

Submission: 121

**Martin Florian**

Dear Sir or Madam,

First of all, thank you very much for your initiative to ensure safe and efficient operation of all aircraft in Australia's airspace.

I am a member of the Australian paragliding community and understand that hang gliding and paragliding aircraft may, in the future, be required to carry ADS-B transmitters. In this context, I would like to inquire how you intend to ensure that radiofrequency (RF) field exposure remains within safe limits for participating pilots.

According to the Australian Radiation Protection and Nuclear Safety Agency's (ARPANSA) "Standard for Limiting Exposure to Radiofrequency Fields – 100 kHz – 300 GHz", the maximum exposure for the general public is limited to 0.08 W per kilogram of body mass. For an average pilot weighing 80 kg, this equates to a maximum permissible exposure of 6.4 W.

Commercially available ADS-B Electronic Conspicuity (EC) devices, such as the SkyEcho 2, typically operate with emission power levels around 20 W—more than three times the permissible exposure limit defined by Australian standards. Based on this, it appears that ADS-B transmitters cannot be continuously operated in a safe manner in close proximity to the body, as would be the case in a hang glider or paraglider setup.

Could you please clarify your position on this matter? Specifically, are exemptions being considered for hang gliders and paragliders regarding the requirement to carry ADS-B transmitters? Are there plans to adopt different technologies that would ensure both operational safety and compliance with Australian RF exposure standards?

Thank you very much for your time and consideration.

Kind regards,