



Australian Government  
Civil Aviation Safety Authority



# RPA REGISTRATION & ACCREDITATION

## SUMMARY OF CONSULTATION

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Date

30 July 2019



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## 1. BACKGROUND

In November 2018, the Australian Government supported the introduction of mandatory registration for all remotely piloted aircraft systems (RPAS) and that operators successfully complete a basic competence test regarding the safe use of RPAS. Accordingly, the Civil Aviation Safety Authority (CASA) developed a proposed registration and accreditation scheme.

On 25 January 2019, CASA opened public consultation on the scheme. The consultation closed on 22 February 2019.

This document uses the term RPA, commonly known as drones, flown commercially or recreationally, and includes model aircraft.

The consultation invited comment on the following policy positions:

1. CASA proposes that the registration and accreditation requirements apply (with certain exceptions) to RPA weighing more than 250 grams operated recreationally and all RPA operated commercially, including excluded RPA operations, regardless of weight.
2. The RPA registration and accreditation requirements are not proposed to apply to RPA 250 grams or less operated recreationally, model aircraft at CASA-approved model airfields or RPA operated recreationally indoors.
3. Accreditation will be free. RPA users will be required to undertake an online course on the rules that apply to them. RPA licence holders will not have to do this course.
4. The cost of registration has yet to be determined by CASA, it will depend on whether the RPA is flown for fun or profit. It is likely to be a per person annual fee of \$20 or less for recreational RPAs and for some model aircraft operators. There will also be an annual registration fee likely to range from \$100 to \$160 per RPA, for each commercial RPA.

This report provides a summary of the consultation.

## 2. EXECUTIVE SUMMARY

Based on detailed analysis of the responses, the main findings are:

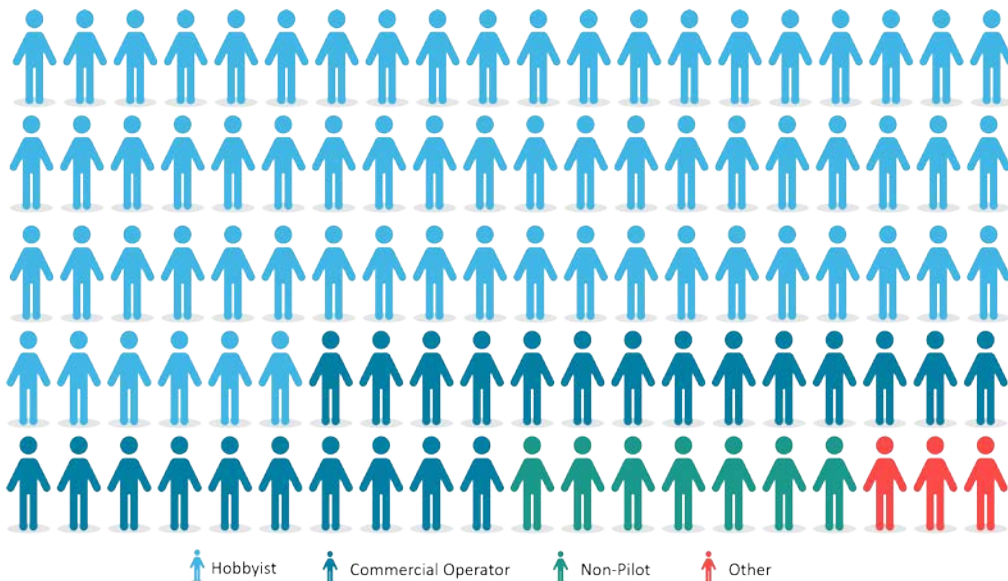
- 35% of respondents thought registering all RPAs over 250 grams was about right, 22% disagreed with any registration at all and 18% thought 250 grams was too low.
- 42% of respondents felt the exceptions for registration were about right, and approximately 37% wanted additional exceptions. 60% of commercial operators felt the proposed exceptions were about right. There was a high percentage of model aircraft respondents.
- Only a small section of the respondents agreed with charging a registration fee. Most did not see any benefits or return on investment to paying a fee.
- Support for making registration annual was not high, 21%, and many respondents also disagreed with having to register or having to pay a fee at all.  
A number mentioned the practical difficulty in CASA monitoring an RPA's registration status.
- Almost half of the respondents, 46%, indicated that the proposed aim of accreditation was about right. Around 10% of responses were materially identical and from model aircraft groups asking to be exempt.
- 39% of respondents agreed that repeating the accreditation every three years was a good approach. A third of the respondents felt that the accreditation should never expire. 52% of commercial operators felt that the 3-year accreditation period was appropriate, whereas 33% of model aircraft operators agreed.
- 42% agreed that 16 was the right age to take responsibility to fly an RPA without supervision. While 23% supported 14 years, other comments in the consultation indicated that some of these respondents believed there should be no age limit.
- 51% agreed that a responsible adult should be supervising unregistered operators, with the majority agreeing to an 18-year-old limit.

Please note: The consultation allowed respondents to answer yes and no but allowed some free text responses. These responses were subjected to statistical analysis.

### 3. DEMOGRAPHICS

The consultation received 4,236 on-line submissions. The respondents could all be categorised as either hobbyists, commercial operators, non-pilots or other.

There was a significant number of hobbyists, that is, those respondents who indicated they were recreational drone owners or pilots and model aircraft owners and pilots. A quarter of respondents were commercial operators, that is, holders of RPA operator certificates and licences, or operating under the excluded category.



