



Explanatory Note to ED Decision 2025/018/R

issued in accordance with Article 4(2) of MB Decision No 01-2022

Regular update of the AMC and GM to Commission Implementing Regulation (EU) 2019/947 *Operation of drones in the ‘open’ and ‘specific’ category* AMC & GM to Regulation (EU) 2019/947 — Issue 1, Amendment 3

RMT.0730 — SUBTASK 3

WHAT THIS DECISION IS ABOUT		
<p>This Decision issues amendments to the acceptable means of compliance (AMC) and guidance material (GM) to Implementing Regulation (EU) 2019/947 in order to introduce the latest version of the Specific Operations Risk Assessment (SORA) 2.5 package, developed by the Joint Authorities for Rulemaking on Unmanned Systems (JARUS).</p> <p>The aim is to introduce simplifications while maintaining a high level of safety for the operation of unmanned aircraft systems (UAS) in the ‘specific’ category. Additionally, the aim is to enhance the level of harmonisation as regards the implementation of the Regulation and promote a level playing field.</p>		
REGULATION(S) INTENDED TO BE AMENDED	ED DECISION(S) INTENDED TO BE AMENDED	
n/a	ED Decision 2019/021/R ‘ AMC & GM to Commission Implementing Regulation (EU) No 2019/947 ’	
AFFECTED STAKEHOLDERS		
UAS operators (private and commercial); national competent authorities; UAS maintenance organisations; UAS maintenance training organisations; UAS continuing airworthiness management organisations; UAS maintenance licence holders; UAS manufacturers; other airspace users (manned aircraft); general public		
WORKING METHODS		
Development	Impact assessment(s)	Consultation
By EASA with external support	Light	Focused (Advisory Bodies) — NPA
RELATED DOCUMENTS / INFORMATION		
<ul style="list-style-type: none">— ToR RMT.0730 - Regular update of the acceptable means of compliance and guidance material to Commission Implementing Regulation (EU) 2019/947 on the rules and procedures for the operation of unmanned aircraft EASA— ED Decision 2022/002/R - Regular update of the AMC & GM to Regulation (EU) 2019/947: AMC & GM to Regulation (EU) 2019/947 — Issue 1, Amendment 2 AMC & GM to the Annex to Regulation (EU) 2019/947 — Issue 1, Amendment 2 EASA— NPA 2024-107		
PLANNING MILESTONES: Refer to the latest edition of the EPAS <i>Volume II</i> .		



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1. About this Decision

1.1. How this regulatory material was developed

The European Union Aviation Safety Agency (EASA) identified the need to mitigate a safety risk and to support the uniform implementation of Implementing Regulation (EU) 2019/947 (as described in Chapter 2), and after having assessed the impacts of the possible intervention means, identified rulemaking as the necessary intervention action.

This rulemaking activity is included in the 2025 edition of Volume II of the European Plan for Aviation Safety (EPAS) 2024¹ under Rulemaking Task (RMT).0730².

The text of this Decision is based on the Specific Operations Risk Assessment (SORA) 2.5 package³ published by the Joint Authorities for Rulemaking on Unmanned Systems (JARUS) and consulted through the JARUS website. All comments, including those provided by European stakeholders, were addressed and EASA participated in their review and assessment. The CRD is available on the JARUS website⁴. EASA adapted the JARUS version of the SORA to the peculiarities of the operations conducted in the European skies, in line with Regulation (EU) 2018/1139⁵ (the Basic Regulation). With this Decision, AMC1 to Article 11 is amended to include the European version of SORA 2.5. Moreover, some additional AMC and GM material is amended to maintain consistency with SORA 2.5 introduced in the European Union regulatory framework.

This Decision has been developed according to the Rulemaking Procedure⁶, as well as in accordance with the objectives and working methods described in the Terms of Reference (ToR) for this RMT.

Considering that JARUS SORA 2.5 was already publicly consulted by JARUS, the draft regulatory material was consulted with the EASA Advisory Bodies through NPA 2024-107 'Regular update of the AMC & GM to Commission Implementing Regulation (EU) 2019/947 | Operation of drones in the 'open' and 'specific' category | AMC & GM to Regulation (EU) 2019/947 — Issue 1, Amendment 3' (RMT.0730 — Subtask 3)⁷.

