

## **Acceptable Means of Compliance and Guidance Material to Regulation (EU) 2019/947, Issue 1, Amendment 3**

### **‘AMC and GM to Regulation (EU) 2019/947— Issue 1, Amendment 3’**

This document shows deleted text, new or amended text as follows:

- deleted text is ~~struck through~~;
- new or amended text is highlighted in **blue**;
- an ellipsis ‘[...]’ indicates that the rest of the text is unchanged.

Annex I to ED Decision 2019/021/R of the Executive Director of the Agency of 9 October 2019 is amended as follows:

## LIST OF ABBREVIATIONS

[...]

**DVR** design verification report

[...]

**GDOP** geometric dilution of precision

[...]

**PDOP** position dilution of precision

## GM1 AMC1 Article 11 Rules for conducting an operational risk assessment

### GENERAL

The operational risk assessment required by Article 11 of the UAS Regulation may be conducted using the methodology described in AMC1 Article 11. This methodology is basically the specific operations risk assessment (SORA) developed by JARUS. Other methodologies might be used by the UAS operator as alternative means of compliance.

Unmanned free balloons are unmanned aircraft and shall thus comply with Regulation (EU) 2019/947. For this type of aircraft, compliance with Appendix 2 to Regulation (EU) No 923/2012 is considered an acceptable means of compliance with Article 11.

[...]

## AMC1 Article 11 Rules for conducting an operational risk assessment

### SPECIFIC OPERATIONS RISK ASSESSMENT (SORA) (SOURCE JARUS SORA V2.0)

[...]

#### 1.5 Roles and responsibilities

[...]

- (b) UAS operator — The UAS operator is responsible for the safe operation of the UAS, and hence the safety risk analysis. In accordance with Article 5 of the UAS Regulation, the UAS operator must substantiate the safety of the operation by performing the specific operational and risk assessment, except for the cases defined by the same Article 5. Supporting material for the assessment may be provided by third parties (e.g. the manufacturer of the UAS or equipment, U-space service providers, etc.). The UAS operator obtains an operational authorisation from the competent authority/ANSP. A UAS operator having a LUC cannot be

granted the privilege to assess compliance with the design requirements when a UAS with a design verification report<sup>1</sup> (DVR) or a (restricted) type certificate ((R)TC) is required.

[...]

- (f) Competent authority — The competent authority that is referred to throughout this AMC is the authority designated by the Member State in accordance with Article 17 of the UAS Regulation to assess the safety case of UAS operations and to issue the operational authorisation in accordance with Article 12 of the UAS Regulation. The competent authority may accept an applicant's SORA submission in whole or in part. Through the SORA process, the applicant may need to consult with the competent authority to ensure the consistent application or interpretation of individual steps. The competent authority must perform oversight of the UAS operator in accordance with paragraphs (i) and (j) of Article 18 of the UAS Regulation. According to Regulation (EU) 2018/1139<sup>2</sup> (the EASA 'Basic Regulation'), EASA is the **competent** authority ~~competent~~ in the European Union to verify compliance of the UAS design and its components with the applicable rules, while the authority that is designated by the Member State is **the** competent **authority** to verify compliance with the operational requirements and compliance of the personnel's competency with those rules. The following elements are related to the UAS design:

- OSOs #02 (**limited to design criteria**), #04, #05, #06, #10, #12, #18, #19 (limited to criterion #3), #20, **#23 (limited to criterion #1)** and #24;
- ~~M1 mitigation (tethered operations): criterion #1 and~~ M2 mitigation **for ground risk: (criterion #1)**;
- Verification of the system to contain the UAS ~~within the operational volume to avoid an infringement of the adjacent areas on the ground and/or adjacent airspace~~, in accordance with step #9 of the SORA process.

~~When according to the SAIL or to the claimed mitigation means, the level of assurance of the above OSOs and/or mitigation means is 'high' (i.e. SAIL V and VI), a verification by EASA is required according to~~ **If the UAS operation is classified as SAIL V and VI, compliance with the design provisions defined by SORA (i.e. design-related OSOs, mitigation means linked with the design and containment function) should be demonstrated through a type certificate (TC) issued by EASA according to Annex I (Part 21) to Regulation (EU) No 748/2012<sup>3</sup> as defined in Article 40(1)(d)**

<sup>1</sup> [https://www.easa.europa.eu/sites/default/files/dfu/guidelines\\_design\\_verification\\_uas\\_medium\\_risk.pdf](https://www.easa.europa.eu/sites/default/files/dfu/guidelines_design_verification_uas_medium_risk.pdf)

<sup>2</sup> 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) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1139>).

<sup>3</sup> Commission Regulation (EU) No 748/2012 of 3 August 2012 laying down implementing rules for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification

of Regulation (EU) 2019/945<sup>4</sup>. For the other OSOs and mitigation means, the competent authority **may verify compliance or may** defines which **entity** ~~third party~~ is able to verify compliance with them **as a third party**.

- (1) ~~If the level of robustness of the design-related OSOs and/or mitigation means is 'lower than 'high', the competent authority may still require a verification by EASA of the compliance of the UAS and/or its components with the design-related OSOs and/or mitigation means according to point Article 40(1)(d) of Regulation (EU) 2019/945. Similarly, also for UAS operators to which the competent authority granted a light UAS operator certificate (LUC), the terms of the approval may require to use a UAS that is verified by EASA when conducting operations for which the level of robustness of the design-related OSOs and/or mitigation means is lower than 'high'. In those cases, EASA will verify that the achievement of the design integrity level is appropriate to the related SAIL and to the mitigation means, when those means are applicable, and will issue a type certificate (TC) (or a restricted type certificate (RTC)) to the UAS manufacturer, which will cover all design-related OSOs, the design-related mitigation means, and the enhanced containment verification in accordance with Step #9, if that verification is applicable. Alternatively, the competent authority that issues the operational authorisation may accept a declaration by the UAS operator, who is responsible for compliance of the UAS with the design-related OSOs.~~ **If the UAS operation is classified as SAIL IV, compliance with the design-related SORA provisions (i.e. design-related OSOs, mitigation means linked with the design and containment function) should be demonstrated through a DVR issued by EASA. Evidence of compliance with the other OSOs and mitigations (not related to design) will be provided to the competent authority according to the level of robustness of the OSOs, that will assess them as part of the application for the operational authorisation.**
- (2) **If the UAS operation is classified as SAIL I, II or III, the competent authority may accept a declaration submitted by the UAS operator for the compliance with all OSOs and mitigations related to design. The competent authority may check the statements of the UAS operator, in particular with regard to the claimed level of integrity and robustness of the UAS for the considered SAIL.**
- (3) **Despite the SAIL, when the claimed level of robustness of the mitigation means M2 is high, the competent authority should require the operator to**

---

of design and production organisations (OJ L 224, 21.8.2012, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32012R0748&qid=1622557691925>).

<sup>4</sup> Commission Delegated Regulation (EU) 2019/945 of 12 March 2019 on unmanned aircraft systems and on third-country operators of unmanned aircraft systems (OJ L 152, 11.6.2019, p. 1) (<https://eur-lex.europa.eu/legalcontent/EN/TXT/?uri=CELEX:32019R0945>).

use a UAS with a DVR issued by EASA limited to compliance with those mitigation means<sup>5</sup>.

[...]

### 2.3.1 Step #2 – Determination of the intrinsic UAS ground risk class (GRC)

[...]

- (k) When evaluating the typical kinetic energy expected for a given operation, the applicant should generally use the airspeed, in particular  $V_{cruise}$  for fixed-wing aircraft and the terminal velocity for other aircraft. Specific designs (e.g. gyrocopters) might need additional considerations. Guidance useful in determining the terminal velocity can be found at <https://www.grc.nasa.gov/WWW/K-12/airplane/termv.html> <https://www1.grc.nasa.gov/beginners-guide-to-aeronautics/termvel/>.

[...]

### 2.5.2 Step #8 — Identification of the operational safety objectives (OSOs)

[...]

OSO number (in line with Annex E)		SAIL					
		I	II	III	IV	V	VI
	<b>Technical issue with the UAS</b>						
OSO#01	Ensure the UAS operator is competent and/or proven	O	L	M	H	H	H
OSO#02	UAS manufactured by competent and/or proven entity	O	O	L	M	H	H
OSO#03	UAS maintained by competent and/or proven entity	L	L	M	M	H	H
OSO#04	UAS developed to authority recognised design standards <sup>6</sup>	O	O	L	L	M	H
OSO#05	UAS is designed considering system safety and reliability	O	O	L	M	H	H
OSO#06	C3 link performance is appropriate for the operation	O	L	L	M	H	H
OSO#07	Inspection of the UAS (product inspection) to ensure consistency with the ConOps	L	L	M	M	H	H
OSO#08	Operational procedures are defined, validated and adhered to	L	M	H	H	H	H
OSO#09	Remote crew trained and current and able to control the abnormal situation	L	L	M	M	H	H
OSO#10	Safe recovery from a technical issue	L	L	M	M	H	H
	<b>Deterioration of external systems supporting UAS operations</b>						
OSO#11	Procedures are in-place to handle the deterioration of external systems supporting UAS operations	L	M	H	H	H	H

<sup>5</sup> If the UAS has a DVR covering the full design, this may cover also the mitigation means.

<sup>6</sup> In the case of experimental flights that investigate new technical solutions, the competent authority may accept that recognised standards are not met.

OSO number (in line with Annex E)		SAIL					
		I	II	III	IV	V	VI
OSO#12	The UAS is designed to manage the deterioration of external systems supporting UAS operations	L	L	M	M	H	H
OSO#13	External services supporting UAS operations are adequate for the operation	L	L	M	H	H	H
	<b>Human error</b>						
OSO#14	Operational procedures are defined, validated and adhered to	L	M	H	H	H	H
OSO#15	Remote crew trained and current and able to control the abnormal situation	L	L	M	M	H	H
OSO#16	Multi-crew coordination	L	L	M	M	H	H
OSO#17	Remote crew is fit to operate	L	L	M	M	H	H
OSO#18	Automatic protection of the flight envelope from human error	O	O	L	M	H	H
OSO#19	Safe recovery from human error	O	O	L	M	M	H
OSO#20	A human factors evaluation has been performed and the human machine interface (HMI) found appropriate for the mission	O	L	L	M	M	H
	<b>Adverse operating conditions</b>						
OSO#21	Operational procedures are defined, validated and adhered to	L	M	H	H	H	H
OSO#22	The remote crew is trained to identify critical environmental conditions and to avoid them	L	L	M	M	M	H
OSO#23	Environmental conditions for safe operations are defined, measurable and adhered to	L	L	M	M	H	H
OSO#24	UAS is designed and qualified for adverse environmental conditions	O	O	M	H	H	H

[...]

### 2.5.3 Step #9 – Adjacent area/airspace considerations

- (a) The objective of this section is to address the risk posed by a loss of control of the operation, resulting in an infringement of the adjacent areas on the ground and/or adjacent airspace. These areas may vary with different flight phases.
- (b) Safety requirements for 'basic containment' are:

~~1.~~ No probable<sup>7</sup> failure<sup>8</sup> of the UAS or any external system supporting the operation should lead to operation outside the operational volume.

<sup>7</sup> The term 'probable' needs to be understood in its qualitative interpretation, i.e. 'Anticipated to occur one or more times during the entire system/operational life of an item.'

<sup>8</sup> The term 'failure' needs to be understood as an occurrence that affects the operation of a component, part, or element such that it can no longer function as intended. Errors may cause failures, but are not considered to be failures. Some structural or mechanical failures may be excluded from the criterion if it can be shown that these mechanical parts were designed according to aviation industry best practices.

Compliance with the requirement above ~~should~~~~shall~~ be substantiated by a design and installation appraisal and ~~shall~~~~should~~ include at least:

- the design and installation features (independence, separation and redundancy);

*Note: Independence, separation and redundancy are not necessarily required, but they may be useful to substantiate the robustness of the containment system.*

- any relevant particular risk (e.g. hail, ice, snow, ~~electromagnetic~~~~electro-magnetic~~ interference, etc.) associated with the ConOps.

The competent authority may accept a declaration for the claimed integrity. The applicant declares that the required level of integrity has been achieved and supporting evidence is available.

- (c) The enhanced containment, ~~which consists in the following three safety requirements~~, applies to operations conducted:

- (1) either where the adjacent areas:

- (i) contain assemblies of people<sup>9</sup> unless the UAS is already approved for operations over assemblies of people; or
- (ii) are ARC-d unless the residual ARC of the airspace area intended to be flown within the operational volume is already ARC-d;

- (2) Or where the operational volume is in a populated area where:

- (i) M1 mitigation has been applied to lower the GRC; or
- (ii) operating in a controlled ground area.

- (d) The enhanced containment consists in the following safety requirements:

- (a) The UAS is designed to standards that are considered adequate by the competent authority and/or in accordance with a means of compliance that is acceptable to that authority such that:

- (1) the probability of the UA leaving the operational volume should be less than  $10^{-4}$ /FH; and
- (2) no single failure\* of the UAS or any external system supporting the operation should lead to its operation outside the ground risk buffer.

Compliance with the requirements above should be substantiated by analysis and/or test data with supporting evidence.

<sup>9</sup> See the definition in Article 2(3) of the UAS Regulation.

\* The term 'failure' needs to be understood as an occurrence that affects the operation of a component, part, or element such that it can no longer function as intended. Errors may cause failures, but are not considered to be failures. Some structural or mechanical failures may be excluded from the criterion if it can be shown that these mechanical parts were designed according to aviation industry best practices.

- (b) Software (SW) and airborne electronic hardware (AEH) whose development error(s) could **directly** (refer to Note 2) lead to operations outside the ground risk buffer should be developed to an industry standard or methodology that is recognised as being adequate by ~~the competent authority~~ **EASA**.

For UA with maximum characteristic dimensions not greater than 3 m, operated up to SAIL II operations, the competent authority may accept a declaration from the applicant for the compliance with the MoC to Light-UAS.2511<sup>10</sup>. For UAS configurations exceeding the applicability of such MoC<sup>11</sup>, the competent authority may decide to still accept declarations based on such MoC with evidence available, or to accept appropriate MoC proposed by the applicant. Otherwise, the competent authority may request the applicant to use a UAS for which EASA has verified the claimed integrity.

[...]

---

<sup>10</sup> [Final Means of Compliance with Light-UAS.2511 MOC Light-UAS.2511-01 - Issue 01 | EASA \(europa.eu\)](#)

<sup>11</sup> EASA is developing MoC applicable to different UAS configurations. Until these are available, the competent authority may define means of compliance for special configurations (e.g. tethered drones) where a DVR may not be appropriate.



## Annex B to AMC1 to Article 11

### INTEGRITY AND ASSURANCE LEVELS FOR THE MITIGATIONS USED TO REDUCE THE INTRINSIC GROUND RISK CLASS (GRC)

[...]

#### B.2 M1 — Strategic mitigations for ground risk

[...]

		Level of assurance		
		Low	Medium	High
M1 — Strategic mitigations for ground risk	Criterion #1 (Definition of the ground risk buffer)	The applicant declares that the required level of integrity is achieved <sup>1</sup> .	The applicant has supporting evidence to claim that the required level of integrity has been achieved. This is typically done by means of testing, analysis, simulation <sup>2</sup> , inspection, design review or through operational experience.	The claimed level of integrity is validated by the competent authority of the MS or by an entity that is designated by the a-competent authority <del>third party</del> .
	Comments	<sup>1</sup> Supporting evidence may or may not be available.	<sup>2</sup> When simulation is used, the validity of the targeted environment used in the simulation needs to be justified.	N/A
	Criterion #2 (Evaluation of people at risk)	The applicant declares that the required level of integrity has been achieved <sup>3</sup> .	The density data used for the claim of risk reduction is an average density map for the date/time of the operation from a static sourcing (e.g. census data for night time ops). In addition, for localised operations (e.g. intra-city delivery or infrastructure inspection), the applicant submits the proposed route/area of operation to the applicable authority (e.g. city police, office of civil protection, infrastructure owner, etc.) to verify the claim of a reduced number of people at risk.	Same as medium; however, the density data used for the claim of risk reduction is a near-real time density map from a dynamic sourcing (e.g. cellular user data) and applicable for the date/time of the operation.
	Comments	<sup>3</sup> Supporting evidence may or may not be available	N/A	N/A

Table B.3 — Level of assurance assessment criteria for ground risk of non-tethered M1 mitigations

[...]

		Level of assurance		
		Low	Medium	High
M1 — Tethered operation	Criterion #1 (Technical design)	Does not meet the 'medium' level criteria	The applicant has supporting evidence (including the specifications of the tether material) to claim that the required level of integrity is achieved. (a) This is typically achieved through testing or operational experience. (b) Tests can be based on simulations; however, the validity of the target environment used in the simulation needs to be justified.	The claimed level of integrity is validated by <del>EASA</del> the competent authority of the MS or by an entity that is designated by the competent authority.
	Comments	N/A	N/A	N/A
	Criterion #2 (Procedures)	(a) Procedures do not require validation against either a standard or a means of compliance considered adequate by the competent authority of the MS. (b) The adequacy of the procedures and checklists is declared.	(a) Procedures are validated against standards considered adequate by the competent authority of the MS and/or in accordance with the a means of compliance acceptable to that authority <sup>1</sup> . (b) The Adequacy of the procedures is proven through: (1) dedicated flight tests; or (2) simulation, provided that the representativeness of the simulation means is proven to be valid for the intended purpose with positive results; or (3) any other means acceptable to the competent authority of the MS.	Same as medium. In addition: (a) Flight tests performed to validate the procedures cover the complete flight envelope or are proven to be conservative. (b) The procedures, flight tests and simulations are validated by the competent authority of the MS or by an entity that is designated by the a competent authority third party.
	Comments	N/A	<del>N/A</del> <sup>1</sup> AMC2 UAS.SPEC.030(3)(e) (Operational procedures for medium and high levels of	N/A

			robustness) is considered an acceptable means of compliance.	
--	--	--	--	--

Table B.5 — Level of assurance assessment criteria for ground risk tethered M1 mitigations

**B.3 M2 — Effects of ground impact are reduced**

[...]

		LEVEL of ASSURANCE Level of assurance		
		Low/None	Medium	High
<b>M2 — Effects of UA impact dynamics are reduced (e.g. parachute)</b>	Criterion #1 (Technical design)	The applicant declares that the required level of integrity has been achieved <sup>1</sup> .	The applicant has supporting evidence to claim that the required level of integrity is achieved. This is typically <sup>2</sup> done by means of testing, analysis, simulation <sup>3</sup> , inspection, design review or through operational experience. The applicant may declare compliance with MoC to Light-UAS.2512 <sup>4</sup> providing the supporting evidence defined in it.	<del>The claimed level of integrity is validated by EASA against a standard considered adequate by EASA and/or in accordance with means of compliance acceptable to EASA (when applicable).</del> The competent authority should request the applicant to use a UAS for which EASA has verified the claimed integrity through a DVR.
	Comments	<sup>1</sup> Supporting evidence may or may not be available.	<sup>2</sup> The use of industry standards is encouraged when developing mitigations used to reduce the effect of ground impact. <sup>3</sup> When simulation is used, the validity of the targeted environment used in the simulation needs to be justified. <sup>4</sup> <a href="https://www.easa.europa.eu/en/document-library/product-certification-consultations/means-compliance-mitigation-means-m2-ref-amc">https://www.easa.europa.eu/en/document-library/product-certification-consultations/means-compliance-mitigation-means-m2-ref-amc</a>	
	Criterion #2 (Procedures, if applicable)	(a) Procedures do not require validation against either a standard or a means of compliance considered adequate by the	(a) Procedures are validated against standards considered adequate by the competent authority of the MS and/or in accordance with the means of compliance acceptable to that authority <sup>1</sup> .	Same as medium. In addition: (a) Flight tests performed to validate the procedures cover the complete flight envelope or are proven to be conservative. (b) The procedures, flight tests and simulations are validated by the competent authority of

		competent authority of the MS. (b) The adequacy of the procedures and checklists is declared.	(b) The adequacy of the procedures is proven through: (1) dedicated flight tests; or (2) simulation, provided that the representativeness of the simulation means is proven to be valid for the intended purpose with positive results; or (3) any other means acceptable to the competent authority of the MS.	the MS or by an entity that is designated by the a-competent authority third party.
	Comments	N/A	N/A <sup>1</sup> AMC2 UAS.SPEC.030(3)(e) (Operational procedures for medium and high levels of robustness) is considered an acceptable means of compliance.	N/A
	Criterion #3 (Training, if applicable)	Training is self-declared (with evidence available)	(a) Training syllabus is available. (b) The UAS operator provides competency-based, theoretical and practical training.	(a) Training syllabus is validated by the competent authority of the MS or by an entity that is designated by the a-competent authority third party. (b) Remote crew competencies are verified by the competent authority of the MS or by an entity that is designated by the a-competent authority third party.
	Comments	N/A	N/A	N/A

Table B.7 — Level of assurance assessment criteria for M2 mitigations

#### B.4 M3 — An ERP is in place, UAS operator validated and effective

[...]

		Level of assurance		
		Low/None	Medium	High
M3 — An ERP is in place, UAS operator validated and effective	Criterion #1 (Procedures)	<p>(a) Procedures do not require validation against either a standard or a means of compliance considered adequate by the competent authority of the MS.</p> <p>(b) The adequacy of the procedures and checklists is declared.</p>	<p>(a) The ERP is developed to standards considered adequate by the competent authority of the MS and/or in accordance with means of compliance acceptable to that authority<sup>1</sup>.</p> <p>(b) The ERP is validated through a representative tabletop exercise<sup>42</sup> consistent with the ERP training syllabus.</p>	<p>(a) Same as medium. In addition:</p> <p>(b) The ERP and the effectiveness of the plan with respect to limiting the number of people at risk are validated by the a competent third-party authority of the MS or by an entity that is designated by the competent authority.</p> <p>(c) The applicant has coordinated and agreed the ERP with all third parties identified in the plan.</p> <p>(d) The representativeness of the tabletop exercise is validated by the a competent third-party authority of the MS or by an entity that is designated by the competent authority.</p>
	Comments	N/A	<p><sup>1</sup> AMC3 UAS.SPEC.030(3)(e) (ERP for medium and high level of robustness) is considered an acceptable means of compliance.</p> <p><sup>42</sup> The tabletop exercise may or may not involve all third parties that are identified in the ERP.</p>	N/A
	Criterion #2 (Training)	Does not meet the 'medium' level criterion	<p>(a) An ERP training syllabus is available.</p> <p>(b) A record of the ERP training completed by the relevant staff is established and kept up to date.</p>	Same as medium. In addition, the competencies of the relevant staff are verified by the a competent third-party authority of the MS or by an entity that is designated by the competent authority.
	Comments	N/A	N/A	N/A

**Table B.9 — Level of assurance assessment criteria for M3 mitigations**

## Annex C to AMC1 to Article 11

### STRATEGIC MITIGATION — COLLISION RISK ASSESSMENT

[...]

#### C.3.3 SORA flight rules assumptions

Today, UAS flight operations under the 'specific' category cannot fully comply with the IFR and VFR rules as written. Although IFR infrastructures and mitigations are designed for manned aircraft operations (e.g. minimal safe altitudes, equipage requirements, operational restrictions, etc.), it may be possible for a UAS to comply with the IFR requirements. UAS operating at very low levels (e.g. ~~400~~ operational volume's ceiling below 150m (~500 ft) AGL and below) may technically comply with the IFR requirements rules, but the IFR infrastructure was not designed with that airspace in mind; therefore, mitigations for this airspace would be derived, and would be highly impractical and inefficient. When operating BVLOS, a UAS cannot comply with VFR<sup>12</sup>.

[...]

#### C.6.2 Lowering the initial ARC using operational restrictions (optional)

[...]

Operational environment, AEC and ARC			
Operations in:	Initial generalised density rating	Corresponding AEC	Initial ARC
<b>Airport/heliport environment</b>			
OPS in an airport/heliport environment in class B, C or D airspace	5	AEC 1	ARC-d
OPS in an airport/heliport environment in class E airspace or in class F or G	3	AEC 6	ARC-c
<b>Operations above 150 m (~450 ft) AGL but below flight level 600</b>			
OPS > 150 m (~450 ft) AGL but < FL 600 in a Mode-S Veil or transponder mandatory zone (TMZ)	5	AEC 2	ARC-d
OPS > 150 m (~450 ft) AGL but < FL 600 in controlled airspace	5	AEC 3	ARC-d
OPS > 150 m (~450 ft) AGL but < FL 600 in uncontrolled airspace over an urban area	3	AEC 4	ARC-c
OPS > 150 m (~450 ft) AGL but < FL 600 in uncontrolled airspace over a rural area	2	AEC 5	ARC-c
<b>Operations below 150 m (~450 ft) AGL</b>			
OPS < 150 m (~450 ft) AGL in a Mode-S Veil or TMZ	3	AEC 7	ARC-c

<sup>12</sup> A UAS operating under VLOS may be able to comply with VFR.

Operational environment, AEC and ARC			
Operations in:	Initial generalised density rating	Corresponding AEC	Initial ARC
OPS < 150 m (~450 ft) AGL in controlled airspace	3	AEC 8	ARC-c
OPS < 150 m (~450 ft) AGL in uncontrolled airspace over an urban area	2	AEC 9	ARC-c
OPS < 150 m (~450 ft) AGL in uncontrolled airspace over a rural area	1	AEC 10	ARC-b
<b>Operations above flight level 600</b>			
OPS > FL 600	1	AEC 11	ARC-b
Operations in atypical or segregated airspace			
OPS in atypical/segregated airspace	1	AEC 12	ARC-a

**Table C.1 — Initial air risk category class assessment**

[...]

Example 1: A UAS operator is intending to operate in an airport/heliport environment, in class C airspace, which corresponds to AEC 1.

[...]

Example 2: A UAS operator is intending to operate in an airport/heliport environment, in class G airspace, with a corresponding level of AEC 6.

[...]

Example 3:

A UAS operator is intending to operate below 150 m (~450 ft) AGL, in a class G (uncontrolled) airspace, over an urbanised area, with a corresponding level of AEC 9.

[...]

### C.6.3 Lowering the initial ARC by common structures and rules (optional)

Today, aviation airspace rules and structures mitigate the risk of collision. As the airspace risk increases, more structures and rules are implemented to reduce the risk. In general, the higher the aircraft density, the higher the collision risk, and the more structures and rules are required to reduce the collision risk.

In general, manned aircraft do not use very low level (VLL) airspace, as it is below the minimum safe height to perform an emergency procedure, ‘unless at such a height as will permit, in the event of an emergency arising, a landing to be made without undue hazard to persons or property on the surface’ (Ref. point SERA.3105 of the SERA Regulation). Subject to permission from the competent authority, special flights may be granted permission to use this airspace. Every aircraft will cross VLL airspace in an airport environment for take-off and landing.



With the advent of UAS operations, VLL airspace is expected to soon become more crowded, requiring more common structures and rules to lower the collision risk. It is anticipated that U-space services will provide these risk mitigation measures. This will require mandatory participation by all aircraft in that airspace, similar to how the current flight rules apply to all manned aircraft operating in a particular airspace today.

~~The~~ SORA does not allow the initial ARC to be lowered through strategic mitigation by common structures and rules for all operations in AEC 1, 2, 3, 4, 5, and 11.<sup>13</sup> Outside the scope of ~~the~~ SORA, a UAS operator may appeal to the competent authority to lower the ARC by strategic mitigation by using common structures. The determination of acceptability falls under the normal airspace rules, regulations and safety requirements for ATM/ANS providers.

Similarly, ~~the~~ SORA does not allow for lowering the initial ARC through strategic mitigation by using common structures and rules for all operations in AEC 10<sup>14</sup>.

The maximum amount of ARC reduction through strategic mitigation by using common structures and rules is by one ARC level.

~~The~~ SORA does allow for lowering the initial ARC through strategic mitigation by structures and rules for all operations below 150 m (~450 ft) AGL within VLL airspace (AECs 7, 8, 9 and 10).

[...]

---

<sup>13</sup> AEC 1, 2, 3, 4, and 5 already have manned airspace rules and structures defined by Regulation (EU) No 923/2012. Any UAS operating in these types of airspace shall comply with the applicable airspace rules, regulations and safety requirements. As such, no lowering of the ARC by common structures and rules is allowed, as those mitigations have already been accounted for in the assessment of those types of airspace. Lowering the ARC for rules and structures in AEC 1, 2, 3, 4, 5, and 11 would amount to double counting of the mitigations.

<sup>14</sup> AEC 10: the initial ARC is ARC-b. To lower the ARC in these volumes of airspace (to ARC-a) requires the operational volume to meet one of the requirements of atypical/segregated ~~A~~ airspace.

## Annex E to AMC1 to Article 11

### INTEGRITY AND ASSURANCE LEVELS FOR THE OPERATIONAL SAFETY OBJECTIVES (OSOs)

[...]

#### E.2 OSOs related to technical issues with the UAS

[...]

TECHNICAL ISSUE WITH THE UAS		Level of assurance		
		Low	Medium	High
OSO #01 Ensure that the UAS operator is competent and/or proven	Criteria	The elements delineated in the level of integrity are addressed in the ConOps.	Prior to the first operation, <del>at the</del> competent authority of the MS or an entity that is designated by the competent authority <del>third-party</del> performs an audit of the organisation.	The applicant holds an organisational operating certificate (e.g LUC) or has a recognised flight test organisation. In addition, the competent authority of the MS or an entity that is designated by the <del>competent authority</del> <del>third-party</del> verifies the UAS operator's competencies.
	Comments	N/A	N/A	N/A

OSO #02 — UAS designed and produced by a competent and/or proven entity

TECHNICAL ISSUE WITH THE UAS		Level of integrity		
		Low	Medium	High
OSO #02 UAS <del>manufactured</del> designed and produced by a competent and/or proven entity	Criteria for design	As a minimum, design documentation covers: (a) the specification of the materials; and (b) the suitability and durability of the materials used.	Same as low. In addition, design documentation also covers: (a) the configuration control; and (b) identification and traceability.	The design organisation complies with Subpart J of Annex I (Part 21) to Regulation (EU) No 748/2012.

	Criteria for production	As a minimum, <del>manufacturing</del> production procedures cover: <del>(a) the specification of materials;</del> <del>(b) the suitability and durability of materials used; and</del> <del>(c) the processes necessary to allow for repeatability in manufacturing, and conformity within acceptable tolerances.</del>	Same as low. In addition, <del>manufacturing</del> production procedures also cover: (a) the configuration control; (b) the verification of incoming products, parts, materials, and equipment; (c) identification and traceability; (d) in-process and final inspections & testing; (e) the control and calibration of tools; (f) handling and storage; and (g) the control of non-conforming items.	The <del>manufacturer</del> production organisation complies with the organisational requirements that are defined in Subpart F or G of Annex I (Part 21) to Regulation (EU) No 748/2012.
	Comments	N/A	N/A	N/A

TECHNICAL ISSUE WITH THE UAS		Level of assurance		
		Low	Medium	High
OSO #02 UAS <del>manufactured</del> designed and produced by a competent and/or proven entity	Criteria for design	The specifications, suitability and durability of the materials are declared against a standard recognised by the competent authority and/or in accordance with means of compliance acceptable to the competent authority.	Same as low. In addition, evidence is available that the UAS has been designed in accordance with design procedures. The competent authority should request the applicant to use a UAS for which EASA has verified the claimed integrity through a DVR.	Same as medium. In addition, the competent authority should request the applicant to operate a UAS designed by an organisation approved by EASA according to Subpart J of Annex I (Part 21) to Regulation (EU) No 748/2012.
	Criteria for production	The declared <del>manufacturing</del> production procedures are developed to a standard that is considered adequate by the competent authority that issues the operational authorisation and/or in accordance with a means of compliance acceptable to that authority. <del>The competent authority may request EASA to validate the claimed integrity.</del>	Same as low. In addition, evidence is available that the UAS has been <del>manufactured</del> produced in conformance with/to its design. <del>The competent authority may request EASA to validate the claimed integrity.</del>	Same as medium. In addition, the competent authority of the MS or an entity that is designated by the competent authority EASA validates compliance with the production organisational requirements that are defined in Subpart F or G of Annex I (Part 21) to Regulation (EU) No 748/2012.
	Comments	N/A	N/A	N/A

OSO #03 — UAS maintained by competent and/or proven entity

[...]

TECHNICAL ISSUE WITH THE UAS		Level of assurance		
		Low	Medium	High
OSO #03 UAS maintained by a competent and/or proven entity (e.g. industry standards)	Criterion #1 (Procedure)	<p>(a) The maintenance instructions are documented.</p> <p>(b) The maintenance conducted on the UAS is recorded in a maintenance log system<sup>1/2</sup>.</p> <p>(c) A list of the maintenance staff authorised to carry out maintenance is established and kept up to date.</p>	<p>Same as low. In addition:</p> <p>(a) The maintenance programme is developed in accordance with standards considered adequate by the competent authority of the MS and/or in accordance with a means of compliance acceptable to that authority.</p> <p>In addition, if the UAS has a DVR or a (R)TC, the maintenance programme includes the scheduled maintenance requirements developed as part of the design.</p> <p>(b) A list of the maintenance staff with maintenance release authorisation is established and kept up to date.</p>	<p>Same as medium. In addition, the maintenance programme and the maintenance procedures manual are validated by the competent authority of the MS or by an entity that is designated by the a competent authority third-party.</p>
	Comments	<p><sup>1</sup> The objective is to record all the maintenance performed on the aircraft, and why it is performed (rectification of defects or malfunctions, modifications, scheduled maintenance, etc.).</p> <p><sup>2</sup> The maintenance log may be requested for inspection/audit by the approving authority or an authorised representative.</p>	N/A	N/A
	Criterion #2 (Training)	A record of all the relevant qualifications, experience and/or training completed by the maintenance staff is established and kept up to date.	<p>Same as low. In addition:</p> <p>(a) The initial training syllabus and training standard, including theoretical/practical elements, duration, etc., is defined and is</p>	<p>Same as medium. In addition:</p> <p>(a) A programme for the recurrent training of staff holding a maintenance release authorisation is established; and</p>

			<p>commensurate with the authorisation held by the maintenance staff.</p> <p>(b) For staff that hold a maintenance release authorisation, the <u>initial</u> training is specific to that particular UAS model/family.</p> <p>(c) All maintenance staff have undergone <u>initial</u> training.</p>	<p>(b) This programme is validated by the competent authority of the MS or by an entity that is designated by the competent authority <del>third party</del>.</p>
	Comments	N/A	N/A	N/A

OSO #04 — UAS developed to authority recognised design standards

[...]

TECHNICAL ISSUE WITH THE UAS		Level of assurance		
		Low	Medium	High
OSO #04 UAS developed to authority recognised design standards	Criteria	<p><del>Consider the criteria defined in Section 9</del></p> <p>The competent authority should request the applicant to use a UAS for which EASA has verified the claimed integrity through a DVR.</p>	<p>The competent authority should request the applicant to use a UAS for which EASA has issued a type certificate or restricted type certificate in accordance with Annex I (Part 21) to Regulation (EU) No 748/2012</p>	<p>The competent authority should request the applicant to use a UAS for which EASA has issued a type certificate or restricted type certificate in accordance with Annex I (Part 21) to Regulation (EU) No 748/2012</p>
	Comments	<p><del>The competent authority may request EASA to validate the claimed integrity.</del> N/A</p>	N/A	N/A

OSO #05 — UAS is designed considering system safety and reliability

[...]

TECHNICAL ISSUE WITH THE UAS		Level of assurance		
		Low	Medium	High
OSO #05 UAS is designed considering system safety and reliability	Criteria	<p>A functional hazard assessment<sup>1</sup> and a design and installation appraisal that shows <del>that</del> hazards are minimised, are available.</p> <p><del>The competent authority may request EASA to validate the claimed integrity.</del></p>	<p>Same as low. In addition:</p> <p>(a) Safety analyses are conducted in line with standards considered adequate by the competent authority and/or in accordance with a means of compliance acceptable to that authority.</p>	<p>The competent authority should request the applicant to use a UAS for which EASA has issued a type certificate or restricted type certificate in accordance with Annex I</p>

TECHNICAL ISSUE WITH THE UAS		Level of assurance		
		Low	Medium	High
			(b) A strategy for the detection of single failures of concern includes pre-flight checks. The competent authority <del>may request request EASA to validate the claimed integrity.</del> should request the applicant to use a UAS for which EASA has validated the claimed integrity through a DVR	(Part 21) to Regulation (EU) No 748/2012 <del>Same as medium. In addition, safety analyses and development assurance activities are validated by EASA.</del>
	Comments	<sup>1</sup> The severity of failure conditions (no safety effect, minor, major, hazardous and catastrophic) should be determined according to the definitions provided in JARUS AMC RPAS.1309 Issue 2.	N/A	N/A

OSO #06 — C3 link characteristics (e.g. performance, spectrum use) are appropriate for the operation

[...]

TECHNICAL ISSUE WITH THE UAS		Level of assurance		
		Low	Medium	High
OSO #06 C3 link characteristics (e.g. performance, spectrum use) are appropriate for the operation	Criteria	The applicant declares that the required level of integrity has been achieved. <del>Consider the assurance criteria defined in Section 9 (low level of assurance). The competent authority may request EASA to validate the claimed integrity.</del>	<del>Demonstration of the C3 link performance is in accordance with standards considered adequate by the competent authority and/or in accordance with means of compliance acceptable to that authority. The competent authority may request EASA to validate the claimed integrity.</del> The competent authority should request the applicant to use a UAS for which EASA has verified the claimed integrity through a DVR.	The competent authority should request the applicant to use a UAS for which EASA has issued a type certificate or restricted type certificate in accordance with Annex I (Part 21) to Regulation (EU) No 748/2012 <del>Same as medium. In addition, evidence is validated by EASA.</del>
	Comments	N/A	N/A	N/A

OSO #07 — Inspection of the UAS (product inspection) to ensure consistency with the ConOps

[...]