#### RESPONDENT BY TYPE

Respondents overwhelmingly identified as male: 95% of respondents versus 49.7% of the general population.

Women are much more likely to be commercial operators than men (34% of female respondents versus 26% of male respondents) or non-pilots (9% versus 2%). The small sample size of women makes meaningful analysis more difficult.

## 4. KEY FINDINGS

### REGISTRATION – OVER 250 GRAMS

Question 1: Do you agree that all drones over 250 grams should be registered? (noting that there are some exceptions – see Question 2)?

Answer options:

- Yes
- Yes, with changes (Please specify below)
- No, requires changes (Please specify below)
- Don't know

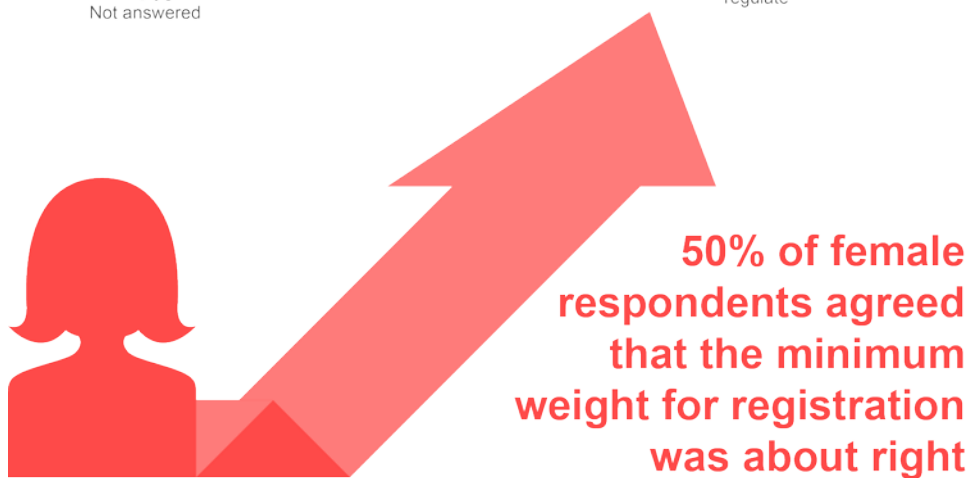
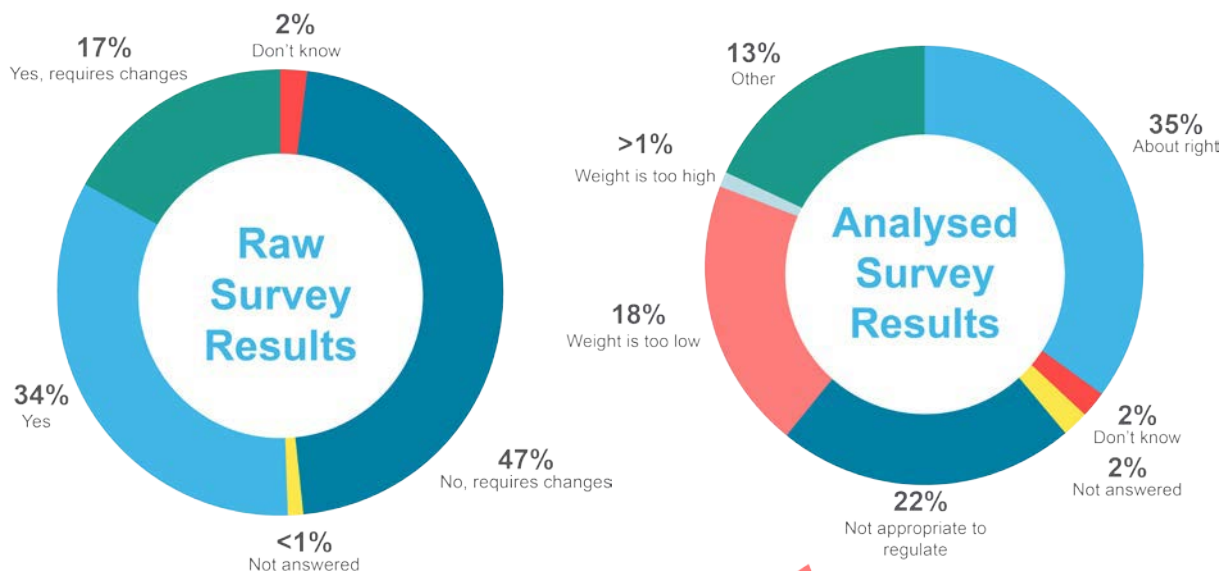
As there were a considerable number of free text responses included in the consultation, coding was applied to the free text responses to enable them to be statistically analysed.

**The codes which were used for this section include:**

Code	Application
Weight is too high	Those respondents who indicated that the minimum weight for RPAs is too high.
About right	Those respondents who indicated that the minimum weight for RPAs is about right.
Weight is too low	Those respondents who indicated that the minimum weight for RPAs is too low.
Not appropriate to regulate	Those respondents who indicated that RPAs should not be registered.
Other	Responses that did not fit well into any of the above categories i.e. responses that did not answer the question, or responses that were not directly relevant to the question asked.

CODING APPLIED TO QUESTION 1

## SUMMARY OF RESULTS



### What does the data tell us?

35% of respondents thought registering all RPAs over 250 grams was about right.

22% disagreed with any registration at all and 18% thought 250 grams was too low.

