



The ACT Equestrian Association Incorporated

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Noise Regulation Review for Remotely Piloted Aircraft (RPA) and Specialised Aircraft

The ACT Equestrian Association (ACTEA) represents nineteen equestrian sporting clubs and associations in the Australian Capital Territory. Their horses live in the main within the limits or on the edge of the city of Canberra, in private and government agistment paddocks. They recreate in public open space in which circumstances they are at the mercy of unregulated and inconsiderate recreational drone users.

ACTEA is pleased that CASA has accepted that remotely operated aircraft need to be regulated by someone. ACTEA participated in the inquiry by the Australian Capital Territory (ACT) Standing Committee on Economic Development and Tourism into drone delivery systems in the ACT. Our main purpose in doing so was to highlight the total lack of regulation applying to a commercially operating public nuisance. In practice, the delivery drones in the ACT have not impacted on our community because we have negotiated them away from vulnerable areas. The real problem for us are the drones the discussion paper seems to dismiss as irrelevant on the basis of size and weight.

The Australian Capital Territory is home to an estimated 17000 horses, the highest percentage of recreational horse ownership per head of population of any city in Australia. The city contains approximately 500km of designated horse trails on public land including nature reserves and working pine plantations. These are supported by 15 Government Horse Holding Paddocks and 13 private agistment centres scattered throughout the city, both in its midst and on its per-urban boundaries. The dedicated equestrian competition ground is only 10km from the city centre.

Horses are prey animals with a highly developed set of survival skills to prevent them becoming lunch; the fact that they have no natural predators in Australia has done nothing to diminish their natural instinct. A horse's hearing is much keener than a humans. Horses can hear low to very high frequency sound, in the range of 14 Hz to 25 kHz (human range = 20 Hz to 20 kHz). Their ears can rotate nearly 180 degrees from front to back. They can hear sounds from greater distances than we can, several kilometres away. They are more reactive to loud noises than we are. Noises from unfamiliar directions, like right above them, can be confusing. Horses grazing in the vicinity of drones register the sound of the drone before the machine even becomes visible to the human eye. A horse panicked by a sound it cannot understand can throw its rider, bolt, end up in traffic, injure itself and those around it.

Since 2017 the ACT Equestrian Association has received reports of recreational drones causing concern to the Canberra equestrian community:

- flying over herds in government horse paddocks causing them to bolt, in one case while a person was in the midst of the herd;
- flying over a person on horseback in a public place causing her horse to shy;
- flying just outside the property line of a government paddock making it impossible for horse riders to use the sand arenas to train and exercise their horses;
- flying over a pony club rally day event causing horses to shy and throw their young riders.

These incidents were not accidental, but deliberate actions by the drone operators acting from a distance. In fact, because they can be operated at a distance, horse owners cannot even assume they are safe from drones even if they do not leave their horse paddock.

Most recently, in September this year, a private company conducting a mountain bike race on public land, with a permit, set up a check point near a government horse paddock and flew a drone over its race, and by default, the yards where horses were tied up to be fed, saddled and shod. On that morning the farrier came very closed to getting his head kicked in by a panicked horse. Horses in the adjoining paddocks bolted around, in serious danger of injuring themselves. One of them was lame for a week afterwards.

These are not small matters to people who love their animals or who have to pay the veterinary and doctor's bills when horses or people get hurt.

- In October 2015, a horse from West Yorkshire Police's mounted unit was spooked by a drone flying close to his paddock. **He tried to jumped a fence and collided with a wooden post. He died on his way to the vet.**
- **In January 2017** a horse attached to a carriage outside a luxury hotel in Zermatt, Switzerland, had to be put down after being spooked by a drone overhead. The horse took flight at such a pace that it suffered fatal fractures.
- In the United States there have been reports of drones being used to deliberately frighten horses.

It is not the size of the drone, it is the noise it makes and the fact that people believe they can fly these things wherever they like with no repercussions. It is not just the fact that drones are exceedingly noisy to a horse; it is the fact that the noise can follow them. It is only a matter of time before a horse in Canberra is terrified into traffic by an idiot 'just having fun'. There is presently NO policing of these activities at all at any level of government. Recreational drones in the wrong or ill informed hands are a public menace.

At a 2018 meeting with the Wing drone delivery service we were told that most recreational drones could be digitally registered and horse riders would be able to use a (yet to be developed) Google app to record the registration number of an offending drone which could then be reported to CASA. While we were left wondering which hand you would be using to activate an app while you struggled to control a panicked 500 kilogram animal the thought had its merits.

ACTEA is of the view that:

- it can only improve things if State or local governments become responsible for policing the use of **all recreational drones regardless of their size or weight**. At least there will be someone to report incidents to who might listen;
- CASA shouldn't be surrendering any responsibility for recreational drones until states/territories have their own legislation in place;
- all recreational drones should be required by law to be registered somewhere so they can be tracked and operating them at all should be illegal if the owners cannot show they are familiar with the Standard Operating Conditions;
- the definition of 'property' in the Standard Operating Conditions should be clarified to include animals;
- there should be upper noise limits for recreational drones imported into this county; and
- there should be painful financial penalties for creating a public nuisance with a recreational drone.

ACTEA looks forward to hearing about the implementation of a workable legal framework for controlling recreational drones of any weight and within a useful time frame.

Christine Lawrence
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