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Australian Government
Civil Aviation Safety Authority



SUMMARY OF CONSULTATION

Drone operations above 400 ft in defined environments

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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.

Use of artificial intelligence

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Overview

CASA consulted on policy proposal 2612US - drone operations above 400 ft in defined environments during July 2026. The consultation closed on 30 July 2026. The proposal sought feedback on permitting certain drone operations above 400 ft above ground level without a separate CASA approval or the need to operate under a remotely piloted aircraft operator's certificate (ReOC), provided specified operating conditions and safety controls were met.

The proposal applied to two defined operating environments. The first would permit operations within 120 m laterally of a natural or constructed vertical structure, object or obstacle and up to 100 ft above its highest point. The second would permit operations over an active mining excavation, with the 400 ft operating limit measured from the nearest pit edge or crest rather than the excavated floor.

CASA sought feedback on the proposed operating environments, operating conditions and safety controls, operational and economic impacts, radio communication requirements and the proposed replacement of routine operation specific Notice to Air Missions (NOTAMs) with broader advisory information.

Overall, the consultation responses demonstrated broad support for the proposal. Most feedback focused on refining the implementation framework rather than retaining the existing approval model. Stakeholders generally accepted that narrowly defined operations near tall structures and within active mining excavations may present a lower likelihood of interaction with crewed aircraft than general operations above 400 ft.

The principal issues raised through feedback were the appropriate balance between individual pilot competency and ReOC based organisational assurance, the clarity of definitions and measurement methods, interaction with authorised low level crewed aviation, radio communication and notification requirements, ground and containment risks and the need for clear implementation guidance. These issues are interrelated and will inform CASA's consideration of the final framework.

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1 Reference material

1.1 Acronyms

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

Table 1: Acronyms

Acronym	Description
ADS B	automatic dependent surveillance broadcast
AROC	Aeronautical Radio Operator Certificate
BVLOS	beyond visual line of sight
CASA	Civil Aviation Safety Authority
CASR	Civil Aviation Safety Regulations 1998
EVLOS	extended visual line of sight
NOTAM	Notice to Air Missions
ReOC	remotely piloted aircraft operator's certificate
RePL	remote pilot licence
RPA	remotely piloted aircraft
RPAS	remotely piloted aircraft systems
VLOS	visual line of sight

1.2 Definitions

Terms that have specific meaning within this SOC are defined in the table below. Should there be a discrepancy between a definition given in this SOC and the civil aviation legislation, the definition in the legislation prevails.

Table 2: Definitions

Term	Definition
active mining operation	A mining operation involving an excavated pit that is in active use for extraction or associated operational activities.
defined environment	One of the two operating environments described in PP 2612US where the proposed regulatory alleviation would apply: operations near a vertical structure, object or obstacle, or operations over an active mining excavation.
electronic conspicuity	Technology that enables aircraft to electronically transmit, receive or display position information to improve traffic awareness and situational awareness.
highest point	The uppermost point of the relevant vertical structure, object or obstacle from which the proposed additional operating height is measured.

Term	Definition
remote pilot	The person who manipulates the flight controls of an uncrewed aircraft, or who initiates and monitors its flight, and is responsible for the safe conduct of the flight.
vertical structure, object or obstacle	A natural or constructed feature that extends significantly above the surrounding terrain, including towers, masts, stacks, wind turbines, buildings, cliffs and similar structures.

1.3 References

Legislation

Legislation is available on the Federal Register of Legislation website.

Table 3: Legislation references

Document	Title
	<i>Civil Aviation Act 1988</i>
	<i>Civil Aviation Regulations 1988 (CAR)</i>
	<i>Civil Aviation Safety Regulations 1998 (CASR)</i>
Part 101 of CASR	Unmanned aircraft and rockets
Part 101 Manual of Standards	Unmanned aircraft and rockets

2 Respondents

CASA received 85 responses for this consultation. Of these, 48 respondents (56%) indicated they were authorised to submit feedback on behalf of an organisation and 37 respondents (44%) provided feedback in a personal capacity.

Table 4: Respondent profile

Respondent category	Number	Percentage
Drone operator	12	14%
Remote pilot	2	2%
ReOC holder	35	41%
RePL holder	16	19%
RePL training organisation	4	5%
Model aircraft or recreational drone user	1	1%
Mining operator or infrastructure owner	7	8%
Crewed aircraft pilot or airspace user	4	5%
Private or commercial pilot	4	5%
Total	85	100%

The consultation attracted feedback from a broad cross section of the RPAS sector and related aviation stakeholders. ReOC holders comprised the largest stakeholder group (35 respondents, 41%), followed by RePL holders (16 respondents, 19%) and drone operators (12 respondents, 14%). Additional submissions were received from mining and infrastructure operators, RePL training organisations, crewed aviation stakeholders, private and commercial pilots and a recreational drone user.