## EXCEPTIONS

Question 2: “Does the proposed scheme ensure the right drone operations are excepted from registration?”

Answer options:

- Yes
- Yes, with changes (Please specify below)
- No, requires changes (Please specify below)
- Don't know

As there were a considerable number of free text responses included in the consultation, coding was applied to the free text responses to enable them to be statistically analysed.

The codes used for this section include:

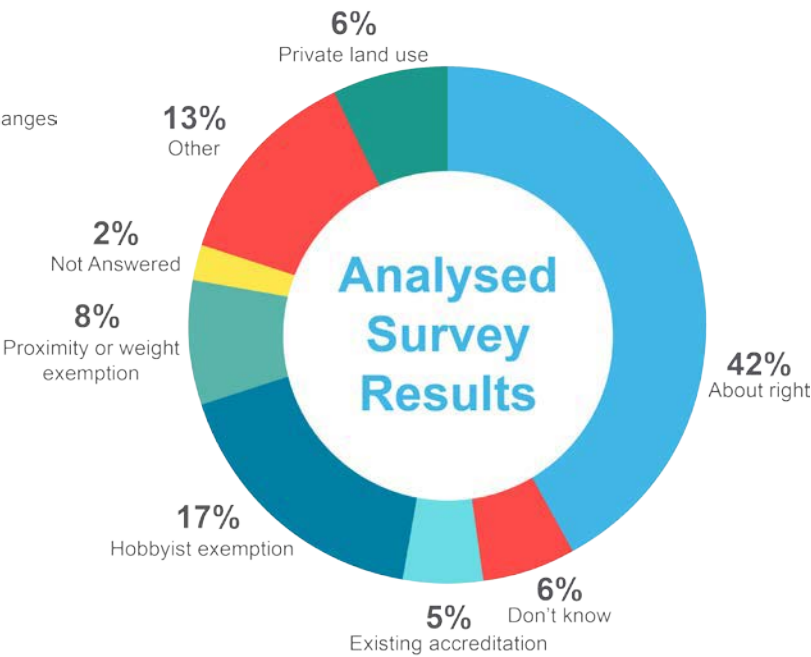
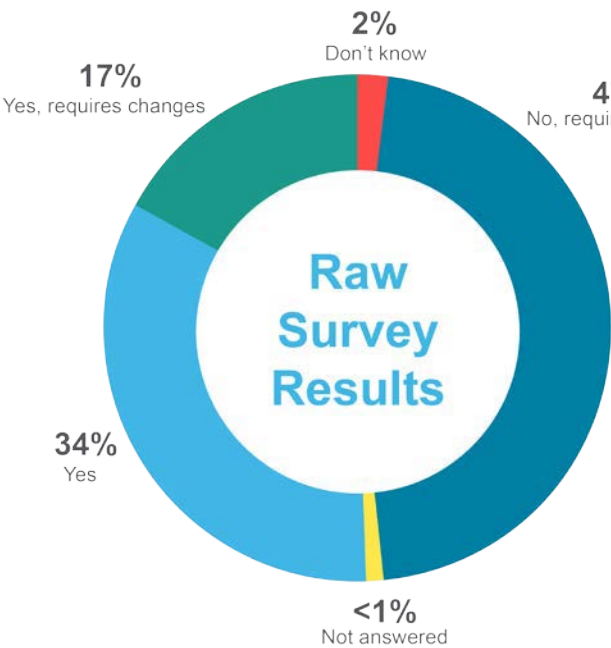
Code	Application
Private Land Use	Where a comment has been made about the use of RPAs on private land or where concern was raised regarding the term ‘CASA approved airfields’. This often stemmed from whether the Model Aeronautical Association of Australia (MAAA) or other appropriate club affiliated, or school fields would be appropriate. There was also significant concern from slope gliders <sup>1</sup> as to whether these fields would be appropriate for this cohort to operate their planes.
About right	Those respondents who indicated that, broadly speaking, the registration exceptions were about right.
Existing accreditation	Included respondents who held existing accreditation which they felt should be taken into consideration for exception. This includes MAAA members and ReOC holders.
Hobbyist exception	Where respondents felt that those operating RPAs for purely recreational purposes should be exempt.
Other	This captured all other categories which didn't necessarily fit well into other codes. This included responses which did not answer the question or suggested other exception categories not covered off in the other tags.
Proximity or weight exception	Respondents who wanted exceptions for flying within certain heights or distances from the pilot e.g. within line of sight or below tree canopy and exceptions for weights greater than 250 grams.

### CODES APPLIED FOR QUESTION 2

<sup>1</sup> Slope gliders are unpowered gliders that are typically thrown off headlands or other bodies that create updrafts.



SUMMARY OF RESULTS



65%

CASA Email



vs



21%

Drone forum

Believe the exemptions are about right.



## What does the data tell us?

42% of respondents felt the exemptions for registration were about right, and approximately 37% wanted additional exemptions.

60% of commercial operators felt the proposed exemptions were about right.

There was a high percentage of model aircraft respondents.

## REGISTRATION FEES

Question 3: “Has the right balance been struck in charging registration fees?”

