



THE AUSTRALASIAN INSTITUTE OF EMERGENCY SERVICES

30 September 2020

Gerry McNally
Committee Secretary
Senate Rural and Regional Affairs and Transport Legislation Committee
PO Box 6100
Parliament House
Canberra ACT 2600

Ref: Submission to the Inquiry into the provisions of the Civil Aviation (Unmanned Aircraft Levy) Bill 2020 and Civil Aviation Amendment (Unmanned Aircraft Levy Collection and Payment) Bill 2020

Dear Senators

Thank you for the invitation to make a submission on behalf of the Australasian Institute of Emergency Services (AIES).

By way of background and introduction - The AIES is a professional body for members of emergency service and affiliated organisations. The Institute and our members are dedicated to the progression and recognition of the emergency services' role in the wider community. We provide an independent forum where members can be heard, and their opinions shared with others.

Additionally, the Institute aims to study the roles and functions of Emergency Services and Emergency Management Organisations throughout Australasia with the twin goals of promoting and advancing of professional standards in these and associated services. The Institute provides a voice for the Emergency Services to speak on issues that affect our members and the community in general.

The Director on the AIES Board representing the ACT, Ms Christine F Miller MAIES, has been working in aviation emergency management for some time. Chris has prepared the following submission and is available to discuss these ideas further if this would be of assistance your Committee.

It appears the goal of your committee, and the proposed legislation, is to regulate Unmanned Aircraft, unmanned aerial vehicles (UAVs) or 'drones'. Although we acknowledge the logic in this proposal, doing so now may be 'shutting the gate after the horse has bolted', as the expression goes. This is due to the proliferation of UAVs, particularly given the low-price points and ready availability of UAVs, as illustrated by these photographs taken by Chris at JB HiFi's Canberra Civic store on 11 December 2019.



Licensing and levies may be intended 'to keep the cowboys out' of our air space. But will it succeed? Even the compliant drone pilots find it difficult to comply – please note the elapse time. <https://www.youtube.com/watch?v=OP9KY3INeBc> when a UAV 'pilot' on 20 July 2016, tried and eventually succeeded in phoning Air Traffic Control (ATC), Sarasota-Bradenton International Airport, Florida, USA. Current US Federal Aviation Administration (FAA) guidelines state that UAVs cannot be flown within 5 miles of an airport unless they seek, and receive, prior written approval and then contact the airport control tower seeking and receiving their approval before flying commences on the day. We are advised that Australia has similar arrangements with Civil Aviation Safety Authority (CASA) and Airservices Australia for UAV pilots seeking to fly their drones near Australian airports.

AIES member's concerns about drone regulation and compliance are driven by a desire to avoid a repeat performance of what happened to a general (note, not civil) aircraft wing tested in 2018 at the University of Dayton Research Institute, Ohio <https://youtu.be/QH0V7kp-xg0>. This test demonstrated the impact of a popular hobby drone/UAV (a DJI Phantom 2, without a camera) on an aircraft's wing.

As you can see, a drone strike has the potential to crash passenger aircraft. This would likely result in fatal outcomes, along with considerable work for emergency services and others to deal with the aftermath, including the potential for psychological injury and PTSD amongst members of the responding emergency services.

Additional to Chris' observations, I am also personally extremely conversant with the advantages, and disadvantages, of UAVs. The thesis for my Master of Emergency Disaster Management from Charles Darwin University recently was titled *Unmanned Aerial Vehicles (UAVs) and their application for use in the Humanitarian Sector*. Consequently, I am acutely aware of their many applications, and that they offer significant benefits across virtually all aspects of modern society.

Thank you for giving our concerns your consideration during your deliberations.

Yours sincerely

Stephen Jenkins FAIES
National President
Australasian Institute of Emergency Services