

SENATE RPAS INQUIRY TALKING POINTS

Key Messages

- the positive economic potential for RPAS is huge and we must embrace the technology
- sharing airspace creates risk through a probability of collision and a range of adverse consequences
- airspace segregation should be the risk mitigator of choice
- if RPAS share airspace with manned aircraft, there can be no reduction in safety for manned operations
- we do not see excessive risk coming from compliant non-excluded commercial operations
- we do see excessive probability of collision coming from the uneducated, the unwise, the cowboys and the criminals
- we do see adverse outcomes due to the chosen mass of excluded RPAs
- we do not believe that the collision dynamics of bird strikes and drone strikes are the same – drone strikes are worse
- we do not believe that the ground collision dynamics with people are related to the airborne collision dynamics with aircraft
- the advice from Monash is not sufficiently rigorous to act as a policy basis
- CASA has not displayed adequate caution in deciding what are excluded RPA operations
- More research is required into aircraft drone collision dynamics to provide a proper basis for defining excluded RPA operations
- Technology such as geo-fencing should be implemented to the maximum practical extent to aid compliance and minimise collision risk
- We need a strong enforcement regime
- We are committed to doing our part in shaping any new concept for RPA management strategies such as “U Space”

Education

- Ignorance is too often forgiven
- General education is fine, but targeted education is best
- Education must emphasis the primacy of safety for manned operations
- We are committed to doing our part in helping to educate operators and regulatory bodies at all levels of government

Enforcement

- targeted education must meet any legal hurdles to improve enforcement
- there must be a proportionate but very robust enforcement regime
- RPA ownership and operator identify must be easily established
- We need to explore ways to expand CASA's surveillance/enforcement reach by involving State police forces and local government ranger resources

Registration

- Every RPA over the scientifically determined risk threshold must be registered
- There must be an appropriate means of identifying the vehicle, preferably in flight, and by the largest bit of wreckage following a collision
- Appropriate education should be part of the registration process

User Pays Principle

- The "user pays" principle applies to all participants in the aviation system – who pays the cost of any initiatives to limit the impact of RPAS on the manned aviation industry?
- Why has CASA created a "free rider" class of commercial RPA users (no licencing or compliance costs for sub 2kg commercial drone users)?

Consultation with Pilots

- AusALPA is concerned that both the Minister and now the CEO of CASA are advised by panels of vested commercial interests in aviation to the exclusion of pilot bodies.
- The entrepreneurs and operators of Australia's aviation businesses do not speak for pilots and do not deal face-to-face with the real risks every day – governments of all persuasions must seek balanced advice
- The pilot associations have no more or less "industrial" interest in aviation policy development than do the operators
- Advisory panels should have no industrial agenda for any participant