TECHNICAL ISSUE WITH THE UAS		Level of assurance		
		Low	Medium	High
OSO #07 Inspection of the UAS (product inspection) to ensure consistency with the ConOps	Criterion #1 (Procedures)	Product inspection is documented and accounts for the manufacturer's recommendations, if available.	Same as low. In addition, the product inspection is documented using checklists.	Same as medium. In addition, the product inspection <del>is</del> procedures are validated by the competent authority of the MS or by an entity that is designated by the <del>a</del> competent authority <del>third-party</del> .
	Comments	N/A	N/A	N/A
	Criterion #2 (Training)	The remote crew is trained to perform the product inspection, and that training is self-declared (with evidence available).	(a) A training syllabus including a product inspection procedure is available. (b) The UAS operator provides competency-based, theoretical and practical training.	<del>A</del> The competent authority of the MS or an entity that is designated by the competent authority <del>third-party</del> : (a) validates the training syllabus; and (b) verifies the remote crew competencies.
	Comments	N/A	N/A	N/A

### E.3 OSOs related to operational procedures

OPERATIONAL PROCEDURES		Level of integrity		
		Low	Medium	High
OSO #08, OSO #11, OSO #14 and OSO #21	Criterion #1 (Procedure definition)	<p>(a) Operational procedures<sup>1</sup> appropriate for the proposed operation are defined and, as a minimum, cover the following elements:</p> <ul style="list-style-type: none"> <li>(1) Flight planning;</li> <li>(2) Pre- and post-flight inspections;</li> <li>(3) Procedures to evaluate the environmental conditions before and during the mission (i.e. real-time evaluation);</li> <li>(4) Procedures to cope with unexpected adverse operating conditions (e.g. when ice is encountered during an operation not approved for icing conditions);</li> <li>(5) Normal procedures;</li> <li>(6) Contingency procedures (to cope with abnormal situations);</li> <li>(7) Emergency procedures (to cope with emergency situations);</li> <li>(8) Occurrence-reporting procedures; and</li> </ul> <p><del>Note: normal, contingency and emergency procedures are compiled in an OM.</del></p> <p>(b) The limitations of the external systems supporting the UAS operation<sup>2</sup> are defined in an OM.</p>		
	Comments	<p><sup>1</sup> Operational procedures cover the deterioration<del>3</del> of the UAS itself and any external system supporting the UAS operation. To properly address the deterioration of external systems required for the operation, it is recommended to:</p> <ul style="list-style-type: none"> <li>(a) identify these 'external systems';</li> <li>(b) identify the modes of deterioration of the 'external systems' (e.g. complete loss of GNSS, GDOP/PDOP, latency issues, etc.) which would lead to a loss of control of the operation;</li> <li>(c) describe the means to detect these modes of deterioration of the external systems ; and</li> <li>(d) describe the procedure(s) used when deterioration is detected (e.g. activation of the emergency recovery capability, switch to manual control, etc.).</li> </ul> <p><sup>2</sup> In the scope of this assessment, external systems supporting the UAS operation are defined as systems that are not already part of the UAS but are used to:</p> <ul style="list-style-type: none"> <li>(a) launch/<del>take-off</del>take off the UA;</li> <li>(b) make pre-flight checks; or</li> <li>(c) keep the UA within its operational volume (e.g. GNSS, satellite systems, air traffic management, U-Sspace).</li> </ul> <p>External systems activated/used after a loss of control of the operation are excluded from this definition.</p> <p><del><sup>3</sup> To properly address the deterioration of external systems required for the operation, it is recommended to:</del></p> <ul style="list-style-type: none"> <li><del>(a) identify these 'external systems';</del></li> <li><del>(b) identify the modes of deterioration of the 'external systems' (e.g. complete loss of GNSS, drift of the GNSS, latency issues, etc.) which would lead to a loss of control of the operation;</del></li> <li><del>(c) describe the means to detect these modes of deterioration of the external systems/facilities; and</del></li> </ul>		



OPERATIONAL PROCEDURES		Level of integrity		
		Low	Medium	High
		<del>(d) describe the procedure(s) used when deterioration is detected (e.g. activation of the emergency recovery capability, switch to manual control, etc.).</del>		
	Criterion #2 (Procedure complexity)	Operational procedures are complex and may potentially jeopardise the crew's ability to respond by <b>increasing</b> <del>raising</del> the remote crew's workload and/or their <b>ir</b> interactions with other entities (e.g. ATM, etc.).	Contingency/emergency procedures require manual control by the remote pilot <sup>2</sup> when the UAS is usually automatically controlled.	Operational procedures are simple.
	Comments	N/A	<sup>2</sup> <del>This is still under discussion since</del> <b>It should be considered that</b> not all UAS have a mode where the pilot could directly control the surfaces; moreover, <del>some people claim</del> it <b>may</b> requires significant skill not to make things worse.	N/A
	Criterion #3 (Consideration of Potential Human Error)	At a minimum, operational procedures provide: (a) a clear distribution and assignment of tasks, and (b) an internal checklist to ensure staff are adequately performing their assigned tasks.	Operational procedures take human error into consideration.	Same as medium. In addition, the remote crew <sup>3</sup> receives crew resource management (CRM) <sup>4</sup> training.
	Comments	N/A	N/A	<sup>3</sup> In the context of <del>the</del> SORA, the term 'remote crew' refers to any person involved in the mission. <sup>4</sup> CRM training focuses on the effective use of all the remote crew to ensure safe and efficient operation, reducing error, avoiding stress and increasing efficiency.

OPERATIONAL PROCEDURES		Level of assurance		
		Low	Medium	High
OSO #08, OSO #11, OSO #14 and OSO #21	Criteria	<p>(a) Operational procedures do not require validation against either a standard or a means of compliance that is considered adequate by the competent authority of the MS.</p> <p>(b) The adequacy of the operational procedures is declared, except for emergency procedures, which are tested.</p>	<p>(a) Normal, contingency, and emergency procedures are documented and part of the operations manual (OM).</p> <p><del>(a)</del>(b) Operational procedures are validated against standards considered adequate by the competent authority of the MS and/or in accordance with the means of compliance acceptable to that authority<sup>1</sup>.</p> <p><del>(b)</del>(c) The Adequacy of the procedures is proven through:</p> <p>(1) dedicated flight tests; or</p> <p>(2) simulation, provided that the representativeness of the simulation means is proven valid for the intended purpose with positive results; or</p> <p>(3) any other means acceptable to the competent authority.</p>	<p>Same as medium. In addition:</p> <p>(a) Flight tests performed to validate the procedures and checklists cover the complete flight envelope or are proven to be conservative.</p> <p>(b) The procedures, checklists, flight tests and simulations are validated by the competent authority of the MS or by an entity that is designated by the competent authority<del>third-party</del>.</p>
	Comments	N/A	<p><del>N/A</del><sup>1</sup> AMC2 UAS.SPEC.030(3)(e) (Operational procedures for medium and high levels of robustness) is considered an acceptable means of compliance.</p>	

#### E.4 OSOs related to remote crew training

[...]

REMOTE CREW COMPETENCIES		Level of assurance		
		Low	Medium	High
OSO #09, OSO #15 and OSO #22	Criteria	Training is self-declared (with evidence available).	(a) Training syllabus is available and kept up to date. (b) The UAS operator provides competency-based, theoretical and practical training.	The competent authority of the MS or an entity that is designated by the A competent authority third party: (a) validates the training syllabus; and (b) verifies the remote crew competencies.
	Comments	N/A	N/A	N/A

#### E.5 OSOs related to safe design

[...]

		Level of assurance		
		Low	Medium	High
OSO #10 & OSO #12	Criteria	A design and installation appraisal is available. In particular, this appraisal shows that: (a) the design and installation features (independence, separation and redundancy) satisfy the low integrity criterion; and (b) particular risks relevant to the ConOps (e.g. hail, ice, snow, electromagnetic interference, etc.) do not violate the independence claims, if any.	Same as low. In addition, the level of integrity claimed is substantiated by analysis and/or test data with supporting evidence. <del>For</del> If the operation is classified as SAIL IV, the competent authority may should request the applicant to use a UAS for which EASA has verified the claimed integrity through a DVR. EASA to validate the claimed integrity.	The competent authority should request the applicant to use a UAS for which EASA has issued a type certificate or restricted type certificate in accordance with Annex I (Part 21) to Regulation (EU) No 748/2012 Same as medium. In addition, EASA validates the level of integrity claimed.
	Comments	N/A	N/A	N/A

## E.6 OSOs related to the deterioration of external systems supporting UAS operations

For the purpose of ~~the~~ SORA and this specific OSO, the term ‘external services supporting UAS operations’ encompasses any service providers necessary for the safety of the flight, such as communication service providers (CSPs) and U-space service providers<sup>15</sup>.

[...]

