

Submission: 055

Australian Agricultural Drones Pty Ltd

It's a good idea to increase safety, but probably unrealistic. It would include manufacturers getting involved and the Australian drone market is too small for them to care. They'd either continue selling drones without ADS-B or not sell drones at all. It'd be more realistic to wait till EASA or the FAA adopts a similar policy and then implement it here.

I think it would cause more safety problems for certain situations. For example: agricultural drones typically fly 3-5m above crop height. If a crewed aircraft is flying over at a safe altitude and has ADS-B IN, it would receive warnings about a drone within its vicinity, which is typically impossible to spot. At a glance, this may cause stress for the pilot and hyper fixation when looking for a drone that's 3m above the ground. If ADS-B Out is implemented in all drones, the sheer number of audible warnings from the huge amount of hobby drones operating within city limits could also be distracting for aeromedical crews on approach to a city hospital and I think would cause more stress for the crew- potentially eroding safety.

Many DJI enterprise series drones already have ADS-B IN called "AirSense". This would be a much more suitable approach for professional level drones and maybe agricultural drones- though I think agricultural drones are so low to the ground that ADS-B IN or OUT is pointless. ADS-B IN would make sense to introduce for all drones, but to implement this in hobby drones is a complete waste of time till the FAA or EASA get onboard. Cheap hobby drones will just continue to be sold without it and that will be impossible to police.

To be realistic, any change will also have to have an "effective of" date, for example: "Drones that may operate above 400ft by an ReOC operator with CASA approval and purchased after 2030 must have ADS-B (IN or OUT)." This gives the manufacturer time to make drones that are compliant and businesses to plan on purchasing these drones.

In summary, ADS-B IN is realistic and already implemented in some DJI Enterprise series drones with good results that have been proven to increase the Remote Pilots situational awareness, overall safety and ability to abide by law surrounding sharing airspace with aircraft. Implementation of any ADS-B IN or OUT in hobby drones is pointless until EASA or the FAA implement similar rules due to the comparatively small drone market here. ADS-B OUT in drones will need to be thoroughly researched to see if they actually increase or diminish safety for crewed aircraft. ADS-B OUT for some

drones applications, such as agricultural drones, is pointless, would raise the price of these already expensive drones and wouldn't contribute to safety at all in my opinion.