



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: 056

Date Authorised for Publication: 27 February 2019

Submission by Belconnen Dog Obedience Club to the ACT Government - Inquiry into drone delivery systems in the ACT

8th February 2019

Terms of Reference:

This submission is concerned with the bolded sections of the Inquiry Terms of Reference:

(1) the Standing Committee on Economic Development and Tourism inquire into and report on drone delivery systems in the ACT, with particular reference to:

- (a) the decision to base the trials of the technology in the ACT and surrounding region;
- (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;
- **(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;**
- **(d) the extent of any environmental impact as a result of trialling drone delivery technology on:**
 - (i) residents within the trial area;
 - (ii) native wildlife;
 - **(iii) domestic animals;** and
 - (iv) greenhouse gas emissions;
- (e) ways to improve the use of drone delivery technology within the ACT;
- (f) **any other relevant matter;** and
- (g) information privacy; and

(2) the Committee report to the Assembly on the matter no later than the last sitting week in 2019."

Introduction

The Belconnen Dog Obedience Club (BDOC) is a not for profit, member funded, volunteer organisation that provides a range of training and competition opportunities for dog handlers and their dogs of all breeds.

It was formed in 1975 to provide dog training instruction and facilities for people living in North Canberra, Belconnen and Gungahlin. The Club's main activity is obedience training for pet dogs, and we also offer training in dog sports including agility, dances with dogs, flyball, obedience trialling, rally obedience and disc dogs. The Club conducts competitions in these dog sports throughout the year attended by visitors from and across the ACT and interstate.

We operate from our club grounds at 1 Morriset Road, Mitchell. Club activities with dogs training or competing occur seven days a week throughout the year with a short break of approximately three weeks over Christmas/New Year.

The club is administered by a Committee of volunteers, elected at the Annual General Meeting held in August each year. The elected Committee for 2018 - 2019 is as follows:

Christine Bates - President

Margo Hellyer - Vice President

Monique Meacham (elect) - Treasurer

Kate McGee - Secretary

Catherine Griffin - Disc Dogs representative

Heather Swinbourn - DWD representative

Lisa Borthwick - Agility representative

Lyndal Hasselman - Canine companion representative

Maelyn Draper - Obedience and Rally Obedience representative

Sally Provins - Flyball representative

Anya Withell - General member

Katherine Waterhouse - General member

The committee represents the interests of all our club members – which number more than 500 – and has the authority to make this submission on behalf of its members. We will also encourage individual members to make submissions in addition to this document.

Background

On 3 December 2018, BDOC President Christine Bates received an email from Wing, a drone delivery company currently establishing a delivery site in Mitchell. Wing representative Jesse Suskin's email said Wing wanted to reach out so BDOC would have a point of contact for any questions about the company.

They stated that we may have been aware of recent reports on Wing drone delivery and their plans to offer their drone delivery service to the Gungahlin area. This will include the suburbs of Crace,

Palmerston, Franklin, Harrison and Gungahlin. He said operations were due to begin “next year” – in 2019.

A meeting between Wing and BDOC was held at BDOC clubrooms 6-8.30 pm on 10 December 2018, chaired by Lisa Borthwick and attended by other BDOC committee members Margo Hellyer, Lyndal Hasselman, Heather Swinbourn, and Anya Withell.

Wing representatives were Alexa Dennant and Sara Hourigan.

Wing explained about their trial program in Bonython, Tuggeranong and Royalla.

The Wing trial program at Bonython was located quite close to the Tuggeranong Dog Training Club grounds at Rowland Crescent, Greenway. A number of dog sports competitions were held whilst delivery drones were flying and caused considerable disturbance to dogs, their handlers and officials. The visual impact of the drones and their noise level were the most commonly reported concerns. A number of BDOC club members participated in these competitions and have expressed serious concern over the potential impact on BDOC activities in Mitchell.

At the meeting, Wing indicated that after the completion of the Bonython trial their next phase of operation is establishing a drone delivery operations site and warehouse at Vicars Rd Mitchell. This is within one kilometre distance to the north of the BDOC training grounds. Delivery services would fly north of the operations warehouse to the Gungahlin suburbs of of Crace, Palmerston, Franklin, Harrison and Gungahlin.