¹ <https://www.easa.europa.eu/en/document-library/general-publications/european-plan-aviation-safety-epas-2024>

² [ToR RMT.0730 - Regular update of the acceptable means of compliance and guidance material to Commission Implementing Regulation \(EU\) 2019/947 on the rules and procedures for the operation of unmanned aircraft | EASA \(europa.eu\)](#)

³ [Publications – JARUS \(jarus-rpas.org\)](#)

⁴ <http://jarus-rpas.org/wp-content/uploads/2024/10/SORA-v2.5-External-Comment-Response-Document.xlsx>

⁵ Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (<http://data.europa.eu/eli/reg/2018/1139/oj>).

⁶ EASA is bound to follow a structured rulemaking process as required by Article 115(1) of Regulation (EU) 2018/1139. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the 'Rulemaking Procedure'. See MB Decision No 01-2022 of 2 May 2022 on the procedure to be applied by EASA for the issuing of opinions, certification specifications and other detailed specifications, acceptable means of compliance and guidance material ('Rulemaking Procedure'), and repealing Management Board Decision No 18-2015 ([EASA MB Decision No 01-2022 on the Rulemaking Procedure, repealing MB Decision 18-2015 \(by written procedure\) | EASA \(europa.eu\)](#)).

⁷ <https://www.easa.europa.eu/en/document-library/notices-of-proposed-amendment/focused-consultations/npa-2024-107>



EASA reviewed the comments received and duly considered them for the finalisation of the regulatory material presented here.



2. In summary — why and what

2.1. Why we need to act

The core element of UAS operations conducted in the ‘specific’ category is the risk assessment that UAS operators are required to conduct. In Issue 1 of the AMC and GM to Implementing Regulation (EU) 2019/947, issued with Decision 2019/021/R⁸, the risk assessment methodology, known as SORA (specific operations risk assessment), was established at AMC level. After nearly four years of applying this methodology, UAS operators and NAAs identified the need for improvements, particularly with regard to resolving ambiguities and simplifying certain procedures.

2.2. What we want to achieve — objectives

The overall objectives of the EASA system are defined in Article 1 of the Basic Regulation. The regulatory material presented here is expected to contribute to achieving these overall objectives by addressing the issue described in Section 2.1.

More specifically, with the regulatory material presented here, EASA intends to:

- support the safe, efficient and harmonised implementation of Implementing Regulation (EU) 2019/947;
- promote a level playing field.

2.3. How we want to achieve it — overview of the amendments

The SORA 2.5 package includes amendments to the Main Body and to Annexes A, B and E. Additionally, it introduces Annex I and F. The amendments made to SORA 2.5 are summarised in the explanatory note⁹ published by JARUS.

AMC1 to Article 11 is replaced with the European version of SORA 2.5. Compared to the JARUS version, EASA has made limited amendments to address European-specific requirements:

- The detailed requirements on cybersecurity that were included in JARUS SORA 2.5 have been removed from the EASA version. After a thorough analysis of the JARUS proposal, these requirements have been deemed insufficiently proportionate. A report addressing this has been developed and submitted to JARUS for consideration in future revisions. However, EASA emphasises the importance of conducting a cybersecurity vulnerability assessment. This assessment is particularly recommended for operations classified with a Specific Assurance and Integrity Level (SAIL) above III.
- The identification of ‘guidance’ and ‘requirement’ in the JARUS SORA Main Body has been removed because these terms do not align with the way regulations are presented within the EU system. It is important to note that SORA is considered acceptable means of compliance.
- The use of the term ‘applicant’ has been replaced with the identification of the organisation expected to comply with the requirement. In most cases, this organisation is the UAS operator,

⁸ [AMC & GM to Commission Implementing Regulation \(EU\) 2019-947 — Issue 1 | EASA](#)

⁹ <http://jarus-rpas.org/publications/>



the design organisation or the production organisation. The term ‘applicant’ has been retained in requirements that apply to multiple organisations.

