QSA's Response to CASA Consultation on Proposed RPA and model aircraft operations over or near people

Drones 250 grams or less

Link: PP 2609US

Policy proposal 2609US – Section 3.2

CASA proposes to allow drones 250 g or less, to operate within 30 metres of people without the requirement for a CASA approval, where certain criteria are met including that the drone operator holds a remote pilot licence (RePL).

Do you think this proposal appropriately mitigates the safety risks?

No, the proposal does not adequately mitigate safety risks, as it focuses almost exclusively on **direct physical injury from drone impact**, while failing to consider broader and highly relevant risks.

First, the proposal does not sufficiently consider **risks to other airspace users**. The proposal assumes that reducing impact energy (e.g., via drone weight or parachute systems) sufficiently mitigates risk. However, this overlooks:

- **collision dynamics with other aircraft** or objects (e.g., entanglement with paragliding lines or wings), and
- **behavioural responses** (e.g., startle, avoidance reactions).

It is important to note that even small and light-weight drones present a serious risk to **paragliding and hang gliding pilots**, as drones can get **entangled** in lines or propeller nettings, which could lead to a **loss of control of the aircraft** or other **critical systems failures.**

Second, the proposal does not sufficiently account for **human factors**, particularly distraction. In many safety-critical environments—including aviation, driving, and other high-risk activities—**momentary distraction can lead to severe or fatal consequences**, even if the drone itself poses minimal physical injury risk. For example, a paraglider pilot or driver distracted by a nearby drone may misjudge conditions or lose situational awareness, leading to accidents. This risk is not addressed in the current framework.

Third, the proposal does not consider **malicious or inappropriate use**, including harassment, intimidation, or reckless behaviour. Allowing drones to operate at distances closer than the current 30 m separation standard without consent may lead to situations where individuals **feel threatened or react unpredictably** (for example, sudden evasive behaviour near roads or other hazards, as observed in comparable

situations involving wildlife such as aggressive magpies). Vulnerable groups, including **children and adolescents, require particular protection**, as they are more likely to respond unpredictably or impulsively in situations where they are startled or threatened.

Fourth, many environments where people are present—such as coastal cliffs, beaches, and ridgelines—are also regularly **used by recreational aviation**. Allowing drones to operate closer to people will likely increase drone activity in these environments, leading to **greater traffic density, increased collision risk, and higher pilot workload.** These risks are further compounded by the **absence of requirements for drones to be identifiable** (e.g., through position broadcasting or remote identification), thereby **weakening effective oversight, incident reporting** and **enforcement** in increasingly congested environments. CASA needs to cater for these problems, by engaging with relevant recreational aviation partners.

In summary, **even light-weight drones can pose significant risks to both people on the ground and other airspace users**, that have not been considered or addressed in the paper.

Do you think CASA's proposed change is clear and understandable for this section of the proposal?

The proposal clearly communicates CASA's intention to allow certain operations by drones weighing less than 250 g at distances closer than the current 30 m separation requirement. However, several important aspects of the proposal remain unclear.

A key point of uncertainty is the operational need for reducing the existing separation distance. While the proposal explains how the proposed framework would operate, it provides relatively little information regarding the circumstances in which the current 30 m requirement is preventing legitimate operations or why the proposed reduction is necessary. Additional information regarding the nature of the problem being addressed would assist stakeholders in evaluating the proposal.

Similarly, the proposal does not explain why operations conducted in close proximity to individuals would not generally require the consent of the affected person(s). While the proposal focuses primarily on physical injury risk, individuals may also be affected by drones through distraction, startle responses, perceived threat, or other behavioural effects. The role of consent in managing such risks is not discussed in detail.

The proposal also relies on concepts such as "safe distance" without providing clear operational definitions or objective criteria. This creates uncertainty for operators, affected persons, and enforcement authorities.