Wing stated they have no intention to operate deliveries near BDOC at this stage, but conceded that this may change in the future as their business model develops. This potential change to delivery flight paths is of major concern to BDOC, as is the prospect of other commercial entities setting up business within the north Canberra region, including pick up as well as delivery destinations.

Wing presented some facts about their planned drone operation in response to questions from the BDOC members present. We were told that:

- Wing plans to make 30-50 flights per day initially, increasing as demand increases
- Flights are minutes in duration – depending on the destination
- No pickups from local businesses are planned – all flights will be from the Wing Mitchell warehouse to their destination and back to Mitchell
- Each flight is conducted by a licensed Wing operator; Wing has a chief pilot who is responsible for all air operations
- They fly their drones at approx. 130 km/h to 200 km/h
- Flight height is at least 400 ft above ground level (AGL)
- The drones use low resolution cameras to assist with identifying their flight path and obstacles
- The drones to be used from Mitchell have been modified to reduce noise and rotor speed following the Bonython test operation and feedback from local communities
- When operational, they will conduct deliveries 7 am to 7 pm weekdays and 8 am to 7 pm weekends and public holidays

BDOC made it clear that the club was concerned that future expansion of operations by Wing over the club grounds would have an impact on all our activities, as well as potentially affecting individual dogs. The concerns are that the noise level and visual impact of drones is distracting and potentially

frightening or anxiety-inducing in dogs and rendering them unable to train or compete. Dog and human safety may be at risk. Dog handlers, instructors and official are also impacted.

We asked Wing whether they were aware of any scientific research available on the noise or other impacts of drones on dogs. However they were not aware of any research.

Wing listened to our concerns and acknowledged they need to have community support to achieve a 'social license to operate' their business.

At our request, they offered to prepare a series of Questions and Answers that we can provide to our members on Wing's planned operations. The Wing Q&A was provided to us on 21 December 2018 and is being prepared for publication on the [BDOC website](#).

We expressed to Wing a desire to not have drones operating anywhere near the club or what we described as the EPIC/Canberra Racecourse animal precinct – pointing out that dogs and horses visit EPIC frequently for competition events. We made it clear that we request that Wing considers this entire area a no-fly zone now and in the future.

At the end of the meeting, Wing agreed to continue to keep BDOC informed as its operations develop and when operations begin, as well as any plans to expand operations near our club grounds.

BDOC understands that the Civil Aviation Safety Authority (CASA) is the airspace regulator. Wing has been licensed by CASA to conduct its operations both in the Tuggeranong/Bonython trial and from Mitchell. There does not appear to be any other regulation applied to commercial drone delivery services and their impact on the community, either from ACT or Commonwealth agencies.

Key issues

BDOC has identified serious issues and concerns regarding the negative impact of drones on dog training and competition activities at the club:

- Drone flight and operations in close proximity to the BDOC grounds is likely to have a significant impact on some individual dogs causing heightened levels of anxiety and fright. This may impact a dog's ability to be under handler control during training and competition activities. There is potential for dogs to become so frightened that there is a **risk to dog and human safety**. A frightened dog is difficult to bring under control and may potentially bite and be aggressive.
- Individual dogs reacting to both the sight and sound of drones is likely to cause some dogs a degree of stress and distraction which seriously impacts a dog's ability to train or compete. Such impacts were directly observed during the Tuggeranong/Bonython drone trial at the Tuggeranong Dog Training Club. This distraction is distressing to dog handlers and may make it very challenging to conduct training classes and run competition trials at our grounds. This impacts all BDOC members, class participants and instructors, trial competitors and judges/officials.
- Such potential disruption to classes and trials potentially impacts on BDOC's membership and on our valuable role in the community as a provider of pet dog obedience training.
- Expansion of drone delivery services by Wing and other providers across North Canberra where future flight paths are across or near the club grounds and other animal facilities such as BDOC, DogsACT and the EPIC precinct appear to have little or no regulatory oversight of the community impact of commercial drone activities. The Civil Aviation Safety Authority is not concerned with community impact.