Organisations represented in the consultation included industry associations, commercial RPAS operators, mining and infrastructure organisations, emergency service agencies, government bodies, training providers and technology providers.

3 Key feedback

The consultation generated a broad range of feedback on the proposed regulatory alleviation. Overall, submissions supported the proposal while identifying several matters requiring further consideration, including eligibility, safety controls, airspace awareness, implementation and the clarity of the proposed operating conditions.

Table 5: Question results

Question	Result
Question 1 - Overall support	57 support, 20 support with changes, 3 do not support, 0 unsure and 5 not answered
Question 2 - Defined environments	55 agree, 22 agree with changes, 2 disagree, 0 unsure and 6 not answered
Question 3 - Conditions and controls	50 agree, 25 agree with changes, 4 disagree, 1 unsure and 5 not answered
Question 4 - Implementation challenges	34 agree, 12 agree with changes, 16 disagree, 14 unsure and 9 not answered.
Question 5a - Listening watch near structures	54 agree, 16 agree with changes, 8 disagree, 1 unsure and 6 not answered
Question 5b - AROC and broadcasts over mines	43 agree, 8 agree with changes, 19 disagree, 7 unsure and 8 not answered

Overall, the consultation feedback demonstrated broad support for the proposal and its objective of reducing unnecessary regulatory burden for recurring lower risk operations. Many stakeholders considered the two proposed operating environments provide an appropriate basis for a more proportionate regulatory framework and anticipated benefits including shorter approval timeframes, improved emergency response capability, more efficient inspection and survey activities and reduced exposure of workers to hazardous environments.

Most feedback focused on the design and implementation of the proposed framework rather than the underlying policy objective. The principal areas of feedback included eligibility without ReOC oversight, clarity and application of the proposed operating boundaries, the effectiveness and proportionality of radio communication requirements and the circumstances in which operation specific NOTAMs should continue to be used.

Consultation feedback demonstrated broad acceptance of the proposal while highlighting several implementation issues requiring further consideration. Stakeholders generally supported the policy objective but sought confidence that the supporting regulatory framework would provide clear, practical and proportionate safety controls.

The following sections summarise the feedback received for each consultation question. Recurring themes have been grouped to provide a concise summary of stakeholder views, including areas of agreement, differing perspectives and issues identified for further consideration.

4 Themes

Question 1 - Overall support for policy

Overall views

Overall, there was broad support for the proposal, with 77 of the 85 respondents (91%) supporting the proposal or supporting it with changes. Many considered it a practical, risk-based approach to reducing unnecessary regulatory burden for recurring lower risk operations.

Supportive views

Many considered the proposed operating environments sufficiently constrained to present a lower likelihood of interaction with crewed aircraft. Respondents anticipated that the proposal would reduce repeated applications, approval timeframes and administrative burden for both industry and CASA, allowing greater emphasis on operational risk management rather than administrative processes.

Emergency service organisations highlighted benefits for time critical operations, including high rise incidents, cliff rescues, search and rescue activities and critical infrastructure inspections. Mining and infrastructure organisations similarly supported the proposal, citing improved access for inspections and surveys of wind turbines, towers, powerlines and active mine sites. These organisations also identified potential workplace safety benefits through reduced exposure of personnel to working at height, unstable terrain and active mining environments.

Qualified and opposing views

While overall support was strong, eight respondents considered that eligibility should be limited to ReOC holders or introduced through a tiered framework. These respondents reasoned that a ReOC provides organisational assurance through documented procedures, chief remote pilot oversight, maintenance systems, occurrence reporting and compliance monitoring that are not required of an individual RePL holder.

Three respondents expressed concern about potential interaction with authorised low-level helicopter, aerial application and firefighting operations. They noted that crewed aircraft may legitimately operate close to terrain and infrastructure and considered that the consequences of a mid-air collision warranted additional safeguards.

Several submissions also proposed strengthening the safety framework through additional controls, including ADS B or other electronic conspicuity technologies, mandatory radio broadcasts, continued use of NOTAMs, geofencing, documented risk assessments, record keeping requirements and aircraft weight restrictions.