Finally, the statement that maintaining a safe distance is not intended to restrict overflight of a person is difficult to interpret. It is unclear why overflight would be considered acceptable while lateral proximity is restricted, particularly where an individual may perceive overflight as presenting an equal or greater risk.

Overall, the proposal would benefit from clearer definitions, stronger justification for the proposed reduction in separation distances, and additional explanation of the circumstances in which close-proximity operations are considered necessary and appropriate.

Do you think CASA's proposed change considers the current needs and requirements of drone users in your sector?

While the proposal aims to increase operational flexibility and administrative efficiency at the CASA level, it **does not adequately consider** the needs of drone operators in terms of **clarity, predictability, and legal certainty**. In particular, the changes **increase uncertainty** for drone operators by relying on **subjective assessments of "safe distance"** without providing sufficient operational guidance.

This creates potential risks for drone operators themselves. If an operator misjudges what constitutes a safe distance and an incident occurs—whether involving injury, distraction, or a near-miss—they may **face significant legal and regulatory consequences**, despite having had limited practical guidance on how to comply with the requirement. **A regulatory framework that relies on subjective judgement without clear thresholds may therefore expose operators to unnecessary liability**.

In addition, the proposal does not sufficiently address the **human factors challenges** faced by operators in real-world environments. **Assessing safe distances in dynamic settings**—such as near moving people, changing weather conditions, or other airspace users—requires:

- situational awareness,
- risk assessment under uncertainty, and
- sound decision-making under pressure.

These are **non-trivial skills**, particularly for **less experienced operators**, yet the proposal does not appear to be accompanied by corresponding requirements for **training, guidance, or standardised decision-making frameworks**.

Furthermore, the proposal does not sufficiently consider possible **interactions** between different drone operations (from different drone operators) as well as **other airspace users,** particularly in low-level environments where recreational aviation and

other high-risk activities take place. In such environments, **reliance on operator judgement alone is unlikely to provide an adequate level of safety**.

Overall, a more balanced approach would:

- provide **clear, objective separation standards or thresholds**,
- introduce limits on the **number of drone operations within a given airspace**, particularly in **high-use or safety-critical environments**;
- be supported by **practical guidance** and **human factors training**, and
- explicitly consider **shared airspace environments** and the needs of all users, not only drone operators, including **clearer guidance on the management of conflicting operations**.

Do you currently fly or intend to fly a drone weighing 250 grams or less?

Yes

Physical barrier separates the drone from people

Link: PP 2609US

Policy proposal 2609US – Section 4.2

We are proposing to allow drones 25 kg or less to operate over or near people where all people are reasonably protected by a structure or barrier, without the requirement for a CASA approval, where certain criteria are met.

Do you think this proposal maintains an acceptable level of safety for people when reasonably protected by a structure or barrier?

The intention and rationale behind the proposal is clear. However, one major weakness is that the proposal focuses almost exclusively on **risk to people on the ground**, while giving very little consideration to **risk to other airspace users**. CASA explicitly states that the proposal "does not introduce additional risks to crewed aircraft," but does not provide evidence or analysis supporting that conclusion.

1. **The proposal does not adequately consider airspace risk.**
   - A drone operating near buildings, industrial structures, sporting facilities, or transport corridors may still pose a collision risk to other aircraft.
   - The consultation provides no requirement for electronic conspicuity, remote identification visible to other airspace users, or any mechanism that would assist see-and-avoid by crewed aircraft.

2. The concept of "reasonable protection" requires clarification.

- The proposal leaves determination entirely to the drone operator through an "outcome-based assessment."
- To support drone operators and enforcement, clear operational definitions of ‘reasonable protection’ should be provided, including minimum standards and failure to meet minimum standards.

3. **The proposal should not be interpreted as creating a general exemption from broader aviation safety obligations.**

- Even where people are protected by barriers, operators should remain responsible for avoiding hazards to other aircraft and airspace users.
- CASA should consider defining an area around a building or structure of interest that restricts drones to that space, to avoid that the drone can conflict with other traffic or distract other airspace users.

