10 March 2023

AAUS Feedback on Aviation White Paper Terms of Reference (ToR)

The Australian Association for Uncrewed Systems (AAUS) is pleased to provide this initial feedback to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA) on the Aviation White Paper.

General Feedback:

In general, AAUS does not see any gaps in the proposed ToR. We offer some initial commentary and feedback on the specific ToR and look forward to contributing to ongoing discussion in these items.

Feedback on Terms of Reference:
(AAUS feedback in Blue).

aviation's role in economic development, trade and the visitor economy - general, domestic, regional and international aviation;

Herein lies an opportunity for Government to express a national vision and priority for aviation that acknowledges the significant value and criticality of aviation to Australia but also the opportunity, particularly in relation to new aviation sectors (jobs growth, manufacturing and export) and the benefits through their many applications (e.g., sustainability, primary industry, regional services, land and infrastructure management, disaster response, etc.).

The Aviation White Paper represents an opportunity to rethink what "domestic, regional and international" aviation will look like.

how to maximise the aviation sector's contribution to achieving net zero carbon emissions including through sustainable aviation fuel and emerging technologies;

AAUS notes the importance of ecosystem wide approach and not just aircraft (airspace and airport efficiency).

Emerging aviation (drones, RPAS, AAM) potentially offer more environmentally friendly means of passenger and freight transportation in the medium to long term.

Necessary investments might include regional airport investments (e.g., growth in airport infrastructure for satellite centres, charging for electronic powered aircraft).

changing aviation technologies and ways to position our policies, regulations and systems to encourage uptake and manufacturing of new, more efficient, transport technologies;

The Government should recognize that Drones/RPAS/AAM will continue to grow in number, size, and operational complexity. They are on track to be the largest sector of aviation, in time, contributing the same (if not more) triple bottom line value as the commercial aviation passenger and freight transport industry today.

Key aspects are:

- Automation and the digital age
    - o Automation to address workforce challenges, enhance safety and efficiency
        - Ground / airport operations
        - Piloting tasks
        - ATC
    - o Assured data critical resource.
        - Security, access, fair commercial access etc.
    - o New challenges to a digital connected system
        - Cyber
- Delivery of all new services and benefits to communities, in the short to medium term, including to regional areas.

- Recognise Government innovation policy – foster proactive industry-engagement to keep pace with rapidly changing technologies and use cases, address expertise shortages, to remain at the global competitive forefront.
- Strategic policy and planning – address current lack of vision, objectives and roadmap across government.
- Whole-of-Government – Coordinated and consistent policy and regulatory settings across all areas of Government.
- Greater and more frequent industry engagement on policy and legislation consultation is essential to keeping pace with innovation.
- Nationally coordinated – Consistent policy and regulatory settings no matter where aviation business takes place in Australia across departments / portfolios.
- Importance of reviewing bilateral and international agreements (e.g., bi-directional type acceptance, validation of licenses, tariffs, trade controls, etc.) to enable Australian business export opportunities (manufacturers and service providers) – particularly in emerging sectors (e.g., RPAS OEMs, training, etc.)

airport development planning processes and consultation mechanisms that consider the impact and changing nature of aircraft noise and related expectations on the role of noise sharing and curfew arrangements;

Key aspects for consideration:

- Support industry in effective engagement on community noise concerns.
- airport development planning processes and consultation mechanisms that consider the impact and changing nature of aircraft noise and related expectations on the role of noise sharing and curfew arrangements;

how to support and regenerate Australia's general aviation sector;

Key aspects for consideration:

- Recognition of the vital importance of GA and value to Commonwealth
- Recognise the development and growth requirements and opportunities to provide a sustainable and vibrant aviation industry.
- Support to modernize.
- Cross aviation sector opportunities

future industry workforce skills and training requirements

Key aspects for consideration:

- Need to start provisioning for future workforce requirements now – e.g., vertiports, remote operators, ground crew, LAMEs, etc. recognizing the changing needs.
- Greater D&I in the workforce is critical.
- Early workforce training and licensing approach that builds resilience in workforce, forward thinking (aligned to needs of tomorrow's industry) and creates career pathways that are attractive and rewarding.
- Greater flexibility to trade and universities to be more responsive to the changing skill needs of industry.
- Alignment of the ASQA qualification and regulatory licensing frameworks.

appropriate consumer protections and access to services;

Key aspects for consideration:

- Regulatory requirements are critical drivers on cost. Desire to offer safe, affordable and accessible services (e.g., freight and passenger transportation).
- Government procurement policies and procedures need to reflect the contemporary environment and need for sovereign industry capability.
- Flexible, risk-based, fair and open, performance driven – support ongoing innovation and local SME opportunity. Particularly for large and lengthy infrastructure investments (e.g., ATM modernization)

maintaining fit-for-purpose aviation safety, air navigation and aviation security systems and service delivery agencies;

AAUS views this as a priority. Part 101 showed how influential this is, enabled Australian RPAS industry to be world leading, but competitive edge has now been eroded, regulatory framework and oversight no longer meeting industry needs. It is the single greatest inhibitor to industry advancement.

We believe strongly that appropriate resourcing to modernize and meet growing industry needs is critical for timely services and quality of services.

As crewed aircraft become the minority, there will be a need to ensure a balance of access but not constrain the growth of aviation industry by perpetuating old and inefficient concepts and technologies. To that end, we need a national airspace operational concept, roadmap and plans that provision for a far more complex and heavily utilized airspace than today.

the role of airlines and airports in supporting regional economies;

Just as important is the role of emerging aviation sectors. Most near-term use cases and job creation are in rural regional Australia, with applications in agricultural and primary industry, infrastructure and new services like medical delivery.

About AAUS

The Australian Association for Uncrewed Systems is Australia's oldest and largest industry advocacy group for uncrewed systems and the emerging Advanced Air Mobility (AAM) sector. AAUS is a not-for-profit organisation which represents the drone and AAM industry across three domains: land, sea, and air. AAUS' objective is to promote a professional, safe and commercially viable uncrewed systems and AAM industry. AAUS achieves this through its industry advocacy and promotion, education and outreach, and networking activities.

AAUS provides a single representative voice for the full breadth of the uncrewed system and AAM industry. AAUS' 3,000 members span small-to-large enterprise, manufacturers, licensed and unlicensed operators, training providers, academic institutions, Government, and other supporting technical and professional services in the Australian uncrewed systems and AAM industry.

Contact

AAUS would be pleased to provide additional information to the Department on the matters contained in this submission. Please do hesitate to contact Reece Clothier, President (president@aaus.org.au) Greg Tyrrell, the Executive Director, on greg.tyrrell@aaus.org.au.