- According to the Basic Regulation, the competence for verifying compliance with production, operational and training aspects lies with the national aviation authorities (NAAs). Meanwhile, the competence for design aspects is assigned to the European Commission and is exercised through EASA. Consequently, the JARUS SORA has been amended to incorporate the following requirements:
 - When issuing an operational authorisation for UAS operations up to SAIL III, NAAs may collect evidence from UAS operators. This evidence is produced by the organisation responsible for designing the UAS and pertains to the design-related Operational Safety Objectives (OSOs). For SAIL levels up to III, these are mostly declarations.
 - For UAS intended to be used in operations classified under SAIL IV, UAS design organisations are required to obtain a design verification report (DVR) issued by EASA. This requirement also applies when technical mitigation means (e.g. M2) or containment measures with a high level of robustness are used.
 - For UAS intended to be used in operations classified under SAIL V and VI, a type certificate in accordance with Part 21 of Regulation (EU) No 748/2012 is required.
- It has been clarified that competent authorities have the flexibility to use various approaches when reviewing supporting evidence for mitigation measures and operational safety objectives in an application. These approaches include the following:
 - Directly assessing the evidence themselves.
 - Employing ‘recognised entities’ to evaluate the evidence and provide recommendations to the competent authority. In such cases, the competent authority retains the responsibility for determining the final assessment. They also have the discretion to define the process for recognising such entities.
 - Employing ‘designated entities’, which should be understood as ‘qualified entities’ in accordance with Article 69 of the Basic Regulation. EASA will propose to replace the term ‘designated’ with ‘qualified’ (as defined in Article 69 of the Basic Regulation in the next NPA proposing amendments to Implementing Regulation (EU) 2019/947, planned for 2025). These entities must comply with the ‘essential requirements for qualified entities’ as outlined in Annex VI to the Basic Regulation. Additionally, they may be granted the privilege by the competent authority to issue a certificate of operational authorisation.
- The definition of the three levels of robustness (i.e. ‘low’, ‘medium’ and ‘high’) has been improved to clarify that the applicant is in any case required to achieve the level of integrity and produce or obtain any necessary evidence required. Moreover, each level of robustness has been amended as follows:
 - For ‘low’ robustness level, a declaration is sufficient. The competent authority may review the evidence during oversight.
 - For ‘medium’ robustness level, the applicant is required to include in the declaration form a reference to the evidence. If the applicant decides not to use a means of compliance published by EASA, then the evidence should be submitted to the competent authority



during the application process. In any case, the competent authority may review the evidence during oversight.

- For ‘high’ robustness level, the verification of the evidence by the authority or a third party is required before issuing the operational authorisation.
- When determining the size of the operational volume, the assessment of the total system error has been relocated from the flight geography to the contingency volume. This change aims to resolve an inconsistency with the examples provided in Annex A.
- The terminology has been standardised across EU documentation using:
 - fixed-wing configurations, including aeroplanes, kites, gliders, etc.;
 - rotorcraft-helicopter, including all vertical-lift configurations with up to two rotors;
 - rotorcraft-gyroplane, referring to special configuration with an unpowered rotor;
 - VTOL-capable aircraft (VCA), including rotorcraft, including vertical-lift configurations with three or more rotors as well as fixed-wing aircraft capable of vertical take-off and landing;
 - lighter-than-air configurations, including airships, hot-air balloons, etc.;
 - UAS flight manual: this is the document provided by the design organisation, replacing all instances of ‘manufacturer’s instructions’.
- The term ‘EVLOS’ (extended visual line of sight) has been removed throughout the SORA documentation as it is not referenced in EU regulations. It has been replaced with ‘BVLOS with AO’ (beyond visual line of sight operation with airspace observer), which is considered equivalent. Additionally, the necessity to develop procedures and establish correct phraseology between the remote pilot and the airspace observer has been emphasised.
- Before opting to use SORA to assess the risk of an operation (as outlined in Section 3.1 ‘Introduction to the SORA walkthrough’), the UAS operator should verify whether the exclusion criteria for small, tethered aircraft, as detailed in Annex I to the Basic Regulation, apply to the UA being used. Furthermore, the concept of harmless UAS has been removed as it is already incorporated within the ‘open’ category under UAS with class label C0.
- In Step #3 ‘Determination of the final ground risk class (GRC) (optional)’, a note to mitigation M1(B) for ‘high’ robustness level has been added saying that in some cases the competent authority may accept a reduction of the intrinsic ground risk class (iGRC) of more than two points.

This may be the case when the competent authority requires UAS operators to use static population density maps, derived by census data, and corrected with higher population density values for those areas where the census maps are likely to be inaccurate. For example, census maps typically categorise commercial, recreational and industrial areas as unpopulated, even though these areas may experience high population density at certain times of the day. To ensure that the UAS operator does not underestimate the population density, the competent authority may decide to assign a high population value to these areas, corresponding to a credible population density value. However, since the population density in these areas can vary significantly throughout the day or time of the year, the UAS operator may be permitted to



assess the actual population density at the time of the operation. If the assessment shows a substantial lower density, the UAS operator may be allowed to claim a credit higher than 2. This is the approach used to develop the population density maps in EASA Member States¹⁰ provided by the IAM HUB.