As a drone operator, do you think you could reasonably determine whether a structure or barrier (such as a roof) would provide reasonable protection for people within 30 metres of your drone?

No, I do not believe it is appropriate to rely on operators to determine whether a structure or barrier provides “reasonable protection”. Where compliance decisions are left to operator judgement, there is a risk that commercial pressures will favour less conservative interpretations. Operators who adopt broader interpretations of what constitutes “reasonable protection” may be able to undertake more operations, creating incentives that disadvantage operators who make more conservative safety assessments. Over time, this may contribute to a gradual normalisation of risk-taking and inconsistent safety outcomes across the industry.

Many of the use cases CASA specifically identifies as beneficiaries of this exemption are roof inspections and asset inspections. Yet the proposal simultaneously assumes that operators can determine whether the very structure being inspected provides “reasonable protection” to people beneath it. This creates a logical difficulty: if the purpose of the operation is to inspect a roof or structure because its condition is unknown, it may not be possible to determine beforehand whether that structure would provide reasonable protection in the event of a drone impact.

CASA should provide clear operational definitions of what constitutes a barrier capable of providing reasonable protection, together with objective guidance on the information operators must possess before making such assessments.

CASA may also wish to consider providing training or assessment tools to support these decisions, as many drone operators are unlikely to possess the engineering expertise necessary to assess structural integrity, impact resistance, secondary debris hazards, or the consequences of a drone striking the structure itself.

Do you think CASA's proposed change is clear and understandable for this section of the proposal?

Partly. The proposal clearly describes CASA's intent to reduce regulatory burden where people are protected by a structure or barrier. However, the practical requirements for operators are less clear.

In particular, the proposal does not clearly define what constitutes "reasonable protection", how operators are expected to assess whether a structure or barrier provides such protection, or what information is required before making that determination. This is especially relevant where the structure itself is the subject of the inspection and its condition may not be known beforehand.

Overall, the proposal contains many terms that are left open to interpretation; including

- "reasonable protection",
- "safe distance",
- "on notice",
- "gathering of people",
- "major gathering",
- "unlikely to cause serious harm".

These phrases are insufficiently defined to ensure consistent application and enforcement. Different drone operators will likely reach different conclusions about the practical meaning of these terms. The proposal would benefit from more objective definitions, examples, and decision-making guidance to ensure consistent interpretation and application across the industry.

The proposal would also benefit from greater clarity regarding how compliance with the "reasonable protection" requirement will be assessed. If an incident occurs, it is unclear what information CASA would expect an operator to have considered when determining whether a structure or barrier provided reasonable protection. Providing objective assessment criteria would improve both regulatory certainty for operators and consistency of enforcement.

Do you think CASA's proposed change considers the current needs and requirements of drone users in your sector?

Partly. The proposal is trying to reduce regulatory burden for drone operators, but in doing so it replaces a clear approval process with a framework that depends heavily on subjective operator judgement. That may reduce paperwork, but it also creates uncertainty for operators who are trying to comply.

As a result, operators may find it difficult to determine with confidence whether a particular operation complies with the requirements. What seems to be clear is that the proposal creates incentives for less conservative interpretations of concepts such as "reasonable protection", particularly where operators are competing for the same work. Some drone operators may even feel pressured to take on more risk in their judgements to avoid losing work to other drone operators.

In addition, the proposal would benefit from additional information regarding the operation of the current approval framework. For example, it would be helpful to understand how many applications are currently received, how many are approved or rejected, and the most common reasons for rejection.

An important consideration in interpreting such data is that operators will have adapted their behaviour to the current regulatory framework. For example, operators may choose not to apply for approvals where they believe a structure or barrier would be unlikely to satisfy CASA's requirements. These learning effects lead to a self-selection of applications that will not be detectable in the approval statistics, but they will nevertheless have contributed to safety outcomes under the current framework. Omitting CASA approval will prevent these self-selection and learning effects, and can lead to drone operators adopting a progressively more high-risk attitude in their decision-making.

