

Regulatory Impact Statement

Civil Aviation Rules — Security Rules Update (docket 7/CAR/1)

Agency Disclosure Statement

1. This Regulatory Impact Statement has been prepared by the Ministry of Transport based on information supplied by the Civil Aviation Authority of New Zealand. It provides an analysis of options to improve:
 - flight deck security
 - security awareness at aerodromes
 - security training
 - vehicle access to security areas
 - cabin security controls for international transits
 - handling of security responsibilities for operators in New Zealand working under the Australia New Zealand Aviation Mutual Recognition Principle.
2. This analysis excludes—
 - Options that were rejected following the Domestic Aviation Security Review (such as extending security screening to all domestic flights).
 - Analysis of fitting strengthened flight deck doors on 19 seat aircraft, as that analysis was done separately in 2009/10.
3. This analysis includes costs that have already been met in the modification of flight deck doors. Because those costs were incurred over a period extending back, in some cases, to 2003, they are the actual costs incurred at the time the work was done.
4. This analysis acknowledges the risk levels and threats detailed in the Domestic Aviation Security Review. It is therefore dependent on those risk levels and threats remaining substantially unchanged.

The preferred option will impose additional costs on businesses engaged in air transport that are required to have a security programme, airports servicing aircraft with 19 or more passenger seats, and air traffic and aviation security service providers.

Richard Cross, Advisor

[Signature]

[Date]

Status quo

International context

5. The strength and effectiveness of the international aviation security system relies on the similarity of standards adopted collectively by each State and implemented by individual participants. A vulnerability or weakness in one State represents a risk to others in that it may be an entry point to be exploited by motivated adversaries.
6. Unaddressed vulnerabilities may lead to a loss of confidence by our international peers which could threaten our access to foreign markets, or lead to sanctions on flights from New Zealand. This situation is detrimental to the vision of *“an effective, efficient, safe, secure, accessible and resilient transport system that supports growth of our country’s economy in order to deliver greater prosperity, security and opportunities for all New Zealanders¹”*.
7. The international aviation security environment is characterised by continually evolving attack modes and threat vectors. The 9/11 events in the US, while by no means the latest significant development, were certainly those resulting in the most significant loss of life and property. Those events were responded to by the International Civil Aviation Organization with the introduction of requirements for flight compartment doors to resist intrusion and ballistic force in aircraft having more than 60 passenger seats.

Domestic context

8. Although New Zealand enjoys a low risk of similar terrorist events, there remains a threat to aviation safety where a person acting on other than terrorist motivations may attempt to gain control, or compromise the safety of an aircraft operating domestically. Such an event was realised in February 2008 when a disaffected person threatened the crew and passengers of a flight from Blenheim to Christchurch. That event prompted a review of domestic aviation security which studied not only the 2008 incident, but involved a comprehensive industry-wide assessment of the aviation security system.
9. The Domestic Aviation Security Review² noted that the most likely threat would be a spontaneous event from an acutely disaffected person; and that such a threat should be considered feasible.
10. In responding to the Review, Cabinet agreed that changes to passenger screening were not warranted in light of the significant cost and impacts on the aviation system; but acknowledged that the threat/risk environment warranted flight deck protection (to a greater degree than the International Civil Aviation Organization’s standard), and that the attendant costs would not unduly inhibit the development and sustainability of

¹ National Infrastructure Plan transport plan, 2011 (<http://www.infrastructure.govt.nz/plan/>)

² The Cabinet Paper and the summary report are available at:
<http://www.transport.govt.nz/news/newsevents/Documents/Aviation-Security-Cabinet-Paper.pdf>
<http://www.transport.govt.nz/news/newsevents/DomesticAviationSecurityReviewssummaryreportreleased/>

domestic aviation. Consequently, Cabinet required regulatory action to improve domestic aviation security with respect to:

- strengthened flight deck barriers on aircraft with more than 30 passenger seats,
 - the formation of security committees at aerodromes servicing air transport passenger services on aircraft of 19 or more passenger seats, and
 - enhanced security training for airline and airport staff (this requirement added weight to an existing rules issue that was raised by the Civil Aviation Authority following an International Civil Aviation Organization audit).
11. The New Zealand aviation industry is aware that, even though New Zealand has been remote from the activities of terrorists, security is an issue that must be recognised and addressed. The Ministry of Transport and the Civil Aviation Authority have found willingness on the part of industry participants to engage in measures to enhance the security of both their passengers and themselves in anticipation of the measures referred to in this document coming into regulation; this is evident in the significant financial commitments that have already been made, and the time and energy of the people involved.

