



**LEGISLATIVE ASSEMBLY**  
FOR THE AUSTRALIAN CAPITAL TERRITORY

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STANDING COMMITTEE ON ECONOMIC DEVELOPMENT AND TOURISM  
Mr Jeremy Hanson MLA (Chair), Ms Suzanne Orr MLA (Deputy Chair),  
Mr Michael Petterson MLA

## Submission Cover Sheet

Inquiry into drone delivery systems in the ACT

**Submission Number: 37**

**Date Authorised for Publication: 7 February 2019**

To the Committee Secretary  
SANDING COMMITTEE ON ECONOMIC DEVELOPMENT AND TOURISM  
GPO Box 1020, CANBERRA CITY ACT 2601

### **Submission to the Inquiry into drone delivery system in the ACT.**

#### **Personal Details:**

Name:	Elizabeth Dean and Norman Collings
Postal Address:	██
Phone:	██████████

#### **Background information**

We purchased our property in Bonython in 2004. One reason for choosing the suburb was the peaceful nature of the suburb with little or no through traffic. We chose a house in a short cul de sac so there is no through traffic and, with only ten houses, very little traffic at all. We chose a house with a large garden planted with natives because we enjoy watching the birds that come into our garden and listening to them.

Our house appears to be on the flight path to some houses receiving deliveries. Drones have flown over our house on numerous occasions. Mayfield Hill is next to Stranger Hill, which is bushland. The drones appear over Stranger Hill and then fly either across our back garden or across the front of the house depending where the delivery is being made.

We are both retired – ex government. We have only lay mans’ knowledge of drone technology and have no issue with drones used for certain purposes. The issues we document below relate to the use of drones for the purposes they are being used in Bonython. We would like to be clear that use for emergency surveillance, deliveries in outback or remote areas and used for medical purposes (e.g. delivery of blood and vaccines) is not something we oppose.

#### **Addressing selected Terms of reference of the Inquiry**

*1. (a) the decision to base the trials of the technology in the ACT and surrounding region;*

We are not aware of any community consultation or transparency on the selection of Bonython for the trial prior to the decision to hold the trial by the ACT Government, any ACT or Federal Agency or by Wing. We first heard about the trial from a neighbour who said there was to be a meeting called by Wing at the Tuggeranong Vikings Club. We attended along with about five other people. The Wing representatives explained the trial as a definite go ahead and showed us a drone. We were surprised how large the drones were. We raised issues e.g. would it be safe to fly such large drones over residential areas and, on hearing cameras would be filming, we raised issues of privacy. The Wing representatives listened but it was obvious to us that they considered the evening an ‘information session’ because the trial had already received Government approval.

Fearing we residents had missed an opportunity from the ACT Government to comment on the trial we sought information. We were disturbed to discover there had not been, and was not going to be any Government consultation with residents on the trial. We further found that there had been no community consultation on the use of bushland adjacent to Pine Island Reserve to use as a launch pad and food preparation area.

We were further disturbed to hear from Royalla residents that the Royalla community had been divided by the trial that had already taken place there. Some Royalla residents did not agree it was the success promoted by Wing.

Once the trial began we wished to draw our now real concerns to the Government agency responsible. However, we were thwarted. Queries to ACT Police on drone flights across our property were referred to Air Services Australia and from Air Services Australia to CASA. CASA responded that its remit was safety only – any other issues such as privacy or noise would not be a concern of that organisation. Emails to the responsible Minister received no response or the response failed to answer the issues raised.

In summary, the decision to base the trials in Bonython seems to have been made without any consultation with, or regard to, the views of the residents.

