



Submission from Wing Aviation Pty Ltd Response to the Draft Airspace Policy Statement 2025

Wing welcomes the opportunity to comment on the Department's Draft Airspace Policy Statement for 2025. As the Department notes in its proposal, it is important to take a risk-based approach and implement fit-for-purpose regulations for the UAS industry. Wing agrees with the Department's objective to strive for regulatory alignment with global consensus standards, such as those developed by the International Civil Aviation Organization (ICAO), and ensure that CASA's review process is risk and evidence-based.

In keeping with these end goals, Wing emphasises the need to promulgate distinct, separate regulations for UAS and AAM, tailored to their respective needs, use cases and risk profiles. While both UAS and AAM are uncrewed aircraft, they have significant differences, including size, needed infrastructure to perform operations, and implications of AAM transporting passengers. With the considerations inherent in transporting passengers, AAM operations in a regulatory sense are more akin to crewed aircraft. As such, UAS, particularly small UAS, will require regulation that acknowledges these differences and is appropriately scoped to promote safe and efficient operations without imposing unnecessary, restrictive or burdensome requirements.

Wing agrees that it is important to implement effective UTM solutions. UAS operators have demonstrated interest in and the efficacy of establishing an industry-led UTM system in various jurisdictions, including in the Dallas-Fort Worth (DFW) metropolitan area in the United States. The DFW area is notable in that there are a significant number of BVLOS drone operators sharing the same airspace in the busy North Texas market. A group of UAS operators currently operating in DFW or considering doing so collectively recognised the need to share airspace amongst BVLOS operations and have leveraged applicable standards to effectively share the airspace. The Federal Aviation Administration (FAA) has recognised the effectiveness of this industry led solution by issuing Letters of Acceptance to Wing and others in the UAS industry operating BVLOS while using a strategic coordination service conformant to the ASTM F3548 standard.

As such, Wing does not believe that the Airservices proposed Flight Information Management System (FIMS) is necessary or desirable to facilitate strategic coordination and instead would add unneeded costs and compliance burdens to the UAS industry. If implemented as conceptualised by Airservices, FIMS takes a one-size-fits-all approach that would inhibit operators' ability to efficiently and appropriately coordinate shared airspace access, which in turn could discourage participation and potentially decrease entry into the UAS industry.



Regulators in other jurisdictions have recognised that the UAS industry is well positioned to lead the establishment and maintenance of UTM systems overseen by the regulator. Accordingly, Wing recommends that Australia implements an industry-led framework for a federated, distributed UTM system utilising consensus globalised standards, rather than a centralised FIMS, to facilitate safe and effective data sharing. FIMS should be limited to the most narrow of circumstances to avoid positioning Australian operators at a global disadvantage by mandating usage of a complicated centralised system that is unnecessarily limiting and expensive to maintain and update, as well as being unique to Australia.

Wing supports the Department's commitment to ensure national security is preserved in the airspace through close collaboration with national security agencies. Given that the vast majority of drones are legitimate and lawful entities, it is of the utmost importance to combat any rare instances of nefarious drone actors without impeding beneficial drone activity. If the Department is considering an updated policy on counter-drone capabilities, Wing recommends that this regulatory development adheres to this philosophy by prioritising coordination with national security agencies during policy development, with the end goal of producing federal regulation.

Thank you for your continued efforts to solicit feedback from stakeholders both inside and outside of the aviation industry to ensure that the airspace regulation is safe, efficient and appropriate. Wing is confident that the Department can develop and implement policies that are performance-based, tailored to the airspace and type of operation, and empower operators with the flexibility to scope their operations to the needs of their unique operating environment.