

qualified personnel. Instead, they rely for advice and assistance, as well as for airworthiness approval, upon the technical staff of the Civil Aviation Branch.

141. In our opinion, it is not in the best interests of New Zealand civil aviation that aeronautical engineers with the qualifications mentioned should find a place only in Government service. We are particularly surprised that neither the New Zealand National Airways Corporation nor Tasman Empire Airways, Limited, have yet taken any men with these particular qualifications on to their staff.

142. Notice to Aircraft Owners and Engineers No. 5/1948 stipulates that, as from 28th October, 1948, firms with a " C " rating and operators of scheduled air services must submit, with applications for approval of modifications, a quantitative technical analysis in support of the application. We do not doubt that any firm or operator who shows by the quality and completeness of the technical analyses so submitted that they are competent in this field will be accorded a measure of design approval by the Civil Aviation Branch. Such design approval should, we recommend, ultimately extend to complete exemption from having to submit drawings and technical assessments to the Civil Aviation Branch. Instead, that Branch should accept a guarantee that the modified aircraft complies with requirements as sufficient justification for giving airworthiness approval. With the guarantee should be sent, for record purposes only, the technical assessment giving the evidence on which the applicant has based his guarantee.

143. As regards the New Zealand Civil Airworthiness Requirements, since, in practice, imported aircraft will conform only to the airworthiness code of the country of manufacture, and since the codes of different countries vary considerably in form and to some extent in substance, it is clear that it is not practicable to restate them all in the New Zealand code of civil airworthiness requirements. At present it would involve the repetition of both the British and the American codes ; at any time in the future it might involve the restatement of one or two other national codes. While reserving to New Zealand the undoubted right and duty to impose additional requirements which must be met by aircraft as a condition of issue of a New Zealand certificate of airworthiness, it appears that the only practical way to state the New Zealand code is to say that aircraft shall conform to the civil airworthiness requirements of the country of manufacture, and in addition with such special New Zealand requirements as may be promulgated in accordance with the law. The provision for this is contained in the Air Navigation Regulations, 1933, Schedule II, paragraph 3, which makes the issue of a certificate of airworthiness dependent on " minimum requirements approved by the Minister." There is no reason why the power to approve such minimum