*1 (b) the economic impact of drone delivery technology being tested in the ACT including the:*

- *(i) investment that has been brought in to the Territory;*
- *(ii) number of jobs that have been created as part of the trial; and*
- *(iii) extent of collaboration with local industry and academic institutions;*

There have been claims in the press made by the Government that the drone delivery technology will lead to increased investment in the ACT and increased jobs. We have received no substantiation of this and fail to see how coffee deliveries could be economical. We suspect that the trial is to develop air traffic control software for drones. If this was the true reason and we had been advised of such, we might have been more understanding. However, coffee, food and chemist items delivery in a suburb so close to shops and coffee bars surely cannot be economical and could lead to a reduction in employment especially for young people in coffee bars and home delivery businesses.

*1 (c) the extent of regulatory oversight of drone technology at various levels of government including but not limited to:*

- *(i) local authorities such as the Environment Protection Authority, Worksafe and Access Canberra; and*
- *(ii) Commonwealth agencies such as Air Services Australia and Civil Aviation Safety Authority;*

Our advice from the ACT Government as to whether the Government was assessing the outcomes of the trial was that Wing is self-regulating and will report to the Government. This does not seem to have any measure of independent review of the trial. It is an abrogation of responsibility of our local government. From our attempts to find information from agencies it appears to us that none accept any responsibility for the effects the trial may have on any issues.

*1 (d) the extent of any environmental impact as a result of trialling drone delivery technology on:*

- *(i) residents within the trial area;*

## **Loss of privacy**

The environmental impact on us has included the loss of the right to have privacy in our own back yard because:

- The drones fly over our back yard,

- The drones take photographs and store them off shore, and
- The drones could belong to an unauthorised enterprise possibly carrying out unauthorised or illegal activities.

Wing advised us that the drones take photos to be able to retrace their path in the case of the failure of other navigation systems and that the photos are kept for 30 days for research if required following a flight.

Where are the photos stored? Who in the ACT Government or Federal Government is monitoring what images are kept, where they are being stored and when and whether they are being deleted?

We have concerns that we are not qualified to recognise a Wing drone compared with other commercial drones or recreational drones. How do we identify whether our privacy is being intruded upon by a rogue drone crossing our property illegally?

### **Environment impact of undue noise**

Bonython is a quiet suburb. Our street is particularly quiet except for mild traffic noise from Drakeford Drive which we knew about when we purchased the property. The impact of drone noise in horizontal flight is almost bearable, akin to the noise of an electric whippersnipper. However, the noise in hover/delivery mode is extremely piercing, irritating and even worse if it is windy and the 12 vertical lift motors have to rev differentially to maintain horizontal stability.

Our household has been extremely lucky in that there are no adjacent neighbours who are receiving deliveries. However, there are approximately 4 residents in the vicinity (estimated to be within 200~300 metres of our house) who frequently receive deliveries. We are therefore subject to frequent fly overs and then the scream of the drones as they hover and deliver. It would be very distressing if our immediate neighbours were part of the trial.

Unlike traffic noise, the drones' noises are unpredictable and unexpected.

We suggest the ACT Government or a Federal agency conduct research into the noise levels of drones in otherwise peaceful suburbia.

### **Dividing the Bonython community**

There has been impact on the social environment in our Bonython community. During the trial the community became divided between those taking part in the trial and those opposed to it. It created disharmony amongst neighbours, and it made social interaction difficult at various social and charity club meetings when the individual views clashed.

We suggest the ACT Government assess the impact of new technology on the communities affected.

- *(ii) native wildlife;*

Many residents, as we did, selected this suburb in which to purchase real estate because of its proximity to open nature land, the Murrumbidgee corridor and the wildlife in these areas. The trial flights of drones ruined some of our walks and bicycle rides.

We observed that the drone flights had a negative impact on the small birds such as black birds, sparrows, silvereyes and pardalotes with only the larger birds remaining in our garden. We have no resources to obtain data on this. However, it seems more than a coincidence.

Wing have claimed that there were no incidents of drones impacting wildlife, however there is at least one video on social media of a magpie attacking a drone during a Bonython trial delivery.

We would suggest that the ACT Government undertake research into the impact of drone flights on native wildlife.