Answer options:

- Yes
- Yes, with changes (Please specify below)
- No, requires changes (Please specify below)
- Don't know

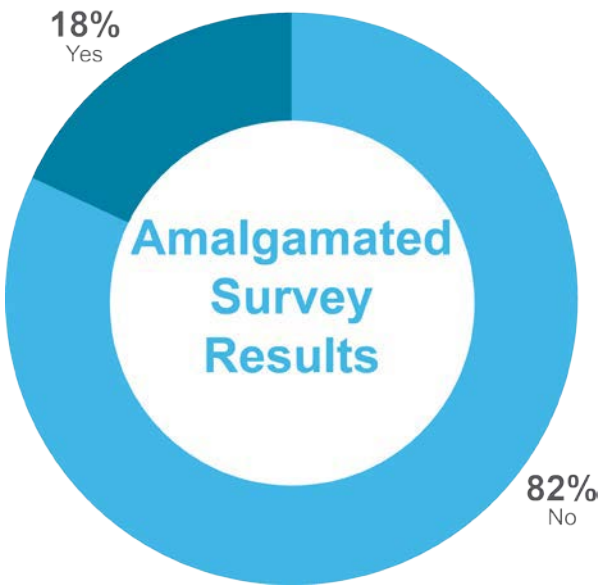
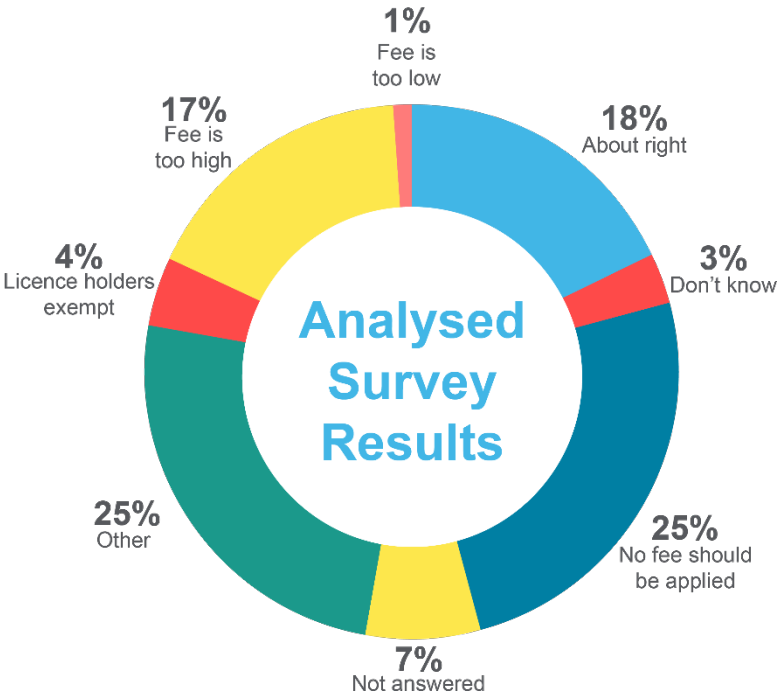
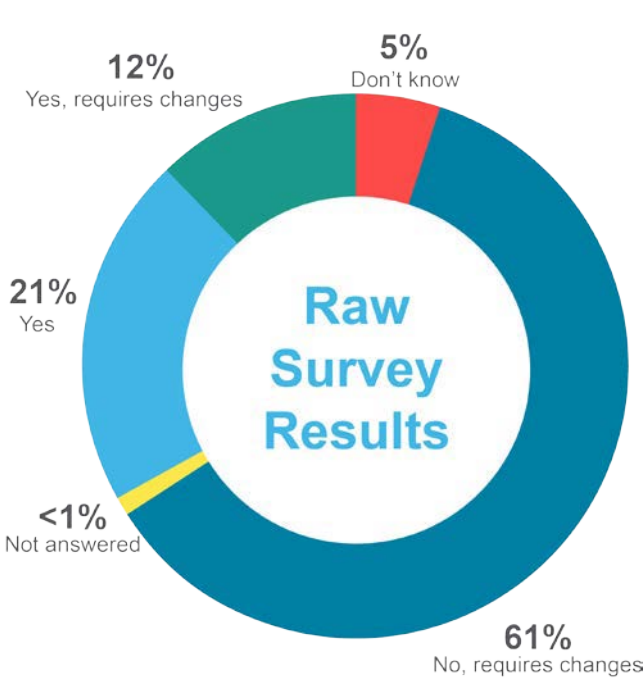
As there were a considerable number of free text responses included in the consultation, coding was applied to the free text responses to enable them to be statistically analysed.

The codes which were used for this section include:

Code	Definition
Fee is too high	Respondents who indicated that the proposed registration fees for RPAs are too high.
About right	Respondents who agree that proposed registration fees for RPAs is about right.
Fee is too low	Respondents who indicated that the proposed registration fees for RPAs are too low.
No fee should be applied	Respondents who do not agree that fees should be charged for the registration of RPAs.
Other	Responses that did not fit well into any of the above categories i.e. responses that did not answer the question, or responses that were not directly relevant to the question asked.
Licence holders exempt	Respondents who were already paying fees to CASA on some other basis and considered they should be exempt.

### CODES APPLIED FOR QUESTION 3

SUMMARY OF RESULTS



What does the data tell us?

Only a small section of the respondents agreed with charging a registration fee.

Most did not see any benefits or return on investment to paying a fee.

## ANNUAL REGISTRATION

Question 4: “Do you agree with the proposed policy of drone registration for one year, with annual fees due thereafter?”

