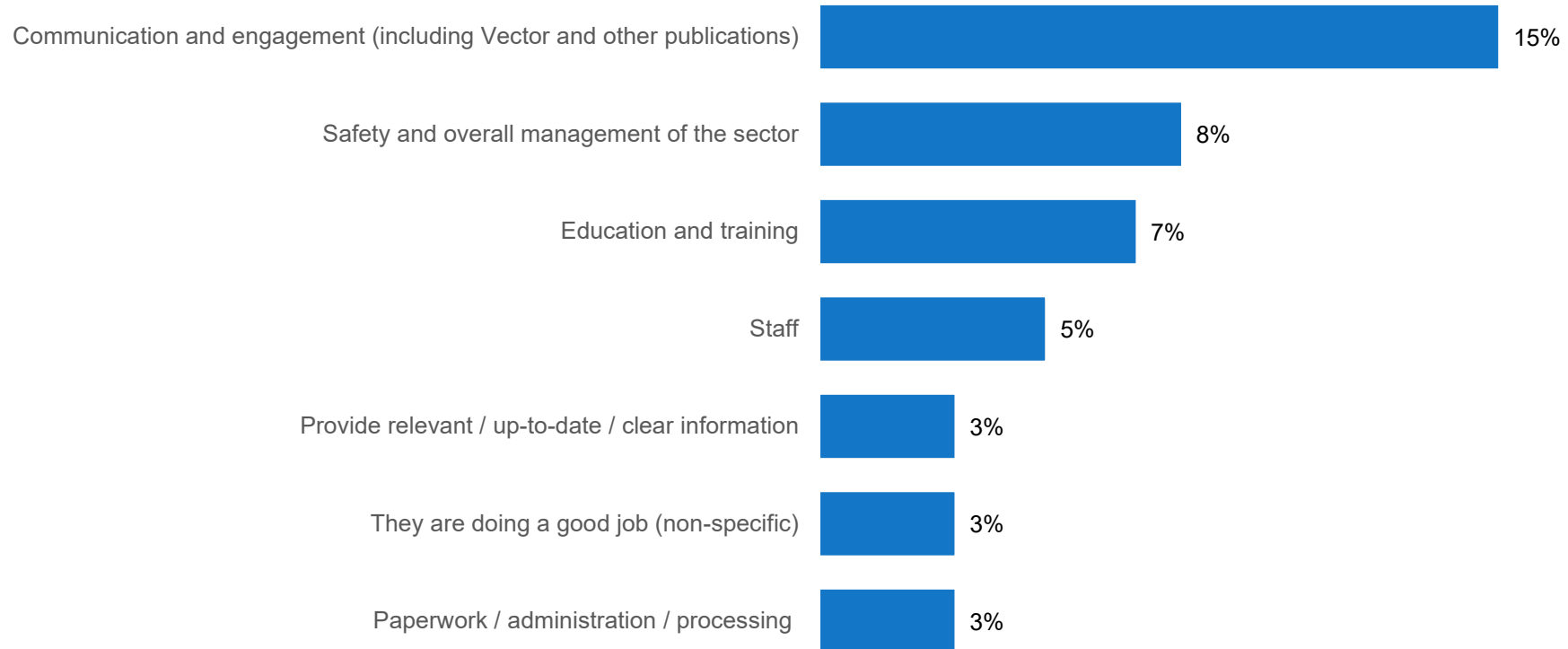
GA pilots. Bring GA medical requirements into line with other countries. [Private / Recreational]

Medical forms could be templated whereupon once a year (or whenever) required could be downloaded with your previous history and added to as required, i.e. annually for a medical. [Air transport]

The CAA needs to be more transparent when it comes to how they manage the medicals and the information required from Pilots who have undergone a minor procedure. My experience with the medical department is one of disappointment as they have shown lack of understanding and poor guidance. I don't think the medical dept within the CAA should be looking to NZ transport for answers as to how a particular condition is to be managed, however in my case that's exactly what happened. [Private / Recreational]

Stakeholders were also asked what they thought the CAA does well. The most frequently mentioned topics were: communication and engagement, industry safety and overall sector management, education and training, and the CAA's staff.

What do you think CAA is currently doing well? – online survey



Below are a selection of comments provided by stakeholders around the CAA's communication and engagement.

Communication and engagement (including Vector and other publications) – online survey



Good communication, with magazine and online website that has improved tremendously. Posters are excellent and personable interaction. [Private / recreational]

There has been a big improvement in the last two years with interaction between CAA staff and small companies such as ours. [Agricultural aviation]

Recent 139 / SMS certification and auditing processes were well communicated, supported and managed [Air transport]

I think the CAA does a good job of providing relevant information to pilots, through publications and information sessions. [Private / Recreational]

Information sharing and good contacts with Delegation holders. I found that contacting Senior management was very easy and information was readily forthcoming. [Air transport, Private / Recreational].

