



**Egg Farmers
of Australia**

25 May 2026

Drone Security Consultation Team

Australian Government Department of Home Affairs

Dear Consultation Team,

RE: Egg Farmers of Australia Submission – Drone Security Consultation Paper 2026

Egg Farmers of Australia (EFA) welcomes the opportunity to provide this submission to the *Drone Security Consultation Paper 2026*.

EFA is the national representative body for Australian egg farmers and works to support a sustainable, safe and responsible egg industry. Our members operate across a range of production systems and are subject to stringent animal welfare, biosecurity, food safety and workplace obligations. Increasingly, our industry is experiencing the misuse of drone technology in ways that present significant risks to agricultural enterprises.

For intensive livestock industries, including egg farming, drones are no longer simply emerging technologies requiring routine regulation. Their misuse has become an active operational issue with serious implications for privacy, animal welfare, workplace safety, biosecurity and commercial integrity. Of particular concern is the increasing use of drones to conduct unauthorised surveillance of private agricultural properties and the subsequent dissemination of unlawfully obtained footage for fundraising, activism, reputational targeting and commercial disruption.

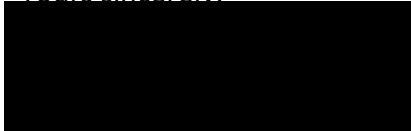
The risks become even more acute during declared emergency responses, particularly Emergency Animal Disease (EAD) incidents, where confidentiality, coordinated communications and operational control are critical to maintaining response integrity and protecting affected businesses. Recent experiences across intensive livestock industries demonstrate that current frameworks are insufficient to prevent harmful drone incursions or to deter the public dissemination of unlawfully obtained material.

EFA considers that reform is required to ensure regulatory settings appropriately distinguish between legitimate drone use and unlawful activity that threatens agricultural enterprises. In particular, stronger privacy protections, enforceable emergency no-fly zones, practical enforcement mechanisms and greater accountability for the use of illegally obtained footage are essential.

EFA has developed this submission in consultation with members and the broader Intensive Industry Group and would welcome further engagement with the Australian Government and relevant agencies as policy development progresses.

Thank you for considering our views. Please do not hesitate to contact Egg Farmers of Australia should further information or discussion be of assistance.

Yours sincerely,



Melinda Hashimoto
Chief Executive Officer

Drone Security Consultation Paper 2026

Question 1: What are the key risks posed by drones in the Australian context?

For intensive livestock industries, the misuse of drones presents significant and escalating risks across privacy, biosecurity, safety, and commercial integrity.

Agricultural enterprises—particularly those housing livestock in intensive systems—are increasingly targeted by activist groups deploying drones to capture footage without consent.

Key risks include:

- **Privacy breaches:** Unauthorised surveillance of private property and operations
- **Biosecurity threats:** Disruption to tightly controlled environments, particularly during disease responses
- **Animal welfare impacts:** Drones cause distress to livestock, increasing the risk of injury to animals and handlers
- **Workplace safety risks:** Staff distraction and interference during critical tasks
- **Exposure of commercially sensitive information:** Including infrastructure, processes, and supply chain relationships

Illegally obtained footage is frequently used for:

- Fundraising and financial gain
- Doxxing and targeted harassment
- Coordinated campaigns aimed at influencing markets and policy

Drones are therefore being used not only as surveillance tools, but as mechanisms of harassment and disruption.

Question 2: Are current regulatory settings adequate to manage drone-related risks?

No. Current regulatory settings do not adequately protect agricultural enterprises from unlawful drone activity.

Key shortcomings include:

- No effective **privacy protections** for commercial agricultural operations
- Lack of **clear restrictions on drone use over private farmland**
- Inability to **prevent or respond to drone incursions in real time**
- Regulatory frameworks that **place the burden on affected producers**, rather than on offenders
- No meaningful **deterrent for misuse of unlawfully obtained footage**, particularly by third parties such as media organisations

Additionally, the current framework treats drones similarly to legitimate aircraft, even when they are being used unlawfully. This creates a disconnect between regulatory intent and real-world misuse.

Question 3: What risks do drones pose during emergency situations, including Emergency Animal Disease responses?

The risks are particularly acute during declared emergency responses governed by the Emergency Animal Disease Response Arrangements.

