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Director, Airspace and Emerging Technologies
Department of Infrastructure, Transport, Regional Development and Communications
National Aviation Policy Issues Paper

Recreational Aviation Australia (RAAus) is a for purpose member based organisation administering on behalf of the Civil Aviation Safety Authority (CASA) 10,000 pilots who operate 3,200 aircraft under Visual Flight Rules (VFR) operations. Flights include private operations and flight training at 220 locations across Australia including rural, regional and urban airports in addition to private airstrips. RAAus pilots are permitted to operate to ground level on their own properties, with appropriate training. Accordingly, use and operation of drone technology has the potential for conflict with our members. The intention of this response is to provide the unique perspective of our members particularly in regard to possible conflicts or operational concerns related to drone operations.

Do you agree with the proposed core principles for the National Emerging Aviation Technologies policy?
RAAus agrees with the proposed core principles.

Will the proposed approach to policy development adequately allow for the future direction, operations and investments of your business/organisation?

While the paper outlines the intent to utilise CNS and UTM systems, these systems will only be effective in controlled airspace environments, where aircraft are required to be equipped with ADS-B and radio and operate under the control of Airservices Australia. However, outside controlled airspace in regional areas utilising Class G airspace, RAAus has been provided with assurance no mandated requirements for pilots operating under Visual Flight Rules (VFR) for carriage of ADS-B or radio will be imposed. Further the aviation industry would not be served by the imposition of carriage of such equipment for VFR operations. Accepted aviation separation practices to manage potential conflicts including formalised pre-flight planning advice to pilots via Airservices Notice to Airmen (NOTAM) and non-controlled aerodromes exclusion zones, which must remain. RAAus stands ready to engage in consultation on these issues on behalf of a significant portion of recreational and flight training organisations.

Are there any other approaches that could benefit the sector?

Consultation with all sport organisations and other low level operators is critical to ensure separation and management of drone operations away from the controlled airspace environment.

What level of service and regulation do you expect from the Government?

Adequate review of all stakeholders needs, in combination with consultation and adherence to the principles outlined in the equal access to airspace for all users outlined in the Airspace Act 2007.

What are your expectations of the Government's role and responsibilities in the management of drones and eVTOL vehicles?

Compliance to international and national legislation and consultation with stakeholders to minimise regulatory burdens while maintaining safe operations of drones.

What are the key opportunities that these new technologies could deliver for Australia?

Flexibility in a range of drone uses, creation of jobs, training opportunities and economic benefits in addition to reductions in environmental impacts.

What are the most significant barriers to realising these opportunities?

Interactions with established aviation operations, the possibility of regulatory overreach and burdensome requirements.

What issues or actions should the government prioritise to facilitate the growth of emerging aviation technologies?

Engagement with stakeholders, low cost private enterprise alternate training methods and administration based on the informed participation principles RAAus offers to recreational flight training and operations at present.

To what extent should Australia's approach be harmonised with approaches taken in other countries?

The flexibility, industry and stakeholder engagement and common sense approach of many overseas countries has appeal to the Australian aviation community, particularly in regard to imposition of regulation. Industry best practice must be adopted and adapted to suit the unique Australian demographic and distribution of population.

Are there other issues that the Australian Government should consider?

Consideration must be given to ensuring excessive regulation is not imposed, while adequately managing safe interactions with existing aviation operators.

Sincerely,

Jill Bailey

Head of Flight Operations

Recreational Aviation Australia