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Civil Aviation Safety Authority



## SUMMARY OF CONSULTATION

# Access to controlled airspace and aerodromes for sport and recreation pilots

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# Overview

We sought industry feedback from 10-27 September 2024 on a Policy Proposal (PP) for access to controlled airspace and aerodromes for sport and recreational pilots. The PP outlined CASA's proposed policy to allow Approved Self-administering Organisations (ASAOs) to authorise their pilots to operate in controlled airspace and at controlled aerodromes, and included:

- the requirements ASAOs must meet to grant an authorisation to operate in controlled airspace and at controlled aerodromes
- pilot competency and Aviation English Language (AEL) competency requirements for sport and recreation pilots seeking an ASAO-issued authorisation to operate in controlled airspace and at controlled aerodromes
- medical fitness requirements for sport and recreation pilots with an ASAO-issued authorisation to operate in controlled airspace and at controlled aerodromes
- aircraft equipment requirements for sport and recreation aircraft operated in controlled airspace and at controlled aerodromes.

The PP was developed in response to concerns raised around the limitation preventing sport and recreation aircraft from operating at controlled aerodromes and in controlled airspace.

As part of CASA's GA Workplan, it was identified that CASA would:

...consider the options to increase access to Class C and Class D airspace for sport and recreational aviation. This includes identifying the additional controls that may need to be put in place to achieve this safely.

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**Acknowledgement of Country**

The Civil Aviation Safety Authority (CASA) respectfully acknowledges the Traditional Custodians of the lands on which our offices are located and their continuing connection to land, water and community, and pays respect to Elders past, present and emerging.

Artwork: James Baban.

# 1 Reference material

## 1.1 Acronyms

The acronyms and abbreviations used in this SPC are listed in the table below.

**Table 1: Acronyms**

Acronym	Description
ADS-B	automatic dependent surveillance-broadcast
AEL	aviation English language
ASAO	approved self-administering organisation
ATC	air traffic control
CAA	<i>Civil Aviation Act 1988</i>
CAR	<i>Civil Aviation Regulations 1988</i>
CASA	Civil Aviation Safety Authority
CASR	<i>Civil Aviation Safety Regulations 1998</i>
MOS	manual of standards
RPC	recreational pilot certificate
RPL	recreational pilot licence
SOC	summary of consultation

## 1.2 References

### Legislation

Legislation is available on the Federal Register of Legislation website <https://www.legislation.gov.au/>

**Table 2: Legislation references**

Document	Title
	<i>Aviation Transport Security Regulations 2005</i>
The Act	<i>Civil Aviation Act 1988</i>
CASR	<i>Civil Aviation Safety Regulations 1998</i>
CAO 95.55	Civil Aviation Order 95.55 (Exemptions from CAR and CASR — Certain Light Sport Aircraft, Lightweight Aeroplanes and Ultralight Aeroplanes) Instrument 2021
CAO 95.32	Civil Aviation Order 95.32 (Exemptions from CAR and CASR — Powered Parachutes and Weight-shift-controlled Aeroplanes) Instrument 2021

Document	Title
CAO 95.10	Civil Aviation Order 95.10 (Exemptions from CAR and CASR — Microlight Aeroplanes) Instrument 2021
CASA EX01/24	Flight Crew Medical Status (Class 5 Medical Self-declaration) Exemption 2024
Part 61 MOS	Part 61 Manual of Standards Instrument 2014
Part 103 MOS	Part 103 (Sport and Recreation Aircraft) Manual of Standards 202x

**Note:** This MOS is still under development with consultations activities to include further Aviation Safety Advisory Panel (ASAP) Technical Working Group (TWG) meetings and full public consultation.

## 2 Respondents

We received 356 responses to the consultation. Respondents were able to select multiple identifier groups, for example both 'Part 61 Pilot' and 'Sport and recreational pilot'. This means that the following discussion of respondent identifier groups will exceed the total number of responses received. All responses were reviewed and analysed.

The majority of responses were from pilots. One hundred and thirty-eight respondents (39%) identified as pilots authorised under the Part 61 licensing scheme, and 274 respondents (77%) identified as pilots authorised by an ASAO. 92 respondents (26%) indicated that they are authorised under both the Part 61 licensing scheme and an ASAO.

