

#1

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, May 31, 2021 11:52:33 AM  
**Last Modified:** Monday, May 31, 2021 12:00:14 PM  
**Time Spent:** 00:07:40  
**IP Address:** [REDACTED]

Page 1

**Q1** Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Heliservices NZ

**Q3**

Email address

**Q4**

Who are you submitting on behalf of?

**Other,**

If you are not submitting as an individual, please specify who you represent.:

Heliservices NZ

**Q5**

Briefly tell us your interest in drones

Helicopter Operator

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

Page 3

**Q7**

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Reducing limitations in place of drones is a seriously poor decision

---

**Q8**

No

Do you think the proposed series of measures would help achieve the desired objectives?

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**Q9**

No

Do you think the proposed series of measures would address the problems and opportunities identified?

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**Q10**

Respondent skipped this question

Are there any other problems and opportunities you can think of?

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**Q11**

No

Do you agree with the proposed order of implementation of the measures?

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Page 4

**Q12**

Yes

Should drones have their own standalone Rule Part?

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**Q13**

No

Should we review the four-kilometre minimum flight distance from aerodromes?

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**Q14**

No – keep the existing consent provision

Should we change the requirement to gain consent to fly above property?

---

**Q15**

No – keep the existing requirement

Should we change the requirement to gain consent to fly above people?

---

**Q16**

Other (please specify):

Ridiculous idea and will not be monitored

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

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**Q17**

Respondent skipped this question

Are there any other major Rules changes we should consider?

**Q18**

No

Are there any minor changes to the Rules that would make them easier for you to understand?

**Q19**

Respondent skipped this question

What do you think of the proposed minor Rules changes?

**Q20**

Respondent skipped this question

Are there any other changes we should consider?

Page 5

**Q21**

Yes,

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Please comment:

Must be completed and shown to obtain a drone from a shop. No license no sale

**Q22**

What impact would a basic pilot qualification likely have on you?

If done correctly skill more people up on what is safe

**Q23**

A practical examination of skill and a paper based written theory test (at a provider)

What format should this test take?

**Q24**

Yes, other age (please specify):

Should there be a minimum age for basic pilot qualification?

18

**Q25**

No

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

**Q26**

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

**Q27**

**Yes**

Should we introduce the proposed drone registration system?

**Q28**

What impact would drone registration likely have on you?

Should enable people to be contacted and held accountable for actions

**Q29**

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Digital. All to be registered

**Q30**

**No**

Should there be a minimum weight threshold for registering a drone?

**Q31**

**No**

Should certain drones not need to be registered (select all that apply)

Page 7

**Q32**

**Yes**

Should we introduce remote ID?

**Q33**

**Respondent skipped this question**

What impact would remote ID likely have on you?

Page 8

**Q34**

**Yes,**

Should we consider introducing geo-awareness?

Please comment:

Drone must be height above ground and immediately below the drone not above where the pilot is

**Q35**

**Respondent skipped this question**

What impact would geo-awareness likely have on you?

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**Q36**

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

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**Q37**

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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## #2

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, May 31, 2021 6:30:58 PM  
**Last Modified:** Monday, May 31, 2021 6:49:37 PM  
**Time Spent:** 00:18:38  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Isaac Chaplin-Hall

**Q3**

Email address

[REDACTED]

**Q4**

**Myself**

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

I recreationally fly drones and am interested in the future of them.

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

**Q7**

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I think instead of a sub 250g weight for rules not to apply, it should be increased to 500g

**Q8**

Do you think the proposed series of measures would help achieve the desired objectives?

**Yes, with changes ,**

Please comment::

I think a theory test should be mandatory however registration of drones is excessive as the drones myself and my community fly are forever changing as we can upgrade frames and components regularly.

**Q9**

Do you think the proposed series of measures would address the problems and opportunities identified?

**Yes**

**Q10**

Are there any other problems and opportunities you can think of?

Operators will not want to go through the hassle of too many of the proposed series of measures.

**Q11**

Do you agree with the proposed order of implementation of the measures?

**Yes**

Page 4

**Q12**

Should drones have their own standalone Rule Part?

**Yes**

**Q13**

Should we review the four-kilometre minimum flight distance from aerodromes?

**Yes,**

Please comment:

2km seems suitable.

**Q14**

Should we change the requirement to gain consent to fly above property?

**No – keep the existing consent provision**

**Q15**

Should we change the requirement to gain consent to fly above people?

**Yes – use ‘safe distances’ as an alternative**

**Q16**

**30 metres**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

**Q17**

**Respondent skipped this question**

Are there any other major Rules changes we should consider?

**Q18**

**No**

Are there any minor changes to the Rules that would make them easier for you to understand?

**Q19**

**Respondent skipped this question**

What do you think of the proposed minor Rules changes?

**Q20**

**Respondent skipped this question**

Are there any other changes we should consider?

Page 5

**Q21**

**Yes**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

**Q22**

What impact would a basic pilot qualification likely have on you?

positive as I can inform others about it and know that we can keep the drone community safe.

**Q23**

**Electronic/online theory test**

What format should this test take?

**Q24**

**Yes, 14 years**

Should there be a minimum age for basic pilot qualification?

**Q25**

**I don't know**

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?



**Q26**

Respondent skipped this question

Is there any other special authorisations you would like to see?

---

Page 6

**Q27**

**Yes, with changes,**

Should we introduce the proposed drone registration system?

Please comment:  
Change the weight to 500g

---

**Q28**

What impact would drone registration likely have on you?

Negative as I try to keep my drones lightweight as possible and the inevitable crash happens and if i break something I repair with a different part so the drone can be potentially forever changing and will not be the same for too long.

---

**Q29**

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

---

**Q30**

**Yes, but with a different weight as the threshold ,**

Should there be a minimum weight threshold for registering a drone?

Please comment:  
500g

---

**Q31**

**Yes, others (please specify below),**

Should certain drones not need to be registered (select all that apply)

Please comment:  
Acro or freestyle drones.

---

Page 7

**Q32**

**No,**

Should we introduce remote ID?

Please comment:  
Too heavy for specific drones.

---

**Q33**

What impact would remote ID likely have on you?

Negative, as I keep my drone lightweight to increase battery life, my platform is small and has limited space for such a module and it could be susceptible to damage in the event of a crash.

---

Page 8

**Q34**

Yes

Should we consider introducing geo-awareness?

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**Q35**

Respondent skipped this question

What impact would geo-awareness likely have on you?

---

Page 9

**Q36**

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

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**Q37**

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#3

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, May 31, 2021 7:55:51 PM  
**Last Modified:** Monday, May 31, 2021 8:23:00 PM  
**Time Spent:** 00:27:08  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Brett

**Q3**

Email address

[REDACTED]

**Q4**

**Myself**

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

model planes as a kid of 8 taught by my uncle and passed the great hobby to my cousins and family.

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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**Q7**

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

there is no need for these rules in a rural area, and disagree with registration,remote id etc, you are wanting rules where no rules are needed and no one has ever died from a drone incident in the world so we dont need these rules,it is a rev-anew collecting act I will not be part of.

**Q8**

Do you think the proposed series of measures would help achieve the desired objectives?

**I don't know,**

Please comment::

waste of time and tax payers money as no one will follow the rules

**Q9**

Do you think the proposed series of measures would address the problems and opportunities identified?

**I don't know,**

Please comment:

you will not stop criminals flying drones just like you will not stop them robbing people.

**Q10**

Are there any other problems and opportunities you can think of?

no problems with our Hobby....its not a Crime !!!!!!!!!!!

**Q11**

Do you agree with the proposed order of implementation of the measures?

**No,**

Please comment:

No leave our hobby alone

Page 4

**Q12**

Should drones have their own standalone Rule Part?

**No**

**Q13**

Should we review the four-kilometre minimum flight distance from aerodromes?

**No**

**Q14**

Should we change the requirement to gain consent to fly above property?

**Yes – remove the consent provision completely**

**Q15**

Should we change the requirement to gain consent to fly above people?

**No – keep the existing requirement**

**Q16**

**50 meters**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17**

Are there any other major Rules changes we should consider?

Yes, there should be no rules added for planes

---

**Q18**

**I don't know**

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19**

What do you think of the proposed minor Rules changes?

there should be No rules

---

**Q20**

Are there any other changes we should consider?

no rules for planes

---

Page 5

**Q21**

**No**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

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**Q22**

What impact would a basic pilot qualification likely have on you?

I would not comply so none

---

**Q23**

**Other (please specify):**

What format should this test take?

no test

---

**Q24**

**No**

Should there be a minimum age for basic pilot qualification?

---

**Q25**

**I don't know**

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

**Q26**

Is there any other special authorisations you would like to see?

no

---

Page 6

**Q27**

Should we introduce the proposed drone registration system?

**No,**  
Please comment:  
no way

---

**Q28**

What impact would drone registration likely have on you?

none as I would no need to register

---

**Q29**

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

do not like this, dont do it....

---

**Q30**

Should there be a minimum weight threshold for registering a drone?

**Yes, but with a different weight as the threshold ,**  
Please comment:  
2kg, but no registration needed in rural area

---

**Q31**

Should certain drones not need to be registered (select all that apply)

**Yes, others (please specify below),**  
Please comment:  
rural area not need to register

---

Page 7

**Q32**

Should we introduce remote ID?

**No**

---

**Q33**

What impact would remote ID likely have on you?

none as i will not do this

---

Page 8

**Q34**

No

Should we consider introducing geo-awareness?

---

**Q35**

What impact would geo-awareness likely have on you?

none

---

Page 9

**Q36**

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

no rules needed for rural users

---

**Q37**

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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# #4

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, May 31, 2021 8:36:22 PM  
**Last Modified:** Monday, May 31, 2021 8:48:05 PM  
**Time Spent:** 00:11:42  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Michael Burke

**Q3**

Email address

[REDACTED]

**Q4**

**Myself**

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

Fully interested in flying my drone when i can and aloud within the laws of new zealand and not to endanger anyone else

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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**Q7**

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Drone registration yes

---

**Q8**

Do you think the proposed series of measures would help achieve the desired objectives?

**Yes, with changes ,**

Please comment::

If that law comes in, nobody is going to bother registering their planes and drones anyway, it'll be another Auckland harbour bridge bike ride.

---

**Q9**

Do you think the proposed series of measures would address the problems and opportunities identified?

**No,**

Please comment:

You need to educate people and not make people register there drones

---

**Q10**

Are there any other problems and opportunities you can think of?

People wont do it and keep continuing to fly

---

**Q11**

Do you agree with the proposed order of implementation of the measures?

**No,**

Please comment:

How are you going to police it when the CAA doesn't even fine people and just wastes there time in following up on cases then say even though you admit to flying illegally they dont even fine you

---

Page 4

**Q12**

Should drones have their own standalone Rule Part?

**No ,**

Please comment:

they share the same airspace

---

**Q13**

Should we review the four kilometre minimum flight distance from aerodromes?

**Yes,**

Please comment:

it is safe to fly within that airspace as long as you are under the height limit and are aware of aircraft or you must have a ADS-B on you

---

**Q14**

Should we change the requirement to gain consent to fly above property?

**Yes – remove the consent provision completely,**

Please comment:

planes fly over our heads and property and we cant say they must get permission so remove this silly rule

---

**Q15** Yes – remove the requirement completely

Should we change the requirement to gain consent to fly above people?

---

**Q16** 10 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17** Respondent skipped this question

Are there any other major Rules changes we should consider?

---

**Q18** No

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19** Respondent skipped this question

What do you think of the proposed minor Rules changes?

---

**Q20** Respondent skipped this question

Are there any other changes we should consider?

---

Page 5

**Q21** No

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

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**Q22** What impact would a basic pilot qualification likely have on you?

i would not fly

---

**Q23** Electronic/online theory test

What format should this test take?

---

**Q24** No

Should there be a minimum age for basic pilot qualification?

---

**Q25**

No

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

**Q26**

Respondent skipped this question

Is there any other special authorisations you would like to see?

---

Page 6

**Q27**

No

Should we introduce the proposed drone registration system?

---

**Q28**

Respondent skipped this question

What impact would drone registration likely have on you?

---

**Q29**

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

---

**Q30**

No

Should there be a minimum weight threshold for registering a drone?

---

**Q31**

Yes, drones flown solely indoors,

Should certain drones not need to be registered (select all that apply)

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

---

Page 7

**Q32**

Yes

Should we introduce remote ID?

---

**Q33**

Respondent skipped this question

What impact would remote ID likely have on you?

---

Page 8

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**Q34**

Yes

Should we consider introducing geo-awareness?

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**Q35**

Respondent skipped this question

What impact would geo-awareness likely have on you?

---

Page 9

**Q36**

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

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**Q37**

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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PROACTIVELY RELEASED BY  
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#5

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, May 31, 2021 8:53:51 PM  
**Last Modified:** Monday, May 31, 2021 9:22:28 PM  
**Time Spent:** 00:28:37  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

P Tyler

**Q3**

Email address

[REDACTED]

**Q4**

**Myself**

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

Recreational drone and model aircraft flying

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

**Q7**

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

They are draconian and unnecessary no changes are needed

**Q8**

No

Do you think the proposed series of measures would help achieve the desired objectives?

**Q9**

No

Do you think the proposed series of measures would address the problems and opportunities identified?

**Q10**

Respondent skipped this question

Are there any other problems and opportunities you can think of?

**Q11**

No

Do you agree with the proposed order of implementation of the measures?

Page 4

**Q12**

No

Should drones have their own standalone Rule Part?

**Q13**

No

Should we review the four-kilometre minimum flight distance from aerodromes?

**Q14**

No – keep the existing consent provision

Should we change the requirement to gain consent to fly above property?

**Q15**

No – keep the existing requirement

Should we change the requirement to gain consent to fly above people?

**Q16**

10 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

**Q17**

Respondent skipped this question

Are there any other major Rules changes we should consider?

---

**Q18**

I don't know

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19**

Respondent skipped this question

What do you think of the proposed minor Rules changes?

---

**Q20**

Respondent skipped this question

Are there any other changes we should consider?

---

Page 5

**Q21**

No

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

---

**Q22**

Respondent skipped this question

What impact would a basic pilot qualification likely have on you?

---

**Q23**

Other (please specify):  
None

What format should this test take?

---

**Q24**

No

Should there be a minimum age for basic pilot qualification?

---

**Q25**

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

**Q26**

Respondent skipped this question

Is there any other special authorisations you would like to see?

---

Page 6

**Q27**

Should we introduce the proposed drone registration system?

**No,**

Please comment:

Registration is not needed for Firearms so why is it needed for Drones?

**Q28**

What impact would drone registration likely have on you?

None

**Q29**

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Respondent skipped this question

**Q30**

Should there be a minimum weight threshold for registering a drone?

**No**

**Q31**

Should certain drones not need to be registered (select all that apply)

Please comment:

No registration is needed

Page 7

**Q32**

Should we introduce remote ID?

**No**

**Q33**

What impact would remote ID likely have on you?

Respondent skipped this question

Page 8

**Q34**

Should we consider introducing geo-awareness?

**No**

**Q35**

What impact would geo-awareness likely have on you?

Respondent skipped this question

Page 9



**Q36**

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

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**Q37**

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#6

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, May 31, 2021 9:22:31 PM  
**Last Modified:** Monday, May 31, 2021 9:34:17 PM  
**Time Spent:** 00:11:45  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Tom Roberts

**Q3**

Email address

[REDACTED]

**Q4**

**Myself**

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

I'm a hobbyist and think they could diversify our delivery market in the future

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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**Q7**

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

In theory this sounds good. In practicality it wont work. Enforcement would be a cumbersome burden on an already stretched system. I would recommend that drone users could register their use of a dron in an area much the same way doc allows hunters. Its efficient while keeping people accountable about what they can and cannot do.

**Q8**

No

Do you think the proposed series of measures would help achieve the desired objectives?

**Q9**

No

Do you think the proposed series of measures would address the problems and opportunities identified?

**Q10**

Are there any other problems and opportunities you can think of?

Reinforcement while allowing creative uses.

**Q11**

No

Do you agree with the proposed order of implementation of the measures?

Page 4

**Q12**

I don't know

Should drones have their own standalone Rule Part?

**Q13**

I don't know

Should we review the four-kilometre minimum flight distance from aerodromes?

**Q14**

Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above property?

**Q15**

Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above people?

**Q16**

**50 meters**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

**Q17**

**Respondent skipped this question**

Are there any other major Rules changes we should consider?

**Q18**

**I don't know**

Are there any minor changes to the Rules that would make them easier for you to understand?

**Q19**

**Respondent skipped this question**

What do you think of the proposed minor Rules changes?

**Q20**

**Respondent skipped this question**

Are there any other changes we should consider?

Page 5

**Q21**

**No**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

**Q22**

What impact would a basic pilot qualification likely have on you?

Its impractical and would be difficult to enforce. It would mean jumping through another hoop just to fly my drone in a controlled area.

**Q23**

**Electronic/online theory test**

What format should this test take?

**Q24**

**No**

Should there be a minimum age for basic pilot qualification?

**Q25**

**I don't know**

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

**Q26**

Respondent skipped this question

Is there any other special authorisations you would like to see?

---

Page 6

**Q27**

No

Should we introduce the proposed drone registration system?

---

**Q28**

What impact would drone registration likely have on you?

It would be cumbersome and would mean more hoops with little effect on your desired outcome

---

**Q29**

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Going too far and doesnt stop self built drones. Wouldn't achieve what you want it to achieve.

---

**Q30**

No

Should there be a minimum weight threshold for registering a drone?

---

**Q31**

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors,

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Yes, others (please specify below),

Please comment:

Flown above public land

---

Page 7

**Q32**

No

Should we introduce remote ID?

---

**Q33**

Respondent skipped this question

What impact would remote ID likely have on you?

---

Page 8

**Q34**

No

Should we consider introducing geo-awareness?

---

**Q35**

Respondent skipped this question

What impact would geo-awareness likely have on you?

---

Page 9

**Q36**

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

---

**Q37**

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

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THE MINISTRY OF TRANSPORT

#7

COMPLETE

Collector: Web Link 1 (Web Link)  
Started: Monday, May 31, 2021 9:26:53 PM  
Last Modified: Monday, May 31, 2021 9:42:32 PM  
Time Spent: 00:15:39  
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Darryl

Q3

Email address

Q4

Myself

Who are you submitting on behalf of?

Q5

Briefly tell us your interest in drones

Personal usage

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Over the top & not needed. Let the control come under the rc clubs

---

Q8

No

Do you think the proposed series of measures would help achieve the desired objectives?

---

Q9

No

Do you think the proposed series of measures would address the problems and opportunities identified?

---

Q10

Are there any other problems and opportunities you can think of?

Yes the caa arnt the correct identity to do this, use the clubs and incourge theses to work with people & family's

---

Q11

No

Do you agree with the proposed order of implementation of the measures?

---

Page 4

Q12

Yes,

Should drones have their own standalone Rule Part?

Please comment:

But the rules are wrong, 4kms from a airport is nuts maybe 1km

---

Q13

Yes

Should we review the four-kilometre minimum flight distance from aerodromes?

---

Q14

Yes – remove the consent provision completely

Should we change the requirement to gain consent to fly above property?

---

Q15

Yes – remove the requirement completely

Should we change the requirement to gain consent to fly above people?

---



**Q16**

Respondent skipped this question

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17**

Respondent skipped this question

Are there any other major Rules changes we should consider?

---

**Q18**

I don't know

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19**

What do you think of the proposed minor Rules changes?

The worst I've ever seen

---

**Q20**

Respondent skipped this question

Are there any other changes we should consider?

---

Page 5

**Q21**

Yes, with changes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

---

**Q22**

What impact would a basic pilot qualification likely have on you?

Nothing but might make it easier for general public

---

**Q23**

Electronic/online theory test

What format should this test take?

---

**Q24**

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

---

**Q25**

No

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

Q26

Is there any other special authorisations you would like to see?

The general rc clubs

---

Page 6

Q27

No

Should we introduce the proposed drone registration system?

---

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

---

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

---

Q30

Yes, but with a different weight as the threshold ,

Should there be a minimum weight threshold for registering a drone?

Please comment:

1kg+

---

Q31

Yes, others (please specify below),

Should certain drones not need to be registered (select all that apply)

Please comment:

Every drone shouldn't need to reg, only commercial drones

---

Page 7

Q32

No

Should we introduce remote ID?

---

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

---

Page 8

Q34

No

Should we consider introducing geo-awareness?

---

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

---

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

---

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

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#8

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, May 31, 2021 8:44:16 PM  
**Last Modified:** Monday, May 31, 2021 9:50:24 PM  
**Time Spent:** 01:06:08  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Jeroen Hattink

**Q3**

Email address

[REDACTED]

**Q4** **Myself**

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

Hobby and commercial use

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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**Q7**

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

All model aviation is degraded as drones and those who operate them labelled as non compliant!  
All cows are animals but not all animals are cows.

The trouble is over the counter drones like DJI and other camera drones where operators have no background, track those commercial built drones but not hobby drones. The hobby drones is the sector where people effectively have created and progressed what now becomes capitalised industry and without the goodwill of this community this would never have been developed and quad(multi)-copters can now fly stable and controlled. Taking this away will stop development. CAA NZ is not going to pay for development of onboard adsb or geolocation! So who is going to do this? And can this be done on a under 250g drone (why this weight limit? Has CAA never been to a model flying field and have a chat with the people there?

Holding a licence? What for? And who is going to teach this at what cost? Who wants to sit through this for a hobby?

The only objective is to capitalise a hobby market where the cost will be higher than the benefit and no safety is increased.

All of this is only done to sell airspace to non existing commercial operators! Are they going to be bound by the same rules?

**Q8**

Do you think the proposed series of measures would help achieve the desired objectives?

**No,**

Please comment::

Taking more money out of a hobby will stop progress and a lot of people will continue to fly as the proposed rules can't be enforced, in-house or under the canopy flying will happen. A HAM-Radio approach would serve better where the government works with a community and not against.

