

Submission: 256

Babcock



Babcock submission Potential future expansion of ADS-B mandate in Australia

27 October 2025



Introduction

Babcock writes in support of the proposal to expand the scope of the ADS-B mandate within Australia.

The rapid advancement of technology in the UAS sector is progressing at a pace that exceeds the effectiveness of awareness based education alone and the accessibility of commercial off-the-shelf systems have reached a level that necessitates stronger legislative measures to ensure larger systems remain by default, visible in the airspace. Relying solely on individual compliance has proved inconsistent as demonstrated by varying levels of adherence across the sector.

It is evident that additional regulatory enforcement is required. At a minimum, all systems beyond a defined size or operational threshold should be equipped with and required to operate ADS-B as a baseline safety standard.

Babcock Operations Overview

Babcock Mission Critical Services Pty Ltd (Babcock) provide helicopter aeromedical support service and law enforcement services through commercial contracts within Queensland, South Australia and Victoria.

Babcock hold an air operator's certificate (AOC), aerial work certificate (AWC), and flight training certificates with approvals to conduct medical transport and search and rescue helicopter operations in the Bell 412, Leonardo AW139 and Airbus H145 helicopter types. All flying operations are conducted in accordance with Babcock's Flying Operations Exposition (operations manual).

Babcock flying operations are conducted in compliance with CASA regulations as they apply to the activities approved by the certificate specification as a commercial activity. Medical Transport Operations are conducted in accordance with CASR Part 119/133, and Airborne Law Enforcement and Search and Rescue tasking are conducted in accordance with CASR Part 138.

Babcock also hold CASA approvals and certificates for flight training activities, both to perform internal and contracted training and checking, and as a stand-alone training organisation to conduct integrated and non-integrated single-pilot and multi-crew flight training

Babcock operations are conducted 24/7 under both IFR and VFR. Operations are generally short notice response tasking and are conducted at varying altitudes depending upon a variety of factors such as weather conditions, traffic and aircraft performance.

Position on the Proposed Model

Support for ADS-B mandate

Babcock support the proposed expansion of ADS-B mandate due to the enhanced safety feature supporting collision avoidance with other aircraft and drones.

Over the years, Babcock has experienced an increasing number of close proximity drone encounters, often occurring without warning, during medical transport or emergency service operations. These events have, in some circumstances, caused delay or influenced task outcomes. Most recently, on the 16th October 2025, a drone identified operating in the vicinity prevented a Bell 412 medical transport aircraft in South Australia from departing on an urgent task.

In 2024, in collaboration with Victoria Police, Babcock received information highlighting the proliferation of drone activity around Melbourne-based hospitals and Essendon Airport. Data obtained by Victoria Police through specialist drone tracking technology revealed the level of activity that raised significant concern among our aircrew, particularly when operating at night over densely populated areas.

The specific drone flights detected in the vicinity of the **Alfred Hospital**, one of Victoria's major trauma centres, between January and May 2024 were as follows:

- There were 3440 flights
- Max Height 6499m (21300ft)
- 950 flights above 120m (393ft)
- 648 flights at night

The operation of drones in and around airport environments is also of significant concern. **Figure 1** illustrates drone activity detected in the vicinity of Essendon Airport during the same reporting period.

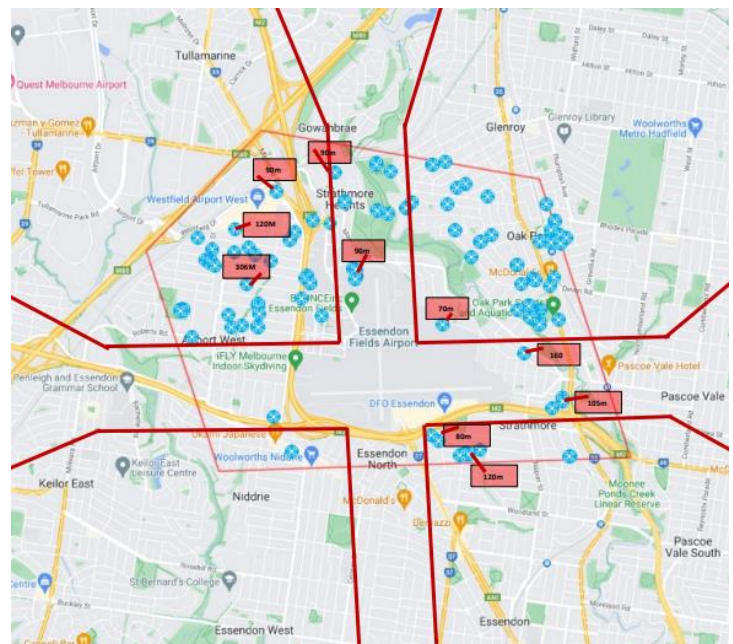


Figure 1 - Essendon Airport Drone Activity Jan - May 2024

Potential model

Babcock acknowledge the potential cost for imposing this mandate across the industry, however, support the staged implementation approach in conjunction with an ongoing government rebate program.

This would support a staged approach toward the full electronic visibility standards that would apply to all aircraft post 2027 and beyond.

Extent of ADS-B use today

Babcock's current fleet of helicopters are all configured with ADS-B IN and OUT capabilities.

In addition to standard 'see and avoid' for collision avoidance, the use of TCAS to draw attention to an intruder aircraft enhances safety during urgent medical, law enforcement and SAR operations.

Conclusion

In conclusion, Babcock strongly supports the expansion of the ADS-B mandate to include unmanned aerial systems.

All aircraft of a size and operational use that pose a legitimate threat to other airspace users should be subject to the same safety requirements already applied to manned operations. The argument of cost to industry is not sufficient justification for exemption, as smaller off-the-shelf systems continue to evolve, the integration of ADS-B should be a necessary requirement, especially when BVLOS capability becomes more widespread. Given the ongoing expansion of drone activity among amateurs, hobbyists and enthusiasts, establish a formal regulatory barrier and technical enforcement standard for non-compliant aircraft is an essential requirement to ensure accountability in Australian airspace.

Point of Contact

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