CAAs informative emails are great and their communication is excellent. CAA have still communicated and got things done well during Covid, nothings seems to be a problem. [Other commercial and flight training]

There has been a big improvement in the last two years with interaction between CAA staff and small companies such as ours. [Agricultural aviation]



CAA is keeping up to date with the safety information through bulletins especially during COVID 19 pandemic so we can take a precautionary actions to stay safe and well and hopefully we can all get through this pandemic soon [Air transport]

Excellent engagement and support throughout covid. Great communications that showed understanding and provided the needed direction during covid [Air transport]

Communication, such as updates/changes/vector magazine/publications on website - great sources of information [Other]

I think the CAA is doing well with the engagement side, I.e. vector podcasts and the GAP Standard overhead rejoin video, Also having there people in the field example having examiners and other personal flying and meeting the everyday person at local aeroclubs [Other commercial and flight training]

Communication has been good and lots of useful information passed on over the past two years. [Air transport]

Vector and Plane Talking booklets are excellent. [Private / recreational]

Communication has dramatically improved and the introduction of the new PPL (RPL) is a great motivator to carry on flying with the new medical. [Air transport, Private / Recreational]

Modelling just culture and engaging in proactive education [Air transport]

Below are a selection of comments provided by stakeholders around safety and the CAA's overall management of the aviation sector.

Safety and overall management of the sector – online survey



I think they take a very level, even-handed approach when dealing with reported incidents and try to ensure the best outcome for safer aviation. [Private / Recreational]

The CAA has helped create an excellent safety culture that is instilled from day 1, and provides great tools to pilots. [Other commercial and flight training]

Ensuring the safe operation of aircraft throughout the industry. [Private / Recreational]

Air Safety - making sure pilots know the rules and are able to apply it in the air. [Air transport]

CAA has proved it's capability repeatedly. Consistent performance has gained CAA and New Zealand a very well reputation for aviation globally. High standards facilitate this. [Other]

Sourcing information from operators, other countries aviation governing bodies and sharing this with operators in New Zealand. [Air transport, Private / Recreational, Maintenance]

Reviewing their organisation, making sound attempts in some areas to make aviation safer. [Private / Recreational]

Maintaining a safe and positive culture towards safety. They are always available via phone or email. They are always trying to make our sky safer through online seminars, GAP booklets, and Vector magazines as well as showing face in the flying community. [Other commercial and flight training]



Ongoing 'informal' liaison creating an atmosphere of trust. Company initiatives are shared early with open and honest discussion about guidance from both compliance and general improvement perspectives. [Air transport]

I'm seeing and experiencing a much kinder and collaborative approach to regulation. Less of the stick and more of carrot to foster safer operations and transparency between operator and regulator. [Air transport, Maintenance]

I think that going to a PPL and having medical grades of licence was an intelligent move. [Private / Recreational]

CAA is doing well in facilitating all Pilot requirements right down to the medical checks. [Air transport]

Pushing for people to make safe decisions and improve airmanship. [Other commercial and flight training]

Getting people to sign up for ADSB in and out. It is amazing to have it and think it should be mandatory for all aircraft irrespective of where you fly, it would add significantly to the safety of flying. [Private / Recreational]

Doing presentations around NZ on areas of safety focus like the Avkiwi series. [Private / Recreational, Aviation infrastructure]

Below are a selection of comments provided by stakeholders around the CAA's education and training offers.

Education and training – online survey



The annual Design Delegation Holders' seminar is of great value and seems to be very well organised. [Air transport, Maintenance]

Trying to educate the general public through Social Media on some of the rules and regulations around the use of RPAS [RPAS]

They have made some good videos to help those who are unfamiliar with the rules understand important concepts for RPAS operations. [Other commercial and flight training, RPAS]

The recent online "roadshow" about standard overhead re-joins was excellent. Vector magazine good [Private / Recreational]

Produce pretty good training material for new pilots (GAP, Instructor guides etc) [Air transport, Agricultural aviation, Other commercial and flight training]

I like the collaborative approach I've experienced so far. I've had good value from the safety courses you have run prior to covid. [Other]

The recent SOHJ online seminar was very well done. A good example of direct contact with industry that reflects positively on CAA. [Other]

Safety publications, Seminars, Training workshops. [Maintenance]

Working to proactively improve the toolbox of Training Resources. [Other commercial and flight training]



Vector magazine is fantastic. The introduction to aviation knowledge points and legal rules to find out is also very well done. The material is very easy to download. There are many more to do that are also very good. [Private / Recreational]

Starting to provide good relevant education (overhead join, navigation etc) [Private / Recreational]

The roadshow type even they held for the over head re-join procedures was really good [Other commercial and flight training]

The educational approach to a range of topics is fantastic. [Private / Recreational]

Training and Certification, both CAANZ Teams are doing a fantastic service, nothing is ever to much! [Air transport, Maintenance]

I think the seminars that the CAA has been doing is a good thing. Especially as a student pilot. [Other commercial and flight training]

In terms of the PPL syllabus, and it's delivery by the Tauranga Aero Club, I have been very impressed by the various modules and the teaching delivery. [Air transport, Private / Recreational]

Safer flying communications have really picked up lately. Loving the videos and webinars. [Private / Recreational]

Below are a selection of comments provided by stakeholders about the CAA's staff.