While the exact outcome is difficult to predict, it is certain that these effects will change under the proposed regulations and should therefore be considered when evaluating the likely consequences of the proposed policy changes.

Changes to CASA's policy for OONP approvals

Link: PP 2609US

CASA's current policy on assessing and approving OONP approvals, for holders of an RPA operator's certificate, is captured in Temporary Management Instruction RPA Operations over or near people - 2024-01 (the 2024 TMI).

This section of the survey relates to proposed changes to the existing policy set out in the 2024 TMI.

Policy proposal for requirement for operational details to support applications

Policy Proposal 2609US – Section 5.1

We are proposing to seek additional operational details to support an application, through a submitted concept of operations (CONOPS) or responses to questions on the application form (this only applies to OONP pathways that require a CASA approval).

A CONOPS is a document, scaled according to the circumstances and risks, that describes what an applicant for a CASA approval wants to do.

Do you think this proposal is an appropriate way for CASA to obtain the information it needs to assess applications for approvals?

Yes. It is reasonable for CASA to require sufficient operational information to understand the nature of a proposed operation and assess the associated risks before granting an approval. Requiring applicants to describe how they intend to conduct the operation should improve the consistency and quality of the assessment process and is a positive development.

However, it is difficult to assess the practical implications of the proposal because the consultation does not specify what information CASA intends to request or the expected contents of a CONOPS. While the proposal indicates that the documentation should be scalable according to the complexity and risks of the operation, no examples, templates, or minimum information requirements are provided.

CASA should therefore consider providing this information as part of the consultation process so that stakeholders can better assess the likely administrative burden and practical implications of the proposal. This would also help ensure that applicants have a consistent understanding of the information CASA expects to receive in support of an application.

Policy Proposal 2609US – Section 5.2

We are proposing to require OONP conducted in conjunction with other CASA approvals (i.e., outside of most standard RPA operating conditions) must be applied for and assessed together.

Do you think the proposal to require OONP approvals conducted in conjunction with other CASA approvals applied for and assessed by CASA, is an appropriate risk mitigator?

Yes. Assessing OONP operations in conjunction with other CASA approvals appears to be an appropriate risk mitigation measure. Where multiple approvals are required, the

associated risks may interact in ways that are not apparent when each approval is considered independently. Assessing the combined operation therefore provides CASA with a more complete understanding of the overall risk profile.

The proposal may also improve consistency by ensuring that operational limitations and risk controls are considered within a single assessment framework rather than across multiple approval processes.

However, CASA should provide additional information regarding the practical implications of this approach, including any impacts on application complexity, assessment timeframes, and administrative burden. This would assist stakeholders in understanding the costs and benefits of the proposed process.

Policy proposal for operations over or near a major gathering or organised event

Policy Proposal 2609US – Section 5.3

We are proposing to restrict operations over or near a major gathering or organised event unless applied for and approved by CASA.

The approval is not intended to be event-specific; however, the operator must obtain a letter of agreement or invitation to operate from the event organiser and must notify CASA at least 7 days prior to operating over or near the event.

Do you think this proposal appropriately mitigates safety risks for operations over or near a major gathering or organised event?

Partly. Requiring CASA approval for operations over or near major gatherings and organised events appears to be an appropriate risk mitigation measure. However, the proposal would benefit from clear operational definitions regarding the practical meaning of terms such as "major gathering" and "near".

The additional requirements for a letter of agreement or invitation from the event organiser and advance notification to CASA also appear sensible. It also raises an interesting question regarding the scope of the risk assessment. The proposal primarily evaluates risk in terms of physical injury arising from a drone impact. However, event organisers may also be concerned about disruption, distraction, behavioural responses, security issues, privacy concerns, or other human factors considerations. These broader risks receive relatively little attention in the proposal and may warrant further consideration.