Problem Definition

12. This Civil Aviation Rule amendment project is addressing two areas of concern:
- **domestic aviation security threats** with respect to the security of an aeroplane's flight compartment, security training standards of people employed in the civil aviation system, and the level of security awareness of people working in an airport environment.
 - **regulatory gaps** identified by the audit processes of the Civil Aviation Authority and the International Civil Aviation Organization in the areas of vehicle security identification, security controls for international transit operations, and airlines operating from or within New Zealand with an Australian issued air operator certificate under the Australia New Zealand Aviation Mutual Recognition Principle³.
13. The security concerns and regulatory gaps noted above will be addressed as six separate matters:
- Flight deck security: The current regulatory requirements do not address flight compartment security other than there must be a lockable door between the flight and passenger compartments.
 - Security committees: There is currently no regulatory requirement to form and maintain security committees. Although security committees have been operating effectively at the eight security designated aerodromes⁴ for some

³ The Australian New Zealand Aviation Mutual Recognition Principle refers to the arrangement between the governments of New Zealand and Australia on mutual recognition of aviation-related certification.

⁴ Auckland, Wellington, Christchurch, Queenstown, Dunedin, Hamilton, Palmerston North and Rotorua.

years, this has been driven by international commitments and the National Aviation Security Programme Reference Manual.

- Security training: Current requirements for security training are inconsistent and do not support industry-wide, robust, competency based training outcomes. This disparity of requirements cannot deliver confidence that industry participants meet minimum knowledge and competency expectations that are reasonable for a security-aware civil aviation system.
- Vehicle security identification: Vehicle access control to security areas or security enhanced areas on security designated aerodromes is currently in place only to address public safety obligations; there is no regulatory requirement in respect of security. Consequently, access control is inconsistent from airport to airport and in most cases may not adequately deter unauthorised vehicles. In addition, the aviation security service provider's (Avsec) obligations to patrol security areas and security enhanced areas are not supported by complementary obligations of the aerodrome operator that will facilitate an appropriate response to a detected threat.
- Security controls for international transit flights: Existing requirements for transiting international flights are structured around now obsolete practices and outdated International Civil Aviation Organization requirements. Some transiting airlines currently advise their passengers that they may leave their carry on items on board the aircraft during a transit stop which does not address the risk of a weapon or explosive device being left on board and the transiting passenger who placed it then abandoning the flight prior to its onward departure.
- Australia New Zealand Aviation Mutual Recognition Principle operators: Under the Australia New Zealand Aviation Mutual Recognition Principle, the Civil Aviation Authority is able to recognise air operator certificates issued by the Civil Aviation Safety Authority of Australia. Australian airlines taking advantage of this agreement are required under New Zealand's Civil Aviation Rule Part 108 (*Air Operator Security Programme*) to establish and implement an air operator security programme. However, there is no requirement for these airlines to gain Civil Aviation Authority approval when making changes to the security programme, the person or persons responsible in New Zealand for security compliance, or changes regarding that person's responsibilities.

Objectives

14. The desired outcomes of this proposal are to protect passengers from identified security threats, and to ensure that New Zealand retains the confidence of its trading partners.

Regulatory impact analysis

Preferred option

15. The preferred option is to amend the Civil Aviation Rules relating to aviation security. The following changes are proposed:

- Flight deck security: Require the same flight deck door standards and flight deck access provisions as the Federal Aviation Administration in the USA, the European Aviation Safety Agency, and the Civil Aviation Safety Authority in Australia; applied to aircraft with more than 30 passenger seats. The proposal excludes the Convair 580 aeroplanes operated by Air Chathams from the flight deck door requirements until 31 December 2020, provided the operator has mitigated the risk of unauthorised flight deck entry by other means. The rationale for this provision is explained in more detail at paragraph 34.
 - Security committees: Require, for security designated aerodromes, that the aviation security service provider establishes security committees; and for non-security designated aerodromes, that each aerodrome operator forms a security awareness group. In both cases, the requirements include administrative responsibilities.
 - Security training: Amend Parts 108, 139, and 172 to specify requirements for initial and recurrent competency based training criteria for all categories of staff responsible for the implementation of security measures. This option reflects the current requirements for air cargo agents regulated under Part 109, which have proven to be effective without being onerous.
 - Vehicle security identification systems: Require the establishment of a system and procedures to control vehicle access to the security areas and security enhanced areas of security designated aerodromes serving international passenger flights and screened domestic flights.
 - Security controls for international transit operations: Require that an air operator transiting a New Zealand airport has procedures in place to ensure that items left on board by a transiting passenger are removed from the aircraft cabin during the transit stop.
 - Australia New Zealand Aviation Mutual Recognition Principle operations: Require an air operator, operating under the Australia New Zealand Aviation Mutual Recognition Principle, to gain Civil Aviation Authority approval when changes are made to the operator's security programme, the person or persons responsible in New Zealand for security compliance, or changes regarding that person's responsibilities.
16. The requirement for strengthened flight deck doors will exceed the International Civil Aviation Organization standards which are only intended for international operations using aeroplanes of greater than 45,500kg carrying more than 60 passengers, and operating into international aerodromes. However, most other States require all domestic passengers to security screened before boarding an aircraft. In contrast, New Zealand currently only requires passengers travelling on aircraft with more than 90 passenger seats to be screened, due to the comparatively low risk to domestic aviation in New Zealand. As a consequence, passengers travelling in aircraft with between 30