CAA staff – online survey



The staff at the Christchurch office are very professional and fair. The medical team is really proactive too. [Other commercial and flight training]

Well our last audit went well. It was not as daunting as I thought it was going to be. The two guys that conducted it where hard but fair and made you feel at ease. It felt like they where working with you not against you. [Agricultural aviation, Other commercial and flight training]

Some staff who engage directly with operators are practical, helpful, and beneficial to aviation safety. [Air transport, Private / Recreational, Maintenance]

Given the COVID restrictions and working from home, CAA staff have done an exceptional job, especially as they couldn't travel to Auckland for four months and must had built up a huge backlog of inspections during that time. [Private / Recreational]

One example of a recent audit, professional staff acting with integrity and professionalism. Communications improvement [Maintenance]

Individuals within the CAA are friendly, co-operative and helpful most of the time. [Private / Recreational, Maintenance]

Safety Advisors, they are the only contact we have outside of audits with the CAA and it is a pleasure to catch up with them each month. [Air transport, Agricultural aviation, Other commercial and flight training, Private / Recreational, Maintenance]



Great engagement by the staff and always willing to work with organisation on any issues or concerns. [Air transport]

The CAA staff have been really accommodating and have done their best to help operators with this rather than hang them out. [Air transport, Agricultural aviation, Other commercial and flight training, Private / Recreational, Maintenance]

Individuals I have contact with in CAA are supportive and helpful. I believe CAA have a good blend of regulatory , educational ,helpful staff at their disposal. [Agricultural aviation]

The endeavours of those staff who do promptly respond to enquiries or necessary changes is appreciated. [Air transport]

Some good new staff who know their stuff. [Maintenance]

There are individuals in CAA that do a fantastic job. [Agricultural aviation]

The people are friendly and fun to work with while still maintaining professional standards. [Maintenance]

Hiring top-quality Flight Ops Inspectors. [Air transport]

They are very approachable and helpful across many issues you may have. [Air transport]



Aviation sector analysis

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Private / recreational flyers (under a Part 61 licence or under a licence endorsement issued by a Part 149 organisation) tend to be more negative about the CAA than the rest of the aviation sector.

Sector analysis

		Total Population	Private / Recreational	Air transport	Other commercial and flight training	Maintenance	Agricultural aviation	RPAS	Aviation infrastructure	Other
<i>Being and feeling safe</i>	I feel safe when operating in the New Zealand aviation system	81%								
	Overall, I believe that the New Zealand Aviation System is safe	80%								
<i>CAA leadership and influence</i>	The CAA positively influences my safety performance in the aviation sector	54%		●			●		●	
	The CAA provides high quality advice, education, and support	49%		●		●	●		●	
	The CAA is a firm but fair safety regulator of New Zealand civil aviation	48%	●							
	I trust the CAA	46%	●				●			
	The CAA engages effectively with me	44%	●							
	I find the CAA approachable and easy to interact with	43%	●	●						
	The CAA is open and accountable for its actions	28%	●	●		●	●			
<i>Active regulatory stewardship</i>	Supporting documentation is provided in a timely manner	60%				●			●	
	CAA's responses to risks in the civil aviation system are reasonable and proportionate	43%	●		●					
	Implementation is efficient and effective, following the release of a Rule	40%	●	●						
<i>Professional regulatory practice</i>	Safety information and analysis is shared widely and used to educate the aviation sector	63%		●			●	●	●	
	Lessons from safety investigations are shared throughout the sector	60%	●	●					●	●
	CAA staff that I deal with are competent and knowledgeable	57%	●		●					
	The CAA treats me fairly and with respect	56%	●							
	CAA staff that I deal with have a consistent understanding of regulations and apply rules consistently	46%	●				●			
	CAA staff provide timely responses to my requests for work or queries	43%	●	●	●					
	The CAA operates in line with 'Just Culture' principles	42%	●		●					
I find CAA advice and decision making consistent	33%	●								

●● Significantly higher / lower than average (95% confidence level), ●● Significantly higher / lower than average (90% confidence level).

Base: All respondents (n=1,992), Agricultural aviation (n=115), Other commercial and flight training (n=275), Private / Recreational (n=1,051), Aviation infrastructure (n=36), Air transport (n=569), RPAS (n=72), Maintenance (n=183), Other (n=30).



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