Respondents also selected other identifier groups, including:

- ASAO (11 respondents, 3%). 4 of these responses were provided by people authorised to submit feedback on behalf of an ASAO, while the remainder were submitted by pilots operating under the authority of an ASAO.
- sport and recreation flight training school (30 respondents, 8%)
- Part 141 or 142 flight training operator (22 respondents, 6%)
- Part 61 flight instructor or flight examiner (23 respondents, 6%)
- air traffic controller (6 respondents, 1.5%)
- 'other' (32 respondents, 9%).

Responses were received from organisations including, but not limited to:

- Airservices Australia
- Australian Airline Pilots' Association (AusALPA)
- Australian Ballooning Federation<sup>1</sup>
- Australian Sport Rotorcraft Association
- Gliding Australia
- Recreational Aviation Australia
- RV Aircraft Australia
- Sports Aviation Federation of Australia
- SportPilot Magazine.

229 respondents (64.5%) gave permission for their response to be published.

CASA values the contributions made by all respondents. Where permission to publish has been granted by the respondent, individual consultation responses can be found at [Access to controlled airspace and aerodromes for sport and recreational pilots – \(PP 2412OS\) - Civil Aviation Safety Authority - Citizen Space.](#)

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<sup>1</sup> Note that the Australian Ballooning Federation ceased administering Private ballooning from 2 December 2023.

### 3 Key themes

Respondents were asked 'Do you have any comments about the proposed policy?' and 'Will this have any impact on you or your operation?'. Each question included an optional free-text field to provide any feedback. Thirty-four respondents (9.5%) chose not to provide any feedback, and an additional 57 respondents (16%) did not clearly indicate whether they support or oppose the proposed policy.

Two hundred and thirty-nine (67%) respondents indicated that they support the proposed policy, while 25 (7%) respondents indicated that they oppose the proposed policy.

Analysis of responses received to the consultation indicated broad support for the proposed policy. Key themes were identified, including commentary on:

- the proposed policy's impact on aviation safety
- the capability and capacity of ASAOs and sport and recreation pilots to use the policy
- the importance that equivalent competency and consistent requirements are met
- the potential impact on airspace traffic and accessibility
- cost and other impacts.

These key themes, and the other notable themes emerging from the consultation, are discussed further below.



## 4 Detailed analysis of key themes

### 4.1 Theme 1 - Impact on aviation safety

The potential impact on aviation safety from the proposed policy was a key topic of feedback, with 80 respondents (22.5%) providing comments on this topic. Fifty-four respondents (15.2%) indicated that they thought the proposed policy would lead to improved aviation safety, while 26 (7.3%) highlighted safety concerns.

#### Proposed policy would improve aviation safety

Numerous respondents indicated that they thought the proposed policy would lead to improved aviation safety. One of the key benefits highlighted by respondents is that the policy would lead to improved skill and competency for sport and recreation pilots who wish to utilise the policy, which would boost their overall proficiency. It would ensure that all pilots operating in controlled airspace have an equivalent understanding of operating, radio use, and communication procedures, and encourage a more professional mindset.

"I believe that this policy would have immense benefit to all pilots, both RAAus and GA, as safety and airspace requirements and awareness would become a more routine and hence normal and standard part of RAAus operations, rather than just being aware of the higher classes of airspace and avoiding it to remain compliant.

Radio skills would also be exercised more often and a higher standard of proficiency attained by more pilots, creating peer pressure to improve.

Whilst some pilots may choose to stay out of Class D and C airspace as they have no desire to enter it, we flight trainers have an opportunity to demonstrate the additional requirements and offer additional flight skills and awareness training which would make a better pilot." (ANON-N96P-KHGQ-R)

"I think that the policy is a great first step in helping recreational pilots become better pilots. As pilots we should always be learning whether it be through formal training or learning through the experience of others. Access to controlled airspace would demand higher airmanship standards from recreational pilots which can only be considered a good thing. As a reward for achieving a controlled airspace endorsement, recreational pilots would have more freedom with their flying in more areas and also help them to simplify navigation flights by potentially facilitating more direct flight paths. Another bonus would also be making their presence in and around controlled airspace more visible and provide recreational pilots with a better appreciation of commercial flight operations." (ANON-N96P-KH77-E)

Several respondents also suggested that the policy would allow for safer operations:

"It is a clear benefit to those RAA pilots operating close to high traffic densities and CTA areas.