- In the JARUS SORA 2.5 version, the strategic mitigations for visual line of sight (VLOS) defined in Step #5 ‘Application of strategic mitigations to determine residual ARC (optional)’¹¹ have been extended to include scenarios where the airspace observer (AO) is positioned alongside the remote pilot. It is EASA’s opinion that the mitigation should remain valid even when the AO is located at a distance from the remote pilot to extend the operational range, as utilised in Standard Scenario (STS) 02. The section has been revised to encompass operations where one or more AOs are situated in such a way that the UA is consistently within the VLOS of either the remote pilot or the AO(s). It is essential that the AO(s) can scan the sky and maintain real-time communication with the remote pilot, providing information about other manned or unmanned aircraft in the operational area.
- In Step #8 ‘Determination of Containment requirements’¹², it is clarified that when using a UA that weighs less than 250 grammes, containment is always considered low. The reference weight for this criterion is the take-off mass.
- In Annex B¹², the text related to M2 mitigation has been slightly amended to reflect MoC SC.Light-UAS.2512¹³ published by EASA. Specifically, the requirements for the level of integrity of criterion #1 have been modified using MoC text, which is considered clearer and equivalent.
- In operational safety objective (OSO) #1 it has been clarified that an organisation that holds a Light UAS operator certificate (LUC) according to Part C of Implementing Regulation (EU) 2019/947, an air operator certificate (AOC) according to Regulation (EU) No 965/2012, or an approval according to Subpart J or P of Annex I (Part 21) to Regulation (EU) No 748/2012, is considered sufficient to meet the ‘high’ robustness level required.
- In OSO #2, titled ‘UAS designed and produced by a competent and/or proven entity’, the requirement has been divided into two distinct criteria. One criterion pertains to the design organisation, while the other focuses on the production organisation. This division reflects the allocation of responsibilities within the EU system between NAAs and EASA. It is important to note that this division was already present in EASA SORA 2.0.
- In OSO #3, the criteria for the UAS operator and the design organisation have been separated. Additionally, maintenance inputs that the design organisation should provide to the UAS operator have been incorporated into a new criterion. This amendment does not introduce any changes to the content, as the JARUS SORA already indicated in the OSO table that criterion #1 applied to both the UAS operator and the design organisation. EASA’s update serves solely to clarify this distinction. Furthermore, the title of OSO #3 has been revised to read ‘Maintenance of UAS’ to accurately reflect this approach.

¹⁰ [Population density in EASA Member States - Exploring population density in your country | EASA](#)

¹¹ [SORA-v2.5-Main-Body-Release-JAR_doc_25.pdf](#)

¹² [SORA-v2.5-Annex-B-Release-JAR_doc_27pdf.pdf](#)

¹³ [Means of Compliance for mitigation means M2 Ref. AMC to article 11 of Regulation 2019/947 | EASA](#)



- The level of robustness for OSO #4 is inconsistent with the definitions in Section 2.4 ‘Robustness’¹⁴ since, in the EU system, a DVR is required for UAS operated in SAIL IV, and a type certificate is required for SAIL V and VI under Annex I (Part 21) to Regulation (EU) No 748/2012. To maintain consistency, the level of robustness for SAIL IV is set to ‘medium’ whereas for SAIL V the original ‘high’ is kept, without amending the requirements in Annex E¹⁵ for OSO #4.
- OSO #6 requires some activity by both the UAS operator and the design organisation to ensure that the C3 link characteristics are appropriate for the operation. Therefore, without adding any new requirements, the OSO has been split in two criteria.
- OSO #7 was shown in the JARUS version to be applicable to both the UAS operator and the design organisation. In reality, the requirement defined in OSO #7 consists of the responsibility of the UAS operator to verify that the UAS is in the correct configuration as defined by the UAS designer in the UAS flight manual. Only UAS operators are responsible to comply with this requirement.
- In OSO #8, a requirement for the UAS designer to develop a UAS flight manual is missing. However, the OSO table provided in the SORA Main Body assigns also to the UAS designer the responsibility to comply with criterion #1. In order to better clarify the responsibility of the UAS operator and the UAS designer, a new criterion has been created and named ‘1’ to include only the UAS designer requirement, while the remaining criteria apply to the UAS operator.
- According to Table 14 ‘Recommended operational safety objectives (OSO)’¹⁴ of the Main Body, OSO #20 is assigned to both the UAS operator and the design organisation; however, it is a UAS designer responsibility. Therefore, Table 4 has been amended.
- The reference to functional-test-based (FTB) approach has been removed from OSO #4 for SAIL IV as it is only acceptable up to SAIL III, as explained in the FTB means of compliance published by EASA¹⁶.
- The JARUS SORA 2.5 package includes Annex F¹⁷, which describes the ground risk model and provides mathematical justifications for the ground risk classes used in SORA. This document is not intended for routine use by UAS operators but should be considered by operators with advanced skills when proposing deviations from the ground risk tables in the SORA Main Body. The most commonly used formula is for calculating the critical area tailored to a defined UAS, which has been made available on the IAM HUB through an automated algorithm.
- The definition of examples of atypical airspace is not yet fully harmonised among Member States. For this reason, a note has been added to the example of the definition I.18 provided in Annex I of the EASA SORA 2.5, explaining that the values may differ among Member States.

