Submission 122 – Model Aeronautical Association of Australia Inc

MODEL AERONAUTICAL ASSOCIATION OF AUSTRALIA

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MAAA response to Public Consultation on Remote ID

Summary:

The MAAA does not support the introduction or mandating of this technology for recreational model aircraft and recreational drones.

Our rationale is detailed below:

Organisational Background:

The Model Aeronautical Association of Australia (MAAA) is recognised by CASA as an Approved Aviation Organisation (AAO), and is considered a subject matter expert on model aircraft up to 150kg. The MAAA has just celebrated its 75th anniversary - we began in 1948.
The MAAA is affiliated with Fédération Aéronautique Internationale (FAI) via the Australian Sports Aviation Council.

Current flying:

All MAAA flying is of a recreational nature.
The MAAA has numerous classes of competition under nationally and internationally recognised classes.
Members' do not fly for commercial reward or compensation.

The MAAA has some 8,500 active members across Australia, made up of some 300+ clubs. All flying is done from known locations, and we provide CASA regular updates of these locations.
Many clubs have been operating from the same location for many years, with some operating at the same location for 40+ years.
As MAAA modellers, we fly a wide variety of model aircraft. These include, but are not limited to;

- Small free flight aircraft weighing a few hundred grams
- Non-powered aircraft
- Aircraft with gasoline engines
- Turbine powered aircraft.

It is estimated nationally that MAAA members fly in excess of 1.5 million flights a year.

The MAAA does not represent all recreational flyers, and we estimate that the actual number of model pilots and flights could be up to double the figures mentioned above.

The MAAA has a solid safety culture underpinned by flying rules and manuals of Procedures (MOPs) for the various types and classes of aircraft.
There is already significant existing Legislation governing the use, type and operation of Model Aircraft.

Model Aircraft Flying Locations:

Most clubs operate below 400' AGL, however, for clubs flying classes of models requiring heights above 400' AGL, including operations from an aerodrome or in restricted areas, a CASA Area Approval is required to enable these operations (CASAR 101.075).

This process involves risk assessments, stakeholder engagement and all the relevant permissions from Air Services etc as/if required.

The majority of our flight operations are conducted in relatively benign airspace in locations where there is little and/or no domestic dwellings and the associated risks.

Model Aircraft Registration and our operations:

All our flying is done Visual Line of Sight (VLOS), with all members and clubs actively practicing "See and Avoid" principles.
With the increase in sub-400'AGL traffic from groups such as Wing and other RPAS operators, we generally advise them of our locations and these areas are normally geofenced from their operations.

We have been involved in various technical working groups on the UAS airspace integration, security aspects as well as the UAS traffic management.

With the dropping of registration for recreational drones and model aircraft, we can't see the benefit by way of an improved safety outcome by the imposition of remote ID on to these aircraft given they operate from known locations and within the existing Legislation in Section 101.

We have 75 years of demonstrated safe flying operations, are subject to Regulatory oversight by CASA and regularly report incidents and accidents. There is no history of incidents involving our members or recreational aircraft presenting a danger to crewed aircraft.

There is no evidence of an improved safety case with the introduction of this type of remote Identification into the model aircraft area.

The technology cost -v- benefit:

The cost of the equipment and its availability would be disproportionate to the benefit, given most modellers have numerous operational aircraft.

Only the larger aircraft would be capable of carrying/powering the equipment and that would represent challenges for many competitions, both international and domestic.

To re-iterate, a significant number of models would be unable to carry such equipment under existing competition rules.

All of our clubs have extensive procedures and are well-practised in "See and Avoid" to ensure the safety of crewed aircraft.

The challenges of the UAS and moving towards Beyond Visual Line of Sight (BVLOS) operations present difficulties but as demonstrated by Wing and others at our flying fields, can be adequately geofenced to ensure safe operations.

In closing the MAAA does not support the introduction or mandating of this technology for recreational model aircraft and recreational drones as operated by our members.

Tim Nolan
President
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Model Aeroplane Association of Australia