In addition, major events often involve a more complex aviation environment than routine operations, including media aircraft, helicopters, emergency services,

temporary airspace arrangements, and increased public attention. These factors strengthen the case for maintaining direct CASA oversight of such operations and assessing risks within the broader aviation context rather than focusing solely on risks to people on the ground.

The proposal should also recognise that safety risks at major gatherings are not limited to direct physical injury from a drone impact. Drones may create distraction, startle responses, avoidance behaviours, or crowd reactions that could lead to secondary injuries, particularly in densely populated environments or where vulnerable groups such as children are present. Startle responses can also propagate through crowds, creating a serious threat, potentially resulting in secondary injuries, particularly where crowd movement is constrained by physical barriers or high population density.

If CASA considers these broader risks sufficiently important to require organiser agreement for major events, it may be appropriate to consider whether similar human factors risks—including distraction, startle responses, behavioural reactions, and operational disruption—should receive greater consideration throughout the broader proposal.

Overall, maintaining a CASA approval process for these operations appears appropriate, but additional clarification of key terms, specifications of minimum distances, and clear description of assessment criteria would improve regulatory certainty.

Policy proposal for requirement for an emergency response plan

Policy Proposal 2609US – Section 5.4

We are proposing that OONP approval holders have an emergency response plan (ERP) commensurate with the complexity and risk of the operation.

Do you think the proposal for OONP approval holders to have an ERP, commensurate with the complexity and risk of the operation, may improve safety outcomes?

Yes. Requiring OONP approval holders to maintain an emergency response plan (ERP) is appropriate and is likely to improve safety as it forces operators to think about risks and mitigation and recovery measures.

However, the proposal did not detail the minimum expectations for an ERP, including examples or templates for operations of different complexity. Most ERPs likely focus on technical failures. I would like to encourage CASA to consider broader risk factors, including **human factors**—for example, what to do if a drone startles a crowd, causes a distraction, creates conflict with members of the public, or results in unexpected interactions with other airspace users.

Policy proposal for refinement of TMI 2024-01 Pathway 1 – Informed consenting active participants

Policy Proposal 2609US – Section 5.5

We are proposing changes to existing TMI 2024-01 Pathway 1 including:

- consideration of laceration protection
- the requirement for a safety case to support the application as well as requirements for specific documented practices and procedures
- the requirement to maintain a 'safe distance' from active participants
- that consent may be digitally recorded
- a separate RPA weight limit where operations are over or near active participants below 18 years of age.

Do you think the proposed changes to existing TMI 2024-01 Pathway 1 would appropriately mitigate safety risks?

Partly. Several of the proposed changes appear likely to improve safety outcomes. However, the proposal continues to rely on concepts such as “safe distance” without providing clear operational definitions or objective criteria.

The inclusion of laceration protection is welcome because it recognises that injury mechanisms other than impact energy exist. However, CASA may also wish to consider other injury mechanisms that are not directly related to impact energy, including entanglement hazards (e.g., involving hair, clothing, lines, or aircraft structures), as well as startle effects and behavioural responses that may lead to secondary injuries. These risks may be particularly relevant where operations occur in close proximity to participants or other airspace users.

The proposal should also recognise that informed consent does not itself mitigate risk in all situations. While informed consent may be relevant when determining whether a participant is willing to accept a particular level of risk, it does not reduce the likelihood or consequences of a drone incident. Safety outcomes therefore continue to depend on the effectiveness of the underlying risk controls, regardless of whether participants have provided consent. Moreover, vulnerable populations like children may not be able to provide informed consent and require special protections that go beyond limiting the weight of the drones to 7 kg (e.g., increased distance requirements).

