



30 September 2020

Committee Secretary
Senate Standing Committees on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra ACT 2600

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

Ausfilm welcomes the opportunity to submit to this inquiry.

Ausfilm markets all that Australia has to offer to filmmakers internationally, to find what they need in Australia to bring their stories to life. Ausfilm markets Australia's Screen Production Incentive Scheme which comprises the Location Offset, Location Incentive, PDV Offset and Producer Offset. In relation to the Location Incentive the Government recently announced a \$400 million top up to the program as a measure to attract more international production to Australia, supporting \$3 billion of inward investment and creating 8,000 jobs a year.

Ausfilm is a member organization and a unique partnership between private industry and government. This partnership comprises Australia's federal and state governments, the major studio complexes, production service providers and leading post, visual effects, animation and sound/music studios. Ausfilm is supported by the Australian Government through the Department of Infrastructure, Transport, Regional Development and Communications.

In particular, two members of Ausfilm, XM2 and Heliguy, are world-leading multi-platform aerial cinematography companies that have ridden the wave of innovation in the use of drone photography in feature film and television production. Drone camera platforms are not only used as a substitute for aerial photography but replicate crane, dolly and Steadicam platforms, giving directors and cinematographers the ability to shoot multiple takes in quick succession, thus enhancing workflows. Using laser technology they are also used to make digital 3-D representations of landscapes and objects as the basis for visual effects shots.

Both the Civil Aviation (Unmanned Aircraft Levy) Bill 2020, which imposes a levy for future cost recovery arrangements for regulatory services for Remotely Piloted Aircraft (RPA) operators, and the Civil Aviation Amendment (Unmanned Aircraft Levy Collection and Payment) Bill 2020, which establishes arrangements for CASA to collect the levy, are supported by Ausfilm. However, we are concerned about the potential for the levy to be an unreasonable imposition on commercial operators.

The Bill states that the amount of the levy is the amount prescribed by regulations, which must not be more than \$300 and may be a nil amount. We make a submission arguing that that any levy to be imposed for future cost recovery arrangements for regulatory services for RPA operators should be minimal.

Ausfilm submits that a fee that is set too high compares unfavourably to other jurisdictions and other registration fees.



If the fee is set at an unattractive level, there is a possibility that it will discourage investment in R&D currently being conducted in Australia. Investment in R&D is likely to be sent offshore, as comparable jurisdictions require a minimal fee for drone registration. In the United Kingdom, the annual fee is 9£; in the USA, USD\$5.00 is charged per aircraft and is valid for three years; in Ireland, registration costs 5€, and in France, the registration is free and valid for five years. It may also make it more attractive for Australian companies to work overseas.

In relation to other registration fees, a fee set out at \$300 is more expensive than registration for an Australian driver's license. For example, in NSW, a driver's license costs \$60 for one-year, whilst in Victoria, it costs \$82.80 for three years. Similarly, an Australian passport costs \$150 for five years and \$298 for ten years.

Ausfilm welcomes the opportunity to discuss these issues further.

Yours sincerely

Kate Marks
CEO