**Q9**

Do you think the proposed series of measures would address the problems and opportunities identified?

**No,**

Please comment:

Who is going to develop the necessary applications and who is paying for this? Current drones won't be able to be retrofitted, like old cars, you can't ban them from the roads, are you banning the out of the sky?

**Q10**

Are there any other problems and opportunities you can think of?

Who is going to enforce an aviation enthusiastic kid in a park with a toy aeroplane that can glide? Is he/she/it/they going to be fined for trying out a scientific principle? Will the toy be confiscated?

Who will want to go into an industry in the future if you have to deal with negativity before even getting in to a hobby?

**Q11**

Do you agree with the proposed order of implementation of the measures?

**No,**

Please comment:

People with no clue on the subject, refusal to listen and having a dialogue with the hobby groups and only money as their main objective are in this panel. Get the people in this committee to actually engage with the hobby group and learn to fly model aircraft, helicopters and quadcopters from a hobby perspective, learn the time and effort behind it and the self control already in place in clubs and park flyers.

Page 4

**Q12**

Should drones have their own standalone Rule Part?

**No ,**

Please comment:

Model aviation should be a part of aviation as it is in part 101 & 102 and free below 250m (safety height for VFR manned aviation). putting more restrictions on this is not making anything safe.

**Q13**

Should we review the four-kilometre minimum flight distance from aerodromes?

**No ,**

Please comment:

Model aviation has never breached this. It is over the counter drones that are an issue where people at point of buying are not informed.

**Q14**

Should we change the requirement to gain consent to fly above property?

**No – keep the existing consent provision,**

Please comment:

If you integrate 'safe distance', then all commercial drones need to follow the same rule and can't deliver goods or services so you can't sell a spaces when it becomes inaccessible!

**Q15**

Should we change the requirement to gain consent to fly above people?

**No – keep the existing requirement,**

Please comment:

In model aviation the rule has always been not to fly over people, or if there will be flights over people it has to be indicated or notified of that happening. Sports events can benefit from a different perspective and this should follow a safe procedure but shouldn't be common occurrence.

**Q16**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

At what speed is the drone operating?

**Q17**

Are there any other major Rules changes we should consider?

Bump the proposed 250g to 500g so model aviation remains sustainable from a home build perspective

---

**Q18**

Are there any minor changes to the Rules that would make them easier for you to understand?

**No,**

Please comment:

The rules are pretty clear at the moment and leave room for people to develop new applications and use.

---

**Q19**

What do you think of the proposed minor Rules changes?

Respondent skipped this question

---

**Q20**

Are there any other changes we should consider?

Respondent skipped this question

---

Page 5

**Q21**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

**No,**

Please comment:

You can drive a car in NZ without holding a license, why should you be a holder of a pilots license when you fly model aircraft? The self governance within clubs and groups is working. Again you destroy the wrong target groups.

---

**Q22**

What impact would a basic pilot qualification likely have on you?

I would fly without as I have done for 40 years and I would not comply with that rule

---

**Q23**

What format should this test take?

Other (please specify):

What a leading question, this means it has been decided!

---

**Q24**

Should there be a minimum age for basic pilot qualification?

Yes, other age (please specify):

Kids as young as 6 should be encouraged to play and learn under supervision

---

**Q25**

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

**No,**

Please comment:

Again a leading question that you have already made a decision. Why is no-one actually talking to flying clubs and local groups? It must be all about making money and not safety or creating a space for hobby

---

**Q26**

Is there any other special authorisations you would like to see?

Leading question that the decision already has been made over the backs of a hobby group

---

Page 6

**Q27**

Should we introduce the proposed drone registration system?

**No,**

Please comment:

you make people a target and violate their privacy rights under current legislation (Privacy act). Model aircraft over 15kg have already a system in place for identification and over 25kg are registered with CAA. And older model aircraft couldn't be retrofitted, how would that work? Exemptions for drones bought before 2022?

---

**Q28**

What impact would drone registration likely have on you?

I wouldn't register model aircraft (or they all get the same number)

---

**Q29**

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Who is going to develop this? And who is going to monitor this? And who will pay for this?

If I send an ID with 10mW the rang is less then 500m this is within line of sight and this means it can't be monitored from wellington.

---

**Q30**

Should there be a minimum weight threshold for registering a drone?

**Yes, but with a different weight as the threshold ,**

Please comment:

Threshold should be 15kg as per current legislation unless it is a commercial drone used for profit.

---

**Q31**

Should certain drones not need to be registered (select all that apply)

**Yes, drones flown solely indoors,**

**Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)**

,

**Yes, others (please specify below),**

Please comment:

Model aircraft flown on private land or flown on private land with consent from owner.Or on council approved land like public parks as it is at the moment.

---

Page 7



Q32

Should we introduce remote ID?

No,

Please comment:

Who is going to pay for development and in what drones does it need to be installed? Sub 250g with added adsb, geolocation and remote ID? You haven't sorted out GA yet and you think this can be done in light model aircraft?

---

Q33

What impact would remote ID likely have on you?

It wouldn't be installed as it violates privacy

---

Page 8

Q34

Should we consider introducing geo-awareness?

No,

Please comment:

For hobby purpose geo awareness is already done by clubs and hobby groups. The problem is DJI drones that can be operated by idiots that choose to ignore the rules anyway, what would change? The current map works pretty good.

---

Q35

What impact would geo-awareness likely have on you?

It wouldn't change my flying as it wouldn't be retrofitted or fitted. It is not done for cars or GA, why target a hobby?

---

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

It is easier in NZ to drive a car then to fly hobby model aircraft, many deaths per year but still no driver training in NZ.  
It is easier to buy a gun in NZ then to fly hobby model aircraft, mosque attack..  
It is easier to buy a knife in NZ then to fly a model aircraft..  
It is easier to buy alcohol in NZ then to fly a model aircraft.

It looks like someone is looking for money and hasn't done any homework but is pushing through legislation without having a clue. How about starting a dialogue first with the hobby groups and get an understanding of what is actually happening. Based on that you can act on recommendations and work together with the different parties.

And make sure that a commercial future operator has to fulfil the same requirement as you propose for hobbyists! See if they still have an interest, not flying over people without consent and not flying over private property!

---

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

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#9

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, May 31, 2021 7:58:20 PM  
**Last Modified:** Monday, May 31, 2021 9:51:45 PM  
**Time Spent:** 01:53:24  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Mitchell

**Q3**

Email address

[REDACTED]

**Q4**

**Myself**

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

Recreational FPV flight.

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

A surprising amount of the proposed changes have nothing to do with improving safety. Most of the proposal seems to be written on the assumption that all drones out there are DJI or equivalent.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

There seems to be more of a focus on enforcement ("accountability") rather than safety. Additional restrictions seem to be in direct contradiction to objective #2

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes, with changes

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

Yes

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

Clarity is always a good thing. The existing rules can be confusing, and something aren't entirely clear leading to the feeling that you need to make a judgement call.

Q13

Should we review the four kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

Manned flight safety obviously needs to be highest priority. Given the max altitude restrictions on drones currently, and the min altitude requirements of general aviation, there shouldn't be any airspace cross-over anyway (outside of immediate landing/take-off). It doesn't make much sense having a blanket 4km restriction.

Q14

Should we change the requirement to gain consent to fly above property?

Yes – use 'safe distances' as an alternative

**Q15** **Yes – use 'safe distances' as an alternative**

Should we change the requirement to gain consent to fly above people?

---

**Q16** **Other (please specify):**  
20 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17**  
Are there any other major Rules changes we should consider?

Removing VLOS observer requirements for FPV drones. The existing requirements haven't kept pace with the availability and advances in FPV technology. I don't think there's any appreciable safety benefit in having a spotter maintaining VLOS - FPV provides visual from the drone, and a pilot can still hear what's happening around them. In a situation where a bunch of FPV pilots are out flying together, all this restriction does is make one pilot sit out a race while they observe.

I'd consider this a major rule change, rather than the minor rule change discussion currently happening.

---

**Q18** **I don't know**

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19**  
What do you think of the proposed minor Rules changes?

Removing the 15-25kg category seems sensible. Thoughts regarding FPV systems are included in the major changes above. I strongly believe that there is no need for a VLOS observer when operating an FPV drone.

---

**Q20** **Respondent skipped this question**

Are there any other changes we should consider?

---

Page 5

**Q21** **Yes, with changes ,**  
Please comment:  
I suspect the majority of people breaching the existing requirements - especially with regards to flying in restricted airspace - aren't aware of the requirements in the first place. Having a basic qualification would be a step toward making sure that all drone operators are aware of the requirements. The real challenge is going to be in ensuring retailers are telling people about the requirements when selling them drones.

---

Q22

What impact would a basic pilot qualification likely have on you?

I would get a piece of qualification. Maybe I could put it up on the wall.

---

Q23

Electronic/online theory test

What format should this test take?

---

Q24

No

Should there be a minimum age for basic pilot qualification?

---

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

No,

Please comment:

Given that the training undertaken by those organisations would already cover everything that needs to be known, and "...they can prove so" is in the wording, why not just have them do the test? What better way to prove they can pass the test than by passing the test? Everything then boils down to a simple "Have you passed the test?" question.

---

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

---

Page 6

Q27

Should we introduce the proposed drone registration system?

Yes, with changes,

Please comment:

#164 is ridiculous, and the wording of #165 implies that's something that would be intended for the future.

---

Q28

What impact would drone registration likely have on you?

My existing and future home-built drones would be expected to be registered.

I'd be far more likely to spend money on sub-250g builds in future, solely to save on paperwork. This has become a major development target for a large number of FPV pilots overseas.

---

**Q29**

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

How would integration with RealMe work for tourists etc?  
Having APIs for 3rd party integration is a great idea.  
Fees are a big turn-off. Especially annual and per-drone.

Again, this seems to be catered towards DJI-type drones rather than FPV. A large proportion of FPV drones are home built. All will suffer crashes. Most will require replacement parts.

What constitutes a drone that has been registered? Is my Drone of Theseus the same as what I initially registered? What's the point of asking for photo's of the drone?

If I pull the guts out and stick it in a new frame it's not going to look the same at all. Hell, changing prop colours is going to completely change it in the eyes of a layperson.

**Q30**

Should there be a minimum weight threshold for registering a drone?

**Yes, but with a different weight as the threshold ,**  
Please comment:  
I would prefer to see it higher, say 500grams.

**Q31**

Should certain drones not need to be registered (select all that apply)

**Yes, drones flown solely indoors,**  
**Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)**  
**Yes, others (please specify below),**  
Please comment:  
Home-built drones

Page 7

**Q32**

Should we introduce remote ID?

**No**

**Q33**

What impact would remote ID likely have on you?

Frustration and a lot of additional expense. Plus added weight on drones.  
On an FPV freestyle drone you'd be hard-pressed to maintain a stable bluetooth or wi-fi connection for a cell phone to receive. Let alone the risks of interference with other systems etc.  
I can see value in Remote ID for big heavy drones (say >1kg) that pose a noteworthy risk to other air traffic. If DJI want to put Remote ID into their drones, fine.  
But for home-built FPV drones this is an inconvenience at best.

#214 is suffering from the "All drones are DJI" mindset that pervades the document. Drones in the FPV community almost certainly don't have Remote ID functionality, and don't have any intention of adding it.

Page 8

**Q34**

Should we consider introducing geo-awareness?

**No,**

Please comment:

The AirShare map already provides information on restricted flight areas. Pilots are responsible for knowing what they're doing. I can see value in having restrictions around airfields etc, but if qualification becomes a requirement it should put an end to all the idiots flying around airfields anyway.

**Q35**

What impact would geo-awareness likely have on you?

A bunch of expense to retro-fit existing drones and build into new drones.

This section is particularly bad at falling into the "all drones are DJI" mindset.

The majority of FPV drones, especially racing ones, do not have GPS - nor do they have any intention of adding GPS. So #231 simply doesn't account for the FPV community.

Page 9

**Q36**

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

The bulk of the document ignores the existence of the FPV community, and instead focuses on commercially available drones (ie, DJI). This is understandable given the proportion of drones that fall into each category. I also suspect that the majority of the drone-related complaints received have not been about the FPV community.

I think more care needs to be taken to consult with those in the FPV hobby, and give consideration to our use case. Particularly the later goals of Remote ID & Geo awareness seem to be written without any knowledge of the existence of the FPV community, or based on assumptions that don't hold true in the hobby.

**Q37**

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.



#10

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, May 31, 2021 9:28:18 PM  
**Last Modified:** Monday, May 31, 2021 10:55:46 PM  
**Time Spent:** 01:27:27  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Jason L Materii

**Q3**

Email address

[REDACTED]

**Q4**

**Myself**

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

Hobbyist. General photography. Fun

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I can see the need for "rules updates & Geo-awareness" but Basic pilot qualifications, Drone registration & Remote identification seem ridiculous if the Ministry do want the people to believe their objectives. Geo-awareness & updates on "local laws" are always a necessity.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

Firearms users require less regulatory measures yet drones are a problem. I do not think so

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No,

Please comment:

The only identified problems are SOME of the Ministries 2015/current laws and its impossible enforcement.

Q10

Are there any other problems and opportunities you can think of?

Manned Aviation.

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

As a safe & respectful (can't afford to crash or loose the thing) "hobby" drone user, I do not agree or feel the need to "register" each drone is unnecessary as well as intrusive. The idea that a licensed firearms user is considered "less" dangerous than a "drone user" is appalling. I can only assume if more "drone hobbyists" knew the current and planned laws they too would feel the same way.

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

If they meet a required size & weight that is likely to cause serious damage.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Respondent skipped this question

Q14

Respondent skipped this question

Should we change the requirement to gain consent to fly above property?

---

Q15

Respondent skipped this question

Should we change the requirement to gain consent to fly above people?

---

Q16

Respondent skipped this question

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

---

Q18

Respondent skipped this question

Are there any minor changes to the Rules that would make them easier for you to understand?

---

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

---

Q20

Respondent skipped this question

Are there any other changes we should consider?

---

Page 5

Q21

No,

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Please comment:

No one would buy drones if they had to sit a test no matter how easy.

---

Q22

What impact would a basic pilot qualification likely have on you?

I would be breaking the law like some drink and drive.

---

Q23

Respondent skipped this question

What format should this test take?

---

Q24

Respondent skipped this question

Should there be a minimum age for basic pilot qualification?

---

Q25

Respondent skipped this question

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

---

Page 6

Q27

No,

Should we introduce the proposed drone registration system?

Please comment:

Firearms users do not register their stuff and to think people will comply in the first place.

---

Q28

What impact would drone registration likely have on you?

I would be breaking the law like some speed in their cars

---

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

---

Q30

Respondent skipped this question

Should there be a minimum weight threshold for registering a drone?

---

Q31

Respondent skipped this question

Should certain drones not need to be registered (select all that apply)

---

Page 7

Q32

Yes,

Should we introduce remote ID?

Please comment:

If the drone meets a required size & weight that is likely to cause serious damage.

---

**Q33**

What impact would remote ID likely have on you?

I would never own such a drone. None.

---

Page 8

**Q34**

Should we consider introducing geo-awareness?

**Yes,**

Please comment:

I am weary of the terms "sensitive sites and infrastructures", but the ability to see government/military related major airports/motorways even local govt bylaws is always necessary for informed flight.

---

**Q35**

What impact would geo-awareness likely have on you?

I do not fly in this manner. None.

---

Page 9

**Q36**

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

As a safe & respectful (can't afford to crash or loose the thing) "hobby" drone user, I feel the need to "register" each drone is unnecessary as well as intrusive. The idea that a licensed firearms user is considered "less" dangerous than a "drone user" is appalling. I can only assume if more "drone hobbyists" knew the current and planned laws they too would feel the same way.

---

**Q37**

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

#11

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, May 31, 2021 10:32:49 PM  
**Last Modified:** Monday, May 31, 2021 10:59:43 PM  
**Time Spent:** 00:26:54  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Steven Follows

**Q3**

Email address

[REDACTED]

**Q4**

**Myself**

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

Flying as a hobby

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Drones do not need to become a feature of the transport industry, they will be a hazard and an eyesore

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

The roads are there fore autonomous deliveries and transport

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No,

Please comment:

In a country like NZ I would have thought these industries proposed would be unnescesary

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

No

Page 4

Q12

Should drones have their own standalone Rule Part?

No

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

For commercial drones make it 10kms, if there is going to be as many as the Govt think it will cause all sorts of problems.

Q14

Should we change the requirement to gain consent to fly above property?

Yes – use 'safe distances' as an alternative

Q15

Should we change the requirement to gain consent to fly above people?

No – keep the existing requirement

**Q16**

Respondent skipped this question

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

**Q17**

Are there any other major Rules changes we should consider?

Make sure the people flying non commercial craft are not pushed out of the way just so the airspace can be charged for by introducing licence fees for something that is for everyone to use

**Q18**

No

Are there any minor changes to the Rules that would make them easier for you to understand?

**Q19**

Respondent skipped this question

What do you think of the proposed minor Rules changes?

**Q20**

Respondent skipped this question

Are there any other changes we should consider?

Page 5

**Q21**

No,  
Please comment:  
Only for comercial use

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

**Q22**

Respondent skipped this question

What impact would a basic pilot qualification likely have on you?

**Q23**

Respondent skipped this question

What format should this test take?

**Q24**

No

Should there be a minimum age for basic pilot qualification?

**Q25**

No,  
Please comment:  
Just a money making scheme.

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?



Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

---

Page 6

Q27

No

Should we introduce the proposed drone registration system?

---

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

---

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

---

Q30

Yes, but with a different weight as the threshold ,

Should there be a minimum weight threshold for registering a drone?

Please comment:  
250g is to light, 5kg at least is needed

---

Q31

Yes, drones flown solely indoors,

Should certain drones not need to be registered (select all that apply)

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Yes, others (please specify below),

Please comment:

Flown on private property

---

Page 7

Q32

No,

Should we introduce remote ID?

Please comment:

Not needed

---

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

---

Page 8

Q34

No

Should we consider introducing geo-awareness?

---

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

---

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

---

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

#12

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, May 31, 2021 9:39:11 PM  
**Last Modified:** Tuesday, June 01, 2021 12:18:21 AM  
**Time Spent:** 02:39:10  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

George Feast

**Q3**

Email address

[REDACTED]

**Q4**

**Myself**

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

Hobbyist and Student Pilot

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

**Q7**

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Unnecessary. The current part 101 rules are sufficient from a safety perspective for Drone and convention aircraft operators. The biggest problem is that the majority of drone operators are unaware of the part 101 rules or are unaware that New Zealand has any drone rules to begin with. Educating these people would significantly reduce or eliminate the risk to conventional pilots.

---

**Q8**

Do you think the proposed series of measures would help achieve the desired objectives?

**No,**

Please comment::

No. the best way to solve this problem would be to educate the general public about the existing part 101 rules. This would encourage people to use drones safely and securely. There are also existing laws in place to hold them accountable if they use them irresponsibly. These rule changes would definitely not allow people to get the most out of drones and use them in exciting and innovative ways as the rule changes would prohibit them from doing this. If the ministry of transport wants to lay the foundation for drones to become a familiar feature of the transport system they should consider doing this outside of part 101 and keep part 101 as is. If part 101 was changed the people of New Zealand should feel worried as drones will be used irresponsibly in their communities as some drone operators will continue to operate without following the rules while others might intentionally choose to not follow the rules.

---

PROACTIVELY RELEASED  
THE MINISTRY OF TRANSPORT

**Q9**

Do you think the proposed series of measures would address the problems and opportunities identified?

**No,**

Please comment:

The proposed series of measures would not address the problems and opportunities identified because the rules do not need to be updated. This is because the current rules are sufficient enough. Basic pilot qualification is also not needed because the main problem with compliance with part 101 currently is lack of education. Education would negate the need for a qualification because the current rules are sufficient enough. Drone registration will have no effect as anyone with intend to misuse a drone would fly with no registration, a false one or a stolen one. These methods are seen with other vehicles like cars in New Zealand and are difficult to enforce. These methods are only more difficult to enforce due to the drone being an aircraft. Remote identification will also have no effect as drones with flown with malicious intent will be flown with no registration, a false one or a stolen one negating the effectiveness of Remote Identification. Remote Identification would also be a huge privacy concern as contact information and address would be easily available. this would only encourage the use of flying a drone with no registration, a false one or a stolen one. Geo-awareness is also unnecessary as drones under the current part 101 rules cannot legally have a collision with full size aircraft. This is because drones are not allowed above 400ft AGL and aircraft bellow 500ft AGL. The only times aircraft are bellow 500ft AGL drones are already prohibited from flying in that area.

**Q10**

Are there any other problems and opportunities you can think of?

No

**Q11**

Do you agree with the proposed order of implementation of the measures?

**No,**

Please comment:

No because all of the measures are irrelevant as mentioned previously.

Page 4

**Q12**

Should drones have their own standalone Rule Part?

**No ,**

Please comment:

Part 101 and the current rules associated with part 101 is sufficient enough for this. If Drones wanted to fly outside of the limits of part 101 then this should fall within part 102 or fall within something closer to part 61.

**Q13**

Should we review the four-kilometre minimum flight distance from aerodromes?

**No ,**

Please comment:

This is unnecessary as aircraft should never should be bellow 500ft AGL outside of an aerodrome or between 0ft to 400ft AGL where drones operate. The only times where aircraft are in this area of altitude drones are all ready prohibited from flying. (Low fly zones, etc.)

**Q14**

Should we change the requirement to gain consent to fly above property?

**Yes – remove the consent provision completely,**

Please comment:

Drone operators should not need to get consent from the land owner where they are flying. If asked by the land owner to stop the drone operator should use common curtesy and avoid flying over the property. If privacy is the main concern there are other laws in New Zealand's legal system to handle this. If the drone is not allowed to be taken off or landed on the property then it is a matter of trespassing.

**Q15**

Should we change the requirement to gain consent to fly above people?