Scope and stakeholder perspectives

Five respondents considered the proposed operating environments did not adequately address operations in cliffs, valleys, gorges and other steep terrain. Emergency service organisations and infrastructure operators placed particular emphasis on these environments because of their operational relevance.

Views also differed on the appropriate level of organisational oversight. One respondent expressly supported extending the proposal to independent RePL holders, while several certificated operators considered that some form of organisational assurance should remain a prerequisite for the proposed regulatory alleviation.

Consultation analysis

Feedback on this question demonstrated broad support for the proposal and its objective of reducing unnecessary regulatory burden for lower risk operations. The principal area of disagreement related not to

whether regulatory relief should be provided, but to the level of assurance that should accompany it. This theme recurred throughout the consultation and reflected differing views on the appropriate balance between expanding operational access and maintaining organisational oversight.

Question 2 - Defined environments

Overall views

Overall, 77 of the 85 respondents (91%) agreed or agreed with changes that the proposed defined environments were clear and appropriately scoped.

Feedback generally supported the proposed defined environments and the principles underpinning the proposal. Comments primarily focused on improving clarity and operational application rather than altering the scope of the proposed framework. The most common themes related to clearer definitions, objective measurement methods and consideration of additional operating environments.

Definitions and measurement

Twenty-two respondents considered that greater clarity would be required to support consistent application of the proposed framework. Common issues included how the 120 m lateral distance and the highest point should be determined for irregular or clustered structures, cliffs, ridgelines, sloping terrain, small structures and rotating wind turbine blades. Many requested diagrams or worked examples and practical guidance to support consistent interpretation.

Six respondents sought a clearer definition of an active mining operation and the proposed operating boundary. Issues included variable pit rim heights, quarries, waste dumps, stockpiles, spoil heaps, haul roads, processing areas, abandoned pits and rehabilitation sites. Several considered that the operating boundary should relate to the excavation itself rather than the broader mining lease or operational footprint.

Requests to change scope

Eight respondents proposed extending the defined environments to include additional operational settings such as offshore facilities, gas plants, powerlines, bridges, trees, valleys, canyons and rehabilitation sites. Infrastructure operators noted that, where transmission lines cross deep valleys, measuring height relative to the asset being inspected may better reflect operational risk than measuring from the surrounding terrain.

A few respondents proposed changes to the structure relative operating envelope. Suggestions included increasing the permitted height above a structure to 400 ft or adopting a smaller horizontal and vertical operating envelope. These views did not emerge as a recurring theme.

Consultation analysis

Feedback indicated broad support for the use of defined operating environments as a practical means of limiting the proposed regulatory alleviation. The most consistent theme was the need for operating boundaries that could be applied objectively and interpreted consistently by both operators and CASA.

The consultation also highlighted the importance of supporting guidance, particularly for complex terrain, irregular structures and mining environments. While some respondents advocated expanding the scope of the proposal, these suggestions generally sought to extend the existing risk-based approach rather than alter its underlying principles.

Question 3 - Conditions and controls

Overall views

Overall, respondents considered the proposed conditions and controls to be appropriate and proportionate. 75 of the 85 respondents (88%) agreed or agreed with changes to the proposed conditions and controls.

Feedback generally supported the proposed conditions as an appropriate foundation for the regulatory alleviation. Most comments focused on whether the controls would remain proportionate across different aircraft, operational models and operating environments. The principal themes related to eligibility and organisational assurance, operational competency, interaction with existing approvals and measures to support airspace awareness.

Eligibility, competency and assurance

Nine respondents supported limiting eligibility to ReOC holders or introducing a tiered framework, particularly for more complex operations. These respondents considered organisational oversight to be an important component of operational assurance. Others proposed additional competency requirements, including environment specific training, minimum operational experience, recurrent competency assessments, platform specific abnormal procedure training and documented maintenance and flight records.

A few respondents also raised concerns about containment and fly away risk. Suggested controls included geofencing or other effective containment technologies, documented ground risk assessments, clearly defined abort criteria and lower remotely piloted aircraft weight limits, most commonly below 25 kg.

Controlled airspace and other exclusions

Seven respondents requested a pathway for operations in controlled airspace where a separate airspace approval or air traffic services coordination was already in place. Emergency service organisations noted that the exclusion could reduce the operational benefits of the proposal during high rise incidents and other time critical activities in metropolitan areas.

