



MODEL AERONAUTICAL ASSOCIATION OF AUSTRALIA

ABN 64 819 095 900

Tyson Dodd

Federal Secretary

20 September 2020

Reference 101-20

Committee Secretary

Senate Standing Committees on Rural and Regional Affairs and Transport

PO Box 6100

Parliament House

Canberra ACT 2600

Dear Secretary,

On behalf of the MAAA (being our 10 State and Territory Associations, 353 clubs and over 9400 members) we wish to provide a submission during the consultation period of the [Civil Aviation \(Unmanned Aircraft Levy\) Bill 2020 Civil Aviation Amendment \(Unmanned Aircraft Levy Collection and Payment\) Bill 2020](#) bill.

As the RAAO (Aeromodelling) the MAAA provides a long and significant list of services, guidance and support material to our clubs and members who fly model aircraft in Australia. This list includes but is not limited to:

- Significant insurance policy coverage:
 - Public and products Liability;
 - Association Liability for our Associations and Clubs;
 - Member Injury insurance;
 - Club Asset insurance;
 - Travel insurance for our competitors and executive members';
 - Cyber Insurance for the protection of the MAAA, States and club IT assets.
- Complete Manuals of Procedures (MOPS's) and continual review procedures:
 - MOP's to cover all aspects of our members model aircraft operations;
 - Continual review and MOPs to facilitate e.g. (1) Night Flying Exemptions (2) BVLOS operations for Drone Racing.
- Complete incident and accident reporting processes for the diverse range of membership types and allowing for on-line and hard format reporting;
- A full-time staff member as the Executive Officer to full-fill the necessary tasks for the administration of the MAAA. This includes continual clear and succinct dialogue with the CASA RPAS team;
- Implementation of proficiency wings programs across a range of competency levels of members. The MAAA invests significantly to have a Chief Flight Instructor in each State and Territory and to allow these CFI's to continually improve the proficiency and instructor program for all MAAA Instructors and Members for consistency;
- Investment of time and investigation materials for the preparation and lodgement of Area Approvals (over 200 for MAAA Clubs and associated locations since October 2018) for our clubs and Special Interest Groups (SIGs)

for height increases or locations requiring such approvals due to Directive 96/17.

As indicated, the above is not an exhaustive list of the involvement of the MAAA, State Associations and Clubs with our members. However, it does illustrate the seriousness of the MAAA's dedication to the safe operation of model aircraft by our membership. For many decades the MAAA Membership fee has been \$60/year. Due to continual cost increases associated with the administration of the national body, an increase to \$90/year occurred from July 2019.

We recognise this consultation is to identify the cost and process for CASA's registrations fee to RPA and model aircraft operators the initial focus is on entities who are operating for financial gain (RPA's) to contribute to the cost recovery of the development of the scheme. For Not For Profit operators like MAAA, the considered CASA fee adopted (if any) has to be considered in respect to the service to be provided by CASA to each person that registers as a model aircraft operator. Documentation released this year by the Department of Infrastructure, Transport and Regional Development has confirmed the absence of evidence of RPA or Model Aircraft causing impacts or injury to manned aircraft or non-associated individuals. Consideration of available evidence and statistics MUST be considered by CASA when considering if/how much the fee would be for Model Aircraft operators when implemented to ensure the greatest possible uptake for the registration scheme. Without a considered balance between the % uptake of registrant's vs fee to ensure this highest performance of the registration scheme, CASA's fundamental goal for aviation safety outcome associated with the Registration scheme will be undermined.

MAAA as a RAO has negotiated terms directly with CASA for the continuation of MAAA Membership to replace requirement for our members to participate in the CASA Registration Scheme, the specific responsibilities committed to by the MAAA in accordance with our Deed of Agreement will continue. Notwithstanding this the association feels it prudent to provide a response detailing an example of the extensive list of services the MAAA provides to its members to assist CASA in its consideration of a possible future fee for service under the Registration Scheme.

The MAAA will continue to strive for continual improvement in all aspects of model aviation in Australia and represent our members and clubs while having and implementing an Aviation Safety and Awareness culture which is imperative to continued manned aviation safety.

Should the opportunity arrive, we would be delighted to be a part of further discussion and considerations in relation to the proposed Bill.

Yours sincerely

On behalf of the MAAA
Tyson Dodd
Federal Secretary
Model Aeronautical Association of Australia Inc