

**Archived:** Thursday, 21 November 2019 8:36:59 AM

**From:** [Secretary](#)

**Sent:** Fri, 15 Nov 2019 17:03:55

**To:** Noise Regulation

**Subject:** RE: Aircraft Operations Submission Enquiry [SEC=OFFICIAL]

**Sensitivity:** Normal

**Attachments:**

[MTA Infrastructure Department Submission - Drone.pdf](#)

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[REDACTED]

Please find attached the Mitchell Traders Association submission to the review of Air Navigation (aircraft noise). Our submission can be made public.

Thank you

Julian

[REDACTED]

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[REDACTED]



**MITCHELL TRADERS ASSOCIATION**

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Aircraft Operations

Aviation Environment Branch

Department of Infrastructure, Transport, Cities and Regional Development

GPO Box 594 CANBERRA ACT 2601

E: noiseregulation@infrastructure.gov.au

**Review of the Air Navigation (Aircraft Noise) Regulations 2018 – Remotely Piloted Aircraft**

Dear [REDACTED],

The Mitchell Traders Association (MTA) welcomes and thank you for the opportunity to provide a submission to the review of aircraft noise regulations and operations of remotely piloted aircraft (RPA) or drones, urban air mobility (UAM), supersonic and historic aircraft. Early this year, the MTA provided a submission in support of the use of commercial drone delivery in Canberra to the ACT Legislative Assembly Standing Committee on Economic Development and Tourism, which examined drone delivery systems in the capital territory.<sup>1</sup> The MTA endorses the conclusion and recommendations that the standing committee delivered to the ACT government in July 2019.

Since drone technology is evolving rapidly the MTA is au courant that the Aviation Environment Branch needs to review and set acceptable current and future regulatory guidelines for RPA noise emissions. We have read the terms of reference in the Department of Infrastructure’s Issues Paper (September 2019)<sup>2</sup> and would like to specifically comment on sections 2 (a{v-vi}) and 2 (c). The MTA considers the sections which relate to the technological

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<sup>1</sup> See Attachment – ‘Submission No. 73, Mitchell Traders Association - Inquiry into Drone Delivery Systems in the ACT, 27 February 2019.’

<sup>2</sup> Department of Infrastructure, Transport, Cities and Regional Development. *Review of the Air Navigation (Aircraft Noise) Regulations 2018 – Remotely Piloted Aircraft, Issues Paper September 2019*. Canberra, 2019: p. 14.

and noise characteristics of the aircraft as ever-advancing and each generation of development would see a gradual reduction in noise emission. Soon we may see RPAs that emit no sound at all when airborne. It should be noted that the Wing trial in Canberra and the community feedback received led the company to design a quieter drone which is currently in use at their Mitchell facility. The section on community acceptability of noise impacts from the aircraft, albeit very subjective, is difficult to ascertain, predict or measure as individual reactions may vary. However, since Wing relocated its operations to Mitchell the response from businesses and traders in our precinct has been positive. The sound emitted from the delivery drones in Mitchell does not adversely affect the businesses or workers in our area. To date, there have been no complaints made to the MTA from the circumjacent residential suburbs that receive drone deliveries from Wing's Mitchell operational facility.

We request the Aviation Environment Branch in its review to remain impartial and not curtail commercial drone operations in Canberra (or Logan, QLD), which the current regulations under Section 17 of the *Air Navigation Act 1920* have approved. Without continued commercial drone operations, it would be difficult to ascertain both the scope for regulatory noise guidelines and the approach to aircraft design and technological innovation.

Yours sincerely,

Julian Kusa

Secretary

Mitchell Traders Association

15 November 2019

**Attached** - 'Submission No. 73, Mitchell Traders Association - Inquiry into Drone Delivery Systems in the ACT, 27 February 2019.'



## **LEGISLATIVE ASSEMBLY**

**FOR THE AUSTRALIAN CAPITAL TERRITORY**

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**STANDING COMMITTEE ON ECONOMIC DEVELOPMENT AND TOURISM**

**Mr Jeremy Hanson MLA (Chair), Ms Suzanne Orr MLA (Deputy  
Chair), Mr Michael Pettersson MLA**

# Submission Cover Sheet

## Inquiry into drone delivery systems in the ACT

**Submission Number: 73**

**Date Authorised for Publication: 27 February 2019**



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**Standing Committee on Economic Development and  
Tourism** ACT Legislative Assembly  
London Circuit, Canberra ACT 2601  
LACommitteeEDT@parliament.act.gov.au

### **Inquiry into Drone Delivery Systems in the ACT**

Dear Committee,

The Mitchell Traders Association (MTA) welcomes the opportunity to provide a submission to the ACT Legislative Assembly's inquiry into drone delivery systems in the territory.

The MTA supports the use of commercial drone delivery in Canberra. Traders in the Mitchell precinct are openminded towards new technology and understand the transformative impact that drones will have in the future. We believe drone-based deliveries will be beneficial to local ACT businesses and consumers who wish to use the service.

The traders are cognisant of sections within our Canberra community are opposed to the use of delivery drones for a number of ostensible reasons (e.g. noise pollution, privacy issue, environmental impact) that have been highly publicised by the media. We hope that these community concerns are adequately addressed and resolved with the inquiry. However, we request the committee to approach this matter in an impartial manner.

The MTA would welcome the introduction of transparent regulatory provisions to govern current and future use of the territory's airspace. We believe such laws would enable drone delivery services to operate, whilst at the same time provide protection to residents and wildlife from undesired intrusion and harm.

Yours sincerely,

Julian Kusa

Secretary, Mitchell Traders Association

20 February, 2019