

Submission: 141

Peninsula Aero Club



Peninsula Aero Club appreciates the opportunity to provide feedback on CASA's proposal regarding mandatory ADS-B fitment for VFR aircraft. While recognising the safety benefits of surveillance technologies in controlled airspace, we believe a blanket mandate is disproportionate, imposes excessive cost on general aviation, and delivers limited net safety benefit relative to alternative investments.

Key Arguments

Disproportionate Cost Burden

- Typical ADS-B installation cost was much lower in 2018 and now exceeds \$10k – \$15k per aircraft, whereas the grant costs have remained static.
- For many private owners and aero clubs, this is equivalent to several years' operating budget for some smaller aircraft, thereby making GA less affordable.
- Safety return on investment must be proportional — training, currency flying, and instructor renewal may deliver greater real-world safety outcomes.

Extremely Low Mid-Air Collision Risk in Australia

- Australia has one of the lowest rates of mid-air collision globally in GA operations.
- Imposing large mandatory costs for marginal safety gain is not efficient use of safety dollars.
- Individual pilots and operators should retain discretion to allocate safety investment where it is most effective.

Antique and Legacy Aircraft Incompatibility

- Many heritage and recreational aircraft have no electrical systems and therefore cannot support this technology.
- ADS-B installation would necessitate major airframe modification, compromising historical authenticity and safety.
- Exemptions or alternative compliance pathways are essential to allow these older aircraft to continue to operate.

Privacy and Commercial Exploitation Concerns

- ADS-B data is publicly broadcast and aggregated by numerous online platforms in real time.
- Aircraft movements are being used internationally for taxation, landing charges, and commercial price-tracking without operator consent.
- This raises significant privacy and misuse concerns for private aviation.

Promised Benefits Have Not Fully Materialised

- The 2017 IFR ADS-B mandate was sold on reduced separation, capacity increase, and fuel-efficiency benefits.
- Airservices Australia has not installed sufficient nationwide ground station coverage.
- ADS-B-equipped aircraft still frequently drop off ATC surveillance.

International Inconsistency and Technology Restriction

- Australian requirements diverge from the USA, which permits cheaper UAT ADS-B solutions and continued use of portable equipment.
- The proposed mandate would disadvantage Australian GA relative to global peers.

Conclusion

Peninsula Aero Club urges CASA to avoid a blanket mandate and instead consider more flexible, proportionate, and risk-based approaches — including voluntary equipage incentives, exemptions for low-risk VFR operations, acceptance of portable and UAT equipment, and prioritisation of pilot proficiency and training over costly avionics retrofits.

We welcome further consultation and would be pleased to engage directly with CASA on pragmatic alternatives.

Kind regards



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