and 60 passenger seats⁵ currently have no protection from the risk of unauthorised access to the flight deck.

17. There is currently no intention to require similar access barriers in other transport modes, such as buses, trains or passenger ships. These transport modes do not have the same risks as aviation, where the consequences of an accident in respect of passengers on board, and persons and/or property on the ground, are potentially catastrophic.

Alternative options

- Flight deck security: The option extending passenger screening to all domestic flights was considered as part of the Domestic Aviation Security Review, and rejected due to the prohibitive cost. The cost of extending security screening to all domestic passengers at New Zealand's 14 busiest airports was estimated at approximately \$22 million per year, representing a cost per passenger of \$5.31 (with passenger separation) or \$5.41 (without passenger separation).

The option of requiring the installation of strengthened flight deck doors on Air Chatham's three passenger-carrying Convair 580 aircraft was also considered. However, this was ruled out due to the disproportionate effect it would have on Air Chathams and the Chatham Islands economy. Figures provided by the Chatham Islands Enterprise Trust indicated that the requirement would necessitate fare increases of as much as 5%. This would be borne by a single community of just over 600 people. Notably, much of the travel undertaken by the community is non-discretionary, as the Chatham Islands lacks infrastructure for specialised dental, medical and other professional services.

The requirement would also have wider implications across the Chatham Islands economy, as air freight capability supports the transport of live or chilled seafood; and there is no all-weather freight alternative. The industry currently suffers with lower catches and market returns, increased transport costs will further exacerbate this situation.

The security risk for Air Chathams is also lower than other airlines as the majority of passengers are local and well known by the flight crew. The proposed Rule amendment would require Air Chathams to have alternative security measures in place (such as behaviour profiling), as an alternative to strengthened flight deck doors.

- Security committees: The status quo is a viable alternative in light of the level of voluntary compliance already achieved. However, there is a risk that, without a regulatory requirement, the programme could lose momentum and threaten the security awareness gains that have already been made. Security committees play an important role as a potentially powerful first line of defence that will provide airport staff with the tools to identify and respond to suspicious behaviours. It fosters information sharing and a proactive approach.

⁵ A requirement for strengthened flight compartment doors to be installed on aircraft with less than 30 passenger seats was previously considered, but ruled out due to cost and safety concerns.

- Security training: Guidance material could be developed to improve the clarity of the existing requirements. However, this would not address the fact that the existing Rules are inconsistent and do not support robust industry-wide training outcomes.
- Vehicle security identification systems: There is no viable alternative that will achieve a consistent and satisfactory level of vehicle access control into security areas that will result in the reduction/mitigation of unlawful acts, within security areas, which ultimately threaten passenger safety.
- Security controls for international transit operations: There is no viable alternative that will bring New Zealand into line with our international peers to achieve consistency of security measures across the international network of air transport operations.
- Australia New Zealand Aviation Mutual Recognition Principle operations: The status quo is a viable alternative, but it is an indirect means of security oversight, and is unreasonably demanding of Civil Aviation Authority time. It also fails to provide assurance that security measures are being properly applied, or that any new market entrants will respect the current situation.

