

Australian Model Rocket Society Inc.

PO Box 1233, Browns Plains, QLD 4118

www.rocketry.org.au

ARBN 165 666 357

12/07/2018

**Submission to the Senate Standing Committees on Economics
RE: Space Activities Amendment (Launches and Returns) Bill 2018 [Provisions]**

Dear Committee Secretariat,

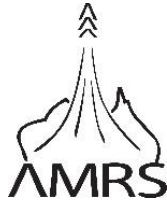
The Australian Model Rocket Society Inc. (AMRS) thanks you for your invitation to comment on the Space Activities Amendment (Launches and Returns) Bill 2018 [Provisions].

As a not-for-profit organisation and as the National Body for hobby rocketry activities in Australia, AMRS has concerns of the proposed High Power Rocket (HPR) regulations for non-commercial operations. For clarity, below is an overview of AMRS' structure:

- AMRS holds \$20mil public liability insurance for its member clubs and subsequent launch sites.
- AMRS has created and implements HPR safety codes that are internationally recognised.
- AMRS has certification processes to assess the competency of individuals as they progress in size and complexity of rockets and rocket motors.
- AMRS has a rocket motor testing regime that is internationally recognised.
- AMRS has international reciprocity with the National Association of Rocketry (USA), Maryland Delaware Rocketry Association (USA), New Zealand Rocketry Association and Tripoli Rocketry Association (USA).
- AMRS is the only organisation in the world that facilitates online training/exams for HPR certifications, Launch Control Officer and Range Safety Officer courses etc.
- AMRS clubs hold CASA instruments for operating high power rockets.
- AMRS clubs hold regular launch activities (generally monthly) with annual national and international events held at varying locations across Australia.

AMRS' initial comments and concerns are outlined below, however are anticipated to invoke further discussion and comments.

1. The definition of a 'High Power Rocket' is not clearly defined.
2. As per previous regulations, we acknowledge that this proposed Bill defines a HPR as a rocket that does not go beyond 100km Above Mean Sea Level (AMSL). If this is the only limitation then this would be considered acceptable as there are no changes to previous operations.
3. The proposed Bill indicates that a 'person' will be required to hold a HPR permit. Under current operations, it is up to the member club/organisation to hold a CASA Instrument for an Approved Area. This is not under the name of an individual. If a permit must be issued to an individual, then literally thousands of permits may be required which would be onerous on the department. In addition, at any one event, there could be up to a few hundred high powered rockets launched of varying size, power and altitude.



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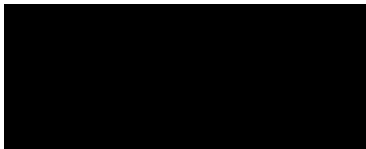
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4. Hobby rocketry has been in existence for over six decades and has an exemplary safety track record. In saying that, it is not unreasonable that a high powered hobby rocket may sustain damage at some stage during a flight, in particular on landing. The definition of an 'accident' in the proposed Bill, indicates that any of these instances which have not breached any safety codes are deemed investigable. It is unclear as to the reporting requirements. From AMRS' perspective, it would appear the proposed Bill has been authored purely for commercial activities. Whilst AMRS has internal processes to mitigate such events occurring, AMRS believes that should each instance be required to be reported and investigated would be overly burdensome on all parties.
5. The responsibilities of the Australian Space Agency vs Civil Aviation Safety Authority are not defined.
6. AMRS believes that the reference to 'High Power Rocket' is a poor choice of definition. Irrelevant of the altitude, power, mass etc., strictly commercial operations should be defined as a launch vehicle. With 100km being the upper limit for all non-commercial activities, HPR hobby users are already bound by existing CASA regulations.

In making this submission, AMRS acknowledges the complexities of this proposed Bill and the relevant agencies that are working towards developing the space sector.

AMRS is available to discuss further the above comments and concerns. AMRS looks forward to working with the Senate Economic Legislation Committee to ensure HPR users of all sizes and backgrounds are afforded an equitable opportunity to operate.

Kind regards,



Dave Couzens
AMRS Chancellor