

To Whom It May Concern:

**RE: Civil Aviation (Unmanned Aircraft Levy) Bill 2020 and Civil Aviation Amendment (Unmanned Aircraft Levy Collection and Payment) Bill 2020 [Provisions]**

**Submission:**

1. ReOC (Remote Operator Certificate) holders are licensed and their drones are already registered with CASA – Anyone who has a ReOC already has their drones registered with CASA. This is part of the operating manual that has to be created and then submitted to CASA for approval. The image below is a screenshot from my operator's manual

showing some of the drones.

Manufacturer	Vulcan X8
Model / Type	Black Widow
Maximum Take-off Weight	24.99 Kg
Identity / Serial Number	████

Manufacturer	Vulcan X8
Model / Type	Raven
Maximum Take-off Weight	24 Kg
Identity / Serial Number	████



Manufacturer	DJI
Model / Type	M600
Maximum Take-off Weight	15.1 Kg
Identity / Serial Number	████

Manufacturer	Parrot
Model / Type	Disco
Maximum Take-off Weight	750gm
Identity / Serial Number	██████████

So why should I now pay a fee to register these drones individually when some of them are only used a couple of times a year and others are used more often??? This will make it more cost prohibitive and much harder, if not impossible to operate!

2. The sub 2kg category/excluded category/very small category – This category has been the worst change for professional operators. The people who operate in it do not care for the rules, they know it is very hard, almost impossible for CASA to regulate the category and people operating in it. This shows from the small number of fines issued and the warning letters issued to those caught flouting and breaking the rules. The people who are already breaking the laws are not going to stop and start following them now because they might have to pay a registration fee. The reason this category was created was apparently because “big business and industry said it was cost prohibitive to bring drones into their workspaces”. This in itself seems to be ridiculous because generally speaking, it cost more to purchase a brand-new car than it does to setup a

drone business or incorporate drones into your existing business. Also, because there are 3 different names for this category as mentioned above, people are confused. I had 1 person say to me and I quote, "I am in the excluded category, I am excluded from the rules because I fly small drones". In my opinion, if CASA want to continue to allow this category to operate then people should be, at the very minimum, required to hold their RePL. It's ludicrous allowing people to operate drones commercially without a licence.

3. Hobbyist vs Commercial – There should not be any confusion about either of these groups. Hobbyist, which I am also part of, have been operating safely at approved airfields for decades. These airfields are approved locations, and they are approved by CASA. I am insured through the MAAA – The Model Aeronautical Association of Australia. <https://www.maaa.asn.au/>. As a commercial operator I have aviation public liability insurance that covers my drones/rpas/uav/uas or whatever you want to call them.
4. Australia senate inquiry on drones – <https://www.youtube.com/watch?v=Ix4XeUg3rwc>  
It was clearly stated during the inquiry that the senators were not interested in the people who were licenced and doing the right thing, it was everyone else who was illegally flying drones, and this does not included hobbyist who fly at approved airfields.
5. Drone Fees – Why are you trying to impose registrations on individual drones, when it's better to charge people to renew their remote pilot licence much like we have to renew our car licences. I would have no problem if CASA wanted to make drone licenses have an expiry like car licenses do and then charge a reasonable rate to renew the RePL.
6. RePL and ReOC fees – When I got my RePL, I paid nearly AUD\$4000. This included my AROC – Aeronautical Radio Operators Certificate and my Cert 3 Aviation – Remote Pilot Visual Line of Sight. These days fees for the RePL can be as low as AUD\$1000. The lower the fee the lower the quality of training. And this is obvious when you compare people offering 5-day face to face courses vs theory online then 2 days in a field getting the min 5 hours of flying with a drone. Once I wanted to get my ReOC, and once the operations manual and procedures library were completed, these were sent to CASA, who then charged AUD\$1280 to review the documentation, request any changes, and then complete a 2 hour interview to asses my suitability to be listed as the Chief Remote Pilot for my company. They also during this process approved and confirmed the registration of my drones as per screenshot in point 1. This is the information required for registration, so again why should I pay a fee for something CASA is fully aware of and has already approved?????
7. Fees for no service – This therefor seems to be a fee for no service. You can't charge a fee and receive nothing in return.

In summary, it seems that it is continually made harder and more expensive for the people who try to do the right thing and follow the rules.

Suggested links to watch about drones:

<https://www.youtube.com/watch?v=Ix4XeUg3rwc>

<https://www.youtube.com/watch?v= WMV-3pSIRo>

<https://www.youtube.com/watch?v=rDLj7XKVsm8>

<https://www.youtube.com/watch?v=0GFd7FGk8wA>

<https://www.youtube.com/watch?v=sUBsPZh21eQ>