

Submission to the Aviation White Paper Implementation Process and Drone Security Consultation (April 2026)

Submitted by:

Sport Aviation Federation of Australia (SAFA)

Subject: Drone Security, BVLOS Operations and Integration into VFR Airspace

1. Introduction

The Sport Aviation Federation of Australia (SAFA) welcomes the opportunity to provide comment on the Drone Security Public Consultation Paper (April 2026).

SAFA supports the Government's objective to strengthen drone security frameworks, including improved detection, identification, and enforcement capabilities to manage emerging risks. The consultation correctly identifies that drones are increasingly **accessible, capable, difficult to detect and attribute**, and present evolving risks to public safety and infrastructure .

However, the framework must also recognise that:

- Not all airspace users are electronically conspicuous
- Many are low-level VFR users relying on see-and-avoid principles
- Existing aviation users must not be treated as secondary to drone operations

Drone integration and security reforms must not shift safety or detection burdens onto crewed aircraft that cannot reasonably comply.

2. Proactive Management of Emerging Drone Threats

Q: How can a mode-agnostic, technology-neutral framework avoid burdening legitimate users?

A mode-agnostic framework is appropriate, but must be operationally realistic.

SAFA submits that:

- The framework must explicitly recognise **non-electronically conspicuous aircraft** as a permanent part of the ecosystem

- It must avoid designing detection or security systems that assume universal equipage

A purely technology-neutral approach risks:

- Embedding **hidden assumptions about electronic visibility**
 - Creating de facto exclusion of aircraft unable to comply
-

Q: Are there sectors disproportionately impacted?

Yes — **sport and recreational aviation is disproportionately impacted**, specifically:

- Hang gliders
- Powered Hang gliders
- Paragliders
- Powered paragliders

These aircraft:

- Operate in the same low-level airspace identified as a growing drone security concern
- Have no viable pathway to full electronic conspicuity compliance
- Are often present at predictable sites that may attract persistent drone use

Without tailored recognition, the framework will:

- Increase collision risk through BVLOS expansion
 - Create implicit displacement of existing users
-

Q: Unique risks (land/maritime drones)?

SAFA notes that the paper acknowledges a **multi-domain threat environment** .

However, aerial drones pose a unique risk to aviation because:

- They share airspace with crewed aircraft
- They operate at similar altitudes
- They introduce **mid-air collision risk**, which is not present for land systems

Therefore:

Aviation integration risks cannot be treated equivalently to other domains.

Q: Role of industry/public?

Appropriate role:

- Reporting suspicious activity
- Providing site-based knowledge

However:

- Public reporting must not be relied upon as a primary detection system
 - Aviation users already operating safely must not be burdened with additional reporting obligations
-

4. Identification and Electronic Conspicuity

Q: What level of visibility should authorities have?

SAFA supports visibility of:

- Drone location
- Altitude
- Operator identity (where appropriate)

However:

This requirement must apply to drones — not transferred to legacy aviation users.

The consultation correctly identifies gaps in drone identification and tracking .

SAFA position:

- Enhanced identification should target **drones specifically**
 - Must not rely on universal ADS-B adoption by crewed aircraft
-

Q: Who should have access to detection systems?

SAFA supports controlled expansion to:

- Systems must not create **false expectations of “complete airspace visibility”**
 - Non-detectable aircraft must be explicitly accounted for in system design
-

Q: What drones should be registered?

SAFA supports:

- Registration for:
 - BVLOS drones
 - Persistent (“Drone in a Box”) systems
 - Medium to high-risk commercial operations
-

5. Balanced Enforcement

Q: Effective penalties?

SAFA supports a **tiered enforcement model**, including:

- Education and warnings for minor breaches
- Strong penalties for:
 - BVLOS non-compliance
 - Operations near crewed aviation
 - Deliberate interference or unsafe operations

This aligns with the paper’s proposed proportional enforcement approach .

Q: Reporting obligations?

SAFA recommends:

- Mandatory reporting for:
 - Infrastructure operators

- BVLOS operators
-

6. Drone Classifications and Operating Restrictions

Q: Should restricted zones exist?

Yes — strongly supported.

However:

- Restrictions must account for:
 - Existing aviation use
 - Known recreational flying sites
-

Q: What areas should be restricted?

SAFA agrees with restrictions around:

- Critical infrastructure
- Correctional facilities
- Major events

But also recommends:

Recognition of recreational aviation sites as “protected airspace environments”

Q: How should zones be communicated?

- Digitally (geofencing, apps)
- Aeronautical publications
- Direct engagement with aviation bodies

Critical requirement:

- **Two-way communication between drone and aviation communities**
-

7. Public Awareness and Education

Q: What information is needed?

Education must include:

- Presence of non-equipped aircraft
- Limitations of electronic detection
- Continued reliance on visual separation in some environments

The consultation highlights the need for improved awareness to reduce misuse .

SAFA adds:

Drone operators must be educated that not all aircraft can be electronically detected.

Q: Best communication channels?

- Integration with licensing/training
 - Retailer education at point of sale
 - Targeted outreach to commercial operators
-

8. Core Safety Issue – See and Avoid vs Detect-and-Avoid

Across all consultation themes, the central issue remains:

- The framework increasingly assumes **networked, detectable environments**
- However, Australian airspace **remains mixed-capability**

This creates a fundamental risk:

BVLOS systems may assume separation assurance where none exists.

SAFA position:

- See-and-avoid remains valid
 - BVLOS systems must operate assuming **VFR See and Avoid Principles**
-

9. Key Recommendations

1. Detect-and-Avoid Responsibility

- Remains with drone operators
- Must not rely on ADS-B or EC from crewed aircraft

2. Airspace Protection

- Recognition of sport aviation sites
- Limit BVLOS operations in shared low-level airspace

3. Electronic Conspicuity

- Focus on drones, not legacy aircraft
- Avoid universal equipage assumptions

4. ADS-B Equity

- Expand funding and identify realistic useable solutions OR remove reliance assumptions

5. Counter-Drone Controls

- Strict aviation-safe authorisation
- Limit RF interference risk

6. Consultation

- Mandatory AVSEF engagement
- Direct ASAO involvement

10. Conclusion

The consultation correctly identifies that drones introduce new and evolving risks to safety and security.

However, reforms must not:

- Assume universal electronic visibility
- Displace existing airspace users
- Transfer safety responsibility away from those introducing the risk

With appropriate safeguards, Australia can achieve:

- Strong security outcomes

- Safe integration
- Fair treatment of all aviation participants