**Yes – remove the requirement completely,**

Please comment:

Remove the requirement completely as there is only risk at very low altitudes <5m and close proximity to people <5m. This flying would be classed as endangerment and there are other laws in New Zealand's legal system to handle this.

**Q16**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

**10 metres**

**Q17**

Are there any other major Rules changes we should consider?

Have only 3 rules for part 101. 400ft as a maximum flight altitude, sheltered operation and being prohibited to fly in an aerodrome unless in sheltered operation. Revising some of the aerodromes or having special case scenarios for aerodromes such helicopter pads. In these cases it should only be prohibited to fly on approach or departure paths but not in areas of the aerodrome where aircraft do not fly bellow 500ft.

**Q18**

Are there any minor changes to the Rules that would make them easier for you to understand?

**No ,**

Please comment:

No minor changes but there would be major rule changes to consider

**Q19**

What do you think of the proposed minor Rules changes?

Good as the current rules would be very confusing to someone who is not familiar with them.

---

**Q20**

Are there any other changes we should consider?

None that I have not previously mentioned

---

Page 5

**Q21**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

**No,**

Please comment:

As previously mentioned it is unnecessary as the issue with compliance is education. If the public was better educated about the current rules of part 101 the basic pilot qualification will be unnecessary as everyone will fly in a safe manner.

---

**Q22**

What impact would a basic pilot qualification likely have on you?

I would imagine it would have no effect on how I fly my drones as I already operate them in a safe manner according to the existing part 101 rules.

---

**Q23**

What format should this test take?

Other (please specify):

This test is unnecessary

---

**Q24**

Should there be a minimum age for basic pilot qualification?

**No**

---

**Q25**

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

**Yes**

---

**Q26**

Is there any other special authorisations you would like to see?

---

**Respondent skipped this question**

Page 6

Q27

Should we introduce the proposed drone registration system?

No,

Please comment:

The drone registration system would have little to no effect on safety. If it did have an effect it would most likely be negative as drones could be flown without a registration, with a stolen one or with a false one.

Q28

What impact would drone registration likely have on you?

This would have a huge negative effect on me as I would not want my personal information being easily accessible. This would cause me to give up on flying drones or I would only fly drones that weighed less than 250g so I would not have to register them.

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Enabling identity authentication to protect against identify fraud through integration with RealMe or any other system will not stop the number being physically taken or copied to another drone.

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,

Please comment:

The minimum weight should be 25kg.

Q31

Should certain drones not need to be registered (select all that apply)

Yes, others (please specify below),

Please comment:

All drones that weigh less than 25kg should not be registered

Page 7

Q32

Should we introduce remote ID?

No,

Please comment:

No because it is a major privacy issue and will not solve the problems it is set out to solve as mentioned before.

Q33

What impact would remote ID likely have on you?

Will be a privacy issue for myself. Also may not be physically possible to have the electronics required for remote ID on board due to space and or weight lifting concerns.

Page 8



**Q34**

Should we consider introducing geo-awareness?

**No,**

Please comment:

No because it is already introduced to some extent on certain drones that make up the majority of drones used. It would also be difficult to fit this to certain craft due to size or space limitations. These types of craft also make a a very small percentage of drones.

---

**Q35**

What impact would geo-awareness likely have on you?

little to none as I'm all ready aware of my location when I fly and already avoid flying in the concerned areas. If I was required to install something on my drone there would be some where it would not be possible due to space and weight lifting capability limitations.

---

Page 9

**Q36**

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

The proposed changes are unnecessary because the existing rules already covering the issues stated. If they do not that is because the issue is a nonissue. If the general public of New Zealand was better educated on the existing part 101 rules many of the issues mentioned would be resolved.

---

**Q37**

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

#13

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Monday, May 31, 2021 10:51:45 PM  
**Last Modified:** Tuesday, June 01, 2021 12:38:01 AM  
**Time Spent:** 01:46:16  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Richard Cousineau

**Q3**

Email address

[REDACTED]

**Q4**

**Myself**

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

i am a hobiest

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

hobiest should have air space below 300 feet commercial drone should be in the 300 to 400 feet air space and maned aircraft should stay above 500 feet

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

the rules you propose will only benefit the commercial industry

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No,

Please comment:

the rules you propose will only benefit the commercial industry

Q10

Are there any other problems and opportunities you can think of?

no

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

the rules you propose will only benefit the commercial industry

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

a rule for hobiest and a rule for commercial uas

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No

Q14

Should we change the requirement to gain consent to fly above property?

**Yes – remove the consent provision completely,**

Please comment:

if a plane flying over your property is not a concern a drone should not be either

Q15

Should we change the requirement to gain consent to fly above people?

**Yes – remove the requirement completely**

Q16

Respondent skipped this question

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

Q18

Yes

Are there any minor changes to the Rules that would make them easier for you to understand?

Q19

What do you think of the proposed minor Rules changes?

only good for commercial uas

Q20

Respondent skipped this question

Are there any other changes we should consider?

Page 5

Q21

No,

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Please comment:  
they have one in Canada and it is totally useless

Q22

What impact would a basic pilot qualification likely have on you?

remove my right to fly as a hobiest

Q23

Other (please specify):

What format should this test take?

there should not be any test for hobiest

Q24

No

Should there be a minimum age for basic pilot qualification?

Q25

No

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

**Q26**

Is there any other special authorisations you would like to see?

more security and rules for commercial uas operations

---

Page 6

**Q27**

Should we introduce the proposed drone registration system?

**Yes, with changes,**

Please comment:  
only for commercial uas operations

---

**Q28**

What impact would drone registration likely have on you?

waist my time and your resources

---

**Q29**

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

only for commercial use

---

**Q30**

Should there be a minimum weight threshold for registering a drone?

**Yes, but with a different weight as the threshold ,**

Please comment:  
any drone over 1 kilogram

---

**Q31**

Should certain drones not need to be registered (select all that apply)

Please comment:

any drone below 1 kilogram used by hobiest

---

Page 7

**Q32**

Should we introduce remote ID?

**Yes,**

Please comment:  
on all commercial operations

---

**Q33**

What impact would remote ID likely have on you?

more expensive

---

Page 8

Q34

I don't know

Should we consider introducing geo-awareness?

---

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

---

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

all rules for hobiest flying a uas ( plane or quad copters ) should be relax and an information campaign to inform them of the regulations

---

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

#14

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, June 01, 2021 1:34:47 AM  
**Last Modified:** Tuesday, June 01, 2021 1:51:56 AM  
**Time Spent:** 00:17:09  
**IP Address:** [REDACTED]

Page 1

**Q1**  **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Torben fricke

**Q3**

Email address

[REDACTED]

**Q4**

**Non-government organisation/advocacy group**

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

Hobbyist

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

They are way to hard on the hobby. I personally see one simple alternative: keep or lower the measures you already have. The danger does not come from hobbyists the danger comes from one time buyers who buy a dji drone for Christmas. And these drones already come with nofly zones. No need to regulate anything there. The serious hobbyists all use common sense as an accident would cost them money and time and would take the joy away for them. I also want to point out that there are NO DEADLY ACCIDENTS RELATED TO THE DRONE HOBBY.

Q8

No

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

No

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Respondent skipped this question

Are there any other problems and opportunities you can think of?

Q11

No

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Yes

Should drones have their own standalone Rule Part?

Q13

Yes

Should we review the four kilometre minimum flight distance from aerodromes?

Q14

Yes – remove the consent provision completely

Should we change the requirement to gain consent to fly above property?

Q15

Yes – remove the requirement completely

Should we change the requirement to gain consent to fly above people?

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT



**Q16**

**10 metres**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17**

**Respondent skipped this question**

Are there any other major Rules changes we should consider?

---

**Q18**

**I don't know**

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19**

**Respondent skipped this question**

What do you think of the proposed minor Rules changes?

---

**Q20**

**Respondent skipped this question**

Are there any other changes we should consider?

---

Page 5

**Q21**

**No**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

---

**Q22**

What impact would a basic pilot qualification likely have on you?

I would waste time and money on stuff I already know. The system is useless

---

**Q23**

**Electronic/online theory test**

What format should this test take?

---

**Q24**

**No**

Should there be a minimum age for basic pilot qualification?

---

**Q25**

**No**

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

---

Page 6

Q27

No

Should we introduce the proposed drone registration system?

---

Q28

What impact would drone registration likely have on you?

Making the whole process more complicated

---

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

It's not going to prevent anything. In contrary it will make drones heavier and therefore more dangerous in case of accidents

---

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,  
Please comment:  
25kg

---

Q31

Should certain drones not need to be registered (select all that apply)

Yes, others (please specify below),  
Please comment:  
hobby drones and aircraft under 25 kg

---

Page 7

Q32

No

Should we introduce remote ID?

---

Q33

What impact would remote ID likely have on you?

It will make 80% of my crafts to heavy to fly properly

---

Page 8

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

**Q34** **Yes,**  
Should we consider introducing geo-awareness? Please comment:  
Dump the geo awareness Technologie on drones

---

**Q35**  
What impact would geo-awareness likely have on you?  
Easier to find no fly zones

---

Page 9

**Q36** **Respondent skipped this question**  
Do you have any other feedback on anything else in the  
Enabling Drone Integration discussion document?

---

**Q37**  
If you do not want your name or identifying information to be included, please note the reasons why below. This will  
be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

#15

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, June 01, 2021 3:26:34 AM  
**Last Modified:** Tuesday, June 01, 2021 4:02:12 AM  
**Time Spent:** 00:35:37  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Bischof

**Q3**

Email address

[REDACTED]

**Q4**

**Myself**

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

flying drones for recreational, educational and training purposes (rowing crews)

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Why is there a need for all the bureaucratic stuff ?

The insurance is enough - even in china you have less restrictions.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

Why do invest in such things without any benefit ? there must be a business demand to get access to the sky and priorities for all the commercial delivery services that wanna use the sky and a free highway for them.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No,

Please comment:

amateurs at work - the same amateurs that talk about Gatwick - without having any proof. A friend of mine visited and talked about the case he had witnessed in Germany, a helicopter landing in an emergency. After weeks of investigation they found out that the damage on the prop was caused by blood, yes , blood is not a part of a drone , so the pilots must have hit a flying animal that has cause a damage and forced them to land. And what did he say the pilots had told before: We do not know what has caused the issue - but the police made drone incident out of it. Happened in lower saxony ... big new till the mechanics called the investigators back that there was blood on the damaged prop at that point.

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

useless crap making the hobby to a crime ... while any bicycle rider can drive as he wants, without any licence plate ... where are the licence plates for all those pedestrians that sometime cause accidents and then run away ?

Page 4

Q12

Should drones have their own standalone Rule Part?

No

## Enabling Drone Integration

**Q13**

Should we review the four-kilometre minimum flight distance from aerodromes?

**Yes,**

Please comment:

why not 100 km .... would be always safer but the safest way would to avoid planes and airports cause flying is dangerous as you can see regarding Boeing 737 max crashes ...

**Q14**

Should we change the requirement to gain consent to fly above property?

**Yes – remove the consent provision completely**

**Q15**

Should we change the requirement to gain consent to fly above people?

**Yes – relax the requirement in another way**

**Q16**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

regardless what you will take - who is able to measure that in a vertical projection - no the I have seen a drone flying over me which does not work out cause people can not judge how far away a drone is flying in 120 m altitude.

**Q17**

Are there any other major Rules changes we should consider?

New Zealand has a tiny population in a huge area and there is no need for such strict drone regulations or how many have been injured and killed by drones ?

**Q18**

Are there any minor changes to the Rules that would make them easier for you to understand?

**Respondent skipped this question**

**Q19**

What do you think of the proposed minor Rules changes?

**Respondent skipped this question**

**Q20**

Are there any other changes we should consider?

**Respondent skipped this question**

Page 5

**Q21**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

**No**

Q22

What impact would a basic pilot qualification likely have on you?

nothing will change cause people behave or they do not. just a question of education and attitude.

Q23

Electronic/online theory test

What format should this test take?

Q24

No

Should there be a minimum age for basic pilot qualification?

Q25

No

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

No

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

treated like criminals - unless every pedestrian in NZ gets an ID which every one can see to complain about missing skills and behaviour on public streets ... cause these are causing deadly accidents ...

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

Should there be a minimum weight threshold for registering a drone?

No,

Please comment:

Ask a bird if he wants to attack the next aircraft and what might he reply? What is an aircraft ... for sure a bird does not want to die but sometimes they die crashing airplanes. Are you gonna kill all birds ? Would be great progress if you eliminate all birds above 250 gr.

**Q31**

No

Should certain drones not need to be registered (select all that apply)

---

Page 7

**Q32**

No

Should we introduce remote ID?

---

**Q33**

What impact would remote ID likely have on you?

Who needs it - there has not been a single victim that would have benefited from such stupid thing. You do not even have electronic chains in the cars

---

Page 8

**Q34**

No

Should we consider introducing geo-awareness?

---

**Q35**

Respondent skipped this question

What impact would geo-awareness likely have on you?

---

Page 9

**Q36**

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

---

**Q37**

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

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# #16

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, June 01, 2021 6:13:33 AM  
**Last Modified:** Tuesday, June 01, 2021 6:40:04 AM  
**Time Spent:** 00:26:30  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Sylas

**Q3**

Email address

[REDACTED]

**Q4**

**Myself**

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

I fly, and build them as a hobby

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY  
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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

They are too restrictive. Creating additional laws will not make more people comply with them, only make others more confused. I would not suggest any alternatives because there is no issue that this is fixing. The only deaths caused by drones have been governmentally operated, and many 'close calls' are fake news.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

For one, drone registration does not make the air a safer space, it just taxes hobbyists. Basic pilot training is not necessary if a person is flying legally anyways. Who cares if someone crashes their drone in an empty park, or in their own back yard. The risk is very minimal. Remote identification doesnt induce safety, it just puts the flyer in jeopardy of being harassed by others whom dont actually know the laws.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No

Q10

Are there any other problems and opportunities you can think of?

No, but I bet other will

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

I dont agree with the proposed solution in the first place.

Page 4

Q12

Should drones have their own standalone Rule Part?

No

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No

Q14

Should we change the requirement to gain consent to fly above property?

No – keep the existing consent provision,

Please comment:

Airplanes are allowed to fly over property, why should this be any different

**Q15**

**No – keep the existing requirement**

Should we change the requirement to gain consent to fly above people?

---

**Q16**

**30 metres**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17**

**Respondent skipped this question**

Are there any other major Rules changes we should consider?

---

**Q18**

**No**

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19**

**Respondent skipped this question**

What do you think of the proposed minor Rules changes?

---

**Q20**

**Respondent skipped this question**

Are there any other changes we should consider?

---

Page 5

**Q21**

**Yes,**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Please comment:

Yes, if this would be implemented, It should be implemented for all drone users.

---

**Q22**

What impact would a basic pilot qualification likely have on you?

It would cost me money. I think existing drone users should be grandfathered in. There is no point for qualification if I already have been flying for years.

---

**Q23**

**Other (please specify):**

What format should this test take?

Online, free test. Being free would make it more accessible to those whom are just getting into flying drones

---

**Q24**

Should there be a minimum age for basic pilot qualification?

Yes, other age (please specify):

No age restriction. That would be very silly

**Q25**

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

**I don't know**

**Q26**

Is there any other special authorisations you would like to see?

Respondent skipped this question

Page 6

**Q27**

Should we introduce the proposed drone registration system?

**No**

**Q28**

What impact would drone registration likely have on you?

All this would do is tax drone users. It doesnt induce safety

**Q29**

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Respondent skipped this question

**Q30**

Should there be a minimum weight threshold for registering a drone?

**Yes, but with a different weight as the threshold ,**

Please comment:

Dont just pick a random weight. Do some testing. For god sakes, a football is heavier and doesnt have to be registered!

**Q31**

Should certain drones not need to be registered (select all that apply)

**Yes, drones flown solely indoors,**

**Yes, others (please specify below),**

Please comment:

Drones flown indoors, and on property allowed by the property owner should not have to be registered

Page 7

Q32

No

Should we introduce remote ID?

---

Q33

What impact would remote ID likely have on you?

It makes the flyer feel less safe. I dont want my location broadcasted like that

---

Page 8

Q34

Should we consider introducing geo-awareness?

No,

Please comment:

I am already aware of where I fly. I would trust myself a whole lot more than an onboard computer program.

---

Q35

What impact would geo-awareness likely have on you?

Dji tried to implement this on their DJI fpv drone. I have heard stories that people were not able to fly even in areas that are legal to fly at. This would be too restrictive.

---

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

No

---

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#17

COMPLETE

Collector: Web Link 1 (Web Link)  
Started: Tuesday, June 01, 2021 6:12:01 AM  
Last Modified: Tuesday, June 01, 2021 7:58:34 AM  
Time Spent: 01:46:33  
IP Address: [REDACTED]

Page 1

Q1 Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

Q2

Name

Drew

Q3

Email address

[REDACTED]

Q4

Who are you submitting on behalf of?

Iwi,  
If you are not submitting as an individual, please specify who you represent.:  
nephew

Q5

Briefly tell us your interest in drones

None but my nephew likes them

Q6

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

A waste of time and money. Give up this idea, it is ludicrous.

---

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

Too many just won't bother to follow your new rules.

---

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No,

Please comment:

Not likely to make any difference

---

Q10

Are there any other problems and opportunities you can think of?

Too much bureaucracy. Why can't you just leave things alone?

---

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

To bothersome unless you want people to stop playing with drones. Even then many will ignore your new rules and regs. What you don't see you don't know about. GET IT?

---

Page 4

Q12

Should drones have their own standalone Rule Part?

No ,

Please comment:

What good does this please comment do anyone?

---

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No ,

Please comment:

My nephew flies his done at the aerodrome. You want to ban him from his recreation?

---

Q14

Should we change the requirement to gain consent to fly above property?

No – keep the existing consent provision

---

Q15

Should we change the requirement to gain consent to fly above people?

No – keep the existing requirement

---

**Q16**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):  
about 300 meters would work I think

**Q17**

Are there any other major Rules changes we should consider?

You could take off your blinders and take a look around.

**Q18**

Are there any minor changes to the Rules that would make them easier for you to understand?

No ,  
Please comment:  
Take off those blinders

**Q19**

What do you think of the proposed minor Rules changes?

Not good. Don't do it.

**Q20**

Are there any other changes we should consider?

Lets make the bureaucracy take a vacation for about 20 years

Page 5

**Q21**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

No,  
Please comment:  
This is getting tiresome. You are not going to pay attention to anything I have to say.

**Q22**

What impact would a basic pilot qualification likely have on you?

None I don't fly

**Q23**

What format should this test take?

Other (please specify):  
Don't have the test obviously

**Q24**

Should there be a minimum age for basic pilot qualification?

No

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Q25

No

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

Q26

Is there any other special authorisations you would like to see?

TLEts require special authorisations for the bureaucracy

---

Page 6

Q27

No

Should we introduce the proposed drone registration system?

---

Q28

What impact would drone registration likely have on you?

None I don't fly

---

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

---

Q30

No

Should there be a minimum weight threshold for registering a drone?

---

Q31

Yes, others (please specify below),

Should certain drones not need to be registered (select all that apply)

Please comment:

All drones should NOT be regulated or controlled in any way simply because if someone wants to break your rules. They will break your rules.

---

Page 7

Q32

No

Should we introduce remote ID?

---

**Q33**

What impact would remote ID likely have on you?

None

---

Page 8

**Q34**

**No**

Should we consider introducing geo-awareness?

---

**Q35**

What impact would geo-awareness likely have on you?

None

---

Page 9

**Q36**

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

No other feedback these rules are ridiculous.

---

**Q37**

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#18

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, June 01, 2021 8:19:08 AM  
**Last Modified:** Tuesday, June 01, 2021 8:43:53 AM  
**Time Spent:** 00:24:44  
**IP Address:** [REDACTED]

Page 1

**Q1** Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Gerard Hyland

**Q3**

Email address

[REDACTED]

**Q4** Myself

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

Recreational flyer prior to local Council changing rules to make it impossible to fly in parks.

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

**Q7**

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Absolute over-the-top lunacy. For all but a few top-end models, these are TOYS, not guns or military hardware.

People worry about cameras on drones but not zoom lenses on DSLR cameras. The FUD over drones comes from the media creating clickbait, and regulatory bodies believing the hype. Misinformation and false beliefs worse than the time of witches.

Again, these are primarily TOYS so why are they being regulated harder than guns???

**Q8**

Do you think the proposed series of measures would help achieve the desired objectives?

**No,**

Please comment::

Strawman arguments not worth a response.

**Q9**

Do you think the proposed series of measures would address the problems and opportunities identified?

**No,**

Please comment:

-

**Q10**

Are there any other problems and opportunities you can think of?

> 5Kg multirotors and those used for professional services require a framework for operation - a person should need a licence to show proficiency to operate this equipment. That is all. Remember, guns aren't registered in New Zealand, people are.

**Q11**

Do you agree with the proposed order of implementation of the measures?

**No**

Page 4

**Q12**

Should drones have their own standalone Rule Part?

**No ,**

Please comment:

Stop trying to regulate toys based on fear and incorrect base assumptions. Base it on actual safety record - how many people injured / killed due to drones in NZ?

**Q13**

Should we review the four-kilometre minimum flight distance from aerodromes?

**Yes,**

Please comment:

Allow closer proximity with shielded operation (trees / buildings), not a blanket ban.

**Q14**

Should we change the requirement to gain consent to fly above property?

**Yes – relax the consent provision in another way,**

Please comment:

Drones are an 'annoyance' factor and the 'fear of spying'. While the former is similar to a neighbour's loud stereo, the latter is mostly from uneducated privacy fears.

**Q15** **Yes – use 'safe distances' as an alternative**

Should we change the requirement to gain consent to fly above people?

---

**Q16** **10 metres**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17**  
Are there any other major Rules changes we should consider?

Stop trying to regulate toys! (< 5Kg)

---

**Q18** **No**

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19** **Respondent skipped this question**

What do you think of the proposed minor Rules changes?