Asides from convenience, there are potential safety benefits to transitioning through CTA at safe altitudes, rather than using often very low level transit routes that may be over "tiger" country." (ANON-N96P-KHNM-U)

"This will enhance safer operations for our RAAUS members, particularly on the east coast. Presently our Sport registered members wishing to make a north south coastal transit (Vic to Qld) were required to fly well beyond gliding distance over water or fly large inland diversions over tiger country to avoid breaching controlled airspace. This will now permit safer operations." (ANON-N96P-KH4Y-D)

## Proposed policy would not maintain aviation safety

Conversely, 26 respondents (7.3%) highlighted safety concerns. Of these respondents, 21 expressed that they did not support the proposal. Key issues raised by these respondents include the risk of insufficient pilot competency and professionalism, increased congestion in controlled airspace and associated workload for ATC and other pilots. Some respondents suggest that without careful implementation, the policy could lead to a reduction in overall aviation safety.

"I have no objections to the policy proposal but given the current challenges with have with competency for Part 61 pilots let alone ASAO pilots I have serious concerns we are exposing the system to an increased risk profile without reviewing and trying to improve controlled airspace competencies.

Equity to airspace is definitely something that should be considered as a goal that can be achieved, but the standards and knowledge base must to be set to an acceptable level so all airspace users aren't put in danger.

Controlled airspace by definition is congested and complex and mistakes or knowledge gaps can have disastrous consequences." (ANON-N96P-KHKG-J)

"I am concerned about poor to very poor radio and circuit behaviour by [...] pilots and believe that unless this is addressed [...] pilots should not be permitted into controlled airspace." (ANON-N96P-KHK1-V)

"...I think there is potential for dangerous situations developing when you have a small slow aircraft with a pilot that does not regularly navigate controlled airspace and a relatively fast twin converging. If the sport pilot gets confused about instructions or the like the results could be disastrous. As long as they keep their skills up problems should be minimal. Unfortunately that is not something that can be guaranteed." (ANON-N96P-KHWN-5)

"Increasing the number of pilots that can access controlled airspace with the currency low standards of competency will result in higher incidents and lower safety." (ANON-N96P-KHVJ-Z)

## CASA response

The safety of air navigation is the most important consideration for CASA when performing its functions.<sup>2</sup> We appreciate all feedback received on the perceived safety benefits and potential safety impacts of the proposal. A key component of the proposed policy is the requirement for sport and recreation pilots to meet equivalent competency standards as those currently operating in controlled airspace. These standards are not negotiable; they are intended to ensure that every pilot, regardless of the type of aircraft they operate, can operate safely and competently. Ongoing competency will need to be maintained.

ASAOs would also be responsible for certifying that pilots meet the required standards before they are granted any authorisation to access controlled airspace, and ongoing checks will help mitigate risks related to lapses in skills or knowledge over time. ASAOs would need to demonstrate to CASA how they can safely utilise the expanded administrative function, and CASA would continue to oversight ASAOs.

The policy would also be subject to monitoring and review. We will continue to seek engagement and feedback and will make adjustments where necessary to address issues that arise, either when finalising the policy to be included in the forthcoming Part 103 MOS or at a later date.

<sup>2</sup> See subsection 9A (1) of the *Civil Aviation Act 1988*.

## 4.2 Theme 2 - ASAO capability

Thirty-four respondents (9.5%) made comments relating to the capability of ASAOs and ASAO-authorized pilots to safely utilise the proposed policy and meet the requirements. For instance, concerns were raised relating to the current standard of theory and practical flight training for sport and recreation pilots, and the capability of ASAOs to ensure their training schools meet the required standards.