- *(iii) domestic animals;*

We do not have pets. However, we have noticed that two dogs in a neighbour's property seem to bark more often and for longer on days when there are frequent drone flights. We have no data to support this.

We suggest that the ACT Government carry out research into whether drone flights would cause distress or alarm to domestic pets.

- *(iv) greenhouse gas emissions;*

We suggest that the ACT Government assess this important aspect.

#### *1. (e) ways to improve the use of drone delivery technology within the ACT;*

We would like to emphasize that we are not against the development of drone technology for valid reasons for example:

- Transport of blood to hospitals as is happening in Namibia,
- The transport of vaccines as is being trialled in Vanuatu,
- Observing fire fronts during bush fires,
- Dropping survival packs to lost hikers or sailors, and
- Overcoming the tyranny of distance for rural dwellers.

We are regularly under air ambulance and firefighting helicopter paths and we can accept the noise and disruption from these flights because it is a proven and appropriate use of that technology for the general benefit of the community.

#### *1. (f) any other relevant matter;*

### **Safety**

There would appear to be issues that affect the safety of residents for example:

- A drone carrying hot coffee or hot food could potentially drop the product on someone below (dropped hot drinks in Bonython have been shown on Facebook),
- A drone carrying chemist items could drop them and potentially affect the health of a child or animal, and
- The drone could distract a car driver, pedestrian or cyclist and thereby cause an accident.

We suggest that the ACT Government examine this issue.

## **Concerns about the future**

The futurists are telling us that the skies will be crowded with delivery drones.

With the lack of Territory and Federal Government control and consultation evident from the trial, future use raises concerns. Will there be any upper limit on the number of companies that can fly drones in a suburb? If there is a licensing or similar scheme, how will we residents know if it is a licensed drone? Who will monitor noise and safety issues?

In light of the issues raised by Bonython residents we suggest that the ACT Government:

- withhold/cease any rights for Wing to fly drones in Canberra's northern suburbs until all the issues have been solved
- the ACT Government works with the agencies responsible for matters outside the remit of ACT Government to resolve issues and
- the ACT Government establishes a clear line of communication with ACT residents to receive and respond to any issues raised.

## **In conclusion**

- The drones are intrusive on our privacy in our own backyard
- The drones are noisy
- The drones potentially have a negative impact on local wildlife
- The drones diminish the enjoyment of the nature reserves adjacent to this suburb
- The drones affect the wellbeing and safety of a large number of residents by flying over properties to deliver non-essential items to a small number of residents
- The current trial has shown the apparent ineptitude of the ACT Government in managing either drone issues or the various responsibilities of different agencies that appear to be involved and
- The current trial has considerably reduced our confidence that the ACT Government will listen and communicate on future issues that disturb residents and may impact on the way residents vote in future local elections.

We appreciate the opportunity to provide our comments to the ACT Government on this matter and look forward to receiving the outcomes of the Inquiry.

We attach below examples of the correspondence between us and Wing and local and federal agencies/governments. As you will read, much of the response was not helpful or informative.

### **VIA E-MAIL:**

Standing Committee on Economic Development and Tourism

Email : [LACommitteeEDT@parliament.act.gov.au](mailto:LACommitteeEDT@parliament.act.gov.au)

Examples of Correspondence.

**EMAIL TO WING**

Subject:  
MAJOR SAFETY CONCERN  
From:  
Norman Collings [REDACTED]  
Date:  
12-Oct-18, 14:11  
To:  
wing-au@x.team  
CC:  
stopbondrones@gmail.com, environment.protection@act.gov.au,  
letters.editor@canberratimes.com.au, news@canberraweekly.com.au, barr@act.gov.au,  
gentleman@act.gov.au, burch@act.gov.au, lawder@parliament.act.gov.au,  
lecouteur@parliament.act.gov.au, rattenbury@act.gov.au, simon.denby@casa.gov.au,  
gai.brodtmann.mp@aph.gov.au, info@tuggcc.com

Hello,

I am contacting you for two reasons: 1. to allow me to express my disapproval of your drone project in my suburb, and 2. to give you feed back on what I see as a safety issue to humans, animals, property and birds.