Answer options:

- Yes
- Yes, with changes
- No, requires changes
- Don’t know

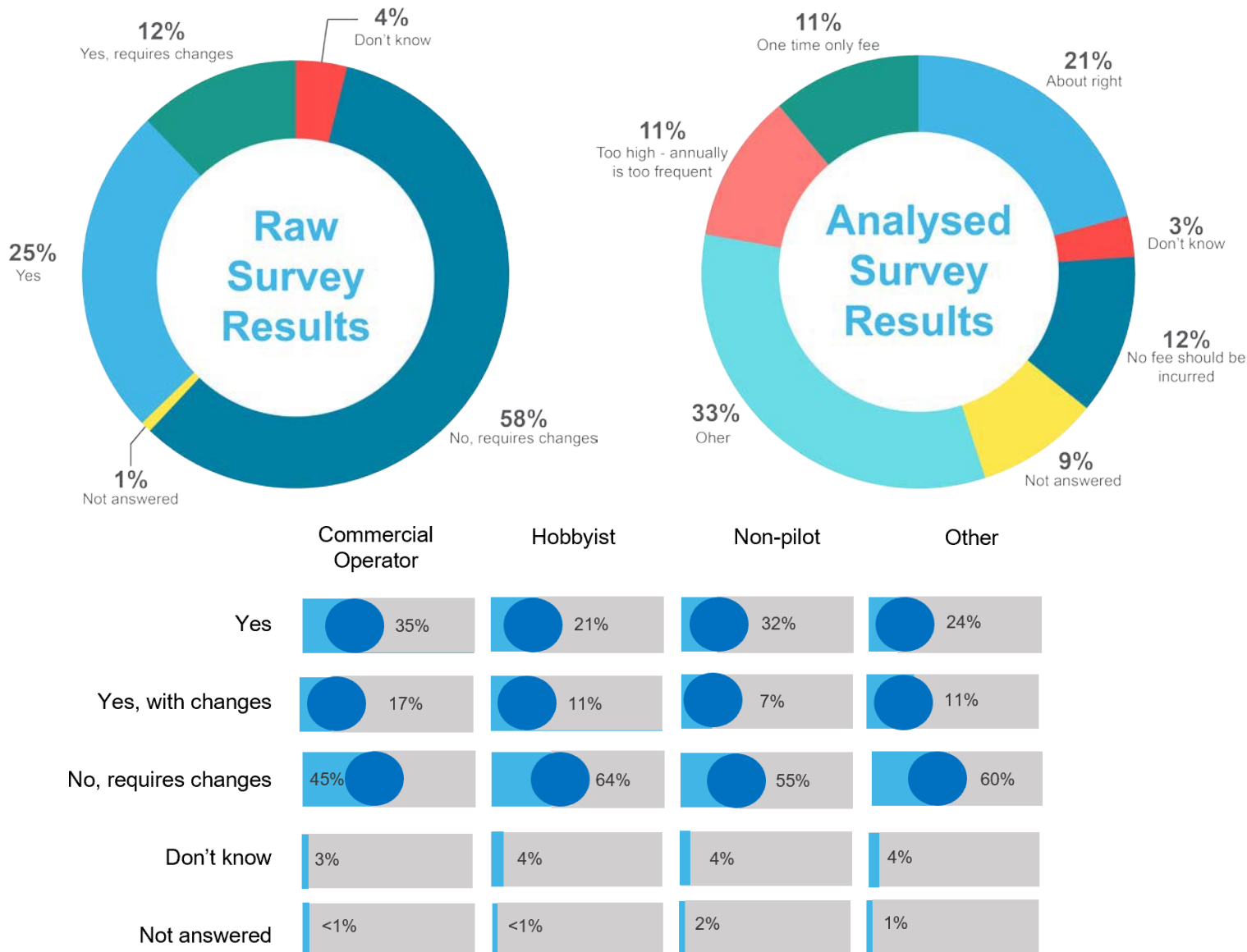
As there were a considerable number of free text responses included in the consultation, coding was applied to the free text responses to enable them to be statistically analysed.

The codes which were used for this section include:

Code	Application
Annually is too frequent	Where respondents indicated that the annual renewal timeframe was too frequent.
About right	Those respondents who indicated that, broadly speaking, the timeframe for renewal was about right.
One-time only fee	Respondents who had indicated that the registration and/or fee should only occur once and not require renewal.
No fee should be incurred	Where respondents felt that registration was appropriate, however no fee should be incurred by the registrant.
Other	This captured all other categories which didn’t necessarily fit well into other tags. This included responses which did not answer the question or suggested other exception categorisation categories not covered off in the other tags.

### CODES APPLIED FOR QUESTION 4

## SUMMARY OF RESULTS



### What does the data tell us?

Support for making registration annual was not high, 21%, however many respondents also disagreed with having to register or having to pay a fee at all.

A number mentioned the practical difficulty in CASA monitoring an RPA's registration status.

## ACCREDITATION SCHEME AIM

Question 5: “Is the accreditation scheme aimed at the right drone flyers?”