A few respondents also questioned the exclusion of one-to-many operations, particularly for approved dock-based emergency service systems. Others sought clarification of how the proposal would interact with existing operational approvals, relevant events at non controlled aerodromes, heliports and existing shielded operation provisions.

Airspace awareness

Views on the proposed listening watch requirement were mixed. Some considered it a practical and proportionate means of improving situational awareness with minimal additional burden. Others questioned its effectiveness where crewed aircraft were not transmitting or where existing CASA approved EVLOS or BVLOS operations already incorporated tactical air risk controls. These issues are discussed further under Question 5.

Consultation analysis

Feedback demonstrated broad support for the proposed conditions and controls while highlighting the importance of ensuring they remain proportionate across a diverse range of operational scenarios. Feedback consistently identified the need to align the level of regulatory assurance with the complexity and risk of the operation. It also highlighted the importance of ensuring the proposed framework operates consistently alongside existing approvals and operational authorisations to avoid duplication, uncertainty and unintended regulatory outcomes.

Question 4 - Operational, technical and cost challenges

Overall views

Overall, feedback indicated that the proposal was expected to deliver operational and administrative benefits while presenting a number of implementation issues requiring further consideration. Comments focused on balancing the anticipated reduction in regulatory burden with practical implementation, operational consistency and appropriate safety assurance. The principal themes related to expected cost savings, implementation guidance, interaction with existing approvals and compliance arrangements.

Expected benefits and costs

Around 30 respondents anticipated little or no additional operational or financial burden and expected the proposal to deliver an overall benefit. The most commonly identified benefits were reduced application fees, shorter approval times, lower administrative effort and reduced CASA processing workload. Emergency service organisations, mining operators and infrastructure operators generally considered implementation could be accommodated using existing procedures, systems and in house training.

Some respondents identified potential implementation costs associated with radio equipment, Aeronautical Radio Operator Certificate (AROC) training, operational procedures and pilot competency assessments. A few also considered that requiring an additional observer for operations already approved under EVLOS or BVLOS would duplicate existing controls, increase operating costs and reduce the operational efficiencies associated with remote operations.

Implementation challenges

Eight respondents identified a need for additional guidance and training to support implementation. Common themes included clearer operating boundaries, radio communication requirements, interaction with existing approvals and the management of risks associated with different operating environments. A few also noted that manufacturer software may restrict operations above 400 ft or require changes to geofencing and altitude settings.

Five respondents raised concerns relating to compliance monitoring, record keeping and enforcement. These respondents considered that removing individual approvals and operation specific NOTAMs could reduce CASA's visibility of operations and make non-compliant activity more difficult to identify. Other implementation issues included accounting for wind turbine blade height, the availability of relevant aeronautical information and the potential for radio congestion.

Consultation analysis

Feedback on this question was largely forward looking, with comments focusing on how the proposal would operate in practice rather than questioning its underlying objectives. While many anticipated reductions in regulatory burden and improvements in operational efficiency, feedback consistently highlighted the importance of clear guidance, practical implementation arrangements and proportionate oversight to realise those benefits.

Responses also indicated that implementation should avoid duplicating existing controls where equivalent safety measures already apply under other CASA approvals. This suggests that the effectiveness of the proposed framework will depend not only on the regulatory requirements themselves but also on how they integrate with existing operational approvals and practices.

Question 5 - Radio requirements

Overall views

Feedback on the proposed radio communication requirements was mixed. While many supported radio as a practical means of improving situational awareness, there was less agreement on whether it should be a mandatory requirement in all circumstances. Comments focused on the effectiveness of radio communications across different operating environments, interaction with existing operational controls and whether alternative technologies or risk based approaches could provide an equivalent level of safety.

The principal themes related to the proportionality of mandatory radio requirements, interaction with existing EVLOS and BVLOS approvals, the use of alternative airspace awareness measures and the need to avoid unnecessary duplication of existing operational controls.

Question 5a - listening watch near a vertical structure

Support for the proposed listening watch requirement was generally strong. Seventy of the 85 respondents (82%) agreed with the proposal or agreed with changes.

Thirteen respondents supported a listening watch as a practical, low burden means of improving situational awareness.

Twelve respondents opposed a blanket requirement or supported it only where justified by a risk assessment. These respondents noted that crewed aircraft may not carry or use a radio, may be monitoring a different frequency or may not transmit when operating near a structure. Some also considered that visual observation may provide equal or better warning during certain VLOS operations.