At the same time, informed consent may provide benefits beyond risk acceptance by reducing uncertainty, surprise, distraction, startle responses, and potential conflict between operators and affected persons. CASA may therefore wish to consider whether notification, consent, or other forms of informed participation could play a broader role in mitigating human factors risks in circumstances where drone operations may materially affect people despite posing a relatively low risk of direct physical injury. This

may be particularly relevant for activities involving other airspace users, such as recreational aviation, where distraction or startle responses may create safety risks that are not adequately captured by impact-based risk assessments.

Overall, the proposed changes appear likely to improve safety outcomes. However, the proposal would benefit from clearer definitions of key terms, consideration of additional risk mechanisms beyond impact injury, and a stronger distinction between risk acceptance and risk mitigation.

Policy proposal for refinement of TMI 2024-01 Pathway 2 - Unlikely to cause serious harm upon impact

Policy Proposal 2609US – Section 5.6

We are proposing changes to existing TMI 2024-01 Pathway 2 including:

- complying with an impact test standard to determine transferred kinetic energy
- simplifying when laceration protection is required
- considering sustained overflight of moving vehicles travelling at speeds higher than 60 km/h
- including third party organisations, acting on behalf of emergency service organisations for emergency services operations, to use the option for a higher kinetic energy limit of 34 joules
- clarifying requirements for consideration of wind speed and wind monitoring where a parachute recovery system is used
- clarifying options for applying to operate over or near a major gathering or organised event.

Do you think the proposed changes to existing TMI 2024-01 Pathway 2 would appropriately mitigate safety risks?

It is difficult to fully assess whether the proposed changes would appropriately mitigate safety risks because the consultation primarily provides a summary of the proposed amendments rather than a detailed explanation of the practical effect of each change. In several instances, it is unclear how the proposed approach differs from the current framework, what specific problem is being addressed, and what evidence supports the proposed modification.

- For example:
- "simplifying when laceration protection is required" sounds reasonable, but what exactly is being simplified?
- "considering sustained overflight of moving vehicles travelling at speeds higher than 60 km/h" does not clearly explain whether this is more restrictive or less restrictive than the current framework.
- "clarifying options for applying to operate over or near a major gathering" is not really a safety mitigation at all; it is an administrative clarification.
- "complying with an impact test standard" sounds sensible, but CASA does not explain why the previous approach was inadequate.

In this consultation, CASA is frequently asking stakeholders whether they support concepts, while indicating that many of the important details will only be developed later in guidance material or legislative drafting. Without this information, it is difficult (if not impossible) for stakeholders to provide fully informed feedback on whether the proposed changes are likely to improve safety outcomes.

Policy proposal for new pathway - Low altitude operations not over people

Policy Proposal 2609US – Section 5.7

We are proposing a new pathway for OONP approval where the drone is operated at a low altitude and overflight of people is not expected.

Under this new pathway, low altitude operations near people may be approved where all specified conditions are met.

Do you think the proposed new pathway for a low altitude operation not over people approval would appropriately mitigate safety risks?

Partly. The proposed pathway appears likely to reduce risks to people on the ground by limiting operations to low altitudes, requiring visual line-of-sight operations, and prohibiting intended overflight of people. These controls appear reasonable and proportionate for many lower-risk operations.

However, the proposal focuses primarily on risks to people on the ground and gives relatively little consideration to interactions with other airspace users. Low-altitude environments are frequently shared with a range of aviation activities, including helicopters, paragliders, hang gliders, powered paragliders, model aircraft, and other recreational or commercial operators. In many locations, these aircraft routinely operate at heights similar to those contemplated under the pathway.

As a result, reducing the risk of direct impact on people does not necessarily reduce the risk of conflict with other airspace users. Indeed, increased drone activity at low

altitudes may increase traffic density and collision risk in environments that are already heavily used by other forms of aviation. These risks are further exacerbated by the absence of requirements for drones to be electronically visible to other airspace users through technologies such as remote identification or position broadcasting.

