

## **DfT Drone Consultation - BGA Comments**

The British Gliding Association has submitted a response to the DfT online drone consultation as well as these additional comments;

We understand that government are trying to get ahead of what could be a sustained growth in the operation of small leisure drones, and in due course larger commercial drones.

Other than being better informed, ground controlled within visual range and less than 400ft operations can surely continue unchanged. These valuable 'local' applications as seen today will probably remain relatively small in number and their modus operandi probably presents negligible risk to others and to themselves provided they are kept out of immediate vicinity of aerodromes and airports. The 'beyond visual range' drone operations present a more challenging scenario. While it isn't our place to provide the solution to the full scope of this, we offer the following statements;

1. Data is needed to properly understand the risks posed by drones so that a risk based and proportionate response can be developed.
2. Where drones are 'piloted' by someone within (say) 500m and flying below 400AGL, no change required (this covers the sort of use we see today such as photography, roof surveys, possibly transmission line inspections, leisure / model flying, etc).
3. Remote/autonomous drone operating outside controlled airspace and above 400AGL must have a 'see and avoid' capability which does not rely on electronic identification in other, non-drone aircraft (this covers the military and any high capability and relatively long range applications).
4. Remote/autonomous drones below 400ft must have electronic identification to the extent required to avoid collision with other drones or into obstacles for whatever drone traffic management system is eventually developed.
5. Unless the drone traffic has visual see and avoid capability, drone requirements should not result in leakage of drone traffic into airspace frequently used by manned traffic. As noted in our response to the online consultation, there is no safety justification for mandating electronic identification of manned aircraft in all airspace. The BGA is extremely concerned that a mandate for electronic identification of gliders and other manned aircraft represents a disproportionate approach not justified by safety-related statistics. The BGA believes that mandated electronic identification of all manned aircraft would give rise to significant economic and other burdens for small businesses and individuals and has the potential to threaten the fundamental viability of the sport of gliding in many parts of the UK. The BGA can supply further data if required.

We hope that is helpful.