



Black Sky Aerospace Pty Ltd  
512 Mona Drive  
Jimboomba, QLD 4280 Australia  
P: +61 7 3077 6861  
W: <https://bsaero.space>

12 July 2018

Committee Secretariat  
Senate Standing Committees on Economics  
PO Box 6100  
Parliament House  
Canberra ACT 2600  
**By email:** [economics.sen@aph.gov.au](mailto:economics.sen@aph.gov.au)

**Submission to the Senate Standing Committees on Economics  
RE: Space Activities Amendment (Launches and Returns) Bill 2018 [Provisions]**

Dear Committee Secretariat,

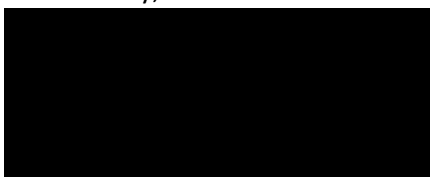
As the demonstrated leading provider of launch services in Australia, Black Sky Aerospace (BSA) thanks you for your invitation to comment on the Space Activities Amendment (Launches and Returns) Bill 2018 [Provisions].

1. BSA finds the distinction between launch vehicles above and below 100km irrelevant. Any operations, whether operated below or above 100km and for clarity, this includes:
  - Any launch of a vehicle and/or space object that is ultimately destined for space; or
  - Testing of any launch vehicle and/or space object that is ultimately destined for spaceshould be considered entirely as a launch vehicle. The use of 'High Power Rocket' for vehicles that are below 100km that are not intended for flights into space is likely to negatively impact operations of organisations that do not intend to fly above 100km. In addition, ambiguous definitions adds complexity to regulation and may be burdensome on regulators.

BSA acknowledges the complexities of this proposed Bill and the relevant agencies that are working towards developing the space sector. BSA believes the proposed Bill has a number of ambiguities that do not appropriately define the many variations of possible launches. BSA believes that a working group should be considered selected from a panel of industry professionals and key stakeholders.

BSA is available to discuss further the above comments. BSA looks forward to working with the Senate Economic Legislation Committee to ensure space activities are correctly identified and equitably accessible by all operators.

Sincerely,



Blake Nikolic  
Director  
Black Sky Aerospace Pty Ltd