"I would expect that training standards of some of the ASAO training organisations need to be looked at closely." (ANON-N96P-KHK8-3)

"I think that this proposal is not before time. However, implementing it will require careful attention to application of the Part 61 MOS. This is not something that many ASAO FTFs would be familiar with, other than those which currently offer both GA and RAAus flight training. The overhead required to bring an ASAO instructor who has never flown in CTA/CTR, up to the standard required to instruct in those airspaces, will be large. Perhaps ASAOs might consider that the first tranche of instructors might be limited to those who already hold a Part 61 instructor rating, or those ASAO instructors whom also hold a Part 61 licence, with CTA & CTR access, and whom regularly use that privilege." (ANON-N96P-KHGK-J)

Five respondents also commented on the sport and recreation scheme more broadly. These respondents suggested that the proposal would deviate from the original intent of the sport and recreation scheme and would erode the benefits of both the Part 61 licensing scheme and the sport and recreation scheme.

### CASA response

We recognise that some respondents expressed concerns about ASAOs' ability to effectively manage the new responsibilities outlined in the policy. ASAOs will be required to demonstrate to CASA how they would use the expanded administrative functions, and that they have the operational capability and expertise to do so. This will include developing adequate training material, forms, and guidance for their flight training schools, instructors, and pilots. ASAOs will need to outline how they will ensure their instructors and assessors are fully trained and competent. CASA will work closely with ASAOs to provide guidance and resources to help them meet these expectations, and ASAOs will be subject to ongoing oversight.

## 4.3 Theme 3 - Encourage consistency and equivalent competency

Forty-seven respondents (13%) emphasised the need for pilots operating in controlled airspace to have equivalent training, assessment, and competence. Of these 47 respondents, 44 expressed their support for the proposal. This highlights that many supportive respondents are also cognisant of the need for equivalent competency to be achieved and maintained, in line with the proposed policy.

"If the pilot is appropriately qualified to operate in controlled airspace then I don't see what the issue is - of course he/she should be allowed to!" (ANON-N96P-KHGC-A)

"Access to controlled airspace must ensure all participants meet minimum standards, including training, competency, medicals and aircraft equipment. This proposal ensures these requirements are met.

Current limitations on safe access to controlled airspace by sport and recreational pilots will be removed with this proposal.

Nothing in this proposal is so onerous as to prevent a sport and recreational pilot who is appropriately trained and assessed from gaining the requisite training and qualifications to access controlled airspace." (ANON-N96P-KHQU-6)

"I think it looks appropriate for the expected outcome of a higher standard of sport pilot competency and professionalism which I fully support... This is not just an excellent opportunity for sport pilots to access major controlled airspace aerodromes but far more important for sport aviation pilots to upgrade their skills and performance of flight operations to the standard required for General Aviation. We all fly with essentially the same risks in the same environment and require the same high standard of airmanship and understanding of the essential regulatory provisions. I think this will improve the overall standard and competency and draw all private aviation closer to the same high standard." (ANON-N96P-KHDV-T)

"AusALPA supports the consultation policy theme of moving away from blanket restrictions preventing access for the sport and aviation sector to Class C and D airspace and towards a fair approach with equivalent risk management. If this intent is achieved, there should be no detrimental effect upon the operations our member pilots are associated with." (ANON-N96P-KH11-2)

## CASA response

A pivotal objective of the proposed policy is to "ensure appropriate commonality across the aviation sector regarding the competency standards and other standards applicable to accessing controlled airspace and controlled aerodromes" (see subsection 4.1 of the Policy Proposal [PP 2412OS - Access to controlled airspace and aerodromes for sport and recreational pilots \(casa.gov.au\)](#)).

## 4.4 Theme 4 - Impact on airspace traffic and accessibility

Thirty-nine respondents (11%) commented on the potential impact on airspace traffic and the ability to access controlled airspace. Most of these respondents highlighted being able to access more controlled aerodromes and airspace.

Some respondents suggest that the policy would place additional burden on air traffic controllers, especially if sport and recreation pilots require additional guidance or support when operating in controlled airspace.

"I am totally bemused as to why you are even bothering with this, as a GA pilot of 50 years, the chance of a VFR flight getting a clearance into Class C airspace these days is about zero, so whether GA or RAAus it doesn't matter because, in the Melbourne basin at least, the controllers are ""too busy"", which is what GA VFR are repeatedly told.

Instructors I talk to are unable to get students into Class C to give them airspace experience, and most of my friends are so rusty on the appropriate procedures because they never get to practice them due to being continually refused a clearance....