Your drones are noisy, invade my privacy, ruin my suburban peace (for which I have paid a high real estate price) and totally unnecessary for the current role for which they are being used. I have not kept statistics on the repetitive fly overs, but it is an increasingly annoying happening.

This morning between 12:45 and 13.45 there were two noisy fly overs followed by the usual increased noisy hover to deliver. The safety issue is that on both occasions, having made the delivery, the return flight commenced with the winch cable not fully retracted. If this brought about the demise of your drones I would be pleased, except that the failing drone might damage humans, animals or property on the ground. The other issue I have is that a bird, attacking one of your drones, might get entangled in the non retracted winch cable or be damaged by the drone itself.

A company of your international size and status should have a more responsible attitude to the society in which you are operating.

Please advise me of what actions you are taking to address all of these important issues.

Regards,  
Norm Collings  
[REDACTED]

**REPLY FROM WING**

Subject:  
RE: [4-3832000023762] MAJOR SAFETY CONCERN  
From:  
wing-au@google.com  
Date:  
18-Oct-18, 08:15  
To:Norman Collings [REDACTED]

Dear Norm,

Thank you for reaching out with feedback. We've noted your opposition to the trial, and your concerns about noise and safety. To speak to the specific issue you raised

about the drone starting its trip back to our trial operations area with the winch cable not fully retracted, what you witnessed is by design. We designed the return flight to begin as soon as possible after delivery, while the cable is retracting. This reduces the time the drone is hovering and reduces noise. We do this in areas of Bonython where we know it is safe - where there are no trees, power lines, or fixed structures. The cable is secure and strong enough to deliver packages, but it's also very lightweight, and designed to release from the drone in case of tension on the cable (such as from an obstacle). In the tens of thousands of flights we've flown, we've never had an encounter with a bird. We've worked with independent environmental experts and have followed their advice in operating to avoid disturbing birds, or encountering birds (the rate at which we accelerate, the height at which we fly, even the colour of our drone is designed to avoid this scenario). If it were to occur, we've designed the drone's safety mechanisms to prevent damage to the bird or the drone. If you have additional questions, please don't hesitate to reach out again.

Thank you,

Jesse

The Wing Team

### **REPLY FROM SHANE RATTENBURY MLA**

Subject: RE: MAJOR SAFETY CONCERN

From: RATTENBURY <RATTENBURY@act.gov.au>

Date: 12-Oct-18, 16:46

To: Norman Collings [REDACTED]

CC: LE COUTEUR <LECOUTEUR@parliament.act.gov.au>

Good Afternoon,

Thank you for contacting the ACT Greens regarding your concerns about the drone Trial in Bonython. Noting the significant community concerns that we have received, Mr Rattenbury has written to the responsible Minister, Minister Gentleman asking how the government intends to address these concerns. A copy of Mr Rattenbury's letter is attached for your records.

Thank you for contacting the ACT Greens on this issue.

Kind Regards,

[REDACTED] | Office of Shane Rattenbury MLA

ACT Greens Member for Kurrajong

Minister for Climate Change and Sustainability; Minister for Justice, Consumer Affairs and Road Safety;

Minister for Corrections; Minister for Mental Health

[REDACTED] | rattenbury@act.gov.au

Follow Shane on Facebook and Twitter

I acknowledge the Traditional Custodians of the Australian Capital Territory and across Australia, and pay respects to their Elders, past, present and future

### **LETTER ATTACHED TO EMAIL FROM SHANE RATTENBURY MLA**



Shane Rattenbury MLA  
ACT Greens Member for Kurrajong

Mr Mick Gentleman MLA  
Minister for Planning and Land Management  
ACT Legislative Assembly  
London Circuit  
CANBERRA ACT 2601

Dear Minister, *Mick*

**Bonython drone trial**

I have received constituent representation about the trial of drones in Bonython.