DETERIORATION OF EXTERNAL SYSTEMS SUPPORTING UAS OPERATIONS <sup>15</sup> BEYOND THE CONTROL OF THE UAS		Level of assurance		
		Low	Medium	High
<b>OSO #13</b> External services supporting UAS operations are adequate for the operation	Criteria	The applicant declares that the requested level of performance for any externally provided service necessary for the safety of the flight is achieved (without evidence being necessarily available).	The applicant has supporting evidence that the required level of performance for any externally provided service required for <del>the</del> safety of the flight can be achieved for the full duration of the mission. This may take the form of a service-level agreement (SLA) or any official commitment that prevails between a service provider and the applicant on the relevant aspects of the service (including quality, availability, <del>and</del> responsibilities). The applicant has a means to monitor externally provided services which affect flight-critical systems and take	Same as medium. In addition: (a) the evidence of the performance of an externally provided service is achieved through demonstrations; and (b) <del>the competent authority of the MS or an entity that is designated by the</del> competent authority <del>third party</del> validates the claimed level of integrity.

<sup>15</sup> External service should be understood as any service that is provided to the UAS operator, which is necessary to ensure the safety of a UAS operation and is provided by a service provider other than the UAS operator. Examples of external services are:

- provision of geographical zones data and geographical limitations (including orography);
- collection and transfer of occurrence data;
- training and assessment of remote pilots;
- communication services that support the C2 link and any other safety-related communication;
- services that support navigation, e.g. GNSS services (compliance with requirement UAS.STS-01.030(6) could be ensured by referring to the conditions of use of such services in the corresponding Service Definition Document (SDD) or an equivalent one if available.);
- provision of services related to flight planning and management, including related safety assessments; and
- U-space services, which are defined in the corresponding regulation(s) and may include one or more of the above-mentioned services.

			appropriate actions if real-time performance could lead to the loss of control of the operation.	
	Comments	N/A	N/A	N/A

## E.7 OSOs related to Human Error

[...]

HUMAN ERROR		Level of assurance		
		Low	Medium	High
OSO #16 Multi-crew coordination	Criterion #1 (Procedures)	(a) Procedures <del>do</del> are not <del>require</del> validated <del>ion</del> against either a standard or a means of compliance considered adequate by the competent authority of the MS. (b) The adequacy of the procedures and checklists is declared.	(a) Procedures are validated against standards considered adequate by the competent authority of the MS and/or in accordance with the means of compliance acceptable to that authority <sup>1</sup> . (b) The Adequacy of the procedures is proven through: (1) dedicated flight tests; or (2) simulation, provided that the representativeness of the simulation means is proven valid for the intended purpose with positive results; or (3) any other means acceptable to the competent authority.	Same as medium. In addition: (a) flight tests performed to validate the procedures cover the complete flight envelope or are proven to be conservative; and (b) the procedures, flight tests and simulations are validated by the competent authority of the MS or an entity designated by the competent authority <del>third party</del> .
	Comments	N/A	N/A <sup>1</sup> AMC2 UAS.SPEC.030(3)(e) (Operational procedures for medium and high levels of robustness) is considered an acceptable means of compliance.	N/A
	Criterion #2 (Training)	Training is self-declared (with evidence available).	(a) Training syllabus is available. (b) The UAS operator provides competency-based, theoretical and practical training.	The competent authority of the MS or an entity that is designated by the competent authority <del>third party</del> .

HUMAN ERROR		Level of assurance		
		Low	Medium	High
				(a) validates the training syllabus; and (b) verifies the remote crew competencies.
	Comments	N/A	N/A	N/A
	Criterion #3 (Communication devices)	Consider the criteria defined in Section 9 N/A	The applicant has supporting evidence that the required level of integrity is achieved. This is typically done by testing, analysis, simulation <sup>1</sup> , inspection, design review or through operational experience.	The competent authority should request the applicant to operate a UAS designed by an organisation approved by EASA according to Subpart J of Annex I (Part 21) to Regulation (EU) No 748/2012.
	Comments	N/A	<sup>1</sup> When simulation is performed, the validity of the targeted environment that is used in the simulation needs to be justified.	N/A

#### OSO #17 — Remote crew is fit to operate

[...]

HUMAN ERROR		Level of assurance		
		Low	Medium	High
OSO #17 Remote crew is fit to operate	Criteria	The policy to define how the remote crew declares themselves fit to operate (before an operation) is documented. The remote crew <del>fit-to-operate</del> declaration <del>of fit to operate</del> (before an operation) is based on a policy defined by the applicant.	Same as Low. In addition: — Remote crew duty, flight duty and the resting times policy are documented. — Remote crew duty cycles are logged and cover at a minimum: — when the remote crew member's duty day commences, — when the remote crew members are free from duties, and	Same as Medium. In addition: — Medical standards considered adequate by the competent authority and/or the means of compliance acceptable to that authority are established and the competent authority of the MS or an entity that is designated by the competent authority <del>third party</del> verifies that the remote crew is medically fit.

			<ul style="list-style-type: none"> <li>— resting times within the duty cycle.</li> <li>— There is evidence that the remote crew is fit to operate the UAS.</li> </ul>	<ul style="list-style-type: none"> <li>— The competent authority of the MS or an entity that is designated by the competent authority third party validates the duty/flight duty times.</li> <li>— If an FRMS is used, it is validated and monitored by the competent authority of the MS or an entity that is designated by the competent authority third party.</li> </ul>
	Comments	N/A	N/A	N/A

### OSO #18 — Automatic protection of the flight envelope from human errors

[...]

HUMAN ERROR		Level of assurance		
		Low	Medium	High
OSO #18 Automatic protection of the flight envelope from human errors	Criteria	<p>The automatic protection of the flight envelope has been developed in-house or out of the box (e.g. using commercial off-the-shelf elements), without following specific standards.</p> <p><del>The competent authority may request EASA to validate the claimed integrity.</del></p>	<p><del>The automatic protection of the flight envelope has been developed to standards considered adequate by the competent authority and/or in accordance with a means of compliance acceptable to that authority.</del></p> <p>The competent authority may should request the applicant to use a UAS for which EASA has verified the claimed integrity through a DVR <del>EASA to validate the claimed integrity.</del></p>	<p>The competent authority should request the applicant to use a UAS for which EASA has issued a type certificate or restricted type certificate in accordance with Annex I (Part 21) to Regulation (EU) No 748/2012 <del>Same as Medium.</del></p> <p><del>In addition, evidence is validated by EASA.</del></p>
	Comments	N/A	N/A	N/A

## OSO #19 — Safe recovery from human errors

[...]

HUMAN ERROR		Level of assurance		
		Low	Medium	High
OSO #19 Safe recovery from Human Error	Criterion #1 (Procedures and checklists)	<p>–(a) Procedures and checklists <del>do not require validation</del> against either a standard or a means of compliance considered adequate by the competent authority of the MS.</p> <p>–(b) The adequacy of the procedures and checklists is declared.</p>	<p>–(a) Procedures and checklists are validated against standards considered adequate by the competent authority of the MS and/or in accordance with the means of compliance acceptable to that authority<sup>1</sup>.</p> <p>–(b) The Adequacy of the procedures and checklists is proven through:</p> <ul style="list-style-type: none"> <li>–(1) dedicated flight tests; or</li> <li>–(2) simulation, provided that the representativeness of the simulation means is proven valid for the intended purpose with positive results; or</li> <li>–(3) any other means acceptable to the competent authority of the MS.</li> </ul>	<p>Same as Medium. In addition:</p> <p>–(a) Flight tests performed to validate the procedures and checklists cover the complete flight envelope or are proven to be conservative.</p> <p>–(b) The procedures, checklists, flight tests and simulations are validated by the competent authority of the MS or an entity that is designated by the competent authority third party.</p>
	Comments	N/A	N/A <sup>1</sup> AMC2 UAS.SPEC.030(3)(e) (Operational procedures for medium and high levels of robustness) is considered an acceptable means of compliance.	N/A
	Criterion #2 (Training)	Consider the criteria defined for the level of assurance of the generic remote crew training OSO (i.e. OSO #09, OSO #15 and OSO #22) corresponding to the SAIL of the operation.		
	Comments	N/A	N/A	N/A