---

**Q20** **Respondent skipped this question**

Are there any other changes we should consider?

---

Page 5

**Q21** **Yes, with changes ,**  
Please comment:  
Part 101 should apply to Commercial operators and those using > 5kg units only. Leave toys for children and hobbyists out of all this.

**Q22**  
What impact would a basic pilot qualification likely have on you?

Minimal

---

**Q23** **Electronic/online theory test**

What format should this test take?

---

**Q24**

No

Should there be a minimum age for basic pilot qualification?

---

**Q25**

No

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

**Q26**

Respondent skipped this question

Is there any other special authorisations you would like to see?

---

Page 6

**Q27**

No

Should we introduce the proposed drone registration system?

---

**Q28**

What impact would drone registration likely have on you?

It will kill the hobby, and cripple use for those who may enjoy or need to use small systems to their advantage such as intermittent use by farmers.

---

**Q29**

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Waste of money

---

**Q30**

Should there be a minimum weight threshold for registering a drone?

**Yes, but with a different weight as the threshold ,**

Please comment:

5kg minimum - this is about safety.

---

**Q31**

Should certain drones not need to be registered (select all that apply)

**Yes, others (please specify below),**

Please comment:

Weight-based as that is the key safety factor.

---

Page 7

**Q32**

No

Should we introduce remote ID?

---

**Q33**

What impact would remote ID likely have on you?

Kills the hobby.

---

Page 8

**Q34**

Should we consider introducing geo-awareness?

**Yes,**

Please comment:

For commercial models over 5kg - all based on safety & risk assessment.

---

**Q35**

What impact would geo-awareness likely have on you?

None

---

Page 9

**Q36**

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Stop trying to over-regulate toys & hobbyists with a regime stricter than guns. Small, <5kg Multi-rotor craft are not inherently dangerous, as the proven record shows. Please do not base your assumptions on unverified reports & complaints and media hype. There are better ways to spend money to keep people safe.

---

**Q37**

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

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#19

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, June 01, 2021 9:50:21 AM  
**Last Modified:** Tuesday, June 01, 2021 10:33:06 AM  
**Time Spent:** 00:42:44  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Andrew Lusta

**Q3**

Email address

[REDACTED]

**Q4**

**Myself**

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

Recreational drone flyer. Both fpv and videography ones

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Drone registration and remote I'd will negatively affect the drone community and the hobby not giving anything in return

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

**Yes, with changes ,**

Please comment::

Rules update, basic and available (online) pilot qualification and thoughtful geo awareness is good

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

**Yes, with changes ,**

Please comment:

You should distinguish recreational flying of 200-500,700g drones and huge flying machines used for business

Q10

Are there any other problems and opportunities you can think of?

Education if both the flyers and people around

Q11

Do you agree with the proposed order of implementation of the measures?

**No,**

Please comment:

I disagree with remote I'd and drone registration

Page 4

Q12

Should drones have their own standalone Rule Part?

**Yes**

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

**Yes,**

Please comment:

These are too strict now with no risk based approach

Q14

Should we change the requirement to gain consent to fly above property?

**Yes – relax the consent provision in another way,**

Please comment:

Should be distinguished just flying and flying and filming, height should be reviewed etc

Q15

Should we change the requirement to gain consent to fly above people?

**Yes – relax the requirement in another way**

**Q16**

**10 metres**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17**

**Respondent skipped this question**

Are there any other major Rules changes we should consider?

---

**Q18**

**Yes**

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19**

What do you think of the proposed minor Rules changes?

Mostly agree

---

**Q20**

Are there any other changes we should consider?

No

---

Page 5

**Q21**

**Yes**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

---

**Q22**

What impact would a basic pilot qualification likely have on you?

I'm happy to learn the course and pass online test

---

**Q23**

**Electronic/online theory test**

What format should this test take?

---

**Q24**

**No**

Should there be a minimum age for basic pilot qualification?

---

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Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

Q26

Is there any other special authorisations you would like to see?

No

---

Page 6

Q27

Should we introduce the proposed drone registration system?

No,

Please comment:

The drone pilot ID number might be used as a sticker on all drones

---

Q28

What impact would drone registration likely have on you?

I don't believe registration of each drone is required. I can build and rebuild my drones several times a day changing components, motors, frames. Registration of each new drone is not feasible

---

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Not feasible at the moment due to size/weight and cost restrictions

---

Q30

Should there be a minimum weight threshold for registering a drone?

No,

Please comment:

Racing drone of 250g flying full speed can be more dangerous if hits person's face than 1kg one that just bothers you with its noise: pilots should be trained and qualified

---

Q31

Should certain drones not need to be registered (select all that apply)

Yes, drones flown solely indoors,

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

,

Yes, others (please specify below),

Please comment:

Pilots should be registered

---

Page 7

## Enabling Drone Integration

**Q32**

Should we introduce remote ID?

**No,**

Please comment:

Not feasible due to the cost and size/weight restrictions

---

**Q33**

What impact would remote ID likely have on you?

I won't be able to build and fly my drones from cheap and available components and fly them

---

Page 8

**Q34**

Should we consider introducing geo-awareness?

**Yes**

**Q35**

What impact would geo-awareness likely have on you?

No-fly zones should be thoughtful and reasonable, with fly height difference

---

Page 9

**Q36**

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Not atm

---

**Q37**

**Respondent skipped this question**

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

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#20

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, June 01, 2021 2:11:31 PM  
**Last Modified:** Tuesday, June 01, 2021 2:17:33 PM  
**Time Spent:** 00:06:02  
**IP Address:** [REDACTED]

Page 1

**Q1** Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

John R Speaks

**Q3**

Email address

[REDACTED]

**Q4**

Myself

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

hobby

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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**Q7** Respondent skipped this question

What is your view on the proposed series of measures?  
Are there any other alternatives you suggest we consider?

---

**Q8** No

Do you think the proposed series of measures would help achieve the desired objectives?

---

**Q9** No

Do you think the proposed series of measures would address the problems and opportunities identified?

---

**Q10** Respondent skipped this question

Are there any other problems and opportunities you can think of?

---

**Q11** No

Do you agree with the proposed order of implementation of the measures?

---

Page 4

**Q12** Yes

Should drones have their own standalone Rule Part?

---

**Q13** Yes

Should we review the four-kilometre minimum flight distance from aerodromes?

---

**Q14** Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above property?

---

**Q15** Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above people?

---

**Q16** 10 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

**Q17**

Respondent skipped this question

Are there any other major Rules changes we should consider?

---

**Q18**

Yes

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19**

Respondent skipped this question

What do you think of the proposed minor Rules changes?

---

**Q20**

Respondent skipped this question

Are there any other changes we should consider?

---

Page 5

**Q21**

No

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

---

**Q22**

Respondent skipped this question

What impact would a basic pilot qualification likely have on you?

---

**Q23**

Respondent skipped this question

What format should this test take?

---

**Q24**

No

Should there be a minimum age for basic pilot qualification?

---

**Q25**

No

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

**Q26**

Respondent skipped this question

Is there any other special authorisations you would like to see?

---

Page 6

Q27

No

Should we introduce the proposed drone registration system?

---

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

---

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

---

Q30

No

Should there be a minimum weight threshold for registering a drone?

---

Q31

No

Should certain drones not need to be registered (select all that apply)

---

Page 7

Q32

No

Should we introduce remote ID?

---

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

---

Page 8

Q34

No

Should we consider introducing geo-awareness?

---

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

---

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

---



Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

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THE MINISTRY OF TRANSPORT

#21

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, June 01, 2021 5:24:17 PM  
**Last Modified:** Tuesday, June 01, 2021 5:42:30 PM  
**Time Spent:** 00:18:13  
**IP Address:** [REDACTED]

Page 1

**Q1** Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Peter Hanley

**Q3**

Email address

[REDACTED]

**Q4** Myself

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

I have no interest in drones, defined as multi rotor aircraft. I do have a lifelong passion for the building and FLYING of radio control aircraft, which is a completely different hobby.

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

**Q7**

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I think the way that the Ministry has grouped together all unmanned aircraft under one regulatory measure does a disservice to the aircraft flyers who fly at club airfields under the auspices of MFNZ, with insurance in place, pilot training and qualifications in place and no record of any third party injuries or near misses.

To require the registration of every "drone", even when it is clearly not a drone, and yet not require the registration of individual guns held by a firearms license holder will bring the proposed measures into disrepute as soon as they are enacted.

**Q8**

Do you think the proposed series of measures would help achieve the desired objectives?

**No,**

Please comment::

Those who are responsible drone operators, such as photographers or farmers are already operating safely. Those flying model aircraft have a multi year track record of operating their aircraft with zero impact on third parties. Those who would buy a \$50 drone and fly over their neighbours property will still do so, despite regulations being in place. I think the Ministry is attempting to solve a problem that does not exist with a broad based and heavy enforcement regime which will not capture the information expected, and will p[otentially result in headlines such as "80 year old man prosecuted by MoT for flying his model plane". You are setting yourself up to be tabloid fodder and subject to ridicule on social media which will undermine other more valuable work.

**Q9**

Do you think the proposed series of measures would address the problems and opportunities identified?

**No**

**Q10**

Are there any other problems and opportunities you can think of?

**Respondent skipped this question**

**Q11**

Do you agree with the proposed order of implementation of the measures?

**No**

Page 4

**Q12**

Should drones have their own standalone Rule Part?

Please comment:

What do you mean by drone?

**Q13**

Should we review the four-kilometre minimum flight distance from aerodromes?

**No**

**Q14** **No – keep the existing consent provision**

Should we change the requirement to gain consent to fly above property?

---

**Q15** **No – keep the existing requirement**

Should we change the requirement to gain consent to fly above people?

---

**Q16** **Respondent skipped this question**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17** **Respondent skipped this question**

Are there any other major Rules changes we should consider?

---

**Q18** **Respondent skipped this question**

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19** **Respondent skipped this question**

What do you think of the proposed minor Rules changes?

---

**Q20** **Respondent skipped this question**

Are there any other changes we should consider?

---

Page 5

**Q21** **No**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

---

**Q22**

What impact would a basic pilot qualification likely have on you?

I passed a similar test 30 years ago !~!

---

**Q23** **Respondent skipped this question**

What format should this test take?

---

Q24

Respondent skipped this question

Should there be a minimum age for basic pilot qualification?

Q25

No

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

No

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

I would give up the hobby that I have enjoyed safely for nearly 40 years. I would then campaign to make sure that this as widely known as possible, that New Zealand has laws which are more onerous for model aircraft owners than there are for gun owners.

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Q30

No

Should there be a minimum weight threshold for registering a drone?

Q31

**Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)**

Should certain drones not need to be registered (select all that apply)

Please comment:

This is the most sensible suggestion I have seen yet. I still would not agree with having to register every aircraft though.

Page 7

Q32

No

Should we introduce remote ID?

---

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

---

Page 8

Q34

Respondent skipped this question

Should we consider introducing geo-awareness?

---

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

---

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

---

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

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#22

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, June 01, 2021 7:29:36 PM  
**Last Modified:** Tuesday, June 01, 2021 7:45:13 PM  
**Time Spent:** 00:15:37  
**IP Address:** [REDACTED]

Page 1

**Q1** Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Kirsten

**Q3**

Email address

**Q4**

Myself

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

Husband hobby flies tiny ones. I am okay with our drones on our land, but not other peoples

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

Page 3

PROACTIVELY RELEASED BY  
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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Keep existing rules.

Drones are NOT a viable business tool and registering them will mean there will be illegal drones.

---

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

Data cited is taken out of context

---

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No

---

Q10

Are there any other problems and opportunities you can think of?

All unmanned aircraft (hobby planes, hobby helicopters, racing drones) are tarred with the same brush

---

Q11

Do you agree with the proposed order of implementation of the measures?

No

---

Page 4

Q12

Should drones have their own standalone Rule Part?

No

---

Q13

Should we review the four kilometre minimum flight distance from aerodromes?

No

---

Q14

Should we change the requirement to gain consent to fly above property?

No – keep the existing consent provision,

Please comment:

Real estate agents are already going over private property without permission. I don't want other nitwits to do so.

---

Q15

Should we change the requirement to gain consent to fly above people?

No – keep the existing requirement

---



**Q16**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

5 metres

**Q17**

Are there any other major Rules changes we should consider?

Remove the idea of registering hobby toys

**Q18**

Are there any minor changes to the Rules that would make them easier for you to understand?

No

**Q19**

What do you think of the proposed minor Rules changes?

Respondent skipped this question

**Q20**

Are there any other changes we should consider?

Respondent skipped this question

Page 5

**Q21**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

No

**Q22**

What impact would a basic pilot qualification likely have on you?

It would mean friends have to ditch their hobbies because they'd have increased costs

**Q23**

What format should this test take?

Electronic/online theory test

**Q24**

Should there be a minimum age for basic pilot qualification?

Yes, 16 years

**Q25**

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

I don't know,

Please comment:

Too much fluff in the pdf

**Q26**

Is there any other special authorisations you would like to see?

No

---

Page 6

**Q27**

**No**

Should we introduce the proposed drone registration system?

---

**Q28**

What impact would drone registration likely have on you?

Data about my family would be collected by yet another agency of suspicious agenda

---

**Q29**

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

---

**Q30**

Should there be a minimum weight threshold for registering a drone?

**Yes, but with a different weight as the threshold ,**  
Please comment:  
1kg

---

**Q31**

Should certain drones not need to be registered (select all that apply)

**Yes, others (please specify below),**  
Please comment:  
Hobby drones (model aircraft, racing drones, etc)

---

Page 7

**Q32**

Should we introduce remote ID?

**No,**  
Please comment:  
It doesn't work

---

**Q33**

What impact would remote ID likely have on you?

Data would be collected and potentially hacked increasing the risk of identity theft

---

Page 8

Q34

No

Should we consider introducing geo-awareness?

---

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

---

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

This seems targeted at restricting hobbies at the perceived expectation of future business use which is not viable

---

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#23

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, June 01, 2021 7:22:22 PM  
**Last Modified:** Tuesday, June 01, 2021 7:54:49 PM  
**Time Spent:** 00:32:26  
**IP Address:** [REDACTED]

Page 1

**Q1** Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Justin Adams

**Q3**

Email address

[REDACTED]

**Q4** Myself

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

I have a drone for Photography and inspecting Hard to reach areas

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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**Q7**

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Drone Registration is ridiculous, how is a drone more dangerous than a gun which doesn't need registering. I suggest you just enforce the existing rules for both drones AND manned aircraft as there are multiple incidents of manned aircraft putting lives at risk at a high occurrence than drones.

**Q8**

Do you think the proposed series of measures would help achieve the desired objectives?

**No,**

Please comment::

People who break the current rules wont comply with new rules either.

**Q9**

Do you think the proposed series of measures would address the problems and opportunities identified?

**No,**

Please comment:

enforcing the existing rules is required first before changing them

**Q10**

Are there any other problems and opportunities you can think of?

Recreational drones have caused NO fatalities worldwide, no other section of aviation can boast that.

**Q11**

Do you agree with the proposed order of implementation of the measures?

**No,**

Please comment:

Enforcement of existing rules need to be completed prior to any rule change

Page 4

**Q12**

Should drones have their own standalone Rule Part?

**Yes**

**Q13**

Should we review the four-kilometre minimum flight distance from aerodromes?

**Yes,**

Please comment:

drones have a maximum height restriction of 400ft so the distance from aerodrome should be suited to match

**Q14**

Should we change the requirement to gain consent to fly above property?

**Yes – use 'safe distances' as an alternative**

**Q15**

Should we change the requirement to gain consent to fly above people?

**Yes – use 'safe distances' as an alternative**

**Q16**

**10 metres**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17**

Are there any other major Rules changes we should consider?

I think that you should allow photography drones an allowance for short duration flights higher than 400ft especially for shots that outline property boundary's especially in the rural areas.

---

**Q18**

**No**

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19**

Respondent skipped this question

What do you think of the proposed minor Rules changes?

---

**Q20**

Respondent skipped this question

Are there any other changes we should consider?

---

Page 5

**Q21**

**Yes, with changes ,**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Please comment:

Include part 102 as an online course

---

**Q22**

What impact would a basic pilot qualification likely have on you?

It would annoy me but no long term lasting impact

---

**Q23**

**Electronic/online theory test**

What format should this test take?

---

**Q24**

**Yes, 16 years**

Should there be a minimum age for basic pilot qualification?

---

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

Q26

Is there any other special authorisations you would like to see?

Short duration photography

---

Page 6

Q27

Should we introduce the proposed drone registration system?

No,

Please comment:

Drones are not more dangerous than guns, guns have no registration why would drones. Drones are not more dangerous than boats, boats have no registration why would drones.

---

Q28

What impact would drone registration likely have on you?

I would ignore it

---

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

I am happy to state I have a drone online with the caa but thats all

---

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,

Please comment:

1kg or more, i have a 250g drone and it cant even handle a mild breeze.

---

Q31

Should certain drones not need to be registered (select all that apply)

Yes, others (please specify below),

Please comment:

Photography, recreational

---

Page 7

Q32

Should we introduce remote ID?

No,

Please comment:

Remote ID wont enhance peoples situational awareness

---

**Q33**

What impact would remote ID likely have on you?

I would ignore it

---

Page 8

**Q34**

Should we consider introducing geo-awareness?

**Yes,**

Please comment:

I have a dji mavic air 2 which has this and it works well as a guide

---

**Q35**

What impact would geo-awareness likely have on you?

none as i already use it

---

Page 9

**Q36**

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Respondent skipped this question

---

**Q37**

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#24

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Tuesday, June 01, 2021 7:58:35 PM  
**Last Modified:** Tuesday, June 01, 2021 8:57:05 PM  
**Time Spent:** 00:58:30  
**IP Address:** [REDACTED]

Page 1

**Q1** Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Paul Kendall

**Q3**

Email address

[REDACTED]

**Q4** Myself

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

I am a hobbyist multirotor builder and flyer

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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THE MINISTRY OF TRANSPORT

**Q7**

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Requiring a user to register each and every drone is a burden on the user as some avid modellers have many models. I myself have at least 6 different multicopters. These are all hand built units that I fly in racing and freestyle situations where they are repeatedly crashed into the ground or trees and often break and need repairs. Sometimes the main control unit is destroyed and needs replacing and this would substantially make the unit different enough to require a new registration under the proposed rule changes.

I would think that registering the pilot would be enough.

**Q8**

**No**

Do you think the proposed series of measures would help achieve the desired objectives?

**Q9**

**No,**

Do you think the proposed series of measures would address the problems and opportunities identified?

Please comment:  
Some of the measures are impractical for some models. As an example I have a very small multicopter that weights under 100grams and if it required some sort of remote identification or GPS awareness the weight would significantly increase making the unit unflyable. There are many toy-grade multicopters that weigh under 40grams all-up-weight that it is just infeasible to add these measures.

**Q10**

Are there any other problems and opportunities you can think of?

These rules and regulations would make owning a drone/model more onerous than owning a firearm in NZ. Currently you can own a small caliber air rifle and are not required to have a license to own. You certainly are not required to register each firearm you own. There is a question of a weight limit which if a drone is under that weight then it may not fall under the rules. I think the 250gm proposal is far too low. Most racing and freestyle drones, which are normally around 500-700gms fly well under 100feet as that's where all the obstacles are to race around or freestyle around/up/over for proximity flying. I think a 1kg limit would be practical. Or a lower limit say 250gm unless the model is for recreational purposes and used in shielded operations, which all racing and freestyle would be classified as.

**Q11**

**No,**

Do you agree with the proposed order of implementation of the measures?

Please comment:  
Many of the measures are infeasible or unjust. Requiring GPS or Remote identification is a breach of the owners privacy and actually infeasible in the cases of small toy-grade models.

Page 4

**Q12**

**No**

Should drones have their own standalone Rule Part?

**Q13**

**Yes**

Should we review the four-kilometre minimum flight distance from aerodromes?

---

**Q14**

**Yes – use 'safe distances' as an alternative**

Should we change the requirement to gain consent to fly above property?

---

**Q15**

**Yes – use 'safe distances' as an alternative**

Should we change the requirement to gain consent to fly above people?

---

**Q16**

**10 metres**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17**

Are there any other major Rules changes we should consider?

Anything under 1kg used for recreational, non-commercial purposes should be exempt is flown in accordance with "safe distances" and/or shielded operations.

---

**Q18**

**No**

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19**

**Respondent skipped this question**

What do you think of the proposed minor Rules changes?

---

**Q20**

Are there any other changes we should consider?

Some though needs to made into FPV flight. Where you have more situational awareness of the drone compared to the visual line of sight rule as you can see from drones perspective and can see things that an observer may not.

---

Page 5

**Q21**

**Yes, with changes ,**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

Please comment:

Add another exemption for drones under 1kg. No requirement to complete tests and no age limit.

---

Q22

Respondent skipped this question

What impact would a basic pilot qualification likely have on you?

---

Q23

Electronic/online theory test

What format should this test take?

---

Q24

No

Should there be a minimum age for basic pilot qualification?

---

Q25

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Yes,

Please comment:

If there is an exemption for hobby grade non-commercial perhaps weight limited drones. i.e. under 1kg exemption.

---

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

---

Page 6

Q27

Should we introduce the proposed drone registration system?

No,

Please comment:

There is no need to register drones. If anything, only the pilot should be registered.

---

Q28

What impact would drone registration likely have on you?

I have many drones that are constantly changing as they are crashed and repaired and modified as new hardware becomes available. According to the rule changes these modifications would need to be registered.

---

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

If the goal is to help drone owners recover lost equipment, then a totally opt-in system would be appropriate. i.e. If a user lost a drone, then-and-only then may he/she register the lost drone on the website so people could contact the owner if the drone is found. Perhaps have a user registration system with a user-id sticker that could be printed and placed on the drone may also help in this.

---

## Enabling Drone Integration

**Q30**

Should there be a minimum weight threshold for registering a drone?

