

Submission: 177

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Feedback on ADS-B mandate proposal

"I strongly disagree with the proposed expansion of the ADS-B mandate, with inclusion for VFR aircraft. Specifically for hang gliders and paragliders. Compared to cockpit type aircraft, these gliders have extreme space, weight and power restrictions. They require complete hands-on control and vigilant lookout, the workload is very high. These gliders should be exempt from this mandate for the following reasons:

1) Unpowered aircraft - This would require us to carry a power source (or run the risk of batteries failing/depleting in flight). With limited options of stowing the power source and mounting the ADS-B device itself, it would be impractical on most hang glider and paraglider setups. The added weight is a safety risk for launch and landing of hang gliders. The added weight increases the risk of injury during landing as pilots would have more weight to carry on their legs during the landing phase.

2) Aircraft capabilities - When compared to drone capabilities, paragliders and hang gliders are slow moving and slow to respond to pilot controls. When mixed aircraft are flying, the drone pilot should bare responsibility when it comes to aircraft avoidance in flight. Similar to the maritime rule of power gives way to sail.....

3) Recreational Aviation - Freeflight pilots fly for the sheer passion of aviation and flight. Not only are the ADS-B units not practical for freeflight, they are also another unnecessary regulation which could result in the decline of the sport of Freeflight and recreational aviation in general.

See Attached image of a hang gliding instrument panel and the limited space we have to mount instruments. When you factor in most pilots also fly with a GPS Locator (Spot/Inreach/EPIRB) and a phone, there really is no where left to mount a ADS-B and power source. In an open harness (which most pilots fly) There is no way of fitting said devices."

I'm available to discuss this if you would like further input/ideas.

Best regards,

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