

Anonymous

Introduction

I am writing to provide feedback on the proposed requirement for ADS-B equipage in all Australian aircraft, including paragliders and hang gliders.

As a [paraglider pilot / member of a paragliding club / recreational pilot], I strongly oppose the inclusion of foot-launched aircraft within any mandatory ADS-B framework. While I fully support initiatives that enhance airspace safety, it is clear that the technical, operational, and economic realities of paragliding make ADS-B equipage both impractical and of negligible benefit to safety outcomes.

2. Nature of Paragliding Operations

Paragliders and hang gliders operate at low altitudes, low speeds, and typically in uncontrolled airspace, well away from controlled zones and commercial flight paths. These aircraft are visually conspicuous, and pilots rely on visual separation (see-and-avoid) and established site procedures to maintain safe operations.

Requiring ADS-B in these environments does not enhance safety — there is no air traffic control service to receive or use ADS-B data in most areas where we fly.

3. Technical and Practical Limitations

- **Power Supply:** Paragliders have no onboard electrical system, making continuous ADS-B operation infeasible without heavy and expensive external batteries.
- **Weight and Size:** Any certified ADS-B unit and antenna would significantly increase weight and compromise flight performance and safety.
- **Environmental Exposure:** Equipment mounted on harnesses or frames would be subject to weather, impact, and handling stresses beyond the design limits of typical avionics.
- **Certification Challenges:** There are currently no certified or practical ADS-B solutions for foot-launched or ultralight gliders globally.

For these reasons, ADS-B is technically incompatible with paragliding and hang gliding operations.

4. Economic and Safety Implications

Mandating ADS-B for paragliders would impose unrealistic costs and reduce participation in the sport without improving safety.

In fact, forcing pilots to carry additional electronic equipment could increase risk by adding distractions, complexity, and weight to a minimalist form of flight where simplicity and awareness are key to safety.

5. Alternative and More Appropriate Safety Measures

Instead of ADS-B mandates, safety for paragliding operations is best maintained through:

- Education and training in airspace awareness and communication,
- Continued use of FLARM, FANET+, or other lightweight awareness devices, which are already widely used internationally by glider and paraglider pilots,
- Cooperation with CASA and Airservices to ensure clear airspace boundaries and local operational procedures at shared sites.

These measures are proven, practical, and proportionate to the actual level of risk.

6. Conclusion

ADS-B technology offers genuine benefits for powered aircraft in controlled airspace, but it is entirely unsuitable for paragliders and other foot-launched aircraft.

A one-size-fits-all mandate would be disproportionate, unenforceable, and counterproductive.

I respectfully request that paragliders and hang gliders be formally exempted from any ADS-B equipage requirements under Australian regulations, in line with international practice.

Thank you for considering this submission.