**No,**  
Please comment:  
I do not think that drone registration should be a requirement.

---

**Q31**

Should certain drones not need to be registered (select all that apply)

---

Page 7

**Q32**

Should we introduce remote ID?

**No,**  
Please comment:  
It is infeasible to add a remote ID of any kind to drones as the technology simply does not exist in a form that could be implemented without causing a severe privacy breach for the owner.

---

**Q33**

What impact would remote ID likely have on you?

Most of the drones I have would not be capable of carrying such a system. They are too small to carry any extra weight. Others operate on the 2.4ghz control link and adding more devices wifi/bluetooth on that of the 5ghz frequency will reduce the safety of the control link and could cause control issues for the drones, i.e. becoming uncontrollable and dangerous because of interference.

---

Page 8

**Q34**

Should we consider introducing geo-awareness?

**No,**  
Please comment:  
Adding GPS increases the complexity of drones and only helps the user of the drone in finding their model in the event of a crash. If users/owners want this then they should be able to add GPS at their discretion.

---

**Q35**

What impact would geo-awareness likely have on you?

Some drones cannot carry a GPS unit. They are far too small and light.

---

Page 9

**Q36**

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

**Respondent skipped this question**

---

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

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#25

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Wednesday, June 02, 2021 1:52:21 PM  
**Last Modified:** Wednesday, June 02, 2021 2:06:39 PM  
**Time Spent:** 00:14:18  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Phil Alsford

**Q3**

Email address

[REDACTED]

**Q4**

**Myself**

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

I fly RC model fixed wings

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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**Q7**

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I don't think they will achieve the desired outcomes.

Forcing me to add hardware, register and take a test will make my child friendly hobby not worth the effort.

I like to take my family out for a spin, and will make it not worth it.

I also think that you are targeting the good guys. Bad actors will continue to break rules and regulations.

There will be a cost on me. The same benefits could easily be implemented with mobile app - or heck even a Google Form.

---

**Q8**

Do you think the proposed series of measures would help achieve the desired objectives?

**No,**

Please comment::

Bad actors will continue to break rules and regulations.

---

**Q9**

Do you think the proposed series of measures would address the problems and opportunities identified?

**No**

---

**Q10**

Are there any other problems and opportunities you can think of?

Use a web based form, if you MUST do something. Otherwise don't bother!

---

**Q11**

Do you agree with the proposed order of implementation of the measures?

**No,**

Please comment:

The measures do not suit

---

Page 4

**Q12**

Should drones have their own standalone Rule Part?

**No**

---

**Q13**

Should we review the four-kilometre minimum flight distance from aerodromes?

**No**

---

**Q14**

Should we change the requirement to gain consent to fly above property?

**No – keep the existing consent provision,**

Please comment:

I think people SHOULD have to gain consent to fly anything over a house

---



## Enabling Drone Integration

<b>Q15</b>	<b>No – keep the existing requirement,</b> Please comment: I think people SHOULD have to gain consent to fly anything over a person
Should we change the requirement to gain consent to fly above people?	
<b>Q16</b>	<b>30 metres</b>
If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?	
<b>Q17</b>	<b>Respondent skipped this question</b>
Are there any other major Rules changes we should consider?	
<b>Q18</b>	<b>No</b>
Are there any minor changes to the Rules that would make them easier for you to understand?	
<b>Q19</b>	<b>Respondent skipped this question</b>
What do you think of the proposed minor Rules changes?	
<b>Q20</b>	<b>Respondent skipped this question</b>
Are there any other changes we should consider?	
Page 5	
<b>Q21</b>	<b>No</b>
Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?	
<b>Q22</b>	
What impact would a basic pilot qualification likely have on you?	
There are already barriers to this hobby.	
<b>Q23</b>	<b>Other (please specify):</b> None!
What format should this test take?	
<b>Q24</b>	<b>No</b>
Should there be a minimum age for basic pilot qualification?	

Q25

No

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

No

Should we introduce the proposed drone registration system?

Q28

What impact would drone registration likely have on you?

Cost and enjoyment. Barrier to new friends joining me.

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

RealMe seems fine.

Q30

Should there be a minimum weight threshold for registering a drone?

**Yes, but with a different weight as the threshold ,**

Please comment:

Kids toys weigh this limit! Something massive! Like 2kg seems fair - and will only affect the top end of the hobby/commercial flyers.

Q31

Should certain drones not need to be registered (select all that apply)

**Yes, drones flown solely indoors,**

**Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)**

,

**Yes, others (please specify below),**

Please comment:

See weight comment above. Anything commercial, or 2KG seems fair.

Page 7

Q32

No

Should we introduce remote ID?

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Q33

What impact would remote ID likely have on you?

Extra cost. Barrier. Extra Weight. Complexity. Use an web app.

---

Page 8

Q34

Should we consider introducing geo-awareness?

No,

Please comment:

See previous comment. In this situation you'll need to take your eye off the craft. seems like a distraction.

---

Q35

What impact would geo-awareness likely have on you?

See previous comment

---

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

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Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

#26

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Wednesday, June 02, 2021 2:27:23 PM  
**Last Modified:** Wednesday, June 02, 2021 2:36:12 PM  
**Time Spent:** 00:08:49  
**IP Address:** [REDACTED]

Page 1

**Q1** Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Neil Gordon

**Q3**

Email address

[REDACTED]

**Q4**

Myself

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

Hobbyist - using drone for landscape photography.

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I fully support the thrust of the overall measures.

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Respondent skipped this question

Are there any other problems and opportunities you can think of?

Q11

Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Yes

Should drones have their own standalone Rule Part?

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

I support the concept of something along the lines of a cone-shaped exclusion zone, where the permissible altitude rose with distance from the aerodrome to 400 ft at 4 km range. I believe these should also be a change to the shielding provision. Modern drones are very unlikely to "fly away". There should not be a need to have something between the drone and aerodrome. It should be sufficient to fly below and within 100 m of an object, without it needing to be between the drone and the aerodrome.

Q14

Should we change the requirement to gain consent to fly above property?

Yes – use 'safe distances' as an alternative,

Please comment:

Safe distances is reasonable.

**Q15** Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above people?

---

**Q16** 30 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17** Respondent skipped this question

Are there any other major Rules changes we should consider?

---

**Q18** I don't know

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19**  
What do you think of the proposed minor Rules changes?

Generally support.

---

**Q20**  
Are there any other changes we should consider?

I believe these should also be a change to the shielding provision. Modern drones are very unlikely to "fly away". There should not be a need to have something between the drone and aerodrome. It should be sufficient to fly below and within 100 m of an object, without it needing to be between the drone and the aerodrome.

---

Page 5

**Q21** Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

---

**Q22**  
What impact would a basic pilot qualification likely have on you?

Not much - I consider that I have enough experience and knowledge to be able to pass this.

---

**Q23** Electronic/online theory test

What format should this test take?

---

**Q24**

**Yes, 14 years**

Should there be a minimum age for basic pilot qualification?

**Q25**

**I don't know**

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

**Q26**

**Respondent skipped this question**

Is there any other special authorisations you would like to see?

Page 6

**Q27**

**Yes, with changes.**

Should we introduce the proposed drone registration system?

Please comment:

I'd rather see this for drones of 1 kg and more.

**Q28**

What impact would drone registration likely have on you?

Not much.

**Q29**

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

fine.

**Q30**

**Yes, but with a different weight as the threshold ,**

Should there be a minimum weight threshold for registering a drone?

Please comment:

Around 1 kg.

**Q31**

**Yes, drones flown solely indoors,**

Should certain drones not need to be registered (select all that apply)

**Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)**

Page 7

**Q32**

**Yes**

Should we introduce remote ID?

**Q33**

What impact would remote ID likely have on you?

I believe that my drone (DJI Air 2S) has this already.

---

Page 8

**Q34**

Yes

Should we consider introducing geo-awareness?

---

**Q35**

Respondent skipped this question

What impact would geo-awareness likely have on you?

---

Page 9

**Q36**

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

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**Q37**

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

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#27

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Wednesday, June 02, 2021 2:22:08 PM  
**Last Modified:** Wednesday, June 02, 2021 2:51:09 PM  
**Time Spent:** 00:29:00  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Angelo Belmar

**Q3**

Email address

[REDACTED]

**Q4**

**Myself**

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

I work in forest resource planning and can potentially use data captured utilizing drones

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY  
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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I would like to see bigger/heavier drones go without have to register, etc as long as they for recreational purposes

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Respondent skipped this question

Are there any other problems and opportunities you can think of?

Q11

Respondent skipped this question

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Yes

Should drones have their own standalone Rule Part?

Q13

I don't know

Should we review the four-kilometre minimum flight distance from aerodromes?

Q14

Yes – remove the consent provision completely

Should we change the requirement to gain consent to fly above property?

Q15

Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above people?

Q16

10 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Q17

Respondent skipped this question

Are there any other major Rules changes we should consider?

---

Q18

Respondent skipped this question

Are there any minor changes to the Rules that would make them easier for you to understand?

---

Q19

Respondent skipped this question

What do you think of the proposed minor Rules changes?

---

Q20

Respondent skipped this question

Are there any other changes we should consider?

---

Page 5

Q21

No

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

---

Q22

What impact would a basic pilot qualification likely have on you?

very small

---

Q23

Electronic/online theory test

What format should this test take?

---

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

---

Q25

Respondent skipped this question

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

---

Page 6

**Q27**

Yes, with changes

Should we introduce the proposed drone registration system?

**Q28**

What impact would drone registration likely have on you?

I am sure registration will involve payment as well, so economic impact

**Q29**

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

**Q30**

Yes, but with a different weight as the threshold

Should there be a minimum weight threshold for registering a drone?

**Q31**

Yes, drones flown solely indoors,

Should certain drones not need to be registered (select all that apply)

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Yes, others (please specify below),

Please comment:

Yes, drones flown solely in private properties like farms, forests, etc

Page 7

**Q32**

I don't know

Should we introduce remote ID?

**Q33**

Respondent skipped this question

What impact would remote ID likely have on you?

Page 8

**Q34**

No

Should we consider introducing geo-awareness?

**Q35**

Respondent skipped this question

What impact would geo-awareness likely have on you?

Page 9

**Q36**

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

---

**Q37**

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

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#28

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Wednesday, June 02, 2021 7:42:37 PM  
**Last Modified:** Wednesday, June 02, 2021 8:06:13 PM  
**Time Spent:** 00:23:35  
**IP Address:** [REDACTED]

Page 1

**Q1** Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Katrina Merrifield

**Q3**

Email address

**Q4**

Who are you submitting on behalf of?

**Local government,**

If you are not submitting as an individual, please specify who you represent.:

Greater Wellington Regional Council

**Q5**

Briefly tell us your interest in drones

Our organisation uses drones for survey purposes in relation to flood protection, biosecurity and biodiversity outcomes, for environmental monitoring and for public relations.

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

we think the measures are well thought out and we are supportive of them

---

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

**Yes, with changes ,**

Please comment::

See our comments further into this submission

---

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

**Yes, with changes ,**

Please comment:

See our comments further into this submission

---

Q10

Are there any other problems and opportunities you can think of?

No

---

Q11

Do you agree with the proposed order of implementation of the measures?

**Yes,**

Please comment:

We have no objection

---

Page 4

Q12

Should drones have their own standalone Rule Part?

**Yes,**

Please comment:

We support a standalone rule with drones being separated from other types of unmanned aircraft

---

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

**No ,**

Please comment:

This is not our area of expertise, however, we do not support reviewing the 4km minimum flight distance – varying the distance for some aerodromes sounds complicated and likely to confuse drone users: having one rule for all is simple and clear. The avoidance of stress to pilots of piloted aircraft should be most important. Our opinion would change if it was possible for all aerodromes to be appropriately geo-fenced and this depends on how the following section on geo-awareness is resolved.

---

**Q14**

Should we change the requirement to gain consent to fly above property?

**No – keep the existing consent provision,**

Please comment:

Even at 120m, camera technology is clear enough to be a direct invasion of people's privacy. We understand the consent provision wasn't put in place with regard to privacy concerns, yet this is likely to be the general public's main concern. The use of drones to aid unlawful behaviour should also be considered: random drones flying and hovering overhead can bring concern as to whether someone is using it to determine what they can steal and how they can do it. The implications of removing this rule requirement completely include hobby drones flown above urban neighbourhoods, causing annoyance and concern with no means to address it; drones potentially falling from the sky (due to lack of machine or battery maintenance or pilot inability) and damaging property and/or people. You note that environmental concerns will be considered if the requirement is changed/removed, so we would like to stress the need to consider the concerns of DOC, regional councils, farmers with stock etc and address these as this provision previously, by default, allowed control over drones on public land, during lambing season, etc.

**Q15**

Should we change the requirement to gain consent to fly above people?

**No – keep the existing requirement,**

Please comment:

We currently have a policy in our regional parks that requires drone users to keep drones at least 30m away from people, stock, infrastructure, etc, but this is a horizontal distance not vertical one. Retaining some form of rule to allow policing of drones over people seems sensible.

**Q16**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

We consider that there is no safe distance (for property), for flying above people. >60m is high enough to not be a nuisance (but low enough for good photography), however.

**Q17**

Are there any other major Rules changes we should consider?

No comment

**Q18**

Are there any minor changes to the Rules that would make them easier for you to understand?

**No ,**

Please comment:

No comment



**Q19**

What do you think of the proposed minor Rules changes?

We support them

---

**Q20**

Are there any other changes we should consider?

No comment

---

Page 5

**Q21**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

**Yes,**

Please comment:

We support this: could this be a requirement at point of sale in order to capture all drones purchased within New Zealand?

---

**Q22**

What impact would a basic pilot qualification likely have on you?

None, we already require our drone users to undertake some form of training, preferably certified

---

**Q23**

What format should this test take?

**Electronic/online theory test**

---

**Q24**

Should there be a minimum age for basic pilot qualification?

**No**

---

**Q25**

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

**Yes,**

Please comment:

No comment

---

**Q26**

Is there any other special authorisations you would like to see?

No

---

Page 6

Q27

Should we introduce the proposed drone registration system?

Yes,

Please comment:

Along with Remote I.D., this is likely to result in enhanced safety from UAV operators and in confidence for manned aircraft and the public

Q28

What impact would drone registration likely have on you?

No effect for GWRC – we already maintain a register of our drones and users

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Excellent – ideally there would be an electronic disabling lock of some sort on drones until the purchaser registers it with CAA

Q30

Should there be a minimum weight threshold for registering a drone?

Yes, but with a different weight as the threshold ,

Please comment:

We suggest 200g, the Mavic Mini is 249g and is a good enough quality drone that we would expect it to be commonly used.

Q31

Should certain drones not need to be registered (select all that apply)

Yes, others (please specify below),

Please comment:

We suggest that for simplicity all drones over 200g should be registered

Page 7

Q32

Should we introduce remote ID?

Yes,

Please comment:

This can help improve situational awareness that may reduce the risk of collision between manned and un-manned aircraft. The ability to identify drones in an area of operation will be a benefit.

Q33

What impact would remote ID likely have on you?

Some inconvenience in installing it to our drones if they do not have the capability already which can be activated. We do not consider this an issue however, unless battery life is significantly affected.

Page 8

Q34

Should we consider introducing geo-awareness?

Yes,

Please comment:

We support introducing geo-awareness. There is a significant benefit in users relying on a single standardised map rather than patching together information from Visual Navigation Charts, Airshare, manufactures' versions (eg/ DJI geo-zones) etc. We suggest collaborating with Airshare and bringing their mapping up to specification. The current no-fly zones that have to be unlocked in order to fly within them are no actual impediment beyond an annoying process but also one which in no way actually prevents anyone willing to dig into the system in order to fly in a no-fly zone. This 'security' feature could be improved on through a geo-awareness development process; with drone registration and remote identification contributing to keeping unauthorised drones out of no-fly zones. Could organisations (eg/ DOC, TA's, farmers) have a simple process where they can apply for geo-fence areas - eg/ seasonal breeding areas of native fauna, and other sensitive areas? This would address concerns around removing the requirement for permission to fly over people or property.

Q35

What impact would geo-awareness likely have on you?

Currently, it may introduce issues with DJI'S geo-zone technology (we generally use DJI brand drones). If a system is produced that drone manufacturers can integrate into their drones, this should not be an issue.

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

No

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

#29

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Wednesday, June 02, 2021 8:16:53 PM  
**Last Modified:** Wednesday, June 02, 2021 8:42:19 PM  
**Time Spent:** 00:25:25  
**IP Address:** [REDACTED]

Page 1

**Q1** Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

peter massam

**Q3**

Email address

[REDACTED]

**Q4**

Myself

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

I manage, plan the use of and operate uavs on behalf is Scion

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I think the measures are suitable.

---

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

---

Q9

Yes, with changes ,

Do you think the proposed series of measures would address the problems and opportunities identified?

Please comment:

I still think cultural stakeholders need to be involved in consultation

---

Q10

Are there any other problems and opportunities you can think of?

Iwi landowners and the cultural aspects need more consideration

---

Q11

Yes

Do you agree with the proposed order of implementation of the measures?

---

Page 4

Q12

Yes

Should drones have their own standalone Rule Part?

---

Q13

Yes

Should we review the four-kilometre minimum flight distance from aerodromes?

---

Q14

No – keep the existing consent provision

Should we change the requirement to gain consent to fly above property?

---

Q15

Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above people?

---

**Q16**

50 meters

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17**

Respondent skipped this question

Are there any other major Rules changes we should consider?

---

**Q18**

Yes

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19**

Respondent skipped this question

What do you think of the proposed minor Rules changes?

---

**Q20**

Respondent skipped this question

Are there any other changes we should consider?

---

Page 5

**Q21**

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

---

**Q22**

What impact would a basic pilot qualification likely have on you?

None

---

**Q23**

A practical examination of skill and a paper based written theory test (at a provider)

What format should this test take?

---

**Q24**

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

---

**Q25**

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

---

Page 6

Q27

**Yes, with changes,**

Should we introduce the proposed drone registration system?

Please comment:

Would depend on categories/classification

---

Q28

What impact would drone registration likely have on you?

Not much

---

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Depends on cost

---

Q30

Should there be a minimum weight threshold for registering a drone?

**Yes, but with a different weight as the threshold ,**

Please comment:

100 grams

---

Q31

Should certain drones not need to be registered (select all that apply)

**Yes, drones flown solely indoors**

---

Page 7

Q32

**Yes**

Should we introduce remote ID?

---

Q33

What impact would remote ID likely have on you?

Minimal

---

Page 8

Q34

**Yes,**

Should we consider introducing geo-awareness?

Please comment:

Including cultural areas of significance

---

**Q35**

What impact would geo-awareness likely have on you?

Make the job safer and easier

---

Page 9

**Q36**

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Research and funding is required so this integration isn't half arsed

---

**Q37**

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#30

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, June 03, 2021 9:21:02 AM  
**Last Modified:** Thursday, June 03, 2021 9:37:28 AM  
**Time Spent:** 00:16:25  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Ben Doherty

**Q3**

Email address

[REDACTED]

**Q4**

Who are you submitting on behalf of?

**Myself,**

If you are not submitting as an individual, please specify who you represent.:

Te Uru Rākau New Zealand Forest Service

**Q5**

Briefly tell us your interest in drones

Introduced the use of "off the shelf" RPAS to use for Forestry purposes

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Agree with approach in general. In regards to certifying UAV pilots I would suggest if pilot has already completed basic requirement to 101 standards by approved CAA provider then this should be recognised in proposed changes

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Respondent skipped this question

Are there any other problems and opportunities you can think of?

Q11

Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

No

Should drones have their own standalone Rule Part?

Q13

Yes

Should we review the four-kilometre minimum flight distance from aerodromes?

Q14

No – keep the existing consent provision

Should we change the requirement to gain consent to fly above property?

Q15

No – keep the existing requirement

Should we change the requirement to gain consent to fly above people?

Q16

50 meters

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

**Q17**

Respondent skipped this question

Are there any other major Rules changes we should consider?

---

**Q18**

No

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19**

Respondent skipped this question

What do you think of the proposed minor Rules changes?

---

**Q20**

Respondent skipped this question

Are there any other changes we should consider?

---

Page 5

**Q21**

Yes

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

---

**Q22**

What impact would a basic pilot qualification likely have on you?

None, as all our pilots have basis 101 qualifications through accredited CAA provider

---

**Q23**

A practical examination of skill and a paper based written theory test (at a provider)

What format should this test take?

---

**Q24**

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

---

**Q25**

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

**Q26**

Respondent skipped this question

Is there any other special authorisations you would like to see?

---

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

---

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

---

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

---

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

---

Q31

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

Should certain drones not need to be registered (select all that apply)

---

Page 7

Q32

Yes

Should we introduce remote ID?

---

Q33

What impact would remote ID likely have on you?

None

---

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

---

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

---

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

---

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

# #31

**COMPLETE**

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, June 03, 2021 11:16:55 AM  
**Last Modified:** Thursday, June 03, 2021 1:05:58 PM  
**Time Spent:** 01:49:02  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Alfred Duval

**Q3**

Email address

[REDACTED]

**Q4**

Who are you submitting on behalf of?

**Other,**

If you are not submitting as an individual, please specify who you represent.:

Port Blakely Ltd.

**Q5**

Briefly tell us your interest in drones

I use drones extensively in work and a little bit in my personal life. I am a certified drone pilot and have been creating maps, photos, videos, and survey information for the past 3 years for my forestry work. From what i have seen we will (and have been) using UAVs more and more as time goes on.

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

**Q7**

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I really like the proposed measures! We will be using UAVs more and more in our business and want to be able to innovate and use the benefits more and more. These measures will (hopefully) help to promote innovation and uptake of this technology that we are already seeing help us with efficiency and more accurate data capture.

**Q8**

**Yes**

Do you think the proposed series of measures would help achieve the desired objectives?

**Q9**

**Yes**

Do you think the proposed series of measures would address the problems and opportunities identified?

**Q10**

Are there any other problems and opportunities you can think of?