In addition, it has been necessary to amend other AMC and GM due to the new elements of SORA 2.5:

- AMC1 to Article 12(2)(a) has been added to reflect the definition of level of robustness provided in SORA 2.5. For a VLOS UAS operation up to SAIL II, the competent authority may only validate

¹⁴ [SORA-v2.5-Main-Body-Release-JAR_doc_25.pdf](#)

¹⁵ [SORA-v2.5-Annex-E-Release.JAR_doc_28pdf.pdf](#)

¹⁶ [Final Means of Compliance to Special Condition Light UAS for UAS operated in SAIL III and below “FTB MOC SC Light-UAS” - Issue 01 | EASA](#)

¹⁷ [SORA-v2.5-Annex-F-Release.JAR_doc_29pdf.pdf](#)



the compliance matrix provided by the UAS operator. The competent authority may authorise the UAS operation without receiving the operations manual.

- AMC1 UAS.SPEC.030(2), which provides the form for the issue of operational authorisations, has been amended to reflect the form in Chapter A.2 of Annex A¹⁸ of SORA 2.5. In addition, the following fields have been amended to facilitate the competent authority's assessment of an application for an operational authorisation:
 - the name of the accountable manager has been removed since the relevant information is already provided by the UAS operator during the registration phase;
 - new field to indicate whether material is dropped;
 - new field to indicate whether the remote pilot is permitted to control multiple UA simultaneously along with specifying the maximum number; additionally, the UAS operator has the option to make use of a pool of remote pilots controlling multiple UA;
 - new field to indicate the type of C2 link used;
 - new field to indicate the size of the adjacent ground area;
 - new field to indicate the type of the propulsion system of the UA;
 - new field to indicate whether the UAS is tethered;
 - new fields to indicate whether the UA is equipped with e-conspicuity and green flashing light;
 - declaration of compliance with the remaining points listed in UAS.SPEC.050;
 - overview of the risk assessment as defined in Chapter A.2 of Annex A¹⁷ of the JARUS SORA 2.5.
- AMC1 UAS.SPEC.030(3)(e) has been amended to require the development of an operations manual with the structure defined in Chapter A.3 of Annex A¹⁸ to AMC1 Article 11 (SORA). Examples of operations manuals are available on the EASA website¹⁹.
- AMC2 UAS.SPEC.030(3)(e) has been amended to reflect the changes to OSO #8 and the deletion of OSO #11, #14 and #21.
- AMC3 UAS.SPEC.030(3)(e) has been amended to reflect the changes in SORA regarding the ERP robustness level.
- GM1 UAS.SPEC.030(3)(e) has been deleted since all the information regarding the operations manual is included in Annex A to AMC1 Article 11 (SORA).
- AMC1 UAS.SPEC.040(1), which provides the form for the issue of operational authorisations, has been amended to reflect the changes contained in SORA 2.5. Additionally, a few fields have been amended:

¹⁸ [SORA-v2.5-Annex-A-Release.JAR_doc_26-pdf.pdf](#)

¹⁹ [Specific Category — Civil Drones | EASA](#)