Answer options:

- Yes
- Yes, with changes (Please specify below)
- No, requires changes (Please specify below)
- Don't know

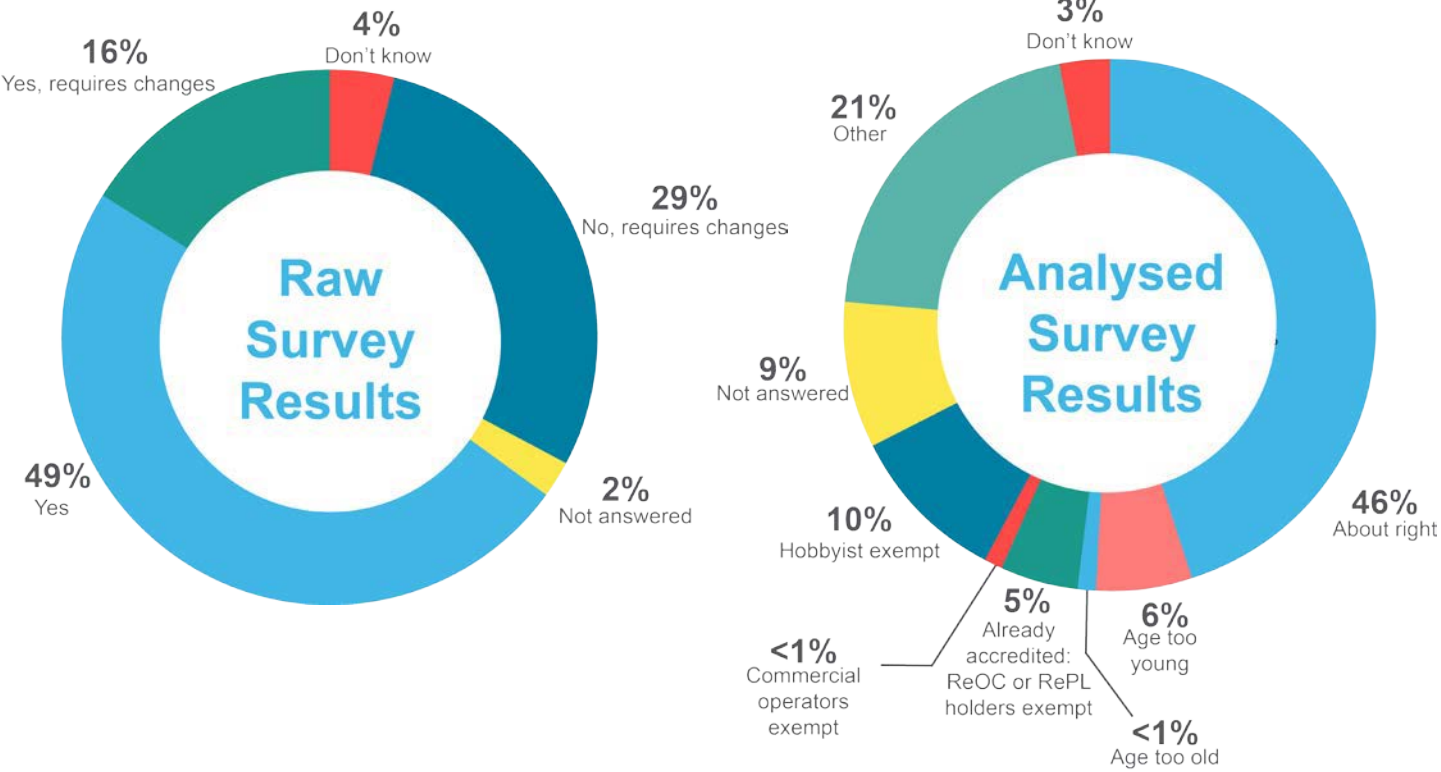
As there were a considerable number of free text responses included in the consultation, coding was applied to the free text responses to enable them to be statistically analysed.

The codes which were used for this section include:

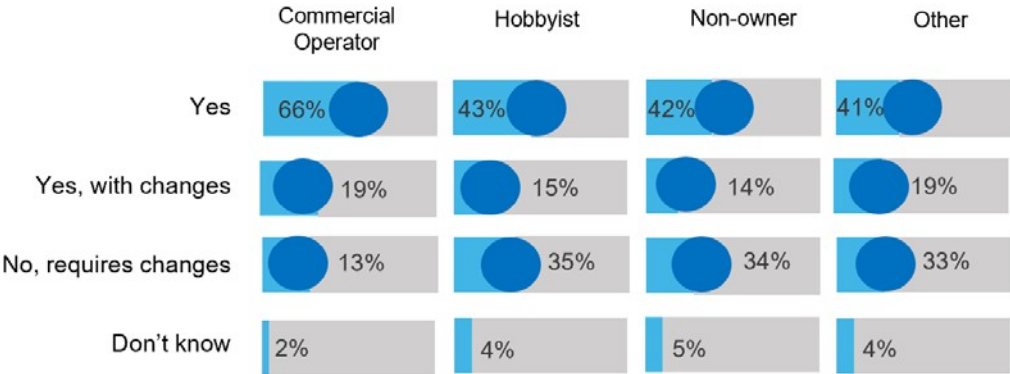
Code	Application
Age too old	Where respondents indicated that the age limit was too high.
About right	Those respondents who indicated that, broadly speaking, the targeted RPA flyers were about right.
Age too young	Where respondents indicated that the age limit was too low.
Hobbies should be exempted	Where respondents felt that those operating RPAs for purely recreational purposes should be exempt from registration.
Other	This captured all other categories which didn't necessarily fit well into other tags. This included responses which did not answer the question or suggested other exception categorisation categories not covered off in the other tags.
Commercial operators exempt	Where commercial operators felt that they should be exempt.
Already accredited	Where the respondent already held an accreditation with a club or was a ReOC or RePL holder.

## CODES USED FOR QUESTION 5

SUMMARY OF RESULTS



By type of respondent



What does the data tell us?

Almost half of the respondents, 46%, indicated that the proposed aim of accreditation was about right.

