



Committee Secretary
Senate Standing Committees on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra ACT 2600
15 December 2016

Regulatory requirements that impact on the safe use of Remotely Piloted Aircraft Systems, Unmanned Aerial Systems and associated systems.

Dear Members of the Committee,

The Australian Strategic Air Traffic Management Group (ASTRA) Council represents a broad cross section of the aviation industry. It is responsible for guiding the development of industry policy in relation to Air Traffic Management (ATM) matters. The Australian Government Aviation Policy and Implementation Groups (APG/AIG) commonly receive advice from ASTRA, as a collaboration of aviation organisations it is well placed to coordinate industry advice to government on ATM. In this context ASTRA welcomes the opportunity to provide comment to the Rural and Regional Affairs and Transport References Committee on this subject.

Australia has an aviation safety record which is frequently cited as world leading. It is ASTRA's view that such an enviable legacy requires sustainment, and indeed continuous improvement. RPAS operations have arguably grown at a rate greater than any previously experienced in Australian aviation history. The industry was underprepared for the proliferation of RPAS, and we are working hard to keep pace with this innovative and emerging sector.

ASTRA supports an inclusive but proportionate approach to integrating RPAS into the aviation environment. We recognise that the impact, issues and opportunities presented by RPAS is wider than the aviation industry. We are of a view that there is an immediately emerging need for a whole of government approach to RPAS policy and regulation to ensure safety, security and privacy for Australian citizens.

The reports of safety occurrences between traditional airspace users and RPAS are increasing and most interactions are in violation of aviation regulatory requirements. The true size of the problem is unclear due to a lack of effective monitoring of RPAS interactions, and a perceived lack of capability to take enforcement action in response to unsafe or unlawful activity. It is our understanding that the finer details of law in support of RPAS operational deviations are as yet unclear.

The Civil Aviation Safety Authority's (CASA) involvement in the regulation of the RPAS sector is vital, however CASA is not a law enforcement agency in the traditional sense. Similarly, the Australian Transport Safety Bureau's (ATSB) remit does not extend to monitoring and investigating all unsafe or unlawful RPAS scenarios. Both organisational structures remain premised upon traditional airspace users, now factoring extensive growth in RPAS. Compounding this much of the RPAS sector is comprised of non-aviation stakeholders who do not see themselves as part of the 'traditional' aviation industry.

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There is a clear need to closely involve federal and state police in addressing unsafe or unlawful RPAS operations. These agencies are in the view of ASTRA, best placed to deter, detect, investigate and as appropriate pursue relevant actions. A stronger public education campaign on the safe use of RPAS and the potential issues that can arise is required. Based on the limited data that the ATSB currently holds, there is a need to focus such a campaign in the Sydney region as a matter of first priority. Airlines now report frequent encounters with RPAS in Sydney at altitudes as high as 12,000 feet. It is apparent from available data that commercially registered RPAS operators are largely compliant with aviation requirements. The pre-eminent risk appears to centre on hobbyists and amateur RPAS operators.

The use of RPAS at or in the vicinity of aerodromes and heliports is restricted by regulation. ASTRA would recommend that a greater level of protection is afforded to aerodromes which receive a regular public transport service. Such protections should not seek to prohibit all RPAS operations, rather they should seek to maintain safe control using a risk based approach.

When considering control of RPAS at or near aerodromes and heliports, it is reasonable to consider systems such as geo-fencing or other systems designed to remove RPAS as required. When determining systems of this sort, consideration must be made of the possible unintended consequences for other airspace users, for example; systems designed to disrupt GPS signals could impact aircraft operations. Ultimately a coherent, inclusive and proportionate approach to RPAS integration should be led by the Australian Government, in a manner consistent with the American and European approaches.

The RPAS sector extends into all areas of modern society, beyond traditional aviation boundaries. The administration and oversight of aviation is primarily funded by traditional airspace users. It follows, in ASTRA's view, that it is inappropriate for the pre-existing aviation industry to bear the majority of costs for managing the risks associated with RPAS.

Thank you for the opportunity to provide comment, ASTRA would welcome further opportunities to consult on this subject and can be contacted through contact@astra.aero.

Yours Sincerely

Bruce Gemmell
Chairman, ATsRA

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