The proposal would therefore benefit from a broader consideration of shared-airspace risks, including interactions with other aircraft, distraction, startle responses, and the potential consequences of collisions or near misses involving safety-critical aviation activities.

Overall, the pathway appears likely to reduce risks to people on the ground, but the assessment framework should more explicitly consider impacts on other airspace users before concluding that the overall level of risk is acceptable.

Policy proposal for new pathway – Operations with a parachute recovery system

Policy Proposal 2609US – Section 5.8

We are proposing a new pathway for an OONP approval where the drone uses a parachute recovery system (PRS) and the maximum impact energy under PRS descent is 34 joules or less.

Do you think the proposed new pathway for an OONP approval with a parachute recovery system would appropriately mitigate safety risks?

Partly. The proposed pathway appears likely to reduce the risk of serious injury to people on the ground following a loss-of-control event by limiting impact energy through the use of a recognised parachute recovery system (PRS). The consideration of wind speed, documented operational procedures, and restrictions relating to gatherings of people also appear sensible and proportionate.

However, a PRS primarily mitigates impact-related risks. It does not necessarily address other safety risks associated with drone operations, including interactions with other airspace users, or entanglement hazards. In some circumstances, a parachute may even increase the physical footprint of the hazard by introducing additional lines and canopy material.

CASA may also wish to consider whether the availability of a PRS could influence operator decision-making. Safety systems sometimes alter risk perception and operational behaviour, leading operators to undertake activities that they might otherwise avoid (e.g., fly in stronger winds, closer to people or other airspace users, flying with drained batteries), because they rely on the parachute to prevent damage to the drone. The overall safety benefit of a PRS therefore depends not only on its technical performance, but also on how it affects operational decision-making in practice.

Overall, the pathway appears likely to improve safety outcomes relating to impact injury, but it may not fully address all relevant risks associated with drone operations.

Removal of certain data collection requirements

Policy Proposal 2609US – Section 5.9

We are proposing to remove the requirement to collect data for OONP where impractical or likely a duplication; such as collecting information on the drone operated, minimum distance operated from people, and the consequences of any collision.

Do you think this proposal is appropriate?

Partly. Reducing unnecessary administrative burden is a worthwhile objective, and removing information that is unreliable or duplicated through other reporting mechanisms seems unproblematic. However, information that is difficult to obtain may nevertheless be valuable and should therefore not be removed without careful consideration.

In particular, information relating to minimum separation distances, collision consequences, and the characteristics of the drones involved may be valuable for understanding incident patterns and informing future risk assessments. If these data are no longer collected, CASA should consider whether equivalent information is available from other sources.

Overall, the proposal would benefit from an explanation of how CASA intends to monitor the safety outcomes of specific regulations if information about separation distances or collision consequences is no longer collected.

In addition, where safety-related data are retained, CASA should ensure that they are stored in a structured and accessible format that supports future analysis, trend monitoring, and evidence-based policy development. The value of collecting safety data is substantially reduced if the information cannot be readily retrieved, analysed, or linked to other relevant records.

Do you think that overall CASA's proposed changes are clear and understandable?

While we commend CASA for undertaking this consultation and reviewing the regulatory framework for drone operations, several aspects of the proposal remain unclear.

A central concern is that the document does not clearly communicate the nature and scope of the proposed changes at the outset. The consultation is labelled as relating to drones below 250 grams, yet it also introduces changes affecting drones weighing up to

25 kg, making the title somewhat misleading. In addition to combining multiple drone categories, the consultation also addresses a wide range of operational contexts, each with substantially different risk profiles. As a result, readers are often required to piece together the proposed arrangements from multiple sections, making it difficult to develop a coherent understanding of what is changing, why it is changing, and how the changes may affect different stakeholders.

