

requirements should not be delegated to the Director of Civil Aviation, but for the removal of doubt it would be preferable that this, like other delegations, should be formally made.

144. The contents of the New Zealand Civil Airworthiness Requirements (C.A. Publication No. 1), as issued up to date, in reality consist of three kinds of requirements :

- (a) Mandatory provisions which, if they are to be effective, should have the force of law. These should be issued as regulations.
- (b) Technical requirements to be satisfied as a condition of issue, validation, continuing in force, or renewal of a certificate of airworthiness. The sanction for non-compliance is failure to obtain or retain the desired certificate. These are proper to the code of New Zealand civil airworthiness requirements.
- (c) Procedural instructions intended to facilitate the process of obtaining a certificate of airworthiness (or other like qualification). These need not and should not have the force of law and should be issued in some suitable separate publication.

145. In Part I of this Report, we have referred to proposals that an air registration board should be established in New Zealand. In the light of what has been said, this may now be better understood. A large part of the work of the British Air Registration Board is the formulation of the British Civil Airworthiness Requirements and the investigation of new aircraft for the issue of certificates of airworthiness to prototype and subsequent aircraft. There being no prospect of a volume of work of this nature in New Zealand, it is not considered necessary or desirable to establish an air registration board.

CHAPTER 11—CONDITIONS GOVERNING THE IMPORT OF AIRCRAFT: TYPE RECORD AND AEROPLANE FLIGHT MANUAL

146. In the report of the Commission of inquiry into the Sandringham ZK-AME incident, reference is made to the failure of the manufacturers to produce a type record for the aircraft, and we have been informed of subsequent difficulties which have arisen in this respect. It appears desirable, therefore, to elucidate the principles and practice governing this matter.

147. Type records were introduced in the United Kingdom in 1928 concurrently with the introduction of an "approved firms" scheme for aircraft design and prototype construction. In the United Kingdom an approved firm guarantees that its aircraft have been designed and constructed in compliance with the appropriate airworthiness requirements. Attached to this guarantee is a summary of the evidence on which compliance with the requirements is based. This summary is the "type record."