Around 10% of responses were materially identical and from model aircraft groups asking to be exempt.



## ACCREDITATION PERIOD

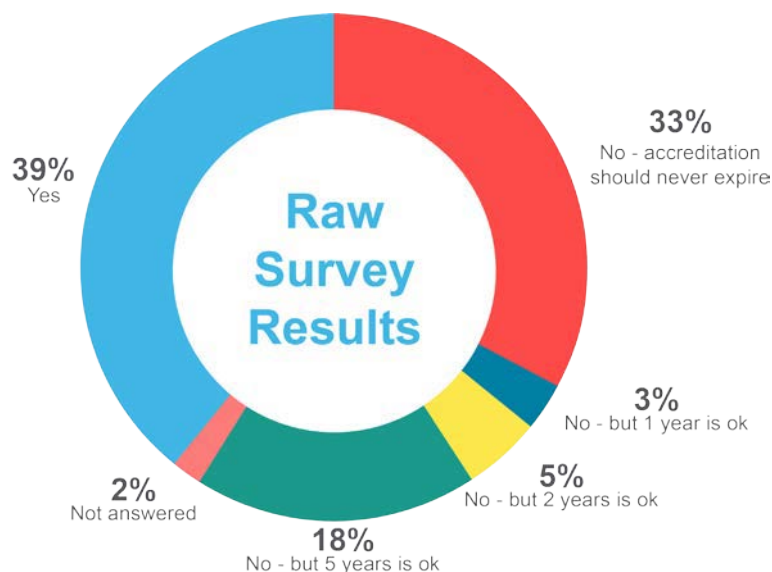
Question 6: “Is three years an appropriate time to need to repeat your accreditation?”

Answer options:

- Yes
- No – but 5 years is ok
- No – but 2 years is ok
- No – but 1 year is ok
- No – accreditation should never expire

No codes were applied for this section as the answer options were satisfactory for statistical analysis.

## SUMMARY OF RESULTS



### What does the data tell us?

39% of respondents agreed that repeating the accreditation every three years was a good approach.

A third of the respondents felt that the accreditation should never expire. 52% of commercial operators felt that the 3-year accreditation period was appropriate, whereas 33% of model aircraft operators agreed.

## REGISTRATION AND ACCREDITATION - CONSIDERATIONS

The final two questions of the survey related to the age restrictions for registration and accreditation. The analysis for these two questions has been combined.

*Question 7: Is 16 the right age to take responsibility to fly a drone without supervision? And provided the following responses:*

- Yes
- No – but 18 years is ok
- No – but 17 years is ok
- No – but 15 years is ok
- No – but 14 years is ok
- Don't know

*Question 8: Is 18 the right age to supervise a drone flyer younger than 16? And provided the following responses:*

- Yes
- No but 16 is okay
- No but 17 is okay
- No but 19 is okay
- No but 20 is okay
- No but 21 is okay
- Don't know

No free text fields were provided for this question.



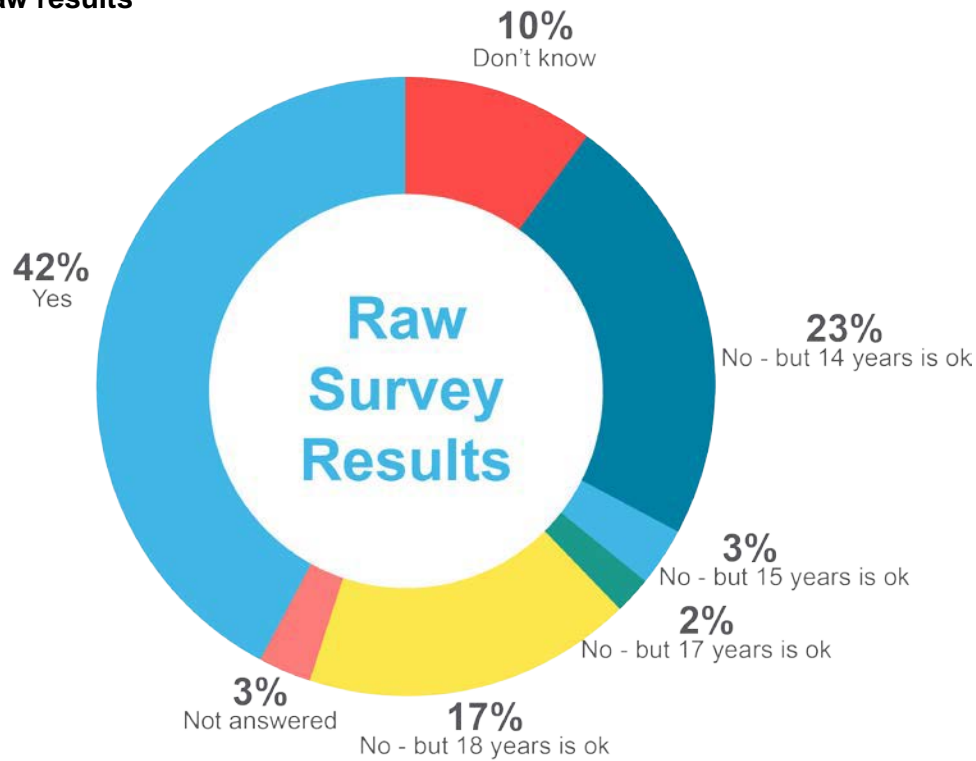
### What does the data tell us?