During a recent Emergency Animal Disease (EAD) response, drone footage broadcast publicly identified an affected business. This represented a serious breach of confidentiality and undermined response protocols.

Impacts include:

- **Compromised confidentiality:**
All response partners are bound by strict communication protocols. Drone footage can bypass these controls.
- **Undermined response coordination:**
Public disclosure outside official channels disrupts messaging and operational integrity.
- **Reputational and financial harm:**
Identification of affected properties—particularly those linked to publicly listed entities—creates material commercial consequences.
- **Increased legal burden on producers:**
Producers must pursue costly legal remedies against broadcasters, even when footage was obtained unlawfully.

The absence of enforceable no-fly restrictions during declared emergencies represents a critical gap.

Question 4: Are enforcement and compliance mechanisms sufficient?

No. Enforcement mechanisms are currently impractical, ineffective, and place an unreasonable burden on affected parties.

Challenges include:

- **Inability to identify operators:**
Drone footage broadcast publicly does not allow identification of the operator.
- **Real-time response limitations:**
It is neither safe nor practical for farmers to attempt to track or intercept drones.
- **Restrictions on intervention:**
Current rules prohibit interference with drones, even when they are operating unlawfully over private property.
- **Delayed access to counter-drone capabilities:**
Licensing processes for detection or tracking technologies can take up to nine months, rendering them ineffective in time-sensitive situations.

The current system is reactive rather than preventative.

Question 5: What role should technology play in managing drone risks?

Technology has a role, but current access and regulatory pathways limit its effectiveness.

While drone detection and tracking technologies exist, their deployment is constrained by:

- Lengthy approval processes
- Property-by-property licensing requirements
- Lack of scalability during emergencies

Improved technological solutions should include:

- **Mandatory remote identification (Remote ID)** for all drones
- **Accessible and rapid approval pathways** for counter-drone technologies
- **Systems that support enforcement agencies**, rather than relying on producers

Technology must complement—not replace—clear regulatory protections.

Question 6: What regulatory or policy changes are required?

We recommend the following targeted reforms:

1. Privacy and Commercial Protection Recognition

A clear regulatory statement that unauthorised drone surveillance of commercial agricultural operations:

- Constitutes a privacy breach

- Exposes confidential commercial information
- Creates safety and animal welfare risks

2. Distinction Between Lawful and Unlawful Drone Use

Drones operated unlawfully should not be afforded the same protections as legitimate aircraft.

They should be treated as equipment being misused for unlawful purposes, including harassment and trespass.

3. Emergency No-Fly Zones

Establish mandatory temporary no-fly buffer zones (minimum 5 km radius) around properties involved in:

- Declared Emergency Animal Disease responses
- Other government-declared agricultural emergencies

4. Accountability for Use of Illegally Obtained Footage

Introduce enforceable penalties for broadcasters, media organisations, and other entities that:

- Use drone footage obtained unlawfully
- Broadcast footage in breach of emergency restrictions
- Publicly identify affected properties during active responses

This is critical to creating a meaningful deterrent.

5. Strengthened Enforcement Framework

- Improved identification requirements for drone operators
- Practical enforcement tools that do not rely on farmer intervention
- Faster regulatory approvals for detection and response technologies

6. Recognition of Animal Welfare Impacts

Formal acknowledgement that unauthorised drone activity:

- Causes stress to livestock
- Increases the risk of injury
- Disrupts farm operations

Question 7: Are there specific sectors or locations that require additional protections?

Yes. Intensive livestock industries require targeted protections due to:

- High biosecurity sensitivity

- Concentrated animal populations
- Strict regulatory and commercial obligations
- Increased targeting by activist groups

Particular attention should be given to:

- Poultry farms
- Piggeries
- Duck and other intensive livestock operations

Additional protections are especially critical during emergency disease responses.

Conclusion

The misuse of drones over agricultural enterprises is no longer a theoretical risk—it is an active and growing threat.

The current regulatory framework does not adequately:

- Protect privacy
- Support biosecurity responses
- Deter unlawful behaviour
- Allocate responsibility appropriately

Reform is required to ensure that drone regulation keeps pace with real-world misuse and provides meaningful protections for Australia's agricultural industries.

Egg Farmers of Australia and the Intensive Industry Group welcome further engagement with the Civil Aviation Safety Authority and the Australian Government Department of Home Affairs to support the development of an effective and enforceable regulatory framework.