Many important concepts also remain insufficiently defined, making it difficult to assess how the framework would operate in practice and whether it could be applied consistently across the industry. Examples include terms such as “reasonable protection”, “safe distance”, “on notice”, “gathering of people”, “major gathering”, “unlikely to cause serious harm”, and “active participant”. In several cases, compliance appears to depend heavily on operator judgement without corresponding operational definitions or objective assessment criteria.

In addition, ideas are not always communicated well: Several proposals are presented at a relatively high level without providing information regarding the practical requirements, supporting evidence, assessment criteria, or expected safety benefits. This makes it difficult for stakeholders to evaluate the proposed changes. For example, the consultation does not clearly explain the operational need for reducing existing separation distances or why informed consent is generally not required when drones operate in close proximity to affected individuals.

Furthermore, the proposal focuses predominantly on risks associated with direct physical injury from drone impacts. Greater consideration should be given to other relevant risk mechanisms, including distraction, startle responses, emotional reactions, and interactions with other airspace users.

Providing clearer definitions, additional examples, objective assessment criteria, and more information regarding the evidence supporting the proposed changes would substantially improve the clarity and assessability of the proposal.

One improvement that would substantially enhance the clarity of the consultation would be the inclusion of a plain-language summary table. For each proposal, the table could describe:

- the current requirement,
- the proposed requirement,
- what is changing in practical terms,
- the intended safety benefit, and
- the expected impact on operators.

Do you think overall, CASA's proposed changes consider the current needs and requirements of drone users in your sector?

Please refer to my response to the previous question regarding whether the proposed changes consider the current needs and requirements of drone users in my sector. In summary, while the overall intent of the proposal is generally understandable, greater clarity would be achieved through clearer operational definitions, additional supporting evidence, and a plain-language comparison of the current and proposed arrangements.

General comments

Do you have any other comments on the proposed policy, including any safety impacts and how it could affect you, your work or business, or your community? Please do not repeat earlier points.

I would like to note that I am also the president of the **Queensland Sports Aviators** (QSA), which represents paragliders, hang gliders, and powered paragliders and hang gliders in South-Queensland.

In this role, we have learnt of multiple instances where **drones and model aircraft operating in close proximity to pilots have caused distraction** and/or have been **perceived as a threat**. Even when no physical collision risk was imminent, such situations have **increased pilot workload, reduced situational awareness, and created unnecessary stress** in an already demanding environment.

In safety-critical settings—such as aviation, rock climbing, horse riding, or the operation of vehicles (cars, motorcycles, bicycles, scooters)—even brief distraction can have serious consequences. For this reason, we recommend that drones of all categories maintain a **minimum separation distance** from individuals in such environments, and **only operate closer** with the **explicit prior consent** of the persons involved.

More broadly, we recommend that CASA:

- provide a clear description of existing regulations and a **stronger justification for proposed reductions in separation distances**;
- undertake a more comprehensive **risk assessment** that explicitly considers **non-impact hazards**, including **human factors** such as distraction, loss of situational awareness, startle responses, and automatic behavioural reactions;
- provide **clear, operational definitions** and **guidance** about core concepts such as "**safe distance**", and acceptable risk thresholds;

- explicitly consider **interactions with other airspace users in low-level, shared environments**, including a clearer differentiation of risk across drone categories and modes of operation;
- explicitly consider **interactions with fast-moving** airspace users and **users operating in high-risk environments** (e.g., paragliders, hang gliders);
- introduce or consider **requirements for the identification of drones** (e.g., remote identification or position broadcasting), to support **accountability, incident reporting, and enforcement** in increasingly dense operating environments;
- consider the **cumulative effects of increased drone density** in popular operating environments, including implications for **congestion, workload, and overall airspace safety**.

We note that the **current consultation format**, which restricts input to a **small number of predefined questions**, is **not sufficient** to capture the complexity of real-world risks. We therefore recommend that CASA conduct a further, **open consultation process** that allows for more comprehensive input, with separate consideration of **different drone weight classes, speed profiles** and **modes of operation**, which present fundamentally different risk profiles.