Impacts and Costs

18. Impacts. The proposed amendments will:

- Protect passengers and crew by substantially eliminating the risk of unlawful entry into the flight deck; require more comprehensive flight deck access procedures; and create a small addition to crew workload (mainly on the ground).
- Increase and maintain security awareness at regional airports; require a small commitment of time for the airport operator and, to a lesser extent, airport tenants. It will also impact Avsec as a provider of information and training.
- Standardise and enhance security training to a level expected by the wider international community. This may present an initial administrative burden for some operators to document procedures, and will introduce an ongoing requirement to keep security training records if they are not being kept already.
- Tighten vehicle access to security areas thus improving confidence in the ability of an aerodrome operator to deter and detect unauthorised vehicle access. This will also support Avsec in its obligations to prevent unauthorised entry to security designated areas.
- Reduce the risk of a weapon or explosive device being left on board an aircraft during a transit stop. This will also align New Zealand with international standards and minimise the potential security vulnerability in the international civil aviation system.
- Facilitate oversight of Australia New Zealand Aviation Mutual Recognition Principle operators' security programmes, therefore providing assurance that security measures are being properly applied.

19. Introducing clear and comprehensive security regulation that is aligned with international standards will also assist the Civil Aviation Authority in demonstrating that security risks have been addressed, which may impact positively on the public liability insurance premiums paid by the Civil Aviation Authority.
20. Costs. The proposed amendments will cost a total of approximately [confidential] to implement, and incur ongoing costs of approximately [confidential] per year. However, approximately [confidential] has already been spent, leaving a remainder \$102,765 to be spread across 37 operators. The proposed amendments will have the following significant cost impacts:
 - In anticipation of the rule requirements, strengthened flight compartment doors have already been installed in a total of 73 aeroplanes operating in commercial air transport with more than 30 passenger seats. This was completed at a cost of approximately [confidential]. Strengthened flight crew compartment doors would not be required on any additional aeroplanes as a result of the proposed requirements. However, there will be an ongoing cost to the industry to maintain the doors which is estimated at [confidential] per annum spread across all operators.
 - The estimated cost to the industry for certificate holders to amend their expositions⁶ is \$102,765 (an average of \$2,635 per operator depending on the type of certificate held). This is expected to be a one-off cost.
21. There will be an administrative burden on some certificate holders, but as those costs are distributed and relatively small they are difficult to quantify as they will be integrated with existing routine tasks. It is expected that there will be no significant compliance or operating costs resulting from the rule amendments relating to security committees, security training, vehicle access control, or Australia New Zealand Aviation Mutual Recognition Principle operators.
22. There is a risk that costs noted as not significant are an optimistic estimation. Given that there are 27 aerodromes, 5 airlines, plus Avsec and Airways that are affected by these proposals, even relatively small compliance costs may have a collective impact that could reach \$170,000 across the industry (for example: \$1,000 each for the smaller airports, and \$10,000 each for the security-designated airports and the airlines, Avsec and Airways).
23. Further details on the impacts and costs of the proposed rule amendment are provided in Appendix A.

Net Impact

24. While the likelihood of an aviation security incident in New Zealand is low, the consequences are potentially catastrophic. The Ministry of Transport considers that, despite the significant cost of the proposed requirement for strengthened flight

⁶ An operator's exposition is the document or set of documents that describe the organisation and detail the systems and procedures that the operator its staff will follow to ensure compliance with the applicable Civil Aviation Rule requirements

compartment doors on aircraft with more than 30 passenger seats (which has already been incurred voluntarily), the proposed rule amendments are the most cost effective option to achieve the desired improvements to aviation security and alignment with international standards and best practice.

Consultation

25. A notice of proposed rulemaking, containing the proposed changes to the affected rules, was issued for public consultation on 9 February 2012 for a period of 4 weeks.
26. The publication of the notice of proposed rulemaking was notified in the New Zealand Gazette and advertised in the daily newspapers in the five main provincial centres. The notice of proposed rulemaking was also published on the Civil Aviation Authority's web site and mailed to identified stakeholders including representative organisations who were considered likely to have an interest in the proposal.
27. Submissions were received from seven organisations. Two further organisations commented informally by e-mail and those comments were also addressed. The submissions and comments have been summarised and responded to in the Summary of Public Submissions⁷ for this project.
28. Notable issues raised during consultation included:
 - Security training recurrency interval: Two submissions were received regarding the proposed security training recurrency interval of two years. One submitter argued that the training interval should align with the airport identity card recurrency interval of three years. The other submitter commented that the proposed two year interval would give rise to increased costs without a significant increase in security value. The Civil Aviation Authority agreed that a three year recurrency interval was sufficient, and this change has been reflected in the proposed rule amendment.
 - Strengthened flight deck doors for the Convair aircraft: The Chatham Islands Enterprise Trust argued that the cost of installing strengthened flight deck doors on Air Chathams' Convair aircraft would be disproportionate to the security benefit, given the unique circumstances of air transport to the Chatham Islands. The Civil Aviation Authority agreed and amended the proposal to exclude the aircraft operated by Air Chathams from the proposed rule until 2020 (the expected life of the aircraft) provided that alternative security measures are in place.
 - Transit passengers' carry on items. One submitter argued that the proposal to require transit passengers to remove their carry-on items during a transit stop was unnecessary given other security measures in place, and would impact upon the workload of aviation security staff, potentially affecting their ability to conduct effective screening. The submitter also suggested that the requirement should not apply to unscheduled transit stops (such as diversions due to weather conditions or an emergency).