Some residents are concerned by issues related to the drones. These issues include:

- The noise emitted by the drones is disturbing.
- Privacy concerns related to the drones recording visual data. How is this data used and stored? Are best practice privacy principles being followed?
- The drones may be interfering with wildlife.
- No consultation occurred with residents about the drone trial.

I would appreciate if you could provide me with a response to these concerns. I would also appreciate further information about the trial, such as how long it will run, and future plans for the service.

Thank you for your consideration of these matters.

Yours sincerely

**Shane Rattenbury**  
ACT Greens MLA for Kurrajong  
9 October 2018

Ph: 6205 0005 Fax: 6205 0007 Email: [Rattenbury@act.gov.au](mailto:Rattenbury@act.gov.au)  
Post: GPO Box 1020, Canberra, ACT 2601 Online: Follow me on [Facebook](#) and [Twitter](#)

There was no response from Shane Rattenbury with Mick Gentleman's response.

**REPLY FROM CASA**

Subject: FW: MAJOR SAFETY CONCERN [SEC=UNCLASSIFIED] CRM:01566529

From: RPAS Mailbox <[rpas@casa.gov.au](mailto:rpas@casa.gov.au)>

Date: 15-Oct-18, 09:52

To: [REDACTED]

Hello,

Thank you for your recent correspondence to CASA where you state you are concerned about drone noise associated with the operations of 'Wing' aircraft in Bonython, ACT. CASA takes all matters relating to aviation seriously, however our remit is limited only to the safe and legal operation of the aviation system and does not extend to issues of noise.

Airservices Australia is responsible for managing complaints and enquiries about aircraft noise, more information on which can be found

here:<http://www.airservicesaustralia.com/aircraftnoise/about-making-a-complaint/>

As your correspondence refers to 'Wing', I can inform you that Wing have been testing drone delivery in Australia over the past several years with the necessary safety approvals from CASA. Wing was required to satisfy CASA that its operation met an acceptable level of safety before CASA permitted Wing to conduct operations in

Bonython. Wing must also continue to operate within CASA's requirements for commercial drone operators flying over 2kg.

At this point CASA has not put an end date on the operations in Bonython, however you may wish to speak with the ACT Government to check if they have placed an end date on the lease of the land in Greenway.

Should you or your members want to report unsafe drone operations, you may do so on CASA's website <https://www.casa.gov.au/webform/report-unsafe-drone-operations> If you or your members observe unsafe aviation operations that are an immediate risk to life, telephone 000 or contact your local police.

Yours Sincerely  
CASA RPAS

Note: When emailing CASA please ensure you include the following:

..If you are not a certified operator please advise the category you are operating under (if known)

..If you are emailing in relation to an existing job can you please include the job number, name of your organisation and ARN number in the Subject line of your email

..If you are a certified operator can you please include the name of your organisation and your ARN number in the Subject line of your email

Kind regards

Remotely Piloted Aircraft Systems (RPAS) Operations

RPAS Branch - Administration Officer

National Operations & Standards

CASA\Aviation Group

#### **MY REPLY TO CASA**

Subject: Re: FW: MAJOR SAFETY CONCERN [SEC=UNCLASSIFIED] CRM:01566529

From:Norman Collings [REDACTED]

Date:15-Oct-18, 10:13

To:RPAS Mailbox <[rpas@casa.gov.au](mailto:rpas@casa.gov.au)>

CC:stopbondrones@gmail.com

Hello CASA RPAS,

I understand that drone noise is not within your remit.

However included in my email I expressed my concern about a safety issue which I believe is within your remit.

I would appreciate your response to the fact that Wing drones commence return flights with about a metre of winch cable dragging beneath the craft. This is a danger should it get entangled in trees or shrubs and also a potential risk to bird life attacking the drone. A drone failing/falling could damage property, people and animals on the ground.

