

Submission: Emerging Aviation Technologies

NATIONAL AVIATION POLICY ISSUES PAPER

Please consider my comments below.

AIRSPACE

The airspace from 0 to 400ft has historically been used for recreational model aircraft, kites etc, while 500ft upwards has been reserved for manned aviation. There is a current push to severely restrict recreational flyers to make room for commercial drone operations in the 0 to 400ft space. This is an unreasonable approach, when a small reduction in the manned aviation airspace could easily accommodate commercial drone operations. This would maintain physical separation between the sectors and would be a lower risk approach than trying to integrate commercial drone operations into manned aviation through a future UTM system of unknown efficacy. I suggest that an equitable situation may be:

0 to 400ft	should be left predominately to recreational users;
500 to 900ft	should be made available to commercial drones; and
1000ft upwards	should be for manned aviation.

Note: exemptions for things such as commercial drone takeoff and landing zones, approved model aircraft area height extensions etc would be in place.

ACCESS to AIRSPACE

Currently large areas are off limits to Remote Piloted Aircraft Systems (RPAS) due to a few manned aviation operations. For example, the Sydney Harbour is a no fly zone due to a couple of seaplane operations. This is a totally inequitable situation, especially when CASA is now charging an annual Tax of up to \$300 per drone. I suggest the airspace in these areas could be made available on a timeshare basis e.g. Manned aviation; Mon, Wed, Fri & Sun. RPAS; Tue, Thur & Sat.

SAFETY and RISK

The issues paper notes on page 6 "proportionate to risk". This is an extremely important point - there are about 35 fatalities and 5000 incidents in manned aviation each and EVERY year in Australia alone! (compared to ZERO fatalities from recreational drones WORLDWIDE EVER.

CASA has demonstrated that it has no understanding of risk in the area of RPAS. The overwhelming consensus among the hobbyists that I have spoken to is that CASA has lost all credibility and has demonstrated zero expertise in Risk Identification, Risk Assessment and Risk Management for recreational RPAS. If CASA continues its unjustified attacks and penalisation

of hobbyists, compliance with all rules (not just the absurd ones) will suffer. Never helpful when a regulator is seen as an incompetent joke, a laughing stock.

An example of CASA's incompetent understanding of risk:

Government policy requires a Risk Assessment for CASA's Drone registration and accreditation scheme - but this requirement was ignored by CASA. See:

<https://www.pmc.gov.au/resource-centre/regulation/risk-analysis-regulation-impact-statements-guidance-note>

Quote from the above document: "The RIS should focus on objective risks rather than 'perceived' risks. Perceptions about risk can be founded on bias and misinformation about the true magnitude and severity of risks (Viscusi et al. 1995). Individuals can often perceive a risk (or harm) to be much greater than it actually is—especially when there is a lack of information about the risk or strong perceptions about the size of the risk. To avoid this error, you should focus on evidence about actual risks and seek to quantify the actual risk."

No Risk Assessment was undertaken by CASA for the drone registration and accreditation scheme. The Government should consider why is this? Clearly, the Drone registration and accreditation scheme in its current form has little to do with safety.

I suggest most reasonable persons would accept that a 50kg RPAS could require registration, whereas registering a 500g toy is ridiculous. The appropriate safety threshold lies somewhere between these extremes, and should be based on a Quantitative Risk Assessment and actual data - again this has not been the case, and an arbitrary, unjustified 250g was chosen by CASA. A 300g flying toy represents zero risk to manned aviation and negligible risk to persons on the ground.

From empirical experience, I would suggest a suitable (very conservative) threshold would be more like 1.5kg for fixed wing aircraft (which largely consist of balsa or foam) and 750g for multirotor aircraft (drones) which are much denser.

The current scenario is beyond ridiculous:



Manned aviation: Once off CASA registration required.



Manned ultralight aircraft: No CASA registration required.



300g toy: Annual CASA registration required, along with the payment of an annual TAX of up to \$300.

