

Anonymous

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I strongly disagree with the proposed expansion of the ADS-B mandate, with inclusion for VFR aircraft. Paragliders/hang gliders should be exempt from this mandate for the following reasons:

- 1) Unpowered aircraft – the expanded ADS-B mandate is impractical for an unpowered aircraft the size of a paraglider/hang glider. The mandate would require us to carry a power source (or run the risk of batteries failing/depleting in flight). With limited options for stowing the power source and mounting the ADS-B device itself, it would be impractical on most paraglider setups. When you factor in that most pilots already fly with a GPS Locator (Spot/Inreach/EPIRB) and a phone, there really is nowhere left to mount an ADS-B and power source. In an open harness (which most pilots fly), there is no way of fitting said devices. Additionally, the added weight of these items can change the geometry of a harness (which then changes the weight-shift capabilities of the aircraft). This can affect the aircraft's responsiveness during turns and recovery to level flight. The added weight would also increase 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 bear responsibility when it comes to aircraft avoidance in flight. This is 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 an unnecessary regulation which could result in the decline of the sport of Freeflight and recreational aviation in general. Many paragliders and hang gliders engage in flying activities within specific recreational flying (such as the small coastal site at Bells Beach in Victoria). In these areas paragliders and hang gliders are very unlikely to come into contact with other aircraft and VFR are always possible.

I sincerely hope that it will be recognised that this mandate is an unnecessary regulatory burden for paragliders and hang gliders.

Kind regards,