I look forward to your positive response on this issue,

Thank you in advance

Norm Collings  
[REDACTED]

#### **THE LAST AND AUTOMATIC RESPONSE FROM CASA**

Subject:Remotely Piloted Aircraft Systems - Automatic Response [SEC=UNCLASSIFIED]

From:RPAS Mailbox <[rpas@casa.gov.au](mailto:rpas@casa.gov.au)>

Date:15-Oct-18, 10:13

To:Norman Collings [REDACTED]

Thank you for contacting the RPAS Branch. Emails are reviewed each day and allocated to a queue for a detailed response and/or appropriate action.

Please be advised that we are working to process your request as quickly as possible. We thank you for your patience.

Kind regards  
RPAS Administration  
RPAS Branch  
CASA \ Aviation Group  
www.casa.gov.au

**REPLY FROM JOY BURCH MLA (Actually contains some information from Mick Gentleman MLA)**

Subject:RE: MAJOR SAFETY CONCERN  
From: BURCH <BURCH@parliament.act.gov.au>  
Date:16-Oct-18, 10:00  
To:Norman Collings [REDACTED]

Good morning,  
Thank you for your recent email regarding your concerns with the drone trials over Bonython.

I have recently contacted the relevant Minister on this issue and have received the below response.

“This trial provides an opportunity to learn about the challenges and opportunities presented by delivery drones, including community concerns about noise. I appreciate this feedback as this will inform the ongoing development of the business model... The ACT Government’s role has been to facilitate the use of a site in Greenway for the take-off and storage of drones through a temporary license for the land. This has included imposing conditions on Wing including a requirement for compliance with the Privacy Act 1988, and limiting operating hours to the same standards the ACT Government has for other activities that create noise in suburban areas such as lawn mowing (for example the service is allowed to operate between 7am-8pm weekdays and 8am-8pm on weekends).”

I can also advise that if you have any additional concerns Wing may be contacted directly via their website: [https://x.company/intl/en\\_au/wing/australia/](https://x.company/intl/en_au/wing/australia/).

Thank you again for raising this matter with me, I hope this information may be of assistance to you. Please do not hesitate to get in contact if you have any further inquiries or issues you wish to raise, no matter how big or small.

Sincerely,  
Joy Burch MLA Member for Brindabella  
Emails CASA

To: [REDACTED] 10/9/18 12:59 [i] [print] [reply] More ▾

Attention [REDACTED]

Hi [REDACTED]

I understand that you are the person responsible in CASA for monitoring the drone project pilot in Bonython. I wish to lodge my objection to any extension of the pilot. Throughout the last two weekends drones have flown repeatedly across my back and front gardens. My reasons are several but the main ones are: I consider this dangerous ( I hear that one has already crashed), intrusive, noisy and an invasion of my privacy (The company have told me that the drones carry cameras). I have raised my objections with the company operating the drones, Mr Mick Gentlemen MLA, ACT Police and AirServicesAustralia, all of whom have suggested I raise them with CASA.

Various reasons for a pilot have been explained to me and the one that carries the most credibility is that testing systems over populated areas is being trialled. This is valid but need not continue after the six months pilot. The company can perhaps discuss with the Government alternative test locations. It would also be very considerate of the Government if it had consulted with the residents in Bonython prior to allocating Bonython as the suburb for the pilot. Perhaps consultation should be included for future locations. The company in all fairness have consulted, after the event and with no intention, it appears ,of ceasing this imposition on local residents.

Please let me know when this pilot will terminate so that I know when I can return to the enjoyment of my property.

Kind regards  
Liz Dean

To: [REDACTED]

23/9/18 12:21



Hi [REDACTED]

As the drone flew over my house a few minutes ago I recalled that I have not had an acknowledgement from you or a reply. If you are not the person responsible for overseeing this project for CASA I would be grateful if you could let me know the appropriate person to contact please. There are already some indications that this issue is dividing our suburb community. We don't need such divisions in what until now has been a peaceful suburb to live in.

Kind regards

Liz Dean