Within the rules updates i would like to see the Beyond Visual Line of Site (BVLOS) rules ammended. Currently we are restricted with these rules when attempting to monitor production forest areas with tall trees. Being able to monitor airspace using another UAV or another mechanism would help us use UAVs more.

We also have issues around keeping to the 400ft AGL rules when flying highly variable terrain. In forestry we deal with steep hillsides - when you take off from the ridge to 400ft and then fly horizontally across a gully you are technically in breach of the rules - this makes the rules in this context impractical.

**Q11**

**Yes,**

Do you agree with the proposed order of implementation of the measures?

Please comment:

For the most-part - i think transponders (or something that does a similar job) would help solve a lot of the issues around unmanned and manned aircraft interaction.

Page 4

**Q12**

**I don't know**

Should drones have their own standalone Rule Part?

**Q13**

**Yes**

Should we review the four-kilometre minimum flight distance from aerodromes?

**Q14**

**No – keep the existing consent provision**

Should we change the requirement to gain consent to fly above property?

**Q15** **Yes – use 'safe distances' as an alternative**

Should we change the requirement to gain consent to fly above people?

---

**Q16** **30 metres**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17**  
Are there any other major Rules changes we should consider?

Height above ground level in certain contexts. In forestry (as mentioned previously) this height restriction can cause difficulties when not flying with 'terrain-following' enabled as the UAV flies over a steep gully or sidling. And (also as mentioned previously) the BVLOS rules whereby you have to have Part 102 to fly without visual line of site should be ammended for certain situations. We already have technology for autocounting our standing trees however can't deploy it because there is no way we can fly forest stands whilst maintaining line of site at all times.

---

**Q18** **I don't know**

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19** **Respondent skipped this question**

What do you think of the proposed minor Rules changes?

---

**Q20** **Respondent skipped this question**

Are there any other changes we should consider?

---

Page 5

**Q21** **Yes,  
Please comment:  
Fully support this.**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

---

**Q22**  
What impact would a basic pilot qualification likely have on you?  
Not a lot as myself and my colleagues are all trained drone pilots (after a 5day course run by Interpine and Massey University).

---

**Q23** **Electronic/online theory test**

What format should this test take?

---



**Q24**

**Yes, 14 years**

Should there be a minimum age for basic pilot qualification?

**Q25**

**I don't know**

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

**Q26**

**Respondent skipped this question**

Is there any other special authorisations you would like to see?

Page 6

**Q27**

**Yes,**  
Please comment:  
Fully support this.

Should we introduce the proposed drone registration system?

**Q28**

What impact would drone registration likely have on you?

It would help to hold those who use UAVs accountable. Currently anyone can own a drone and does not need to register. This keeps operators anonymous. I would support it because it would help maintain a level of accountability among drone operators.

**Q29**

**Respondent skipped this question**

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

**Q30**

**I don't know**

Should there be a minimum weight threshold for registering a drone?

**Q31**

**Yes, drones flown solely indoors,**  
**Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)**

Should certain drones not need to be registered (select all that apply)

Page 7

**Q32**

**Yes**

Should we introduce remote ID?

Q33

What impact would remote ID likely have on you?

It would give me peace of mind when flying that any other aircraft within, or coming into or out of, the airspace that i am in is aware of me and what i am doing. Currently we monitor aircraft radio channels and submit airshare requests but i am uncertain how many manned aircraft operators pay attention to the airshare requests.

---

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

---

Q35

What impact would geo-awareness likely have on you?

It would help to simplify the understandign from all drone operators as to where you can and can't fly. However, there needs to be provisions for thos who need to operate UAVs within controlled airspace. For example, we currently operate UAVs within/near both Rotorua and Tauranga airspace as our forests are covered by these areas. Currently i can call up the air traffic control tower and notify them of my beginning and ending work but there needs to be a process so i can still operate whilst making sure they are aware of what i am doing. A blanket ban on all UAVs in this area would prevent me from flying and therefore prevent me from doing my job. There needs to be provisions for those who operate professionally to sstill operate where they meet the rules for doing so.

---

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Excited and enthused about the proposed changes and fully sipport anything that will encourage UAV use and innovation in the UAV industry within NZ. Happy to work with and share my knowledge and thoughts on simple UAV use in the forest sector and how these changes may influence our forestry operations.

---

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

#32

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, June 03, 2021 11:32:10 AM  
**Last Modified:** Thursday, June 03, 2021 1:17:50 PM  
**Time Spent:** 01:45:40  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Ulrich von Werder

**Q3**

Email address

[REDACTED]

**Q4**

Who are you submitting on behalf of?

**Other,**

If you are not submitting as an individual, please specify who you represent.:

Port Blakely Forestry NZ

**Q5**

Briefly tell us your interest in drones

Professional use of drone surveys in Forestry

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

No, fully support this rule implementation in general but would like to get 400ft rule adjusted for forestry. I explain further down in the survey.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

Yes,

Please comment::

I suggest a rule adjustment for drone operations in hill country: the 400 ft (above ground) drone flight maximum causes difficulties for drone operators in forestry. When we are starting from a ridge and fly up 80 meters and then flying towards an adjacent 100 meter deep valley we quickly break the maximum flight height above ground. If the rule would apply to the start position on the ridge and the drone stays on that height limit the problem would be solved easily.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

Yes,

Please comment:

I do agree!

Q10

Are there any other problems and opportunities you can think of?

The issue of NOTAMs for P101 pilots is a great solution to fly above 400 ft above grounds. Unfortunately, that process hadn't been implemented up to recent times and I had multiple phone calls and emails with Ben McMillan until it worked. The process of issuing NOTAMs needs to be transparent, easy to follow and available on Airshare to improve safety.

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

I suggest to push drone registration and remote identification earlier than later to improve compliance.

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

No

**Q14**

Should we change the requirement to gain consent to fly above property?

**No – keep the existing consent provision,**

Please comment:

Consent provision is not a problem in the professional space providing survey services. Normally the service requester gives that consent.

**Q15**

Should we change the requirement to gain consent to fly above people?

**Yes – use 'safe distances' as an alternative,**

Please comment:

The safe distance should be sufficient!

**Q16**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

**30 metres**

**Q17**

Are there any other major Rules changes we should consider?

Yes, as discussed above. 400 ft above ground is a problem in the hill country for forest surveys. Issuing NOTAMs by using a transparent and established process or accepting 400ft above the start point of the survey.

**Q18**

Are there any minor changes to the Rules that would make them easier for you to understand?

**Yes,**

Please comment:

A picture says more than 1000 words ! little graphs or images make things easier to understand.

**Q19**

What do you think of the proposed minor Rules changes?

ok

**Q20**

Are there any other changes we should consider?

no at the moment

Page 5

**Q21**

**Yes**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

**Q22**

What impact would a basic pilot qualification likely have on you?

I am P101 certified!

---

**Q23**

What format should this test take?

Other (please specify):  
electronic theory & practical examination

---

**Q24**

Should there be a minimum age for basic pilot qualification?

Yes, 14 years

---

**Q25**

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Yes

---

**Q26**

Is there any other special authorisations you would like to see?

Respondent skipped this question

---

Page 6

**Q27**

Should we introduce the proposed drone registration system?

Yes

---

**Q28**

What impact would drone registration likely have on you?

As long as the costs and the effort is not too high - fine with me

---

**Q29**

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

digital platform and identity authentication

---

**Q30**

Should there be a minimum weight threshold for registering a drone?

Yes, with 250 grams as the weight threshold

---

**Q31**

Should certain drones not need to be registered (select all that apply)

**Yes, drones flown solely indoors,**

Please comment:

Keep it simple - otherwise the process is not followed

---

Page 7

**Q32**

Should we introduce remote ID?

**Yes**

---

**Q33**

What impact would remote ID likely have on you?

costs

---

Page 8

**Q34**

Should we consider introducing geo-awareness?

**No,**

Please comment:

Can you reduce the rules when geo-awareness is implemented?

---

**Q35**

What impact would geo-awareness likely have on you?

costs and request for exemptions

---

Page 9

**Q36**

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

no

---

**Q37**

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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#33

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, June 03, 2021 11:40:12 AM  
**Last Modified:** Thursday, June 03, 2021 2:35:17 PM  
**Time Spent:** 02:55:05  
**IP Address:** [REDACTED]

Page 1

**Q1** Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Dan Van Nistelrooy

**Q3**

Email address

[REDACTED]

**Q4**

Who are you submitting on behalf of?

**Local government,**

If you are not submitting as an individual, please specify who you represent.:

Bay of Plenty Regional Council

**Q5**

Briefly tell us your interest in drones

Drones help us survey land and collect information for lots of different uses like river repairs, gravel extraction, construction, flood defense purposes, response, maintenance, upgrades, mitigation and for jobs involving biosecurity, maritime, communications and compliance related activities. We are heavy users of drones as a tool to support some of our organizations services.

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3



Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Bay of Plenty Regional Council has a drone user policy which aligns with the CAA RPAS guidelines. The proposed measures wont have impact on our current drone services.

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Respondent skipped this question

Are there any other problems and opportunities you can think of?

Q11

Yes

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Yes,

Should drones have their own standalone Rule Part?

Please comment:  
Make it clearer for drone users

Q13

Yes,

Should we review the four kilometre minimum flight distance from aerodromes?

Please comment:  
We service the entire region and can include activities within the current minimum flight distance. We do follow the current procedures for applying for NOTAM. However these can take a long time to acquire. I think with safe operations and clear communication with Airport authorities should be enough to keep risks low.

Q14

I don't know,

Should we change the requirement to gain consent to fly above property?

Please comment:  
Would like to see some change to this but maybe just for government services? If we want to carry out surveys on rivers sometimes the best or only access is to fly above a property to get there. But I also understand property owners wanting privacy. Maybe not in residential areas without consent?

**Q15**

Should we change the requirement to gain consent to fly above people?

**Yes – relax the requirement in another way,**

Please comment:

Maybe just require clear signage or communication that drones are operating in the area?

**Q16**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

Perhaps leave it open? Use safe distances as a safe practices approach rather than a rule?

**Q17**

Are there any other major Rules changes we should consider?

Respondent skipped this question

**Q18**

Are there any minor changes to the Rules that would make them easier for you to understand?

Respondent skipped this question

**Q19**

What do you think of the proposed minor Rules changes?

Respondent skipped this question

**Q20**

Are there any other changes we should consider?

Would like some clarity around the current use of drones for declared and undeclared state of emergency. For example we manage flood events which can result in breaches of river flood defenses but not fall under a state of emergency. Some special provisions or exemptions to the rules for flood response, search and rescue and emergency management should be explored or made clearer.

Page 5

**Q21**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

**Yes,**

Please comment:

As long as you can make it an online platform that is free to all. Its more about improving awareness that there are rules for drone use.

**Q22**

What impact would a basic pilot qualification likely have on you?

None.

**Q23**

What format should this test take?

**Electronic/online theory test**

**Q24**

**No**

Should there be a minimum age for basic pilot qualification?

**Q25**

**No,**

Please comment:

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

I think you will get better participation with a simple online test. The questions in the test is consistent for all participants as is any supporting information. As for the cost, I would imagine its far less cost than the cost for shutting down a major airport for any amount of time due to a drone user unaware they are breaking rules.

**Q26**

**Respondent skipped this question**

Is there any other special authorisations you would like to see?

Page 6

**Q27**

**Yes**

Should we introduce the proposed drone registration system?

**Q28**

What impact would drone registration likely have on you?

None

**Q29**

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Agree

**Q30**

**Yes, with 250 grams as the weight threshold**

Should there be a minimum weight threshold for registering a drone?

**Q31**

**Yes, drones flown solely indoors,**

Should certain drones not need to be registered (select all that apply)

**Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)**

Page 7

Q32

Yes

Should we introduce remote ID?

---

Q33

What impact would remote ID likely have on you?

We would need to implement across our drones so some cost there?

---

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

---

Q35

What impact would geo-awareness likely have on you?

Maybe some cost?

---

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

---

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

#34

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, June 03, 2021 4:37:50 PM  
**Last Modified:** Thursday, June 03, 2021 5:31:05 PM  
**Time Spent:** 00:53:14  
**IP Address:** [REDACTED]

Page 1

**Q1** Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Philipp Suelthrop

**Q3**

Email address

**Q4**

Who are you submitting on behalf of?

**Non-government organisation/advocacy group,**

If you are not submitting as an individual, please specify who you represent.:

Kea Aerospace Ltd

**Q5**

Briefly tell us your interest in drones

We are developing the Kea Atmos, a solar-powered, remotely-piloted aircraft that will fly continuously in the stratosphere for months at a time. It will collect data at around 20km altitude to acquire aerial intelligence to fill data gaps in areas, such as: environmental monitoring, forestry management, precision agriculture, disaster management and maritime surveillance.

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Overall, the suggested changes seem to be very reasonable. Active 'rule breaker' however would likely not be captured by changes (aka promoting this aspect is a little bit questionable).

Proposing new standards for drone tracking is quite ambitious and interestingly enough not even required for all manned aircraft.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

**Yes, with changes ,**

Please comment::

We recommend a basic rating of priorities and feasibility of the proposed approaches on top of the already suggested timeline.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

**Yes, with changes ,**

Please comment:

Generally there should be a better framework to educate and support drone users that are generally keen to follow the rules. Making things more complex to primarily capture pilots that violate the current system could be counterproductive as they don't follow rules in the first place. Nothing was suggested to actually capture this issue.

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

**Yes**

Page 4

Q12

Should drones have their own standalone Rule Part?

**No ,**

Please comment:

Separating drones from other unmanned aircraft is not a good idea. However splitting all unmanned aircraft for example from gyrogliders or parasails could be advantageous.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

**Yes,**

Please comment:

Special added use cases where a shorter operation distance would be possible are an interesting idea.

**Q14** **Yes – use 'safe distances' as an alternative**

Should we change the requirement to gain consent to fly above property?

---

**Q15** **Yes – use 'safe distances' as an alternative**

Should we change the requirement to gain consent to fly above people?

---

**Q16** Other (please specify):  
Potentially a combination of altitude and distance

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17**

Are there any other major Rules changes we should consider?

1. The term Unmanned Aircraft is actually not properly defined in CAR101. From CAR001: Unmanned aircraft means an aircraft designed to operate with no pilot on board and includes unmanned balloons, control line model aircraft, free flight model aircraft and remotely piloted aircraft. This is especially problematic since the CAR101 title includes ALL balloons in unmanned aircraft, while the definition in CAR001 includes all unmanned balloons. With respect to rules 101.7 to 101.15 this needs to be clarified.
  2. Visual Line of Sight is not properly defined. This is currently a challenge with respect to night flying operations! The requirement for (manual) controllability and identification of the attitude of a drone is not defined.
  3. Rule 101.209(d) has been used as the ground for EVLOS. Such operations would however suggest that a pilot does not necessarily require a direct visual identification of an aircraft's attitude. It should be considered unrealistic that an observer can give instruction to a pilot to "blindly" fly a drone.
  4. Direct Communication under 101.209(2)(iii) needs to be defined.
- 

**Q18** Please comment:  
Included in list above (point 6.)

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19** **Respondent skipped this question**

What do you think of the proposed minor Rules changes?

---

**Q20** **Respondent skipped this question**

Are there any other changes we should consider?

---

**Q21**

**Yes**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

---

**Q22**

What impact would a basic pilot qualification likely have on you?

As a 102 operator none.

---

**Q23**

**Electronic/online theory test**

What format should this test take?

---

**Q24**

Should there be a minimum age for basic pilot qualification?

Yes, other age (please specify)  
14 Years. However younger kids will need to have the possibility to learn and fly in more controlled environments under supervision, e.g., with MFNZ.

---

**Q25**

**Yes**

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

**Q26**

**Respondent skipped this question**

Is there any other special authorisations you would like to see?

---

Page 6

**Q27**

**Yes**

Should we introduce the proposed drone registration system?

---

**Q28**

What impact would drone registration likely have on you?

None as proposed. We suggest to adapt any online registration to also cover fast acceptances of new 102 drones.

---

**Q29**

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Could for example be linked directly to drone pilot licenses and CAA numbers.

---



**Q30**

Should there be a minimum weight threshold for registering a drone?

**Yes, with 250 grams as the weight threshold,**

Please comment:

As long as these drones still require a drone pilot license.

**Q31**

Should certain drones not need to be registered (select all that apply)

**Yes, drones flown solely indoors,**

**Yes, drones flown in specific designated areas (e.g.**

**Model Flying New Zealand sites)**

,

**Yes, others (please specify below),**

Please comment:

Certain types of experimental drones (e.g. university research, certain R&D designs)

Page 7

**Q32**

Should we introduce remote ID?

**No,**

Please comment:

The idea of a remote ID for drones is probably premature since even more complex airspace users are not yet required to follow this concept (e.g., ADS-B is not mandatory for all manned aircraft). An ID system only between drones is also questionable - under VLOS mostly other air or ground users need to be aware of the drone while the drone pilot is required to be aware of the situation anyway.

**Q33**

What impact would remote ID likely have on you?

None in the proposed form. We require solutions for a remote ID between all airspace users.

Page 8

**Q34**

Should we consider introducing geo-awareness?

**Yes**

**Q35**

What impact would geo-awareness likely have on you?

As a 102 operator none in the proposed form.

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

No, we might raise additional points (e.g., relating to balloons) in a separate submission.

---

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

#35

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, June 03, 2021 6:23:35 PM  
**Last Modified:** Thursday, June 03, 2021 7:10:09 PM  
**Time Spent:** 00:46:33  
**IP Address:** [REDACTED]

Page 1

**Q1** Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Nicholas

**Q3**

Email address

[REDACTED]

**Q4** Myself

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

Weekend flyer of small FPV drones and foam planes.

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY  
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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

I think the registration/Remote ID of small/medium drones and models is not conducive of a thriving model aviation community. In my opinion, the number of actual accidents/incidents involving a risk to human wellbeing is very very small, and collisions that have happened with manned aircraft overseas have never resulted in injury. As far as I am aware, injury has only occurred when a drone has directly hit a person, and this seems to occur when people are asked/paid to film events (races, festivals, sporting events etc.), and thus disregard the 30m spacing rule. Thus the actual risk of injury to people seems to be miss represented and misunderstood. I believe a more indepth independent review of actual risk is needed before any sweeping changes are enacted. If each and every drone had to be registered, along with their owner, then drones would be more regulated than firearms. Which is more dangerous, drones or firearms? I believe the danger of drones is almost solely concentrated with inexperienced pilots who buy off the shelf drones and don't know the risks, so they break the rules and do stupid things. That is where your problem lies. People who build their own drones and planes like I do know better, and how we fly reflects the actual risks involved with flying, so please don't punish us for having fun with our friends. Building and flying little aircraft is a great educational experience, and the negativity from government and the press only succeeds in fear-mongering and turning people off this great hobby. The people who buy a drone from the shop are the ones that need to be more educated, so if you really have to crack down on the actual risks of light unmanned aviation, possibly implement education strategies instead of turning us all into criminals.

Q8

No

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

No

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Respondent skipped this question

Are there any other problems and opportunities you can think of?

Q11

No

Do you agree with the proposed order of implementation of the measures?

Page 4

Q12

Respondent skipped this question

Should drones have their own standalone Rule Part?

Q13

Respondent skipped this question

Should we review the four-kilometre minimum flight distance from aerodromes?

**Q14**

Respondent skipped this question

Should we change the requirement to gain consent to fly above property?

---

**Q15**

Respondent skipped this question

Should we change the requirement to gain consent to fly above people?

---

**Q16**

30 metres

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17**

Respondent skipped this question

Are there any other major Rules changes we should consider?

---

**Q18**

Respondent skipped this question

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19**

Respondent skipped this question

What do you think of the proposed minor Rules changes?

---

**Q20**

Respondent skipped this question

Are there any other changes we should consider?

---

Page 5

**Q21**

Respondent skipped this question

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

---

**Q22**

Respondent skipped this question

What impact would a basic pilot qualification likely have on you?

---

**Q23**

Respondent skipped this question

What format should this test take?

---

Q24

No

Should there be a minimum age for basic pilot qualification?

---

Q25

Respondent skipped this question

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

---

Page 6

Q27

No

Should we introduce the proposed drone registration system?

---

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

---

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

---

Q30

Respondent skipped this question

Should there be a minimum weight threshold for registering a drone?

---

Q31

Respondent skipped this question

Should certain drones not need to be registered (select all that apply)

---

Page 7

Q32

No

Should we introduce remote ID?

---

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

---

Page 8

**Q34**

No

Should we consider introducing geo-awareness?

---

**Q35**

Respondent skipped this question

What impact would geo-awareness likely have on you?

---

Page 9

**Q36**

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Slightly off topic, but a very clear, maximum 6 points poster should be developed of the rules to make it very clear what the rules are, and have it freely available.

---

**Q37**

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

#36

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Thursday, June 03, 2021 9:35:53 PM  
**Last Modified:** Thursday, June 03, 2021 10:21:35 PM  
**Time Spent:** 00:45:42  
**IP Address:** [REDACTED]

Page 1

**Q1** Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

David Keys

**Q3**

Email address

[REDACTED]

**Q4** Myself

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

I own and operate a commercial drone services company. I am also a pilot for Air New Zealand operating the Boeing 787. I have a strong interest in drone integration in New Zealand

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3



**Q7**

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

A rules update is required. There should be prescribed rules for Part 102, separate to Part 101, but so that all Part 102 operators are operating within the same framework. Some Part 101 rules should stay (Shielded operations), but some should be changed (Part 101 height restriction reduced). Part 102 operators could operate to 400 feet but subject to stricter licensing. Drone registration is reasonable but only for larger aircraft (>15Kg) or for speeds >100Kph or BVLOS etc. Remote ID will not work, it will not show who is at the controls, it will increase time and cost burden to operators already operating within the current rules. Similar outcomes with geo-awareness. Responsible operators will bare the cost while rogue operators will find a way around or simply not comply. Licensing should be introduced in a tiered fashion (Part 101 - height restrictions, drone restrictions(speed/weight), shielded operations. Part 102 Annual competency, maintenance schedules allow flight over property, up to 400 feet (higher by NOTAM). Part 103(?) BVLOS, fully autonomous, above 25(50?) Kg

**Q8**

Do you think the proposed series of measures would help achieve the desired objectives?