⁷ The Summary of Public Submissions is available to view or download from the CAA web site (http://www.caa.govt.nz/rules/nprms/NPRM_12-01_Security_Rules_Update.pdf)

The Civil Aviation Authority considers that the proposal remains necessary in order to mitigate the risk of a weapon or explosive device being left on board the aircraft (and abandoned by the transiting passenger) and to achieve compliance with an international Standard. However, the Civil Aviation Authority amended the proposed requirement to add provision for another State's passenger screening to be accepted by the Director⁸, and to exempt an unscheduled transit stop from the requirement.

Conclusions

29. The preferred option will result in improved protection of passengers from identified security threats, and alignment with international standards and best practices. The outcome will be a clearer and more robust aviation security system that reduces the risk of security breaches.
30. The preferred option can be accomplished without unreasonable burden, either financial or administrative, to the affected operators or to the travelling public.

Implementation

31. The rulemaking proposal will be given effect by implementing new rules and amending existing rules under Parts 108, 121, 139, 140, and 172.
32. Once signed, each affected rule will be published on the Civil Aviation Authority website and affected parties will be notified of what they need to do to comply with the rule through updated advisory circulars to Parts 108, 139, and 140 which support the rules by providing guidance material and information on acceptable means of compliance. The National Aviation Security Programme Reference Manual has previously been updated and provides current and relevant guidance.
33. The amendments do not present significant implementation risks due to the level of voluntary compliance that has taken place in anticipation of the proposed rules.
34. Enforcement of the amended requirements will occur through the audits and inspections of operators certificated under Parts 119, 129, 139, 140, and 172 as per current practice.

Monitoring, evaluation and review

35. Once in force, Parts 108, 121, 139, 140, and 172 will be routinely monitored against the objectives of this proposal by the operational group within the Civil Aviation Authority. Effectiveness of the rule amendments should also be evident in the absence of International Civil Aviation Organization audit findings for this sector of the aviation system. Indeed, the recent International Civil Aviation Organization security audit indicated that implementation of this proposal will significantly benefit New Zealand's standing in terms of International Civil Aviation Organization compliance.
36. In addition, ongoing routine security risk assessment activity conducted by the Civil Aviation Authority will highlight the effectiveness of the proposed rule changes.

⁸ Note that the CAA currently has no intention of validating other State's passenger screening activity.

Appendix A – Impacts and Costs

Issue being addressed	Proposed requirements	Impact	Costs
<p><u>Flight deck security.</u> The current regulatory requirements do not address flight compartment security other than there must be a lockable door between the flight and passenger compartments.</p>	<p>Require—</p> <ul style="list-style-type: none"> • flight compartment door intrusion and ballistic resistance standards that match other States' for aircraft with more than 30 passenger seats. • that the door can be opened from either pilot's seat • that the area outside the flight compartment door can be monitored by the flight crew • that the cabin crew can communicate discretely with the flight crew. <p>Strengthened doors will not be required to be installed in Convair aircraft.</p>	<p>Protects passengers and crew from the potentially catastrophic effects of unlawful interference with the flight of an aircraft.</p> <p>Create a small increase in crew workload, chiefly on the ground at the beginning and end of a flight</p> <p>Require the development of airworthiness criteria for the new equipment (which has the potential to prevent aircraft dispatch in the event of equipment failure).</p> <p>Strengthened flight compartment doors have already been installed in all affected aeroplanes, including:</p> <ul style="list-style-type: none"> • Air New Zealand's international and domestic fleets • Mount Cook Airline's fleet • Air Nelson's fleet • Vincent Aviation's De Havilland Canada DHC-8 and Saab SF340 	<p>[confidential] has already spent in anticipation of the proposed Rule amendment to fit strengthened flight compartment doors on 73 aircraft involved in commercial air transport.</p> <p>The ongoing cost in the form of maintenance and spare/replacement parts has already been committed to by virtue of voluntarily fitting the doors in anticipation of the rule requirements. This cost has been estimated at approximately [confidential] per year for the industry.</p> <p>Expected exposition amendment costs for the 4 affected operators are estimated to total \$6,494.</p>
<p><u>Security committees.</u> There is currently no regulatory requirement to form and maintain security committees. Although security committees have been operating effectively at the seven security designated aerodromes for some years, this has been driven by international commitment and the</p>	<p>Require—</p> <ul style="list-style-type: none"> • for security designated aerodromes, that the aviation security service provider establishes security committees • for non-security designated aerodromes, that each aerodrome 	<p>The proposed requirements preserve the intent and the security gains that have already been achieved through voluntary compliance.</p>	<p>There are no significant costs associated with the proposed requirements at either security designated or non-security designated aerodromes.</p> <p>Expected exposition amendment costs for the 20 affected aerodrome operators</p>