- the height of the operational volume has been merged with the identification of the locations since they may have different heights; the locations may be identified using a different methodology such as a list of coordinates of .kml or .kmz file);
 - new field to indicate whether material is dropped;
 - new field to indicate the final ground risk class;
 - new field to indicate whether the remote pilot is permitted to control multiple UA simultaneously along with specifying the maximum number; additionally, the UAS operator has the option to make use of a pool of remote pilots controlling multiple UA;
 - the operations manual (OM) reference has been deleted to avoid the need for revision of the operational authorisation when the OM is amended for a reason that does not affect the operation; the compliance matrix file reference already keeps track of the OM reference as well as of the compliance with all the applicable requirements. Therefore, it is sufficient to keep track of the compliance matrix file only.
 - new field to indicate the e-conspicuity system that must be active during the UAS operation;
 - new field to indicate the type of C2 link.
- Predefined risk assessments (PDRAs — AMC2 to AMC6 to Article 11) have not been adapted to reflect the changes defined in SORA 2.5. JARUS is in the process of finalising them and will also introduce a new PDRA format, which should improve usability. The new format is expected to be published by JARUS in fall 2025. EASA may then issue a new Decision incorporating the new PDRAs into the EU regulatory framework.

The EASA Decision issuing SORA 2.5 will be immediately applicable, thus allowing UAS operators to apply for operational authorisations using that version. However, Member States may still accept applications for operational authorisations using SORA 2.0 since operational authorisations issued using both SORA 2.0 and 2.5 comply with Article 11 of Implementing Regulation (EU) 2019/947. Member States may define the period during which they will accept applications using SORA 2.0. EASA recommends a period of six months. This approach may be useful for those UAS operators that are in the process of finalising applications for operational authorisations at the time of publication of this Decision.

For some cases, SORA 2.0 is more conservative than SORA 2.5, particularly regarding containment requirements. Therefore, UAS operators may find it advantageous to update their authorisations to comply with SORA 2.5. Each Member State may define the validity of operational authorisations issued under SORA 2.0.



2.4. What are the stakeholders' views

JARUS held a public consultation on its SORA 2.5 proposal, and all the comments received were addressed and evaluated as described in the related CRD²⁰.

EASA, on the other hand, consulted its Advisory Bodies (UAS TEB and UAS associations) on the draft AMC and GM.

During the Advisory Body consultation of the draft AMC and GM, EASA received 855 comments from NAAs, UAS manufacturers and UAS operators.

Most of the comments received suggested improvements to enhance the clarity of responsibilities among UAS operators, design organisations and production organisations. The focus was on identifying the specific evidence each party is expected to provide, without altering any existing requirements.

Some additional improvements to the SORA were suggested. However, the majority of the commentators emphasised the importance of maintaining consistency with the JARUS version. They also expressed their support as regards the potential future transferability of products or services. As a result, it has been decided to discuss these proposed improvements at JARUS level as part of the development of SORA 3.0.

²⁰ <http://jarus-rpas.org/wp-content/uploads/2024/10/SORA-v2.5-External-Comment-Response-Documents.xlsx>
[SORA-v2.5-External-Comment-Response-Documents.pdf](#)

3. Expected benefits and drawbacks of the regulatory material

EASA assessed that intervention was required and that new and/or amended AMC and GM material is necessary to effectively address the issues described in Section 2.1 because the objectives described in Section 2.2 cannot be achieved effectively by non-regulatory action.

Keeping the risk assessment methodology unchanged would lead to a non-harmonised implementation of the UAS Regulation due to the ambiguity of some parts of the text. The final amendments improve clarity without creating any drawbacks.

The regulatory material has been developed according to the better regulation principles, and in particular the regulatory fitness principles.

In particular, the regulatory material is expected to reduce:

- existing regulatory burden by simplifying the conditions that require UAS operations to comply with a high level of containment;
- the regulatory burden created by amended requirements to the minimum by allowing those UAS operators that are already authorised under SORA 2.0 to keep the validity of their operational authorisations for 2 years.



4. Monitoring and evaluation

EASA plans to monitor whether the objectives described in Section 2.2 will be achieved with the subject regulatory material by collecting:

- statistics from NAAs on the number of operational authorisations issued;
- feedback on the authorisation process from NAAs and UAS operators during Advisory Body meetings;
- usage and occurrence data by UAS operators.



5. Proposed actions to support implementation

In order to support affected stakeholders in the implementation of the subject regulatory material, EASA plans to take the following actions:

- focused communication for Advisory Body meeting(s) (MAB, UAS TeB, D.CSTG);
- promotion material, including videos, published on the EASA website;
- dedicated thematic webinars.



6. References

- Commission Implementing Regulation (EU) 2019/947 of 24 May 2019 on the rules and procedures for the operation of unmanned aircraft (OJ L 152, 11.6.2019, p. 45)