**Yes, with changes ,**

Please comment::

As mentioned above. At the moment there are a group who don't adhere to the current regulations. These people will still exist but the compliant operators will be paying the cost. There need to be harsher penalties (drone confiscation if you can't provide evidence of a licence or instant fines)

**Q9**

Do you think the proposed series of measures would address the problems and opportunities identified?

**No**

**Q10**

Are there any other problems and opportunities you can think of?

There is opportunity around education. I am sure if educational classes/seminars were held, attendance would be high from recreational users who are where 90% of safety concerns lie.

**Q11**

Do you agree with the proposed order of implementation of the measures?

**No,**

Please comment:

Some proposed measures are overbearing or simply won't achieve the desired result.

Page 4

**Q12**

Should drones have their own standalone Rule Part?

**Yes,**

Please comment:

Part 101 - Recreational, Part 102 - Commercial (with its own set of operation rules), Part 103 - Higher risk (Above 50Kg, High speed or BVLOS)

## Enabling Drone Integration

**Q13**

Should we review the four-kilometre minimum flight distance from aerodromes?

**No ,**

Please comment:

This should stay. It increases awareness of manned aircraft operations. Part 101 operations should obtain permission from the aerodrome operator, Part 102 can operate as any other aircraft with a maximum height subject to holding the required licence.

**Q14**

Should we change the requirement to gain consent to fly above property?

**Yes – relax the consent provision in another way,**

Please comment:

Again, Part 101 operators, fly over their own property or 'Shielded'. Part 102 no permission required.

**Q15**

Should we change the requirement to gain consent to fly above people?

**Yes – relax the requirement in another way,**

Please comment:

Keep the current requirement for Part 101 operators, Part 102 operates at 'Safe' heights

**Q16**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

Dependant on drone size and operator licence. Part 102 operators subject to an annual competency assessment could operate within smaller margins.

**Q17**

Are there any other major Rules changes we should consider?

Part 102 should have its own prescribed rules so everyone is operating to the same regulations. Currently 5 different Part 102 operators can have 5 different requirements for operating over property. This would help with education of both operators and the public. Licensing should also be set out in a rule part and AC. This would assist operators in their expectations and give training providers some consistency.

**Q18**

Are there any minor changes to the Rules that would make them easier for you to understand?

**Yes,**

Please comment:

As mentioned in above comments.

**Q19**

What do you think of the proposed minor Rules changes?

**Respondent skipped this question**

**Q20**

Are there any other changes we should consider?

**Respondent skipped this question**

**Q21**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

**Yes, with changes ,**

Please comment:

Part 61 licensed pilots should still qualify under this with the additional requirement of a competency assessment for operations under Part 102.

**Q22**

What impact would a basic pilot qualification likely have on you?

Nil

**Q23**

What format should this test take?

**A practical examination of skill and a paper based written theory test (at a provider)**

**Q24**

Should there be a minimum age for basic pilot qualification?

**Yes, 16 years**

**Q25**

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

**Yes**

**Q26**

Is there any other special authorisations you would like to see?

**Respondent skipped this question**

Page 6

**Q27**

Should we introduce the proposed drone registration system?

**No,**

Please comment:

Registration will in no way achieve any safety enhancement. Non compliant operators will simply ignore the requirement. On a small Mavic style drone the registration will not be visible enough to provide any enforcement advantage.

**Q28**

What impact would drone registration likely have on you?

Cost for no benefit.

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

---

Q30

Should there be a minimum weight threshold for registering a drone?

**Yes, but with a different weight as the threshold ,**  
Please comment:  
Larger drones (>25-50Kg) or capable of high speed or BVLOS drones should be registered.

---

Q31

Should certain drones not need to be registered (select all that apply)

**Yes, others (please specify below),**  
Please comment:  
Yes, only register large, fast or drones being operated at a higher risk threshold (BVLOS)

---

Page 7

Q32

Should we introduce remote ID?

**No,**  
Please comment:  
The implementation would be a nightmare, non-compliant operators would simply ignore this or if enforced it would be hacked. There are issues around the security of the data, there is a massive cost burden to operators already operating within the regulations.

---

Q33

What impact would remote ID likely have on you?

Huge cost, privacy and security concerns.

---

Page 8

Q34

Should we consider introducing geo-awareness?

**No,**  
Please comment:  
Cost to the regulator and operators for an un-necessary chart or electronic database for information that is already available from certified sources. Monet should be spent on education. Geo fences don't keep out non-compliant operators now and they will only make operations more difficult for compliant operators in the future. The cost involved in implementation would be huge and passed on to the industry. We don't need it. We already have common data available and this would introduce the risk of having conflicting data. Drone operators and manned aircraft using information from the same source is the safest most efficient option.

---

**Q35**

What impact would geo-awareness likely have on you?

Cost, operational inefficiencies, administrative time and cost.

---

Page 9

**Q36**

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Everything is in the comments. Thank you to the ministry for inviting feedback. I look forward to the next step if the collaborative approach is continued.

---

**Q37**

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

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#37

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Wednesday, June 02, 2021 8:33:50 PM  
**Last Modified:** Friday, June 04, 2021 1:08:51 AM  
**Time Spent:** Over a day  
**IP Address:** [REDACTED]

Page 1

**Q1**  Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Kit Adams

**Q3**

Email address

[REDACTED]

**Q4**  Myself

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

I have designed, built and flown model aircraft since childhood. Currently I design, 3D print and fly model aircraft, primarily gliders and small (nano to micro) quad-copters, as a hobby.

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

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Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

In a free society, regulations restricting long-held freedoms should be commensurate with the risk of the activity. Model aircraft have been built and flown since before manned aviation began, and it is sad to see the freedom to enjoy this activity put in jeopardy by the proliferation of multi-rotor drones.

That said, the fact that recreational multi-rotor drones have caused zero fatalities in the world during their entire existence indicates that, despite perceptions, they are generally flown in a responsible manner and are remarkably safe compared to other outdoor pursuits.

Proximity flying

The reason for this safety record is that most drones are flown recreationally either for racing around a course or for filming scenic videos while flying in close proximity to e.g. trees, cliffs, rock faces, or gorges. In other words, places where it would be suicidal for manned aircraft to fly. Flying a drone above 120 m is illegal but also results in relatively boring footage.

Additionally, manned aircraft (apart from gliders, which don't spend much time below 120 m) can be heard from kms away, especially helicopters, allowing plenty of time to reduce altitude or land.

I think there should be exemptions from registration, remote id, and on-board geo-awareness, for recreational shielded operations (within 100 m of the shield and up to 20 m above the shield), and more than 50 m away from people and property, for multi-rotors up to 700 g. Close to airfields there could be tighter restrictions.

The potential damage from a UAV collision is not purely a function of total mass. The density and hardness of the materials are the most important criteria. E.g. density determines the terminal velocity.

So in addition, I think an exemption from registration, remote-id, and geo-awareness, for low-density (foam, balsa or 3D printed), gliders weighing up to 1 kg, flown below 120 m in uncontrolled airspace is also reasonable. If the glider has an electric power system (motor and battery, i.e. the "hard bits"), this should weigh less than 200 g.

The current FPV observer requirement is overly restrictive and was clearly dreamed up by manned aviation pilots, which is a little ironic given the restricted view from (especially in high wing light aircraft) and frequency of mid-air collisions between, light aircraft. In a powered aircraft it is impossible to hear any external sounds, especially other aircraft, whereas on the ground one can hear a light plane or helicopter well before anyone can see it.

I think there should be a relaxation of the FPV observer requirement, especially for shielded operations of sub-250 g quad-rotors, which can yaw instantaneously, effectively giving a 360 view as quickly as turning your head can, and are unlikely to cause damage or injury in even the worst case scenarios.

Q8

Yes, with changes

Do you think the proposed series of measures would help achieve the desired objectives?

Q9

Yes, with changes

Do you think the proposed series of measures would address the problems and opportunities identified?

Q10

Respondent skipped this question

Are there any other problems and opportunities you can think of?

**Q11**

**Yes**

Do you agree with the proposed order of implementation of the measures?

---

Page 4

**Q12**

**I don't know**

Should drones have their own standalone Rule Part?

---

**Q13**

Should we review the four-kilometre minimum flight distance from aerodromes?

**Yes,**

Please comment:

I suggest keeping the existing rules out to 2 km. From 2 to 4 km, shielded operations could be modified to allow a maximum height limit of 20 m above the shield.

---

**Q14**

Should we change the requirement to gain consent to fly above property?

**Yes – use 'safe distances' as an alternative,**

Please comment:

Obviously, this would not be a right to fly at near the safe distance to property if owners/occupiers complain, but is for situations where obtaining consent is impractical.

---

**Q15**

Should we change the requirement to gain consent to fly above people?

**Yes – use 'safe distances' as an alternative,**

Please comment:

Obviously, this would not be a right to fly at near the safe distance to people if they complain, but is for situations where obtaining consent is impractical.

---

**Q16**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

**50 meters**

---

**Q17**

Are there any other major Rules changes we should consider?

**Respondent skipped this question**

---

**Q18**

Are there any minor changes to the Rules that would make them easier for you to understand?

**No**

---

**Q19**

What do you think of the proposed minor Rules changes?

---

**Respondent skipped this question**



Q20

Respondent skipped this question

Are there any other changes we should consider?

---

Page 5

Q21

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

**Yes, with changes ,**

Please comment:

Passing the (free) online test would result in the pilot being issued with a unique, life-long id number they would use to label their > 250g drones.

---

Q22

Respondent skipped this question

What impact would a basic pilot qualification likely have on you?

---

Q23

**Electronic/online theory test**

What format should this test take?

---

Q24

**Yes, 14 years**

Should there be a minimum age for basic pilot qualification?

---

Q25

**Yes**

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

---

Page 6

Q27

Should we introduce the proposed drone registration system?

**Yes, with changes,**

Please comment:

Surely it is the pilot that should be registered, not their drones individually. I can see a reason for keeping a register of all the firearms in the country in addition registering their owners, but firearms are designed for killing and are relatively hard to make. It would be simpler, cheaper and much more practical for pilots who complete the online exam successfully to receive a unique id number which they display on all their drones.

---

**Q28**

What impact would drone registration likely have on you?

I design and 3D print gliders and small quad-copters as a hobby. Each design goes through many iterations so I generate a large number of aircraft and parts of aircraft, transferring parts where possible, commonly creating more than one new combination for a single day of flying.

Under the proposed registration system I would have to register each aircraft and variation of same, because they are not suitable for flying at the flat MFNZ field nearby and the gliders typically weigh between 250 g and 1 kg.

Registering all of these individually seems pointless and impractical!

Why does each aircraft need to be individually registered?

Surely attaching an id number identifying the registered owner would achieve the same goals?

**Q29**

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

I think issuing pilots who pass a (free) online test with a unique, life-long id number to label their drones with would be a workable system.

**Q30**

Should there be a minimum weight threshold for registering a drone?

**Yes, but with a different weight as the threshold ,**

Please comment:

250 g for multi-rotor drones. Increased to 1 kg for low density foam, balsa or 3D printed gliders/electric gliders whose power systems (motor and battery, i.e. the "hard bits") weigh less than 200 g.

**Q31**

Should certain drones not need to be registered (select all that apply)

**Yes, drones flown solely indoors,**

**Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)**

,

**Yes, others (please specify below),**

Please comment:

The potential damage from a drone collision is not purely a function of total mass. The density and hardness of the materials are the most important criteria. E.g. density determines the terminal velocity. I am in favour of a registration exemption for sub 250g micro-quads (flying below 120 m), but I also think that weight limit should be increased to 1kg for R/C gliders constructed primarily from foam, balsa/film or which are mostly 3D printed. These need to be much bigger than a mini-quad to fly effectively but are safer in a collision because of their low density and soft materials. It is generally not practical to fly pure gliders, especially slope soarers, at MFNZ flat field sites. I am also in favour of an exemption for shielded operation of drones up to 700 g. Of course, neither model gliders nor drones should be flown if manned aircraft, especially hang-gliders or para-gliders, are operating in the vicinity.

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Page 7

**Q32**

Should we introduce remote ID?

**No,**

Please comment:

It is impractical on small drones and gliders because the weight and power requirements and I know how unreliable GPS can be in the electrically noisy environment of, say, a quad-rotor. It is no substitute for spatial separation of drones from manned aircraft in my opinion. Therefore, there should be exemptions for sub-250 g drones, and light low density R/C gliders flown either shielded or below 120 m. There should also be exemption for multi-rotors below 700 g flown under shielded operations. I can see the point of remote id for heavy commercial drones, but I think that the majority of drone flights will always be recreational, since it would be a nightmare to have e.g. delivery drones flying around cities or suburbs. Especially when autonomous electric ground vehicles would do that job quietly, safely and efficiently in all weather. One possible use of commercial drones might be in agriculture for top-dressing, but do we really want the equivalent of radio controlled or autonomous full-sized aircraft flying around?

---

**Q33**

What impact would remote ID likely have on you?

I have designed, built and flown model aircraft for over 50 years without injuring anyone or damaging property. Having to install remote devices in many of my aircraft would be both expensive and time consuming for me. An exemption for MFNZ fields would be of little use for me because the local field is not suitable for the types of flying I enjoy (I also don't enjoy being in close proximity to high powered model aircraft and model helicopters).

---

Page 8

**Q34**

Should we consider introducing geo-awareness?

**Yes,**

Please comment:

A mobile phone app could be useful. However, this risks giving pilots a false sense of security if it gives a green light to fly. There is no substitute for common sense when deciding whether or not it is safe to fly. E.g. not flying if there is any possibility a para or hang glider might be in, or come into, the vicinity. Regarding on-board GPS control systems, there should be exemptions for sub-250 g drones, and light low density R/C gliders flown either shielded or below 120 m. There should also be exemptions for multi-rotors below 700 g flown under shielded operations.

---

**Q35**

What impact would geo-awareness likely have on you?

Having to integrate a commercial GPS control system into the models and quads I have built would be expensive and extremely annoying. GPS systems can be unreliable and slow to achieve a fix, especially on small quad-rotors.

---

Page 9

**Q36**

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

---

**Q37**

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

#38

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, June 04, 2021 12:15:27 PM  
**Last Modified:** Friday, June 04, 2021 12:47:40 PM  
**Time Spent:** 00:32:13  
**IP Address:** [REDACTED]

Page 1

**Q1** Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Nathan van Slooten

**Q3**

Email address

[REDACTED]

**Q4**

Who are you submitting on behalf of?

**Non-government organisation/advocacy group,**

If you are not submitting as an individual, please specify who you represent.:

Redzone Drone Racing Incorporated

**Q5**

Briefly tell us your interest in drones

Redzone Drone Racing Incorporated is the only incorporated society for drone racing in New Zealand and the Christchurch club for drone racing. We have a field we lease in the Christchurch Redzone for our activities and meet 1-2 times a week depending on the season.

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

The proposed series of measures will not significantly decrease the lack of compliance and ineffective enforcement problems. Most people know there are rules out there, but are not bothered to look into them or abide by them - the body of people who are currently causing issues, won't adhere to the new measures.

Targeting a different group from above, the proposed rules aside from Remote Identification could however be useful hen trying to integrate commercial activities.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

**Yes, with changes ,**

Please comment::

See above.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

**Yes, with changes ,**

Please comment:

See above.

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

**Yes**

Page 4

Q12

Should drones have their own standalone Rule Part?

**Yes**

Q13

Should we review the four kilometre minimum flight distance from aerodromes?

**Yes,**

Please comment:

The height should be incrementally increased from the base of the airport out. If you are flying on the boundary of the 4km distance, it makes no sense to be able to go from shielded, to the 400ft (or airspace) height boundary.

Q14

Should we change the requirement to gain consent to fly above property?

**Yes – use 'safe distances' as an alternative**

Q15

Should we change the requirement to gain consent to fly above people?

**No – keep the existing requirement**

**Q16**

**30 metres**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17**

**Respondent skipped this question**

Are there any other major Rules changes we should consider?

---

**Q18**

**No**

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19**

**Respondent skipped this question**

What do you think of the proposed minor Rules changes?

---

**Q20**

**Respondent skipped this question**

Are there any other changes we should consider?

---

Page 5

**Q21**

**Yes**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

---

**Q22**

What impact would a basic pilot qualification likely have on you?

None, we hold MFNZ wings.

---

**Q23**

**Electronic/online theory test**

What format should this test take?

---

**Q24**

**No**

Should there be a minimum age for basic pilot qualification?

---

**Q25**

**Yes**

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

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Q26

Is there any other special authorisations you would like to see?

No RemoteID for MFNZ members at approved fields.

---

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

---

Q28

Respondent skipped this question

What impact would drone registration likely have on you?

---

Q29

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

---

Q30

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

---

Q31

Yes, drones flown solely indoors,

Should certain drones not need to be registered (select all that apply)

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

---

Page 7

Q32

I don't know,

Should we introduce remote ID?

Please comment:

More detail on what the Remote ID would involve needs to be given. An exemption for MFNZ sites should also be given.

---

Q33

Respondent skipped this question

What impact would remote ID likely have on you?

---

Page 8



Q34

Should we consider introducing geo-awareness?

I don't know,

Please comment:

Geo-awareness with a creation of a digital map is a good idea, however enforcing this on certain drones makes things difficult and restrictive even when they may be completely legal.

Q35

What impact would geo-awareness likely have on you?

Respondent skipped this question

Page 9

Q36

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Respondent skipped this question

Q37

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

Respondent skipped this question

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

#39

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, June 04, 2021 1:36:11 PM  
**Last Modified:** Friday, June 04, 2021 1:46:06 PM  
**Time Spent:** 00:09:55  
**IP Address:** [REDACTED]

Page 1

**Q1** Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Moustafa Elmehrek

**Q3**

Email address

[REDACTED]

**Q4**

Myself

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

To me they are toys that I enjoy flying and capturing some amazing footage

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

**Q7**

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Agree with most of it.

**Q8**

**Yes, with changes**

Do you think the proposed series of measures would help achieve the desired objectives?

**Q9**

Do you think the proposed series of measures would address the problems and opportunities identified?

**No,**

Please comment:

If you means problems as stupid people flying drones around airports and at times they shouldn't then NO these measure wouldn't stop that.

**Q10**

Are there any other problems and opportunities you can think of?

I think we need to also be more flexible around where we can fly e.g. DOC sites and the process around getting approvals is a nightmare so if we have rules in place and know who is flying what then we should be more flexible around areas where people can fly within the rules.

**Q11**

Do you agree with the proposed order of implementation of the measures?

**Yes**

Page 4

**Q12**

Should drones have their own standalone Rule Part?

**Yes**

**Q13**

Should we review the four-kilometre minimum flight distance from aerodromes?

**Yes**

**Q14**

Should we change the requirement to gain consent to fly above property?

**Yes – remove the consent provision completely**

**Q15**

Should we change the requirement to gain consent to fly above people?

**Yes – relax the requirement in another way**

**Q16** **30 metres**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17** **Respondent skipped this question**

Are there any other major Rules changes we should consider?

---

**Q18** **No**

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19** **Respondent skipped this question**

What do you think of the proposed minor Rules changes?

---

**Q20** **Respondent skipped this question**

Are there any other changes we should consider?

---

Page 5

**Q21** **Yes**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

---

**Q22**  
What impact would a basic pilot qualification likely have on you?

well I would expect a qualification for someone like myself just playing with his drone to be less complex that a commercial drone pilot but again that will not stop A\* holes from ruining it for all of us. The most important piece is know who is flying what so that if something happens we can get them, fine them or ban them from flying drones again.

---

**Q23** **Electronic/online theory test**

What format should this test take?

---

**Q24** **Yes, 16 years**

Should there be a minimum age for basic pilot qualification?

---



**Q25**

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

**Q26**

Respondent skipped this question

Is there any other special authorisations you would like to see?

---

Page 6

**Q27**

Yes

Should we introduce the proposed drone registration system?

---

**Q28**

What impact would drone registration likely have on you?

N/A

---

**Q29**

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

For someone like myself who always flies within the rules no issues.

---

**Q30**

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

---

**Q31**

Yes, drones flown solely indoors,

Should certain drones not need to be registered (select all that apply)

Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)

---

Page 7

**Q32**

I don't know

Should we introduce remote ID?

---

**Q33**

Respondent skipped this question

What impact would remote ID likely have on you?

---

Page 8

Q34

Yes

Should we consider introducing geo-awareness?

---

Q35

Respondent skipped this question

What impact would geo-awareness likely have on you?

---

Page 9

Q36

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

---

Q37

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

#40

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, June 04, 2021 1:41:10 PM  
**Last Modified:** Friday, June 04, 2021 2:20:07 PM  
**Time Spent:** 00:38:57  
**IP Address:** [REDACTED]

Page 1

**Q1** Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Martyn McGuinness

**Q3**

Email address

[REDACTED]

**Q4** Myself

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

Have implemented a UAV manual, training and induction process within a Forestry company I work for. Fly recreational use occasionally.

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Overall it is a practical and sensible proposal for improving the drone aviation system.

---

Q8

Yes

Do you think the proposed series of measures would help achieve the desired objectives?

---

Q9

Yes

Do you think the proposed series of measures would address the problems and opportunities identified?

---

Q10

Are there any other problems and opportunities you can think of?

Insurance companies state cover is conditional on following the '12 rules', but in so many cases the rules are technically exceeded because they are not practical, and therefore insurance is possibly in jeopardy. Rules can be amended that would allow small scale drone flights in rural areas especially to continue and be fully insured and safe.