Nine respondents considered that a listening watch alone would be insufficient and supported additional controls such as an AROC, position broadcasts or both. A few also requested clearer guidance on frequency selection. Others proposed ADS B, electronic conspicuity technologies or existing CASA approved EVLOS or BVLOS airspace awareness measures as alternative means of compliance.

Question 5b - AROC and broadcasts over an active mining excavation

Views on the proposed radio requirements for operations over active mining excavations were more mixed. 51 of the 85 respondents (60%) agreed or agreed with changes, while 19 respondents disagreed, 7 were unsure and 8 did not answer.

19 respondents opposed a blanket AROC and broadcast requirement or supported a more risk-based approach. These respondents noted that RPAs would generally not operate above the surrounding natural terrain, low level crewed traffic within mine pits was uncommon and many mine operators already managed aviation activity through established site procedures.

8 respondents supported the proposed requirement as a simple means of improving awareness for helicopters, visiting aircraft and other RPAs. Some also raised concerns about radio congestion and increased pilot workload, particularly near busy non controlled aerodromes and in mining regions with frequent radio traffic.

A few respondents requested defined broadcast intervals, event-based radio calls, standard phraseology and clearer guidance on the appropriate aeronautical frequency and mine operational radio channels. Others proposed ADS B or other electronic conspicuity technologies as alternative approaches.

Consultation analysis

Feedback demonstrated stronger support for a listening watch near vertical structures than for mandatory radio broadcasts over active mining excavations. Across both questions, stakeholders generally supported improving airspace awareness but differed on whether radio should be a mandatory control or one of several acceptable risk mitigation measures.

The consultation also highlighted that the preferred approach often depended on the operating environment, the level of aviation activity and the availability of existing operational controls. Several respondents considered that alternative technologies or approved procedures could provide an equivalent level of safety while avoiding unnecessary duplication of existing requirements.

Question 6 - NOTAMs and advisory information

Overall views

Overall, feedback supported reducing the use of routine operation specific NOTAMs where the proposed operating environments and other safety controls reduced the need for individual notifications. However, many also considered that any reduction should be accompanied by appropriate replacement measures to maintain airspace awareness. The principal themes related to balancing regulatory efficiency with situational awareness, the design of replacement advisory information and the circumstances in which operation specific notification should continue.

Support for reducing routine NOTAMs

Many respondents supported reducing or removing operation specific NOTAMs for operations conducted within the proposed defined environments. These respondents considered that routine NOTAMs could contribute to information overload, provide limited additional value for fixed structures already known to pilots and delay time critical emergency operations.

9 respondents specifically identified NOTAM congestion as a concern, noting that excessive notifications could reduce the visibility of more significant aviation information. Emergency service organisations similarly supported broader advisory information, observing that operation specific NOTAMs may be impractical during emergency response activities.

Requests to retain notification

15 respondents supported retaining operation specific NOTAMs for all operations, during a transition period or where local operating risks remained higher. These respondents considered that a general advisory product would not provide the same level of detail regarding the location, timing and operating height of individual activities.

17 respondents also emphasised the importance of a clearly defined transition, supported by guidance and replacement advisory products before implementation. Low level helicopter inspection, aerial mustering, aerial application, firefighting and emergency service operations were identified as examples of activities that may legitimately occur within the proposed operating environments.

Views differed on where notification would provide the greatest benefit. Some considered that operation specific NOTAMs remained particularly important for mining operations because they had historically been the primary means of notification. Others considered that existing site access controls and operational procedures reduced the need for individual NOTAMs at mine sites, while operations near vertical structures warranted greater notification because of the potential for interaction with low level crewed aircraft.

Alternative approaches

A range of alternative notification and airspace awareness measures was proposed, including standing or area-based NOTAMs, aeronautical information publications, aeronautical charts, danger areas, local aerodrome coordination, operational noticeboards, radio communications, ADS B and other electronic conspicuity technologies. Several respondents also requested clearer guidance on the circumstances in which local notification or coordination would continue to be required.

Consultation analysis

Feedback broadly supported reducing routine operation-specific NOTAMs, as long as other airspace users remained aware of the operations. Throughout the consultation, notification was generally viewed as an integral part of the broader safety framework rather than an administrative requirement alone.

The consultation also highlighted the importance of replacement advisory information, transitional arrangements and clear guidance on when additional notification or coordination should continue. Together, these elements were consistently identified as important to maintaining situational awareness while achieving the intended reduction in regulatory burden.

