



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: 109

Date Authorised for Publication: 27 February 2019

Inquiry into drone delivery systems in the ACT

The ACT Equestrian Association Inc (ACTEA) welcomes the opportunity to contribute to the important consideration of the impact of delivery drones in the ACT. ACTEA is a recognised umbrella organisation representing 18 affiliated sporting and recreational horse riding groups in Canberra. ACTEA promotes the needs of the equestrian community to government and the community, works to ensure equestrian activities have access to suitable facilities for all disciplines and supports its affiliates on significant activities and issues. Based on a Rural Industry Research and Development Corporation report on the value of recreational horse riding, it is estimated that equestrian activities contributed around \$25 million to the ACT economy annually.

ACTEA has been concerned about drones for some time now. The ACT Government estimates there are 1700 recreational horses in the Territory living on government and private horse agistment on the edge of suburbia. Some horses paddocks, like Illoura and Curtin, are surrounded by suburbia. This agistment is linked by a system of recognised equestrian trails and the Bicentennial National Trail.

Horses are prey animals with a highly developed set of survival skills to prevent them becoming lunch; the fact that they have no natural predators in Australia has done nothing to diminish their natural instinct. A horse's hearing is much keener than humans. Horses can hear low to very high frequency sound, in the range of 14 Hz to 25 kHz (human range = 20 Hz to 20 kHz). Their ears can rotate nearly 180 degrees from front to back. They can hear sounds from greater distances than we can, several kilometres away. They are more reactive to loud noises than we are. Noises from unfamiliar directions, like right above them, can be confusing. Horses grazing in the vicinity of drones register the sound of the drone before the machine even becomes visible to the human eye. A horse panicked by a sound it cannot understand can throw its rider, bolt, end up in traffic, injure itself and those around it.

Since 2017 the ACT Equestrian Association has received reports of recreational drones causing concern to the Canberra equestrian community:

- flying over herds in government horse paddocks causing them to bolt, in one case while a person was with the herd
- flying over a person on horseback in a public place causing her horse to shy
- flying over a pony club rally day event causing horses to shy and throw their young riders.

This is no small matter here or in the rest of the world.

- In October 2015, a horse from West Yorkshire Police's mounted unit was spooked by a drone flying close to his paddock. He tried to jump a fence and collided with a wooden post. He died on his way to the vet.

-In January 2017 a horse attached to a carriage outside a luxury hotel in Zermatt, Switzerland, had to be put down after being spooked by a drone overhead. The

horse took flight at such a pace that it suffered fatal fractures.

- In the United States there have been reports of drones being used to deliberately frighten horses.

The *Canberra Times* in July 2017 reported Project Wing's larger, licenced drones frightening horses near Fernleigh Park at the beginning of their delivery trials.

In an attempt to find some way to control drones flying over horses ACTEA spoke to the ACT Rural Police and the Rural Officers in ACT Parks & Conservation. We were told that there were no actual laws prohibiting the offending behaviour so no one was committing a crime by harassing horses on public land and it is almost impossible to police. After some effort we managed to get a meeting with CASA in 2017 to talk about the issue. They said, basically, that drone regulation had got away from them and they did not have the resources to police recreational drones and were not much interested in any case unless their activities threatened commercial flying space. The Guidelines for flying recreational drones in 2017 did not prohibit harassing animals and still does not.

We hold out some hope that the new proposal to enforce registration of drones weighing 250g and above will at least provide an educational opportunity for those users who until now have just ignored the Operating Guidelines if they even know they exist.

The arrival of Project Wing raised the issue to another level. Their drones are big, very loud and high pitched, almost designed to disturb a horse. Until now, because of the restrictions CASA has placed over their operation, Project Wing has had a limited flying area. ACTEA has spoken with the project team frequently since they arrived in Canberra to express our concerns and have been able to provide them with information about the horse riding networks in their area of operation. From both Bonython and Mitchel it has, and will, be possible for them to avoid paddocks and recreational riding routes.

Our concerns are twofold:

- that, if allowed to continue, Project Wing will move to delivering across the ACT. To minimise public anger at the intrusion on the amenity of innocent bystanders it is probable that the drones will be programmed to use routes over public open space as much as possible – which is where recreational horse riding takes place and
- that, all efforts by project Wing to reduce the noise impact of their drones will be aimed solely at human hearing and do little to reduce the impact on equine aural characteristics

A great many of the equestrian trails in Canberra are marked on the Canberra UBD and it is easy to see how the likelihood of having your horse panicked by a drone anytime you went for ride is of great concern. As we cannot imagine that Project Wing will be given a monopoly over deliveries, the risk to the life and limb of both horses and their riders will be compounded exponentially, should this technology be given approval. Potentially an entire recreational activity could be made untenable because some people are too lazy to go out for a cappuccino.

Apart from the horrendous noise, a concern about these delivery drones is that their routes are pre-programmed and we are told they do not carry cameras. In this case there is no way a drone could be operated to take evasive action if it came across horses in the space below it. Currently, drones cannot be operated blind, they either have to be in the line of sight of the operator or have cameras. Project Wing is seeking to operate a machine that will take no cognisance of its environment or the impact of its passing. Having cause havoc it would just pass on.

Despite our conversations with Project Wing and their willingness to talk to us ACTEA is not at all confident the enthusiastic proponents of this technology understand its real impact on defenceless people and animals subjected to its noisy intrusion. At a recent meeting we were told that, as most recreational drones would soon have to be registered, horse riders would be able to use a (yet to be developed) Google ap which would record the registration number of an offending drone which could then be reported to CASA. We were left wondering which hand you would be using to activate the ap while you struggled to control a panicked 500 kilogram animal. Perhaps you are meant to do that while lying on the ground listening to your precious horse gallop off into the distance?

The complaints made by the residents of Bonython about the impact these machines have had on their right to peaceful enjoyment of their homes in the Bush Capital are very telling. The message the government is sending by its silence on this matter is that it puts the possibility of a financial benefit from a relationship with Google over the amenity of its rate payers.

ACTEA believes there is a place for drone technology in scientific research, land use management, stock management and even emergency services. But it should always be used in the hands of or with the permission of the owners of land over which these things fly and with the greatest respect to the privacy of those land owners. If we do not limit this technology now, it will become a monster very difficult to put back in its box.

ACT Equestrian Association Inc
PO Box 4 Curtin ACT 2605

Contact:

