

Submission: 119

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Submission: Opposition to Compulsory ADS-B Requirements for VFR Aircraft

I wish to express my concern regarding the proposal to make ADS-B devices compulsory for all VFR aircraft in Australia. While the intent to improve situational awareness and safety is understandable, the practical implications for many operators—particularly those flying heritage or recreational aircraft—make this proposal unreasonable and ineffective.

My personal aircraft, a DH82 Tiger Moth, has no electrical system beyond a small battery used intermittently to power a radio or transponder. The installation of a full ADS-B system would be both technically impractical and financially burdensome. Many other aircraft in the recreational and vintage categories are in a similar position, where retrofitting modern avionics would significantly alter their operation, add unnecessary complexity, or even compromise their authenticity.

Moreover, the relative risk of mid-air collisions among VFR aircraft is very low when compared with other, far more common, pilot-induced accident causes. The funds and effort required to implement compulsory ADS-B could be more effectively directed toward improved pilot education, training, and awareness programs—initiatives that deliver broader and more meaningful safety benefits across the aviation community.

In summary, while ADS-B is a valuable tool in certain contexts, making it mandatory for all VFR aircraft—particularly older or purely recreational types—is not practical, equitable, or proportionate to the actual risk it seeks to mitigate.