5 Broader considerations

Safety issues

The most frequently raised aviation safety issue was the potential interaction with authorised low level crewed aircraft operations, including helicopter inspection, aerial application, firefighting, mustering, emergency response and scenic flights. Other recurring concerns included fly away events, loss of control and containment, particularly return to home behaviour near structures and the effectiveness of geofencing or equivalent containment measures.

Ground safety also emerged as a recurring theme. Feedback highlighted risks associated with operations over workers, machinery and uninvolved persons, together with the effects of wind, turbulence, degraded navigation performance, dust and radio or command link limitations around tall structures and within deep excavations. Mining stakeholders also identified operational considerations including blast schedules, active work areas, visiting aircraft and site specific coordination procedures.

Regulatory and implementation issues

A recurring theme throughout the feedback was the appropriate balance between expanding access to the proposed regulatory alleviation and maintaining an appropriate level of regulatory assurance. Many submissions sought greater clarity on eligibility, interaction with existing approvals and how the proposal would operate alongside EVLOS, BVLOS, controlled airspace operations and other regulatory requirements.

The importance of practical implementation was also consistently emphasised. Common themes included clear definitions, objective measurement methods, supporting guidance, competency expectations, compliance monitoring and transitional arrangements. Several respondents also supported post implementation monitoring to evaluate the effectiveness of the framework.

Stakeholder perspectives

Stakeholder perspectives generally reflected operational context. Emergency service organisations strongly supported the proposal because of the potential benefits for time critical operations, particularly in high rise, cliff and critical infrastructure environments. Mining and infrastructure organisations similarly highlighted benefits for inspection activities, worker safety and operational efficiency.

Industry associations and certificated operators generally supported the policy objective but expressed differing views on eligibility and organisational oversight. Crewed aviation stakeholders were more cautious, focusing on interactions with authorised low level operations and the need for effective airspace awareness, notification and communication arrangements. Individual respondents contributed a broader range of suggestions, including staged implementation, expanded operating environments and greater use of electronic conspicuity technologies.

Economic and operational issues

Overall, the proposal was expected to reduce administrative burden, approval timeframes and operational costs while improving workplace safety by reducing the need for personnel to work at height or enter hazardous environments. Some respondents also identified potential implementation costs associated with training, radio equipment, operational procedures, software changes and record keeping.

Views differed on the potential competitive impacts of extending eligibility beyond ReOC holders. Some considered organisational assurance should remain a prerequisite for the proposed regulatory alleviation, while others supported a pathway for independent RePL holders to achieve the intended reduction in regulatory burden.

Emerging risks

Several implementation risks were identified during the consultation. These included reduced regulatory visibility following the removal of individual approvals and operation specific NOTAMs, ambiguity where multiple approvals or instruments may apply to the same operation and practical issues relating to software altitude limits, reference data and return to home settings.

Some respondents also cautioned that applying uniform controls across all operating environments could reduce operational flexibility without necessarily improving safety. Others observed that future developments in electronic conspicuity technology may influence the design of longer term regulatory arrangements.

Overall consultation observations

The consultation demonstrated broad support for the proposal and its objective of reducing unnecessary regulatory burden for recurring lower risk operations. Stakeholders generally accepted that carefully defined operations near tall structures and over active mining excavations could support a more proportionate regulatory framework. Most feedback focused on refining the proposed conditions, scope and implementation arrangements rather than retaining the existing approval framework.

Across the consultation, several themes consistently emerged. The most frequently raised issues related to the appropriate level of regulatory assurance, the clarity and application of the proposed operating boundaries, interaction with authorised low level crewed aviation and the effectiveness of airspace awareness measures, including radio communications and notification arrangements. Many submissions also sought greater clarity on how the proposed framework would operate alongside existing approvals and excluded operations.

Overall, the consultation demonstrated broad acceptance of the proposal while emphasising the importance of a framework that is practical to implement, proportionate to operational risk and supported by clear guidance and objective operating conditions. Guidance, education, transitional arrangements, regulatory visibility and post implementation monitoring were recurring themes throughout the consultation.

6 Future direction

CASA will consider the consultation feedback in determining its final policy position on Policy Proposal PP 2612US. Should the proposal proceed, implementation is intended to occur through a CASA instrument supported by guidance and communication material to assist industry with implementation.

The consultation has provided a comprehensive evidence base on stakeholder views and the issues requiring further consideration. The feedback summarised in this report will inform CASA's consideration of the proposal and any subsequent policy or regulatory development.