Background

The Ripper Group (TRG) has been involved in the Australian UAV industry since 2015, holding ReOC number 0734. The Ripper Group acts as the umbrella company to both the Little Ripper program and also The Ripper Aviation Academy. The Ripper Group welcomes the proposed changes to Part 101 MOS proposed to be implemented by CASA on 10 October 2020. We believe that these changes will be a significant change to the industry for the better and will hold more organisations accountable across the board. We also believe the mandatory registration of UAV's is a critical step forward in professionalising the UAV industry in Australia and keeping hobbyist's accountable for their actions in the national airspace.

Registration

TRG believe that this is a positive step forward for the industry and believe that this should be mandatory across all categories and weight classes as projected. TRG is fully onboard with the mandatory registration requirements and believe this will increase the professionalism and accountability for our side of the aviation industry.

Commercial

Whilst the commercial UAV industry in Australia is on the verge of a boom with acceptance and use, we believe that it is not quite mainstream just yet. In saying this, there are many commercial companies that have a broad range of UAV's for the "what if" scenario. The proposed registration, whilst relevant and accepted by TRG, the rumoured proposed costs seem exorbitant. We believe a fairer price model needs to be proposed for commercial operators as these operators are the ones that have gone through the required training, have the required licenses and company registrations, have insurance, usually are fully compliant with the rules and regulations, yet seem to receive the most criticism and also seem to be looking at the highest registration costs. We believe it is not fair to penalise those who do the right thing with high costs.

Search & Rescue

The Ripper Group through our Little Ripper program has been instrumental in changing the Australian landscape in regard to the use of UAV's for Search and Rescue. We believe that these UAV's that are on call for the saving of life should not be required to pay exorbitant costs for registration. These UAV's should be seen as emergency services - yes should pay some registration but this should be a substantially discounted cost.

Training

Training fleets for UAV training academies should also not be charged full commercial registration rates. These UAV's are designed to teach those entering the industry to maintain CASA rules and regulations and fly safely. If the registration cost of UAV's for training is substantial, this will be passed on to students that already don't want to do certification nor pay for it. Having these extra costs passed on to the student due to the training organisation not wanting to carry these costs will become unreasonable.

CASA Exemptions

TRG believe CASA needs to take into consideration applications from Emergency Services UAV operators in regard to applications for exemptions due to Emergency response. Any emergency application should have all fees waived and gain the highest priority as the exemption is being sort for a specific reason. TRG have applied for Emergency Permits for Search & Rescue operations for both ourselves and on behalf of Surf Life Saving state bodies, having to pay for the exemption and the exemption taking considerable time to be approved. This is not acceptable for the response to the potential saving of life.

In Summary,

While The Riper Group (therippergroup.com) fully endorses the regulation of the UAV industry, and the requirement for registration of all operators, we caution against a one size fits all approach. In particular fees should be structured in such a way as to not impact adversely on the viability of the nascent UAV industry, and that search and rescue operators and training academies should be considered separately.