Must not make the system so prescriptive or difficult to obtain that it becomes a barrier to staff utilising the technology as part of the improving productivity in their day to day operations. Making it so specialised would remove innovation from the sector and force reliance on a small group of advanced, costly operators.

Opportunity to review the 400ft above ground level rule for flying over steep terrain to remove issue of being non-compliant.

---

Q11

Yes,

Do you agree with the proposed order of implementation of the measures?

Please comment:

The proposed changes over a scale of years makes it practical to implement.

---

Page 4

Q12

Should drones have their own standalone Rule Part?

Yes,

Please comment:

Makes it easier for drone users of all levels to interpret and follow. When implementing rules within an organisation it was hard to match rules to exact legislation to justify to management. one standalone rule set would have clarified this easier.

---



**Q13**

Should we review the four-kilometre minimum flight distance from aerodromes?

**Yes,**

Please comment:

Not always reasonable especially around unmanned aerodromes. For example flying over cutover for imagery capture in a forest estate over private land, far from others, in the hills far away from any other activity, but technically falls just within the 4km boundary of an unmanned aerodrome. Operation is non compliant legally, and technically could be argued is uninsured, but hard to justify why.

**Q14**

Should we change the requirement to gain consent to fly above property?

**No – keep the existing consent provision,**

Please comment:

The presumptive right to fly over other property should be exist. Drone operators do not know the risks that may exist over other property. In rural areas for example trees may be being felled nearby and could hit a drone that has flown over. A drone crash into trees could cause a fire on that property.

**Q15**

Should we change the requirement to gain consent to fly above people?

**Yes – use 'safe distances' as an alternative,**

Please comment:

From a safety point of view maintaining safe distances is more practical and applicable in all circumstances. Removes the misunderstanding that this is a privacy issue. It is also ambiguous when you have employees working on your own private property but cannot fly a drone above to monitor safety or environmental performance without being in breach of this rule.

**Q16**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

10m horizontal distance is appropriate but should extend in a cone vertically all the way above person to avoid drones falling directly on people.

PROACTIVELY RELEASED BY THE MINISTRY OF TRANSPORT

**Q17**

Are there any other major Rules changes we should consider?

Rule 101.207 (a) (3) – must not operate above 400 feet above ground level.

This rule is understandable in flat areas however when flying over steep hill country to take aerial imagery, if the drone does not have the ability to follow terrain it can quickly exceed this 'above ground level' requirement as it flies out over the terrain that drops away. A user could only be flying 40m above ground on the hillside launching place, but quickly be 200m above the ground as the gully drops away steeply. Yet the drone clearly in sight on the same plane as the operator. It becomes impossible for aerial surveys to be conducted across hill country without breaking this rule.

**Issuing a NOTAM**

The operation of the drone above 400ft can be conducted if following section 101.207 (c) of the rule which requires a NOTAM to be issued for notification of other aviation users. However most operators have no ability or knowledge of who to contact or how to get a NOTAM advisory issued so this is not utilised. The NOTAM system is not fit for purpose for anyone operating within the 101 rules. There should be a system whereby users can notify through the Airshare platform the appropriate authority of their intention to exceed the 400ft above ground level in hilly terrain in rural areas. The Airshare platform could link via the CAA into the NOTAM system for advising other aviation users if that is deemed acceptable.

**Q18**

Respondent skipped this question

Are there any minor changes to the Rules that would make them easier for you to understand?

**Q19**

Respondent skipped this question

What do you think of the proposed minor Rules changes?

**Q20**

Respondent skipped this question

Are there any other changes we should consider?

Page 5

**Q21**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

**Yes,**

Please comment:

Support an online theory test for Part 101, to certify basic users to operate. An online test, rather than an in person course, is easily accessible to most and requires little commitment in time and money so more likely to get wide scale buy in. Costs associated with qualification would have to be minimal in order to achieve widespread compliance Age limit should at least match the drivers licence age limit to truly understand the safety implications.

Q22

What impact would a basic pilot qualification likely have on you?

Personally I have been through a drone training course offered by Massey Aviation so should not need to take a further test. Within our in house training programme within the company having an online test for users to take would complement the current drone induction process and give some legal weight to it.

Q23

Electronic/online theory test

What format should this test take?

Q24

Yes, 16 years

Should there be a minimum age for basic pilot qualification?

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

Page 6

Q27

Yes,

Should we introduce the proposed drone registration system?

Please comment:

Costs associated with registration would have to be minimal in order to achieve widespread compliance

Q28

What impact would drone registration likely have on you?

Already have a registration logged in Airshare. Something similar with little to no cost would be best to get full compliance.

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Digital platform is essential in this age for ease of use.

**Q30**

Should there be a minimum weight threshold for registering a drone?

**Yes, but with a different weight as the threshold ,**

Please comment:

Should allow 'toy' drones for little kids to continue unregistered. These pose a smaller threat to the aviation system and allow kids to learn about drones at a younger age.

**Q31**

Should certain drones not need to be registered (select all that apply)

**Yes, others (please specify below),**

Please comment:

Toy drones and indoor drones should be exempt.

Page 7

**Q32**

Should we introduce remote ID?

**Yes,**

Please comment:

Remote identification technology would be beneficial in improving safety and awareness for drone operators and the aviation industry. However it can only be implemented if it is incorporated into drones at manufacture. It is unfeasible to make this a requirement if operators have to purchase add on technology in order to comply.

**Q33**

What impact would remote ID likely have on you?

Happy to share that information as long as there is no cost of compliance as it would be a barrier to fair and even application across the entire drone users.

Page 8

**Q34**

Should we consider introducing geo-awareness?

**I don't know,**

Please comment:

Geo awareness to date is not always accurate. Awareness is OK but restriction doesn't work. Currently drones with geo-fencing to not allow for operators who have been given verbal or written approval to operate within that area to override the restriction.

**Q35**

What impact would geo-awareness likely have on you?

Happy to be made aware and comply with restrictions, but system must not prevent flight if approval has been granted from the appropriate authority.

Page 9

**Q36**

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Innovation and benefits from drone technology also come from small scale users within rural industries such as forestry and agriculture, utilising drones in their day to day work to improve operations such as monitoring environmental performance, improving safety and small scale imagery capture. These operations are conducted in rural areas, far from public privacy issues, air corridors, airports and urban areas, and are in most cases within the 101 rules framework. Issues around illegal incursion in the controlled airspace of urban areas, should not restrict the legal use of drone in rural airspace far from any other activity.

While compliance and safety are of the utmost importance, proposed changes to rules should not make it so difficult for these industries to achieve compliance that it becomes impossible to utilise drones in their day to day operations, and makes them reliant on certified external providers. The use of drones under the current 101 rules allows for many benefits that improve productivity and efficiency. If the system requires greater level of compliance and restrictions that mean the industry cannot make use of drone technology, these productivity gains will be lost and only lead to increased costs to access specialised drone services.

**Q37**

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

#41

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, June 04, 2021 1:43:02 PM  
**Last Modified:** Friday, June 04, 2021 2:50:57 PM  
**Time Spent:** 01:07:55  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

**Q3**

Email address

**Q4**

Who are you submitting on behalf of?

**Other,**

If you are not submitting as an individual, please specify who you represent.:

Private company

**Q5**

Briefly tell us your interest in drones

Our company uses drones primarily for capturing aerial photography as part of forest management and landuse consulting.

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

Page 3

**Q7** Respondent skipped this question

What is your view on the proposed series of measures?  
Are there any other alternatives you suggest we consider?

**Q8** Respondent skipped this question

Do you think the proposed series of measures would help achieve the desired objectives?

**Q9** Respondent skipped this question

Do you think the proposed series of measures would address the problems and opportunities identified?

**Q10**  
Are there any other problems and opportunities you can think of?

There are opportunities for fully autonomous and beyond-visual-line-of-sight drone operations.

**Q11** Respondent skipped this question

Do you agree with the proposed order of implementation of the measures?

Page 4

**Q12** Respondent skipped this question

Should drones have their own standalone Rule Part?

**Q13** **Yes,**  
Please comment:  
Suggested changes sound sensible.

Should we review the four-kilometre minimum flight distance from aerodromes?

**Q14** **Yes – relax the consent provision in another way,**  
Please comment:  
In general, requiring consent to fly above private property is a good thing. It should only be relaxed for specific situations which protect privacy and/or there should be a requirement for operators to apply for exemptions to the current rules.

Should we change the requirement to gain consent to fly above property?

**Q15** **Yes – relax the requirement in another way,**  
Please comment:  
Operators should apply for exemptions and be able to demonstrate they can do so safely and in a way that protects privacy and does not cause nuisance.

Should we change the requirement to gain consent to fly above people?

**Q16**

**50 meters**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17**

**Respondent skipped this question**

Are there any other major Rules changes we should consider?

---

**Q18**

**Respondent skipped this question**

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19**

**Respondent skipped this question**

What do you think of the proposed minor Rules changes?

---

**Q20**

**Respondent skipped this question**

Are there any other changes we should consider?

---

Page 5

**Q21**

**Yes**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

---

**Q22**

**Respondent skipped this question**

What impact would a basic pilot qualification likely have on you?

---

**Q23**

**Electronic/online theory test**

What format should this test take?

---

**Q24**

**No**

Should there be a minimum age for basic pilot qualification?

---

**Q25**

**Yes**

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---



**Q26**

Respondent skipped this question

Is there any other special authorisations you would like to see?

---

Page 6

**Q27**

Yes

Should we introduce the proposed drone registration system?

---

**Q28**

Respondent skipped this question

What impact would drone registration likely have on you?

---

**Q29**

Respondent skipped this question

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

---

**Q30**

Yes, with 250 grams as the weight threshold

Should there be a minimum weight threshold for registering a drone?

---

**Q31**

Respondent skipped this question

Should certain drones not need to be registered (select all that apply)

---

Page 7

**Q32**

Yes

Should we introduce remote ID?

---

**Q33**

Respondent skipped this question

What impact would remote ID likely have on you?

---

Page 8

**Q34**

Yes

Should we consider introducing geo-awareness?

---

**Q35**

Respondent skipped this question

What impact would geo-awareness likely have on you?

---

Page 9

**Q36**

Respondent skipped this question

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

---

**Q37**

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

#42

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, June 04, 2021 2:49:54 PM  
**Last Modified:** Friday, June 04, 2021 3:02:32 PM  
**Time Spent:** 00:12:37  
**IP Address:** [REDACTED]

Page 1

**Q1** Yes

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Vicki whittington

**Q3**

Email address

[REDACTED]

**Q4** Myself

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

They have a useful place in emergencies and recreation

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3

PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Rules are already being ignored by tourists.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

**Yes, with changes ,**

Please comment::

Enough staff at CAA to enforce rules

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

**Yes, with changes ,**

Please comment:

Basic pilot qualifications good idea but need to be in depth - treated like driving licence or firearms licence

Q10

Are there any other problems and opportunities you can think of?

Respondent skipped this question

Q11

Do you agree with the proposed order of implementation of the measures?

**Yes**

Page 4

Q12

Should drones have their own standalone Rule Part?

**Yes**

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

**No ,**

Please comment:

Leave that for safety

Q14

Should we change the requirement to gain consent to fly above property?

**No – keep the existing consent provision,**

Please comment:

I'm extremely concerned about privacy - our back yards are the last place for us to expect privacy. Maybe exceptions could be made in a civil defence emergency or for police chasing an offender

Q15

Should we change the requirement to gain consent to fly above people?

**No – keep the existing requirement,**

Please comment:

As above

**Q16**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

Other (please specify):

It won't work... easy to break a rule like this then ask for forgiveness. The distance would only be an estimate at the time and difficult to prove a breach....

**Q17**

Are there any other major Rules changes we should consider?

Respondent skipped this question

**Q18**

Are there any minor changes to the Rules that would make them easier for you to understand?

No

**Q19**

What do you think of the proposed minor Rules changes?

As above

**Q20**

Are there any other changes we should consider?

Respondent skipped this question

Page 5

**Q21**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

**Yes, with changes ,**

Please comment:

A 'simple' test is not enough to demonstrate situational awareness. Needs to be in depth training.

**Q22**

What impact would a basic pilot qualification likely have on you?

None

**Q23**

What format should this test take?

**A practical examination of skill and a paper based written theory test (at a provider)**

**Q24**

Should there be a minimum age for basic pilot qualification?

Yes, other age (please specify):

18

Q25

I don't know

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

Q26

Respondent skipped this question

Is there any other special authorisations you would like to see?

---

Page 6

Q27

Yes, with changes,  
Please comment:  
Register ALL drones

Should we introduce the proposed drone registration system?

---

Q28

What impact would drone registration likely have on you?

None

---

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

Ok. Some terrain and cellphone coverage gaps in nz but outside of the cities means it may not work as planned

---

Q30

No,  
Please comment:  
Register them all

Should there be a minimum weight threshold for registering a drone?

---

Q31

No

Should certain drones not need to be registered (select all that apply)

---

Page 7

Q32

Yes

Should we introduce remote ID?

---

Q33

What impact would remote ID likely have on you?

None

---

Page 8

**Q34**

**Yes**

Should we consider introducing geo-awareness?

---

**Q35**

What impact would geo-awareness likely have on you?

None

---

Page 9

**Q36**

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

I have not seen this information on any public platform at all! Were it not for my work I wouldn't have known about it at all. It makes me wonder how serious you really are about getting submissions from the general public. I don't think you've advised the general public openly enough

---

**Q37**

Respondent skipped this question

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

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PROACTIVELY RELEASED BY  
THE MINISTRY OF TRANSPORT

#43

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, June 04, 2021 3:25:59 PM  
**Last Modified:** Friday, June 04, 2021 4:50:42 PM  
**Time Spent:** 01:24:43  
**IP Address:** [REDACTED]

Page 1

**Q1**  **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Grant White

**Q3**

Email address

[REDACTED]

**Q4**  **Myself**

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

I am really interested in aircraft not colliding with or having to take last second avoiding action and limiting numbers of drones being well regulated and not a free for all that may cause disruption to airports and operations as we have seen . Penalties would have to be severe for rule breakers as a drone operators are in a zero physical harm position and of limited consequences when it collides with a passenger laden aircraft

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

Page 3



Q7

What is your view on the proposed series of measures? Are there any other alternatives you suggest we consider?

Drones need to be well regulated with well trained operators as drones could cause major disruption around airports especially international airports.

Q8

Do you think the proposed series of measures would help achieve the desired objectives?

No,

Please comment::

Any licencing cannot be simple or it will be abused by people that do not care about consequences.

Q9

Do you think the proposed series of measures would address the problems and opportunities identified?

No,

Please comment:

As above

Q10

Are there any other problems and opportunities you can think of?

This opportunity to set a standard needs to be done once and done right first times not stuff ups by trying to be kind being to be kind to everyone.

Q11

Do you agree with the proposed order of implementation of the measures?

No,

Please comment:

Basic Qualification is not enough. Would E scooter be acceptable on a motorway?

Page 4

Q12

Should drones have their own standalone Rule Part?

No ,

Please comment:

101 with a more restrictions and harsher penalties required.

Q13

Should we review the four-kilometre minimum flight distance from aerodromes?

Yes,

Please comment:

Traffic patterns change aroun aerodromes and helicopter bases due winn

Q14

Should we change the requirement to gain consent to fly above property?

No – keep the existing consent provision,

Please comment:

Privacy

Q15

Should we change the requirement to gain consent to fly above people?

No – keep the existing requirement,

Please comment:

Small drones could hurt people.

**Q16**

**50 meters**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17**

Are there any other major Rules changes we should consider?

N/A

---

**Q18**

**I don't know**

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19**

What do you think of the proposed minor Rules changes?

Need to have consequences

---

**Q20**

Are there any other changes we should consider?

??

---

Page 5

**Q21**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

**Yes, with changes ,**

Please comment:

Needs to be greater than basic.

---

**Q22**

What impact would a basic pilot qualification likely have on you?

No worry to me

---

**Q23**

What format should this test take?

**A practical examination of skill and a paper based written theory test (at a provider)**

---

**Q24**

Should there be a minimum age for basic pilot qualification?

Yes, other age (please specify):

18

---

Q25

Yes

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

Q26

Is there any other special authorisations you would like to see?

??

---

Page 6

Q27

Yes

Should we introduce the proposed drone registration system?

---

Q28

What impact would drone registration likely have on you?

Minimal drones in the area

---

Q29

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

?

---

Q30

Should there be a minimum weight threshold for registering a drone?

**Yes, with 250 grams as the weight threshold,**

Please comment:

Any drones with TCAs or similar must be registered.

---

Q31

Should certain drones not need to be registered (select all that apply)

**Yes, drones flown solely indoors,**

**Yes, drones flown in specific designated areas (e.g. Model Flying New Zealand sites)**

---

Page 7

Q32

Should we introduce remote ID?

**No,**

Please comment:

Not going to work in remote areas where drones might be used.

---

**Q33**

What impact would remote ID likely have on you?

may caused disruption to flight paths

---

Page 8

**Q34**

Yes

Should we consider introducing geo-awareness?

---

**Q35**

What impact would geo-awareness likely have on you?

Would keep drones out of hi traffic density areas.

---

Page 9

**Q36**

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Keep it well regulated

---

**Q37**

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

Please use

---

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# #44

COMPLETE

**Collector:** Web Link 1 (Web Link)  
**Started:** Friday, June 04, 2021 4:28:01 PM  
**Last Modified:** Friday, June 04, 2021 4:59:36 PM  
**Time Spent:** 00:31:34  
**IP Address:** [REDACTED]

Page 1

**Q1** **Yes**

By ticking 'Yes' you acknowledge and agree to the terms outlined above.

Page 2

**Q2**

Name

Allister Girvan

**Q3**

Email address

[REDACTED]

**Q4** **Myself**

Who are you submitting on behalf of?

**Q5**

Briefly tell us your interest in drones

I am a flying member of Model Flying New Zealand, flying at MFNZ sites and occasionally in local parks. My children also fly multirotors and model aircraft.

**Q6**

What is the postcode of where you live (or the organisation you represent is primarily based)? Find your postcode using the NZ Post Postcode finder.

[REDACTED]

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**Q7** Respondent skipped this question

What is your view on the proposed series of measures?  
Are there any other alternatives you suggest we consider?

**Q8** Yes, with changes

Do you think the proposed series of measures would help achieve the desired objectives?

**Q9** I don't know

Do you think the proposed series of measures would address the problems and opportunities identified?

**Q10** Respondent skipped this question

Are there any other problems and opportunities you can think of?

**Q11** Yes,  
Please comment:  
The order appears logical

Do you agree with the proposed order of implementation of the measures?

Page 4

**Q12** Yes,  
Please comment:  
There are obvious differences between UAVs and other manned Part 101 aircraft such as paragliders

Should drones have their own standalone Rule Part?

**Q13** No ,  
Please comment:  
More complicated zones around airfields will be confusing without adding anything. It should be enough to require airfield permission to fly within the 4km perimeter but out of the flight paths on the day.

Should we review the four kilometre minimum flight distance from aerodromes?

**Q14** Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above property?

**Q15** Yes – use 'safe distances' as an alternative

Should we change the requirement to gain consent to fly above people?

**Q16**

**10 metres**

If we use 'safe distances' as an alternative to the consent provision, what distance(s) would you consider appropriate?

---

**Q17**

**Respondent skipped this question**

Are there any other major Rules changes we should consider?

---

**Q18**

**No**

Are there any minor changes to the Rules that would make them easier for you to understand?

---

**Q19**

What do you think of the proposed minor Rules changes?

It is always a good idea to make rules easier to understand for everyone.

---

**Q20**

**Respondent skipped this question**

Are there any other changes we should consider?

---

Page 5

**Q21**

Should we introduce the proposed basic pilot qualification for Part 101 drone pilots?

**Yes,**

Please comment:

Ensuring that pilots have at least a basic level of knowledge of the rules involved before they fly is a good idea.

---

**Q22**

What impact would a basic pilot qualification likely have on you?

None. MFNZ Wings qualified pilot. Children will be also.

---

**Q23**

**Electronic/online theory test**

What format should this test take?

---

**Q24**

**No**

Should there be a minimum age for basic pilot qualification?

---

**Q25**

**Yes**

Do you agree with the proposed special authorisations given to Part 141 and Part 101.202 approved training organisations?

---

**Q26**

Is there any other special authorisations you would like to see?

I'd like to see MFNZ exemptions be included as special authorisations to cement them.

---

Page 6

**Q27**

Should we introduce the proposed drone registration system?

**Yes, with changes,**

Please comment:

Individual pilot registration as an option for scratch and kit builders. Individual numbers for commercial multirotors.

---

**Q28**

What impact would drone registration likely have on you?

This could restrict my ability to fly in local parks if I have to register every individual model aircraft I own.

---

**Q29**

What do you think of the proposed system design (e.g. digital platform) and requirements (e.g. identity authentication)?

This is OK as long as there is a way for everyone to be able to access ID without age restriction or cost.

---

**Q30**

Should there be a minimum weight threshold for registering a drone?

**Yes, with 250 grams as the weight threshold**

---

**Q31**

Should certain drones not need to be registered (select all that apply)

**Yes, others (please specify below),**

Please comment:

MFNZ pilot flown aircraft already flying safely all over New Zealand

---

Page 7

**Q32**

Should we introduce remote ID?

**Yes,**

Please comment:

For any drone intended to fly above 400ft. Allow for transferable unit registered to pilot to be moved between aircraft in collection

---



**Q33**

What impact would remote ID likely have on you?

Restrict park flying

---

Page 8

**Q34**

Should we consider introducing geo-awareness?

**Yes,**

Please comment:

Exempt MFNZ or at least allow it to transfer between aircraft

---

**Q35**

What impact would geo-awareness likely have on you?

Restrict flying ability

---

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**Q36**

Do you have any other feedback on anything else in the Enabling Drone Integration discussion document?

Respondent skipped this question

---

**Q37**

If you do not want your name or identifying information to be included, please note the reasons why below. This will be taken into account when we respond to any Official Information Act requests that cover your submission.

---

Respondent skipped this question

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