BDOC position and next steps

Following the meeting with Wing and subsequent discussion by the BDOC Committee on 16 January 2019, the club has resolved to undertake the following actions to make our concerns known and to gather support for our position and recommendations:

1. Formally acknowledge the meeting in a letter to Wing and thank them for the Q&A document, outline our concerns in writing and reiterate our request that Wing does not operate over BDOC now and in the future
2. BDOC prepare a letter outlining in detail our concerns regarding Wing's operations and send it to:
 - a. CASA
 - b. ACT Government (Sport and Recreation portfolio and other relevant Ministers as identified)
 - c. Government Members for Yerrabi (ACT Government electorate where BDOC is located)
 - d. Dogs ACT to seek their support
3. Acknowledge correspondence received on 2 January from Canberra Racing Club and state our concerns
4. Publish the Wing Q&A in the BDOC newsletter and on our website to inform members
5. Create and promote a member rule that no drone deliveries are allowed within the BDOC grounds
6. Maintain liaison with Wing, participate in any community meetings/liason Wing may arrange in the future
7. Monitor the media and other channels for future developments or changes in community attitudes/government policies and regulation
8. Any other actions in addition to the above as deemed appropriate by the Committee

The Committee only became aware of the ACT Government inquiry into drone delivery systems in the ACT on 28 January and began preparation of this submission as a result.

Conclusion and Recommendations

In conclusion, BDOC welcomes the opportunity to make this submission and applauds the ACT Government's initiative in establishing this Inquiry. The BDOC position in the strongest terms is that we are greatly concerned by the impact drone delivery operations would have on individual dogs engaged in activity at the club, the risks to animal and human safety, and on our general ability to conduct classes and competitions.

In summary:

- BDOC wishes to see established a drone 'no fly zone' for drone deliveries within at least one kilometre over and around the BDOC club grounds that takes effect both now and in the future and is not limited to just Wing, but applies to all drone deliveries established in the ACT.
- We believe the operation of deliveries by drone would have a severe effect on individual dogs – which has been experienced and observed by BDOC members and members of other

clubs in the ACT during the Wing trial in Bonython and over or near the Tuggeranong Companion Dog Cub.

- We believe that drone delivery activities over or near our club would impact negatively on the club's general amenity and our ability to operate and conduct classes that contribute to the training and education of dog owners who join our club.
- We provide a valuable community service as evidenced by our membership numbers and our training philosophy, which attracts dog owners from across the north Canberra region to train and compete at our club.
- Drone deliveries near or over our club would also have a severe impact on regular dog sports competitions conducted at our club, which are attended by members of our own club, other ACT dog clubs and competitors from interstate clubs. Our competitions are conducted under the auspices of Dogs ACT and the Australian National Kennel Council. They attract visitors to the ACT and contribute not only to our club, but also to the ACT economy and reputation.

We ask the Inquiry to consider the following **Recommendations**:

1. BDOC therefore urges the ACT Government to consider the proven and implied negative impact the operation of deliveries by drone will have on BDOC, its members, their animals and our ability to continue to operate as a club and provide services to the north Canberra communities.
2. BDOC requests that the ACT Government and this Inquiry consider the establishment of extensive and adequate 'no fly' zones for drone deliveries over sensitive areas of community activity such as our club grounds, and other animal training and competition sites. Specifically we request no-fly zones be established with a one kilometre radius of the Belconnen Dog Obedience Club grounds, and the EPIC Precinct.
3. We also request that the ACT Government represents the best interests of community based organisations such as BDOC to the relevant federal authorities such as the Civil Aviation Safety Authority and other relevant bodies to ensure our rights, needs and ability to continue to operate are protected.

Thank you for your consideration and we would be happy to supply further details if required.

Submitted by Lisa Borthwick on behalf of **Christine Bates, BDOC President for the BDOC Committee and our members.**

BDOC Contact Information

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[REDACTED]

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