Issue being addressed	Proposed requirements	Impact	Costs
National Aviation Security Plan.	operator forms a security awareness group. In both cases, the requirements include administrative responsibilities.		are estimated to total \$18,308.
<u>Security training.</u> There are currently requirements for security training in some rules, but those requirements are inconsistent and do not support industry-wide, robust, competency based training outcomes. This disparity of requirements cannot deliver confidence that industry participants meet minimum knowledge and competency expectations that are reasonable for a security-aware civil aviation system.	Amend Parts 108, 139, and 172 to specify requirements for initial and recurrent training criteria, and require training records to be kept and maintained.	The proposed requirements will provide clarity and consistency; and add a competency based compliance commitment that will keep security training at the appropriate organisational level. The requirements will also ensure compliance with international standards. Although there may be an initial administrative burden for some certificate holders to document training procedures and administer records, these requirements are no more onerous than those currently applying to regulated cargo agents under Part 109.	The cost impact is very difficult to estimate. It is envisaged that the costs will not be substantial, and are expected to be incurred in establishing more structured security training procedures where they do not already exist. Expected exposition amendment costs for the 34 affected operators are estimated to total \$68,672.
<u>Vehicle security identification systems.</u> Vehicle access control is currently in place only to address public safety obligations; there is no regulatory requirement in respect of security. Consequently, access control is inconsistent from airport to airport and in most cases may not adequately deter unauthorised vehicles.	Require the establishment of a system and procedures to control vehicle access to the security and security-enhanced areas of security designated aerodromes.	The proposed requirement will improve confidence in the ability of an aerodrome operator to deter and detect unauthorised vehicle access; and support Avsec in its obligations under Part 140 to deal with unauthorised entry to a security designated area.	The industry has indicated that the proposed amendment will not impose any significant compliance costs. Expected exposition amendment costs for the 8 affected operators are estimated to total \$7,531. Ongoing costs are also expected to be negligible.
<u>Security controls for international transit</u>	Require that an air operator transiting a	The proposed requirements will align	Expected exposition amendment cost

Issue being addressed	Proposed requirements	Impact	Costs
<p><u>operations</u>. Existing requirements are structured around now obsolete practices and outdated International Civil Aviation Organization requirements which provided for a level of control that was threat related.</p>	<p>New Zealand airport appropriately deals with items left in the cabin during the transit stop.</p>	<p>New Zealand with international baseline standards, and minimise potential security vulnerabilities in the international civil aviation system.</p>	<p>for the affected operator is estimated at \$587. The proposed requirement should not generate any ongoing cost.</p>
<p><u>Australia New Zealand Aviation Mutual Recognition Principle operations</u>. There is inadequate ability for the Civil Aviation Authority to maintain satisfactory oversight that Part 108 is intended to provide.</p>	<p>Require an air operator, operating under the Australia New Zealand Aviation Mutual Recognition Principle, to gain Civil Aviation Authority approval when changes are made to the operator's security programme, the person or persons accountable in New Zealand for security compliance, or changes regarding that person's responsibilities.</p>	<p>The proposed requirements will restore conventional levels of Civil Aviation Authority security oversight, therefore providing assurance that security measures are being properly applied. There will be a negligible operator impact, as operators already make such notifications to the Australian authority.</p>	<p>Expected exposition amendment costs for the 2 affected operators are estimated to total \$1,173. The proposed requirement should not generate significant ongoing costs.</p>