



AAUS Submission:
Draft Australian Airspace Policy Statement 2025

December 20, 2024

Background

The draft Australian Airspace Policy Statement (AAPS) 2025 was recently released by Minister King to provide the Government's airspace policy objectives and priorities to the Civil Aviation Safety Authority (CASA), Airservices Australia (AsA) and guidance to the aviation industry and other aviation agencies.

The Australian Association for Uncrewed Systems (AAUS), as the recognized and single voice of the Remotely Piloted Aircraft Systems (RPAS)/drone and Advanced Air Mobility (AAM) sectors, is pleased to respond to this draft document.

General Remarks

The Australian Association for Uncrewed Systems (AAUS) welcomes the release of the AAPS 2025 and believes it sets tangible and timely direction in response to the Australian Government's Aviation White Paper (AWP). AAUS believes the AAPS provides much needed guidance to further develop and maintain the momentum of important tasks that will safely and efficiently integrate RPAS and AAM into Australian airspace to enable the continued growth of the sector.

AAUS is pleased that the AAPS is considering the RPAS/AAM sector as part of the broader aviation ecosystem. A whole-of-aviation approach must be adopted to leverage the many cross-sector opportunities and benefits the RPAS/AAM sectors present, and all sectors of aviation must be represented in discussion concerning the regulation and safe integration of these emerging aviation technologies into Australia's airspace system.

AAUS is supportive of the important key initiatives for the industry's future that have been identified in the AAPS. We recognise that much detailed and coordinated effort is required to bring the many initiatives to fruition. AAUS encourages the government to move with purpose to implement the outcomes, and to ensure resources are made available to achieve meaningful outcomes.

AAUS encourages continued, close consultation by the Department, CASA and AsA in the development of policy and procedures to support the regulation, operation and growth of these sectors. AAUS believes engagement with AAUS/industry to date has been positive and beneficial, and encourages increased consultation during policy development; not only for the review of policy that has been developed by the Department, CASA or AsA.

In the following sections, we have expanded on some relevant aspects under consideration.

RPAS

While the RPAS sector in Australia has maintained strong and steady growth throughout the last decade, there is so much unrealised potential that could be unlocked by policy and regulation that enables more efficient and safe integration of RPAS into Australian airspace.

Currently, the RPAS sector is struggling to remain viable as it deals with a regulatory approval process that is grossly inefficient. AAUS believes the 'case-by-case' regulatory approach utilised by CASA is no longer fit-for-purpose. Reform of the regulatory framework by CASA for RPAS must be accelerated towards a scalable permission-based system that enables safe, integrated operations beyond visual line of sight.

AAUS advocates that a greater level of airspace situational awareness is key if Australia is to achieve the policy objectives contained within the AAPS and also enable a commercially viable RPAS sector.

To that end, AAUS believes that government initiatives identified in the AWP relating to the implementation of Uncrewed aerial systems Traffic Management (UTM) and an ADS-B mandate are vital elements.

AAM

As identified in the AWP and AAPS, AAM offers considerable commercial potential for Australia. It also offers a sustainable aviation solution which can help the government meet its emissions targets.

With the first commercial AAM flights expected in Australia by 2027¹, there needs to be a priority in developing aviation policy and guidance to assist the many regulatory, infrastructure and operations facets needed to progress the AAM enterprise without delay.

According to industry, initial AAM operations are expected to be conducted with no or minimal change or disruption to the existing airspace navigation system. AAM operations will be conducted under existing visual and instrument flight rules. They will operate under existing procedures and separation standards in non-segregated, controlled and uncontrolled airspace. They will need to integrate seamlessly within the existing air traffic management system and make use of existing communications, navigation and surveillance equipment. Over time, the utilisation of UTM will be a significant enabler to digital airspace authorisation, scaling of operations, and enhancing the adoption of self-flying / remotely supervised AAM aircraft.

Again, AAUS encourages close dialogue between Government and industry for AAM development.

¹ [AAM Industry Vision and Roadmap, AAUS 2024](#)

Electronic Conspicuity

AAUS welcomes the Government's commitment to pursue an ADS-B mandate for all aviation which will ultimately provide a big step towards enhancing the safety, security, accessibility and sustainability of airspace for all. AAUS has long advocated for this initiative².

Improving situational awareness of air traffic in Class G airspace, specifically, through encouraging greater aircraft equipage of a surveillance system called Automatic Dependent Surveillance – Broadcast (ADS-B), would radically enhance any pilot's ability to know the position and intent of other aircraft in their surrounding area, significantly reducing the risk of a mid-air collision. ADS-B is essential to enhancing the safety and efficiency of Australian airspace for all airspace users, now and into the future. ADS-B also enables Remote Pilots to develop and maintain comprehensive awareness of air traffic in the vicinity of RPAS and AAM operations. This traffic awareness provides an additional layer in the safety case that is needed to enable the safe and routine operation of RPAS and AAM in a widening array of beneficial applications.

UTM Implementation

The development and implementation of UTM is fundamental to the continued safe development of the RPAS and AAM sectors. AAUS believes that the government's recently released UTM Action Plan comprehensively addresses industry needs via its four focus areas:

- Separation and airspace integration
- Better regulation
- Fit-for-purpose regulatory approvals:
- Improved compliance, enforcement and security

AAUS supports the concept that UTM will also carefully consider conventional aviation which will benefit from and contribute to the UTM ecosystem for the shared objective of ensuring our skies remain safe. The ability for the system to deliver tactical deconfliction is a must for safety and efficiency. We believe that an ADS-B or Electronic Conspicuity mandate will be necessary to deliver against this objective.

Flight Test and Sandbox Capabilities

The government's support for flight testing within the draft AAPS is vital. An all-of-government approach is required to address regulatory and airspace integration to streamline development

² [AAUS Position Paper – Improving Airspace Safety and Accessibility in Class G Airspace through Electronic Conspicuity, AAUS 2023](#)

and testing of emerging aviation technologies while minimizing disruptions to other airspace users.

In addition to flight testing, a sandbox capability can provide a controlled environment for testing and experimentation, enabling regulators, innovators, and stakeholders to explore new technologies and operational concepts without the full constraints of existing regulatory frameworks. For emerging aviation technologies sandbox environments are vital to safely, efficiently, and effectively develop appropriate regulations. There is clear evidence that current developmental users are being constrained due to the lack of test ranges and regulatory policy and procedures.

Sandbox capabilities are important for balancing innovation and safety in the rapidly evolving emerging aviation sectors. By enabling controlled experimentation, fostering collaboration, and facilitating data-driven regulation development, sandboxes ensure that the integration of RPAS and AAM occurs efficiently, safely, and sustainably.

About AAUS

Founded in 2009, the Association for Uncrewed Systems is Australia's oldest and largest industry advocacy group for the Drone and Advanced Air Mobility (AAM sector). AAUS is a not-for-profit organisation which represents the drone and AAM industry across three domains: land, sea, and air. AAUS' objective is to promote a professional, safe and commercially viable uncrewed systems and AAM industry. AAUS achieves this through its industry advocacy and promotion, education and outreach, and networking activities. AAUS provides a single representative voice for the full breadth of the drone and urban AAM industry. AAUS' 4,800 members spans small-to-large enterprise, manufacturers, licensed and unlicensed operators, training providers, academic institutions, Government, and other supporting technical and professional services in the Australian drone and AAM industry.