

Online Further Submission

Further Submitters Name	Richard Milner	Further Submitter #188
Further Submitter Number	FS188	
Wish to be heard	Yes	
FS qualifier	a person who has an interest in the proposal that is greater than the interest the general public has (e.g. land owner, resource user)	
FS qualifier reason	<p>I am the Executive Officer of UAVNZ a division of Aviation New Zealand that reflects the commercial interests of the use of unmanned aircraft in New Zealand.</p> <p>I am a Unmanned aircraft operator with over 3000hours experience and am a flight instructor and examiner for Unmanned aircraft. I am also a commercial helicopter pilot with 18 years experience and am an Aviation Consultant also.</p> <p>It is important to note that I am also the Executive officer for the New Zealand Helicopter Association and that the submissions should not be considered joint in any way.</p>	
Joint presentation	No	
Attention:	Mr. Richard Milner	
Contact organisation	UAVNZ	
Address for service	5-7 Willeston Street Wellington	FS188.01
Telephone		
Mobile	0272733784	
Email	chiefpilot@flyuav.co.nz	
Online further submitter?	Yes	
Date raw FS lodged	02/09/2023 12:08am	

Further submission points

Raw FS number	Original submitter	Related Submission Point	Plan section	Provision	OS Decision Requested	SupportOppose	FS Decision requested	Reasons
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FS188.1	NZ Agricultural Aviation Association	S182.001	Definitions	New Definition	Include a new definition Agricultural aviation activities. means the intermittent operation of an aircraft from a rural airstrip or helicopter landing area for primary production activities, and; conservation activities for biosecurity, or biodiversity purposes; including stock management, and the application of fertiliser, agrichemicals, or vertebrate toxic agents (VTA's). For clarity, aircraft includes fixed wing aeroplanes, helicopters, and unmanned aerial vehicles (UAV's).	Support in part	Allow in part
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We seek the inclusion of the minimum weight of 200kg be added to the definition to read:

Agricultural aviation activities.

means the intermittent operation of an aircraft from a rural airstrip or helicopter landing area for primary production activities, and; conservation activities for biosecurity, or biodiversity purposes; including stock management, and the application of fertiliser, agrichemicals, or vertebrate toxic agents (VTA's). For clarity, aircraft includes fixed

increased in-
wing
aeroplanes,
helicopters,
and
unmanned
aerial vehicles
(UAV's) above
200kg.

Our reasons
for this is so
that UAV that
are smaller
than 200kg
are not
limited in
their function
in the plan as
they provide
vital works in
the areas of
but not
limited to
safety,
infrastructure,
asset
maintenance,
survey,
surveillance,
TV and Film,
Training. UAV
provide
financial gain
to the
economy and
their use has
also
improved
safety to
many fields
of work

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including agriculture. Small UAV (under 200kg) will provide agricultural aviation to work closer to boundaries and in areas that larger manned aircraft can not operate. However with the restrictions of all UAV from 250g and up this could be a significant limiting factor.