You can approve whatever class of traffic you like to be "able" to enter, because the traffic volumes will not increase and it will have no impact on my operations, because they will be refused a clearance to enter!" (ANON-N96P-KHKS-X)

"A great move forward for sport pilots however I am wondering how air traffic controllers will be able manage the huge increase in vfr traffic." (ANON-N96P-KH71-8)

"Currently I try to operate in controlled airspace where possible so I'm kept away from poorly trained pilots. This will likely lead to congestion in controlled airspace with poorly trained and poorly maintained aircraft. Where air traffic is already stretched thin." (ANON-N96P-KH6X-E)

"...There is no doubt that the appropriate training can be provided by RA-Aus instructors. The bigger issue in my mind is that there will be a lot more small aircraft to deal with by ATC which may require more controllers manager. Because most recreational pilots don't interact with ATC that much, interactions, when they do occur, may be less than polished, requiring more time/resources to handle." (ANON-N96P-KH3S-6)

## CASA response

It is important to emphasise that no operation has unfettered access to controlled airspace (except for VFR in Class E) and the proposed policy would not change that situation. Entry into controlled airspace would continue to be subject to ATC clearance and ATC instructions. ATC may consider all factors relevant to the safe, orderly and expeditious flow of air traffic. These factors include workload and prescribed traffic priorities. Accordingly, ATC may withhold clearance, delay an aircraft, or issue a clearance or instructions different to that requested by the pilot. Any pilot, regardless of the type of aircraft they operate, must comply with any clearance issued and adhere to any instructions given by ATC. The proposed policy would not alter the arrangements that currently exist.

## 4.5 Theme 5 - Cost and other impacts

Sixty respondents (17%) indicated that the policy would positively impact them or their operations. Some respondents highlighted benefits such as increased safety and better access to controlled airspace and aerodromes (these topics are discussed more fully above). Others indicated that the policy could offer expanded training opportunities, or reduced expense.

Overall the proposed impact would be to provide new business opportunities to cater for the required training of ASAO pilots (ANON-N96P-KH4J-X)

Yes, but it has a positive impact in that I hold a PPL and an RRA license, which is a ridiculous situation. These changes will eliminate my need for two bi-annual flight reviews, two licence categories, and reduced expenses. (ANON-N96P-KHNR-Z)

A small minority of respondents (3 respondents, 0.8%) indicated the policy could have negative impact on them or their operations. These concerns mainly related to the potential movement of student pilots, and consequential loss of business, from Part 141 flight training operators to ASAO flight training schools.

## 4.6 Other themes

Other relevant, but less prevalent, themes included:

### Medical requirements

Twenty-nine respondents commented on the proposed medical requirements. Of these, 12 respondents questioned the rationale of requiring pilots seeking to use the policy to have at least a Class 5 medical:

...Seriously, if a pilot is not medically safe to fly in CTA, then how can you argue she/he is safe to fly OCTA which obviously includes flight over built-up and populous areas?

In my view there should be no additional medical requirement to access CTA. We are either medically safe within reason or we are not... (ANON-N96P-KH1H-S)

Class 5 med is same as a self declared, so why is ASAO not permitted (ANON-N96P-KHR3-5)

The other 17 respondents either expressly supported the proposed medical requirements (3 respondents), suggested more stringent medical requirements (4 respondents), or made other comments relating generally to medical standards and certificates (10 respondents).

## CASA response

As discussed in section A.3.1 of the [PP 2412OS - Access to controlled airspace and aerodromes for sport and recreational pilots \(casa.gov.au\)](#), CASA's view is that the Class 5 medical self-declaration provides a higher level of assurance and is significantly more rigorous than ASAO self-declaration medicals. Refer to Table 1a in the Policy Proposal for the Class 5 medical self-declaration ([PP 2302FS - Policy proposal for a new aviation medical self-declaration](#)) for a comparison of the medical requirements of the Class 5 medical self-declaration, RAAus self-declaration, Basic Class 2 medical, and Recreational Aviation Medical Practitioner's Certificate (RAMPC).

