

Anonymous

I am an active paraglider pilot and see significant airspace safety benefits of a broadly applicable ADS-B mandate for myself as a paraglider pilot and for those other aviators with which I share the airspace. I found the Consultation paper to be an excellent document that outlined the benefits and rationale for a mandate and the safety imperative for such an approach. Therefore I am strongly in favour of a broadly applicable ADS-B mandate. I believe the time frames could be much shorter than those proposed utilising approved EC devices given the safety benefit this would provide.

Paragliding takes place in predominantly Class G airspace both low level along the coast and inland cross country where significant heights can be reached using thermals (10,000 feet without oxygen) and over great distances (several hundred kilometers). I have long been concerned about the risk of midair collisions with other airspace users.

Visual separation and the use of VHF radio reporting is demonstrably not an effective or reliable method for separation. Along the coast spectacular scenery where we often fly attracts other airspace users whose focus is the scenic view and not separation. We regularly experience low level coastal flights of light aircraft, helicopters and light sport aircraft, often upwind and at similar altitude generating life threatening wake and rotor turbulence. The pilots of these aircraft I believe are rarely aware of the presence of paragliders and hang gliders.

In more recent years the explosion of drone usage creates an additional and escalating airspace safety risk predominantly in coastal environments. It is not the commercial drone operators but the recreational drone users fresh from JB HiFi often using first person view (FPV) looking for the spectacular scenic vision to post online. Whilst we often share the coastline with Remote Control aircraft they are very respectful of paragliders and hang gliders as we often share the same launch sites. The recreational FPV drone users have no such limitation.

A very broad ADS-B mandate where all airspace users must be Electronically Conspicuous (EC) offers the opportunity to largely solve the current escalating airspace risk. Whilst I understand this is technically not practical for the plethora of small drones to all carry EC devices, the incorporation of ADS-B IN functionality in these drone

ground controllers will allow them to display other airspace users operating in their vicinity that will achieve the same separation awareness.

However the airspace safety benefits will only accrue if ALL users are Electronically Conspicuous (EC). There can be no exception. In order to facilitate and achieve this outcome a broad ADS-B mandate must be coupled with the same rebate incentive that has been available to registered aircraft operators over recent years. Not only is this fundamentally equitable, it will go a long way to mitigating those who oppose the mandate on over regulation and cost arguments.

Speaking from a paragliding and hang gliding perspective we are currently required to carry, listen out and broadcast on VHF in various airspace regions to maintain separation. This is often very difficult to comply with in an open cockpit in the thermic conditions we often fly. Working out where other traffic is, if it is likely to be conflicting when in a sharp turn inside a turbulent thermal whilst actively flying your wing, listening on VHF let alone broadcasting your position and altitude is an unrealistic expectation.

The use of an EC device within a broad ADS-B mandate system is a far more effective and practical method of achieving airspace safety for paragliders and hang gliders. Such EC devices are now very similar to a vario and require no pilot input or manipulation inflight apart from turning the power on. Therefore a further recommendation as part of a broad ADS-B mandate would be to exchange the current regulatory requirement to carry a VHF radio for the carriage of an EC device for paragliders and hang gliders. This will go a long way to addressing the over regulation and cost objections.

Thankyou for the opportunity to provide a response to this consultation.

Regards