42% agreed that 16 the right age to take responsibility to fly an RPA without supervision.

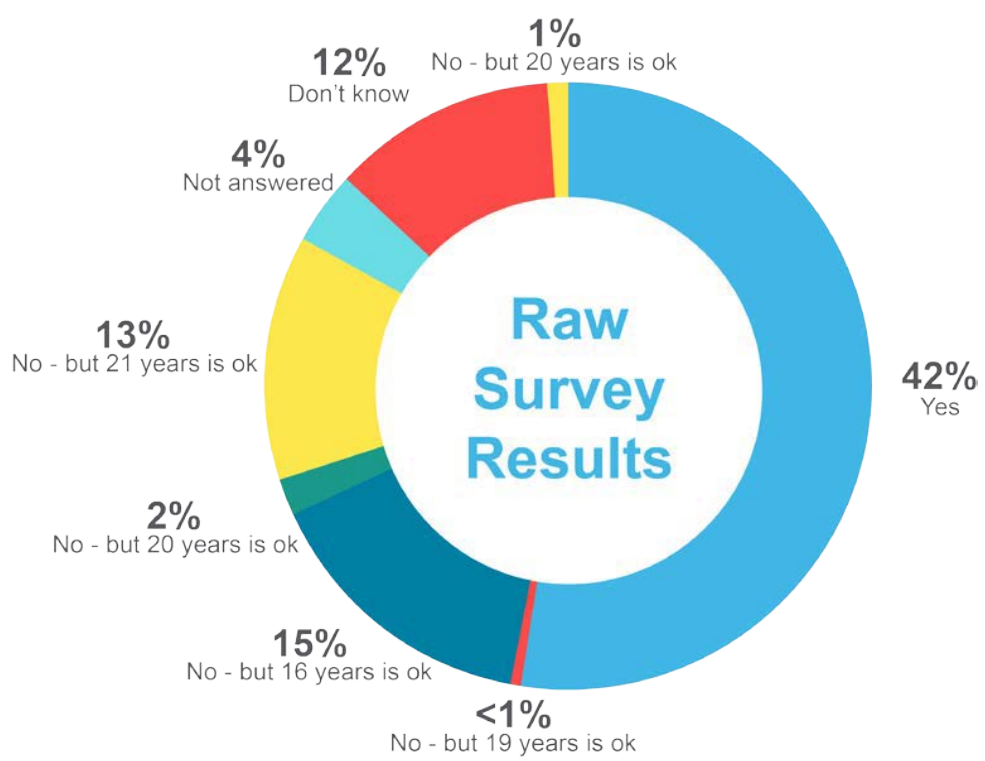
While 23% supported 14 years of age, other comments in the consultation indicated that some of these respondents were in support of no age limit.

51% agreed that a responsible adult should be supervising un-accredited operators, with the majority agreeing to an 18-year-old limit.

SUMMARY OF RESULTS  
Question 7 raw results



Question 8 raw results



## 5. FUTURE DIRECTION

The findings of this consultation have been reviewed by a special working group representing RPA users. The RPAS Registration and Accreditation Technical Working Group (TWG) provided their feedback to CASA's independent industry advisory group, the Aviation Safety Advisory Panel (ASAP).

### CONCESSIONS FOR SPECIAL GROUPS

Following discussion at the TWG, CASA will provide concessions for certain groups.

RPA used for certain educational purposes will be subject to a low, single annual fee, applicable no matter how many aircraft are operated by the educational institution. The maximum weight of the aircraft for these purposes will be 7 kg, and the exemptions will be limited only to those educational institutions funded directly by the federal and state and territory governments.

Unpowered model gliders will be exempt because they present an extremely low risk to other aircraft and to people and property on the ground. The definition of a glider in this context is one that does not have an engine or motor.

Model aircraft association members will not be required to register their model aircraft or be accredited if they are flying at a CASA approved model aircraft site. In addition, CASA has revised and clarified the way model aircraft sites will be administered, making it more flexible for associations.

The regulations will also allow CASA to provide alleviations from the RPA registration and accreditation scheme requirements. These provisions contemplate reductions or exemptions from registration fees for charitable and other non-profit organisations on a case-by-case basis.

### THE COST OF THE SCHEME

The TWG generally supported the framework and the need for such a scheme. However, it advised the ASAP that it was unable to support this proposed scheme, primarily due to the impact of the high registration cost. The TWG considered that this high cost would likely result in a low registration uptake from drone operators and therefore result in the scheme failing. Further, there was concern that the cost of enforcement would likely negate any cost-recovery CASA was trying to achieve.

Whilst considering the TWG advice, the ASAP generally supported the proposed drone registration and accreditation scheme, however strongly encouraged CASA to consider reducing the cost to encourage compliance and achieve the associated safety outcomes. The ASAP noted the significant challenge that CASA faced in implementing this scheme due to large number of RPA operators and was encouraged by the work that CASA was undertaking through the 'Service Delivery Transformation' project to enable electronic transactions.

CASA is now considering the ASAP advice, particularly in relation to the cost of registration. CASA will conduct further public consultation on proposed costs, through a separate consultation on a draft Cost Recovery Implementation Statement (CRIS). The final CRIS will be subject to agreement for release by the Minister for Finance before being approved by the Minister for Infrastructure, Transport and Regional Development, in accordance with the Australian Government Charging Framework. The timing of the release of the draft CRIS for public consultation is being considered by CASA and the Department of Finance.