## Aircraft equipment requirements and maintenance

Fifteen respondents made comments relating to the proposed aircraft equipment requirements, or the maintenance of sport and recreation aircraft. The vast majority of these respondents supported the proposed aircraft equipment requirements, or expressed interest in how the tailored requirements would be determined for some aircraft types.

Three respondents expressed concerns about the standard of maintenance of sport and recreation aircraft and suggested that such aircraft may not be maintained to the required standard.

...Home-amateur built aircraft (eg "19" registered aircraft) should not be permitted to access to CTA at all. A half day online course is an insufficient standard for a maintainer for aircraft operating in controlled airspace and experimental aircraft with on-condition engines carry a higher degree of risk or failure. All aircraft operating in controlled airspace should at least be maintained by a level 2 maintainer and all CAO 100.5 checks should continue to have the requirement that instrument calibrations be completed by a CASA LAME. (ANON-N96P-KH3T-7)

## CASA response

CASA acknowledges all feedback received on this topic. It is not proposed to make changes to the CAOs regarding aircraft certification requirements. This means RAAus registered 19 aircraft can operate in controlled airspace, so long as the relevant requirements are met. Note that additional requirements also apply if an aircraft is operated over a populous area or a public gathering.

CASA is aiming to establish an enduring controlled airspace and controlled aerodrome access policy for all pilots operating under an ASAO as part of the Part 103 MOS development process. Through this process, any tailored requirements for other types of aircraft will be considered.

Some respondents also commented on ADS-B equipment and the current Federal Government rebate for ADS-B equipment. CASA does not administer this rebate scheme. Further information is available at: [Automatic Dependent Surveillance Broadcast \(ADS-B\) Rebate Program – Round 2 | business.gov.au](#).

## AEL proficiency

Four respondents made comments on the proposed AEL proficiency requirements. These comments mainly related to expanding who can conduct AEL assessments:

RAAus is approved to deliver flight radio training and conduct assessments based on our approved syllabi relevant to this area of knowledge and performance. It is our view that ASAOs should be permitted to maintain their own internal English language competency assessment standards without the need for assessment by a CASA Aviation English Language Proficiency (AELP) assessor. This seeks to ensure that pilots are assessed to an equivalent competency standard and is consistent with the policy objective which seeks to reduce regulatory burden for ASAO aviation participants. (ANON-N96P-KH19-A)

### CASA response

Consistent with current process, ASAOs would be able to nominate persons to become aviation English language proficiency assessors. It is not proposed to change the current process by which persons can become AEL assessors as CASA has not received sufficient evidence that this process is inappropriately administratively burdensome compared to its safety outcomes.

### Amending additional CAOs

Two respondents suggested also amending CAO 95.10 and CAO 95.32 ensure access to controlled airspace is made available to all RAAus aircraft, subject to meeting the necessary requirements.

### CASA response

CASA will also amend CAO 95.10 and CAO 95.32 ensure access to controlled airspace is made available to all RAAus aircraft. However, it is noted that the majority of pilots likely to utilise the policy would operate in accordance with CAO 95.55.

### Security considerations

One respondent expressed concern that RAAus pilots flying through controlled airspace could present security risks and suggested CASA should assess the security risk of pilots flying into controlled airspace. This respondent suggested ASAO pilots should have the same security clearance as pilots licensed under Part 61, with either an ASIC or AVID.

### CASA response

The proposed policy would not change who needs to obtain an ASIC or AVID. Any pilot seeking to access a security controlled aerodrome would need to have an ASIC, in accordance with the [Aviation Transport Security Regulations 2005](#).

The Department of Home Affairs is responsible for aviation security policy. CASA has brought the proposed policy to the attention of the Department of Home Affairs, and will continue to engage with that Department to address any issues or concerns that arise.

## 5 Future direction

Amendments to CAOs 95.10, 95.32 and 95.55 will be made to allow sport and recreation pilots operating under RAAus to operate in controlled airspace and at controlled aerodromes if they are authorised to do so by RAAus.

These amendments will be made between late Q4 2024 and the end of Q1 2025.

CASA is aiming to establish an enduring controlled airspace and controlled aerodrome access policy for all pilots operating under an ASAO as part of the Part 103 MOS development process. Consultation activities, both with the ASAP TWG and more widely, are intended to occur in late Q4 2024 and in the first half of 2025.