Submission: 022

John Hawkins-Salt (President Cloudbase WA Paragliding Club)

Mandating ADS-B for all paragliding and hang gliding operations both coastal and inland—would be disproportionate given the operational realities of these aircraft. Current ADS-B transponders are heavy, cumbersome, and designed primarily for powered aircraft with onboard electrical systems and sufficient payload capacity. Paragliders and hang gliders are foot-launched, minimalist aircraft where every kilogram directly affects flight performance, safety, and the pilot's physical ability to carry equipment to launch sites. Many sites are remote and require pilots to hike long distances uphill with all gear on their backs. Adding heavy, power-hungry electronics and associated batteries would not only be impractical but would fundamentally alter the nature of these sports, placing an unreasonable cost and logistical burden on participants without a commensurate safety benefit.

From a risk perspective, paragliders and hang gliders primarily operate under visual flight rules (VFR), in segregated or uncontrolled airspace, and are flown only in suitable weather conditions where pilots maintain constant visual awareness. At altitudes up to 3500 m, these aircraft remain far below the cruising levels of commercial traffic and rarely interact with controlled airspace unless specifically coordinated. The few instances where interactions might occur are already managed through existing airspace procedures, pilot training, and voluntary tools such as lightweight electronic conspicuity devices or mobile tracking apps. Expanding the ADS-B mandate to this sector would impose significant cost and compliance challenges while delivering negligible safety gains compared to current practices.