Submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts

Flight Test Society of Australia comment on the draft Australian Airspace Policy Statement (AAPS) 2025

Reference:
https://www.infrastructure.gov.au/sites/default/files/documents/draft-aaps-2025.pdf

On behalf of the Flight Test Society of Australia, I am pleased to provide comments on the draft Australian Airspace Policy Statement (AAPS) 2025. We commend the Department for its comprehensive approach to shaping the future of Australian airspace management.

Regulatory Certainty for New Aviation Technologies (Section 11)

We wholeheartedly celebrate the direct reference to providing regulatory certainty for new aviation technology in Section 11. This forward-thinking approach is crucial for fostering innovation and enabling Australian efforts toward advancing aviation technologies of all types. By providing a clear regulatory framework, the Department will be enabling the safe and efficient integration of emerging technologies such as RPAS and AAM into our national airspace.

Additionally, we urge the Department to consider the implications of autonomous operations. Extending the concept of the pilot beyond simply being remote from the air vehicle, to encompass various elements such as one-to-many operations. This would also include normalising Extended Visual Line of Sight (EVLOS) and Beyond Visual Line of Sight (BVLOS) operations. These advancements will enable the development of technologies that support operations without a pilot, which is particularly beneficial for serving Australia's low population density. Such measures are critical for ensuring the safe integration of these technologies into our airspace and supporting the unique needs of our country.

Request for Elaboration on Enabling Flight Testing (Section 12)

While we appreciate Section 12 as a baseline, we respectfully request that the Department consider elaborating on this section to better address the nature of contemporary flight technology and Australia's place in the international aviation industry.

Australian indigenous aircraft are celebrated and must be enabled through access to airspace suitable for developmental flight test activities – both civil and military. However, the current reality of aerospace engineering internationally is that very little

developmental flight testing occurs within Australia. It is essential to provide for expansion of flight sciences and development of new air vehicles. But more relevant today is the need to accommodate systems integration testing where the air vehicle is simply a platform. This is particularly necessary when air systems are procured from overseas and require modification and/or integration into the Australian operating environment and broader operating systems. Flight in established regimes is no longer remarkable; the focus has shifted to integrating air platforms into broader systems, many aspects of which intersect with broader society. While providing separation is necessary to ensure safety for developmental flight test activity, flight testing of systems that feature a mature air vehicle component need to be conducted within representative conditions that are best provided adjacent to the intended operating environment.

We believe Section 12 would be significantly bolstered by considering the requirements of flight testing that extend beyond Defence needs. This includes the safe integration of RPAS and AAM into society, which will necessitate testing of the broader system that includes flying vehicles. Addressing these aspects will ensure that Australia remains competitive and capable of supporting advanced aviation technologies.

Thank you for considering our comments. We look forward to continued collaboration with the Department to ensure the safe, efficient, and innovative use of Australian airspace.

Yours sincerely,

Ben Luther

Vice President

Flight Test Society of Australia