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Recreational Aviation Australia

RECREATIONAL AVIATION AUSTRALIA

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Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

Subject: Consultation Response – Proposed Automatic Dependent Surveillance–Broadcast (ADS-B) Mandate

On behalf of Recreational Aviation Australia, a CASR Part 149 approved self-administering aviation organisation (ASAO), we thank the Department for the opportunity to respond to the proposed mandate of Automatic Dependent Surveillance–Broadcast (ADS-B) for aircraft operating within Australian airspace.

Our organisation represents over 9,000 members, registers more than 3,000 sport and recreational aircraft, and administers 130 flight training schools across Australia. As a significant stakeholder in the general aviation sector, we support the introduction of measures that enhance situational awareness and safety outcomes for pilots. However, we offer the following considerations regarding the proposed ADS-B mandate.

Support for Risk-Based Implementation
We are broadly supportive of ADS-B as a technology that improves airspace awareness and collision avoidance potential. However, any mandate for ADS-B equipage should be implemented using a risk-based approach, particularly to avoid imposing unnecessary burdens on operators in remote or low-traffic areas, where the likelihood of aircraft conflict is minimal.

Current Equipage Rates and Cost Impact
Our fleet data indicates that only 40% of currently registered aircraft within our organisation are fitted with a transponder. The financial impact of mandating ADS-B fitment for the fleet is significant, particularly for private owners and operators of recreational and light sport aircraft. Consideration must be given to the economic viability for these stakeholders and the availability of ongoing government incentives and phased implementation pathways.

Training and Awareness
The effectiveness of ADS-B as a safety tool is directly linked to the pilot's understanding of its use and limitations. Any mandate must be accompanied by comprehensive training materials and awareness programs that focus on the correct operational use of ADS-B equipment. Emphasis should be placed on retaining good airmanship practices, such as maintaining a proper visual lookout and radio procedures, and avoiding overreliance on technology, which could introduce new risk factors such as pilot complacency and distraction.

Technological and Infrastructure Considerations

- **Equipment and Power Limitations**: Many aircraft within our register, particularly legacy and ultralight types, lack the electrical infrastructure required to power ADS-B equipment reliably. Mandating equipage without addressing this issue would impose impractical and potentially unsafe modifications on these aircraft.
- **Technology Evolution**: The pace of technological change in avionics presents a risk of rapid obsolescence. Operators may face the need for costly re-fitment within a few years if today's systems become incompatible or unsupported in the near future.
- **Maintenance Capability**: There is a notable shortage of qualified avionics maintainers available to support widespread installation and maintenance of ADS-B systems. This supply constraint must be addressed to avoid backlogs, increased costs, and potential safety risks due to inconsistent installation practices.
- **Ground Station Coverage**: For ADS-B to deliver its full benefit, especially in enhancing situational awareness and surveillance, there must be adequate investment in ground infrastructure to support the expanded use of the technology across Australia, including regional and remote areas.

Airspace Design and Future Planning
ADS-B should be an enabling technology, not a substitute for a comprehensive and forward-looking airspace management strategy. The long-term approach to Australian airspace should integrate evolving technologies (such as RPAS and AAM aircraft) and prioritise equitable and safe access for all airspace users, including those in the sport and recreational aviation sector.

Conclusion
We remain supportive of technology that improves aviation safety and situational awareness but strongly advocate for an evidence-based, proportionate, and flexible approach to any mandated ADS-B equipage.
We welcome continued collaboration with the Department and relevant agencies to ensure the safe, fair, and sustainable integration of ADS-B technology into Australian aviation.
Should you require further information or wish to engage in further consultation, we would be pleased to participate.

Sincerely,
Cody Calder
Chief of Aviation
Recreational Aviation Australia.