



LEGISLATIVE ASSEMBLY
FOR THE AUSTRALIAN CAPITAL TERRITORY

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: 11

Date Authorised for Publication: 7 February 2019

INQUIRY INTO DRONE DELIVERY SYSTEMS IN THE ACT

Invitation of Submissions

The Standing Committee on Economic Development and Tourism is calling for submissions to its inquiry into drone delivery systems in the ACT.

“The Committee would like to hear from all parties involved in, or affected by the trial, including residents, companies and regulators.”

Submission from Bonython Resident Mark Rowland:

I live on the western fringe of Bonython, which is reasonably close to the Project Wing droneport. On drone operating days, my area is subject to repeated overflights of drones. With windows open, we can actually hear the drones being warmed up at the droneport prior to the delivery runs commencing.

I object to these devices flying over my place of residence, for the following reasons:

- Unlike satellites, planes or helicopters, the Project Wing commercial drones fly at low altitude and are therefore prominently visible and audible.
- The noise of the drones is a high pitched whine that can be heard inside a house (with windows shut) and the noise is *especially* loud at the point of goods delivery when the goods are lowered to ground.
- Repeated exposure to the drone noise is annoying and interferes with the pre-existing suburban amenity. Overflights are common. Customers frequently order a quantity of goods that requires multiple drone deliveries for the order to be fulfilled. Thus, drones make repeat flights along the same flightpath until a customer has his/her order fulfilled.
- Residents that live close to the droneport are subject to the greatest level of interference, as most overflights must take place over the western fringe of Bonython in order for a drone to reach its target delivery point in the east or south of the suburb.
- The drones can fly overhead along any path the operator chooses, therefore any residence can, potentially, be affected by repeated overflights.
- We purchased our home knowing that we were a long way away from the Canberra airport flight paths. Yet now we have been subjected to the introduction of drone overflights, without any opportunity to object or voice our concerns.
- Project Wing has been granted rights to operate drones over our heads without any form of consultation with the community. The process of granting approval to Project Wing has occurred in a back-to-front manner. The Bonython community should have been asked for its approval to allow the so-called ‘trial’ before approval was granted by authorities.
- There are no airspace rules governing drone traffic. For example, if a resident flies a recreational drone, what rules apply to which drone must give way – the recreational drone or the commercial drone? Where does fault lie if a recreational drone collides with a commercial drone and causes damage or injury at ground level? The lack of any airspace

rules is a chaotic, 'wild west' approach and Project Wing's 'trial' in Bonython should NEVER have been allowed to go ahead without consideration of all airspace issues.

- Project Wing drones carry a navigation camera. Therefore data is captured during flight by their drones. What guarantee exists that such data cannot or will not in the future be accessed illegally with potential breach of the privacy rights of residents? If Project Wing sells its drone operations to another party, what controls exist to prevent privacy breaches by the acquiring party?
- The drone delivery system in Bonython has been a less than fully transparent activity and raises concerns that the Project Wing operator (or its parent, Google Alphabet) has received preferential treatment by the ACT Government and CASA. Where can a member of the public read the rules governing access to residential ACT airspace by commercial drone operators? Are there any rules? If yes – what consultation process was followed and when and where were they published?
- I object to the commercialization of ACT residential airspace. While I support the use of drones for emergency purposes in residential airspace, residents are currently spoiled for choice when it comes to purchasing discretionary goods and chattels (Uber eats, food deliveries, online shopping with road delivery etc). There is no need to invade the airspace of residential areas to provide a 'technologically glamorous' alternative.
- Residents have a right to expect the airspace above them will not be polluted by noise, aesthetic or to be potentially spied on. The Project Wing drones are, in effect, trespassing over ACT resident's properties by flying so close (usually about 100 feet is the level at which they zoom over). Aircraft (except emergency and government helicopters) keep a respectable distance from residential property by flying at heights typically tens of thousands of feet.
- Recently (19th January 2019), I witnessed two Project Wing drones almost collide with each other as they flew over my house. I was with my family in our driveway and we all witnessed it – if there had been a collision, we could easily have been hit by fragments of the drones. Which leads into the next point.
- If Project Wing is entitled to operate commercial drones over ACT residences, then any other commercial operator will rightly expect to receive approval to also fly its drones over ACT residences. Potentially, there could be competition for delivery of all sorts of discretionary consumer goods. The skies could become chaotically thick with drones buzzing to and fro with their payloads. The risk of collision or third party injury or damage will increase. What will it take for Governments to realize that commercial drone deliveries in residential airspace should never have been allowed in the first place? The visual disruption and noise will be extremely undesirable and would not be allowed over government land.
- Some residents support the commercial drone delivery system, while others object to it. The effect, already observed, has been that some neighbours are now unfriendly to each other, where previously there was never a problem. This side-effect on ACT society of drone deliveries is **highly** undesirable and should be stopped by immediately ceasing the commercial drone delivery system forever.
- The drones interfere with ACT residents' family life. It is morally and ethically wrong that ACT residents are subject to this drone delivery 'service' without any recourse. This is a direct violation of our human rights: *Article 12 of the Universal Declaration of Human Rights*¹ states "No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honour and reputation. Everyone has the **right** to the protection of the law against such interference or attacks".

¹ <http://www.un.org/en/universal-declaration-human-rights/>

Summary

I object to commercial drones and recreational drones flying over the airspace of my residence. I want it to stop. My vote at the next ACT election will be reflected in the way I vote. The ACT Government and CASA should never have agreed to arbitrarily approve an unsolicited request to operate a commercial drone trial in the suburb of Bonython.

Mark Rowland

[REDACTED]

23 January 2019

Email: [REDACTED]