

Aircraft Operations
Aviation Environment Branch
Department of Infrastructure, Transport, Cities and Regional Development (DITCRD)
GPO Box 594
CANBERRA ACT 2601
noise@infrastructure.gov.au

Re: Noise Regulation Review for Remotely Piloted Aircraft (RPA) and Specialised Aircraft

I have interacted with remotely piloted aircraft (RPA/drones) across several. My direct experience is with delivery drones (Wing), though my interest spans further.

I have been a customer of Wing since April 2019 and have used the service moderately. I “show off” drone deliveries to friends and family and ask for their feedback as I can pass it along to Wing. As an enthusiast I regularly discuss my experiences and seek out others with both positive and negative experiences.

As an executive of the Gungahlin Community Council (GCC), I have engaged with stakeholders including other residents of Gungahlin, members of industry, federal government, local government, and other incorporated and unincorporated groups with an interest in drones. I manage aspects of the GCC’s social media, including facilitating audience participation of livestreamed meetings. I have significant insight into all feedback the GCC has received about drones. I note GCC has made a separate submission which I have reviewed and support.

I am the president of the Crace Community Association (CCA), a non-profit incorporated association that fosters community in Crace, Gungahlin – a suburb that receives drone deliveries. Drones are sometimes raised in conversation at general community events/activities, and I encourage residents to give me feedback, attend Wing demonstrations in Crace and Gungahlin, attend GCC meetings when Wing will be present, etc. Through these very strong community channels, I have an excellent (though not scientific) gauge of the local sentiment toward drones and drone noise.

I am making this submission as a private person, though I am drawing on the above experience.

Regarding the department’s proposal, part 2.7:

- a. I support the proposal
- b. I support the proposal
- c. I support the proposal
- d. I support the proposal
- e. I support the proposal

Regarding proposal 2.7.f, I support the goal of the proposal in the long term, though note some considerations.

- There is a lot of common ground that needs to be covered across all States and Territories, and this would seem to be most efficiently handled at the Federal level. Once the groundwork is built, States and Territories may be in a better position to take over regulation. As this is an emerging market, I would like to see at minimum the department take an organisational role while collaborating with the States and Territories.
- The Issues paper mentions that State/Territory governments could be responsible for noise generated on the ground when preparing for a drone delivery, for example noise generated from a kitchen that delivers food by drone. This seems obvious and I support this.

- I have a concern about how achievable local regulation is, particularly noting that “rates pressure” is a real thing being experienced in Canberra, and more government services means more tax. A common issue raised in Crace that has Territory-level enforcement is “Cat Containment”. Cats are not permitted to roam the suburb and are expected to be kept in the home/yard. Regulation of this is the responsibility of City Services and requires a Ranger to attend the suburb and catch the cat. In the collective experience of Crace residents, Rangers are rarely able to enforce this regulation and suffice to say, a drone is harder to catch than a cat. CASA’s drone regulation scheme may alleviate this, however that remains to be seen. I’d like to see that effectiveness of a drone regulation scheme before supporting Territory-level enforcement of drone regulations.
- A single point of contact for members of the public that may have issues with drone noise is necessary, and feedback that goes to a secondary point of contact must be shared with relevant parties. Parties currently involved in this topic have undertaken to share feedback, including DITCRD, CASA, Air Services Australia, ACT Government, Gungahlin Community Council, and Wing, though I have no visibility of if this is happening. If drone noise were to be regulated by local government, the “Fix My Street” web application should prove a useful contact point.

Further to the above, I’d like to comment on my experience with Wing. The Issues Paper mentions:

The willingness of the public to accept drone operations is also likely to be affected by the societal benefit of the operation.

Another key element to the willingness of the public to accept drone operations and the accompanying noise is their actual and perceived ability to have their opinion heard. I have seen and applaud the efforts from all parties, including this submission process. Government teams that may not normally specialise in community consultation have been available to meet with community stakeholders. Wing (who obviously have a commercial stake in the regulations) have been particularly available discuss any feedback and have always been completely helpful, to the extent of describing technical details of their drones in a consumer-friendly way.

These channels of communication must remain open during a regulation review. I have often seen these channels close as a review continues past the initial stages. All parties have shown a willingness to reach positive outcomes for the community so far, and I see no reason why this cannot continue.

I also would like to note the generally positive attitude of the community toward drone deliveries, particularly in Crace, Gungahlin, and my social circles. People have been tentative as concerns like noise, privacy, safety, and environmental impacts are considered, however the most common feedback I receive is “when can I get deliveries”. Members of the public want this emerging service, so this regulation review is welcomed and appreciated. There are members of the public who do not feel the benefits outweigh the costs, and I’m glad they have had the opportunity to be heard.

Regards,

David Pollard