



Wednesday, 21 December 2016

Committee Secretary  
Senate Standing Committees on Rural and Regional Affairs and Transport  
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Parliament House  
Canberra ACT 2600  
Email: [rrat.sen@aph.gov.au](mailto:rrat.sen@aph.gov.au)

**RE: SENATE INQUIRY INTO REMOTELY PILOTED AIRCRAFT SYSTEMS (RPAS),  
UNMANNED AERIAL SYSTEMS (UAS) AND ASSOCIATED SYSTEMS**

The RAAA provides the following response to the Senate Inquiry into Remotely Piloted Aircraft Systems (RPAS), Unmanned Aerial Systems (UAS) and Associated Systems.

**1. Introduction - The RAAA and its Members**

The Regional Aviation Association of Australia (RAAA) is a not-for-profit organisation formed in 1980 as the Regional Airlines Association of Australia to protect, represent and promote the combined interests of its regional airline members and regional aviation throughout Australia.

The Association changed its name in July 2001 to the Regional Aviation Association of Australia (RAAA) and widened its charter to include a range of membership, including regional airlines, charter and aerial work operators, and the businesses that support them.

The RAAA has 29 Ordinary Members (AOC holders) and 63 Associate/Affiliate Members. The RAAA's AOC members directly employ over 2,500 Australians, many in regional areas. On an annual basis, the RAAA's AOC members jointly turnover more than \$1.5b, carry well in excess of 2 million passengers and move over 23 million kilograms of freight.

RAAA members operate in all States and Territories and include airlines, airports, freight companies, engineering and flight training companies, finance and insurance companies and government entities. Many of RAAA's members operate successful and growing businesses providing employment and economic sustainability within regional and remote areas of Australia.

**2. Response to the Committee of Inquiry**

The RAAA supports a proportionate approach to integrating RPAS into the aviation environment. However, in order to retain the excellent safety record of commercial Australian aviation, there is a need for a whole of government approach to RPAS policy and regulation to ensure safety, security and privacy.

There is a need to involve federal and state police in addressing unsafe or unlawful RPAS operations. They are best placed to deter, detect, investigate and as appropriate pursue relevant actions. A stronger public education campaign on the safe use of RPAS and the potential issues that can arise is required and CASA could take the lead in this area.

*Serving regional aviation, and through it, the people and businesses of regional Australia*

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### 3. Current and Future Regulatory Requirements

The use of RPAS at or in the vicinity of aerodromes is restricted by existing regulation, however the RAAA would recommend that a greater level of protection is afforded to all aerodromes which receive a regular public transport (RPT) services. Such protections should achieve safe control using a risk based approach.

For example, when considering control of RPAS at or near RPT aerodromes, it is reasonable to consider systems such as geo-fencing or other systems designed to remove RPAS as required. An inclusive and proportionate approach to RPAS integration should be led by the Australian Government, in a manner consistent with the American and European approaches.

Anecdotal evidence points to the Sydney basin producing an alarming number of RPAS encounters with large RPT jet operations. Perhaps a targeted media campaign in this city could be a priority?

### 4. Safety Issues Associated With RPAS Operations

Commercial operators of RPAS seem to pose minimal and acceptable levels of risk to commercial air transport. It appears that private RPAS operators pose the greatest risk to RPT and therefore the greatest risk to the fare paying public – which is CASA's number one safety priority.

Thank you for the opportunity to provide comment. The RAAA would welcome further opportunities to consult on this subject and can be contacted via [ceo@raaa.com.au](mailto:ceo@raaa.com.au).

*Regards*

A handwritten signature in black ink, appearing to read "MH", is located below the "Regards" text.

**Mike Higgins**  
**Chief Executive Officer**