

SouthernLaunch.Space Pty Ltd  
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30 October 2020

Dear Department of Infrastructure, Transport, Regional Development and Communications

*via email: [drones@infrastructure.gov.au](mailto:drones@infrastructure.gov.au)*

**RE: Consultation on National Policy on Emerging Aviation Technologies**

[SouthernLaunch.Space Pty Ltd](#) (“Southern Launch”) is an Australian launch services company based in Adelaide, South Australia. Southern Launch’s services include launch facility provision, range and flight safety services and launch operation services.

Southern Launch will provide launch services from two facilities, both in South Australia:

- 1) the Koonibba Test Range for suborbital and testing operations
- 2) the Whalers Way Orbital Launch Complex is currently being developed to provide access to space for orbital missions.

Australia is host to a number of actors in its launch industry.

Southern Launch makes this submission to the Department of Infrastructure, Transport, Regional Development and Communications (**Department**) for two purposes:

- 1) to ensure modern and next-generation launch vehicles are included in the policy ambitions and outcomes in relation to Australia’s emerging aviation technologies; and
- 2) to note that Southern Launch uses drones to carry out tasks in the launch industry to contribute to the launch industry being safer, cheaper, coherent and give greater economic benefit to Australia.

***new launch activities as an emerging aviation technology***

The commercial launch market of modern space activities (commonly referred to as NewSpace) has experienced a growth in new launch vehicles and new operations concerning launch vehicles.

Traditionally, space activities required large and expensive launch vehicles to place satellites into orbit. In the advent of the small satellite market, smaller and cost-effective launch vehicles can service much of this demand as well as meet the demand of many new services.

Australia has remarkable opportunity to capitalise on this small satellite and small launch vehicle market. As a consequence, Australia is and will continue experiencing advances in launch vehicle technologies as it develops new satellite and rocket technologies and tests foreign technologies from Australian territory.

Launch activities introduce unique operational considerations to the use and management of airspace, with semi-autonomous vehicles travelling at high speed from the ground up to and above 100km altitude. Launch operations are also beholden to a differing set of timing requirements than current airspace activities.

Southern Launch encourages the Commonwealth to include consideration of launch vehicles, particularly commercial and 'NewSpace' launch vehicles, in its National Policy on Emerging Aviation Technologies.

Consideration of launch vehicles in the National Policy will correlate with the [objective of the Australian Space Agency](#) (Department of Industry, Science, Energy and Resources) to use launch activities deliver next-generation high value jobs and benefit all Australians.

***use of drones to benefit the launch industry***

Southern Launch notes the significance of the use of drones in launch activities.

Drone operations during launch activities allow launch operators to:

- monitor personnel and movements among the exclusion zone of the launch range
- inspect infrastructure remotely
- monitor the performance of the launch vehicle at take-off and early stages of flight
- locate components and payloads for recovery after launch

Southern Launch encourages the Commonwealth to consider the benefit drones provide to Australia's launch industry.

***Summary***

Southern Launch recommends the proposed core principles include consideration of launch activities as the National Policy is developed and followed.

Consideration of launch activities in this important initiative will ensure all emerging aviation technologies are carried out coherently, safely and to the benefit of Australians.

Please don't hesitate to contact Mr Scott Schneider of our office on the details below for further comment or consultation.

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