HUMAN ERROR		Level of assurance		
		Low	Medium	High
	Criterion #3 (UAS design)	<p>The applicant declares that the required level of integrity has been achieved<sup>1</sup>.</p> <p><del>The competent authority may request EASA to validate the claimed integrity.</del></p>	<p>The applicant has supporting evidence that the required level of integrity is achieved. That evidence is provided through testing, analysis, simulation<sup>2</sup>, inspection, design review or operational experience.</p> <p>If the operation is classified as SAIL IV<sub>7</sub>, <del>EASA validates the claimed integrity. In all other cases,</del> the competent authority <del>may</del> should request the applicant to use a UAS for which EASA has verified the claimed integrity through a DVR <del>EASA to validate the claimed integrity.</del></p> <p>If the operation is classified as SAIL V the competent authority should request the applicant to use a UAS for which EASA has issued a type certificate or restricted type certificate in accordance with Annex I (Part 21) to Regulation (EU) No 748/2012.</p>	<p>The competent authority should request the applicant to use a UAS for which EASA has issued a type certificate or restricted type certificate in accordance with Annex I (Part 21) to Regulation (EU) No 748/2012. <del>EASA validates the claimed level of integrity.</del></p>
	Comments	<p><sup>1</sup> Supporting evidence may or may not be available.</p>	<p><sup>2</sup> When simulation is performed, the validity of the targeted environment that is used in the simulation needs to be justified.</p>	N/A

OSO #20 — A Human Factors evaluation has been performed and the HMI has been found appropriate for the mission

[...]

HUMAN ERROR		LEVEL of ASSURANCE		
		Low	Medium	High
OSO #20 A Human Factors evaluation has been performed and the HMI has been found appropriate for the mission	Criteria	The applicant conducts a human factors evaluation of the UAS to determine whether the HMI is appropriate for the mission. The HMI evaluation is based on inspection or analyses. <del>The competent authority may request EASA to witness the HMI evaluation of the UAS.</del>	Same as Low but the HMI evaluation is based on demonstrations or simulations. <sup>1</sup> <del>If the operation is classified as SAIL V, EASA witnesses the HMI evaluation of the UAS. In all other cases,</del> The competent authority <del>may</del> should request EASA to witness the HMI evaluation of the UAS.	Same as Medium. In addition, EASA witnesses the HMI evaluation of the UAS and the competent authority of the MS or an entity that is designated by the competent authority <del>third-party</del> witnesses the HMI evaluation of the possible electronic means used by the AVO.
	Comments	N/A	<sup>1</sup> When simulation is performed, the validity of the targeted environment that is used in the simulation needs to be justified.	N/A

## E.8 OSOs related to Adverse Operating Conditions

OSO #23 — Environmental conditions for safe operations are defined, measurable and adhered to

[...]

ADVERSE OPERATING CONDITIONS		Level of assurance		
		Low	Medium	High
OSO #23 Environmental conditions for safe operations defined, measurable and adhered to	Criterion #1 (Definition)	<del>Consider the criteria defined in Section 9.</del> The applicant declares that the required level of integrity has been achieved.	The applicant has supporting evidence that the required level of integrity is achieved. This is typically done by testing, analysis, simulation, inspection, design review or through operational experience. If the operation is classified as SAIL IV, the competent authority should	The competent authority should request the applicant to use a UAS for which EASA has issued a type certificate or restricted type certificate in accordance with Annex I (Part 21) to Regulation (EU) No 748/2012

			request the applicant to use a UAS for which EASA has issued a DVR.	
	Comments	N/A		
	Criterion #2 (Procedures)	<p>–(a) Procedures do not require validation against either a standard or a means of compliance considered adequate by the competent authority of the MS.</p> <p>–(b) The adequacy of the procedures and checklists is declared.</p>	<p>–(a) Procedures are validated against standards considered adequate by the competent authority of the MS and/or in accordance with the means of compliance acceptable to that authority<sup>1</sup>.</p> <p>–(b) The Adequacy of the procedures and checklists is proven through:</p> <p>–(1) Dedicated flight tests; or</p> <p>–(2) Simulation, provided that the representativeness of the simulation means is proven valid for the intended purpose with positive results; or</p> <p>–(3) any other means acceptable to the competent authority of the MS.</p>	<p>Same as <del>M</del>medium. In addition:</p> <p>–(a) Flight tests performed to validate the procedures cover the complete flight envelope or are proven to be conservative.</p> <p>–(b) The procedures, flight tests and simulations are validated by the competent authority of the MS or an entity that is designated by the competent authority<del>third party</del>.</p>
	Comments	N/A	<del>N/A</del> <sup>1</sup> AMC2 UAS.SPEC.030(3)(e) (Operational procedures for medium and high levels of robustness) is considered an acceptable means of compliance.	N/A
	Criterion #3 (Training)	Training is self-declared (with evidence available).	<p>– Training syllabus is available.</p> <p>– The UAS operator provides competency-based, theoretical and practical training.</p>	<p>The competent authority of the MS or an entity that is designated by the competent authority<del>third party</del>:</p> <p>– validates the training syllabus; and</p> <p>– verifies the remote crew competencies.</p>

	Comments	N/A	N/A	N/A
--	----------	-----	-----	-----

OSO #24 — UAS is designed and qualified for adverse environmental conditions (e.g. adequate sensors, DO-160 qualification)

[...]

ADVERSE OPERATING CONDITIONS		Level of assurance		
		N/A	Medium	High
OSO #24 UAS is designed and qualified for adverse environmental conditions	Criteria	N/A	<p><i>Consider the criteria defined in Section 9</i></p> <p>The applicant has supporting evidence that the required level of integrity has been achieved. This is typically done by testing, analysis, simulation<sup>2</sup>, inspection, design review or through operational experience.</p>	<p>If the operation is classified as SAIL IV, the competent authority should request the applicant to use a UAS for which EASA has issued a DVR.</p> <p>If the operation is classified SAIL V or VI, the competent authority should request the applicant to use a UAS for which EASA has issued a type certificate or restricted type certificate in accordance with Annex I (Part 21) to Regulation (EU) No 748/2012.</p>
	Comments	N/A	<sup>2</sup> When simulation is performed, the validity of the targeted environment that is used in the simulation needs to be justified. <del>N/A</del>	N/A

#### E.9 Assurance level criteria for technical OSO

		LEVEL of ASSURANCE		
		Low	Medium	High
TECHNICAL OSO	Criteria	The applicant declares that the required level of integrity has been achieved <sup>2</sup> .	<p>The applicant has supporting evidence that the required level of integrity is achieved. This is typically done by testing, analysis, simulation<sup>2</sup>, inspection, design review or through operational experience.</p> <p>The competent authority may request EASA to validate the claimed integrity.</p>	EASA validates the claimed level of integrity.

	Comments	<sup>1</sup> -Supporting evidence may or may not be available.	<sup>2</sup> -When simulation is performed, the validity of the targeted environment that is used in the simulation needs to be justified.	N/A
--	----------	--	--	-----

## AMC2 Article 11 Rules for conducting an operational risk assessment

PREDEFINED RISK ASSESSMENT PDRA-G01 Version 1.23

EDITION January September 20232

[...]

PDRA characterisation and conditions				
Topic	Method of proof	Condition	Integrity <sup>16</sup>	Proof <sup>17</sup>
Containment	Declaration supported by data	6.13 To ensure a safe recovery from a technical issue that involves the UAS or an external system that supports the operation, the UAS <del>operator</del> should comply with the following basic containment provisions ensure that:		
		6.13.1 no probable failure of the UAS or of any external system that supports the operation would lead to operation outside the operational volume; and	Please describe how this condition is met	'n/a since enhanced containment applies.'
		6.13.2 it is reasonably expected that a fatality will not occur due to any probable failure of the UAS or of any external system that supports the operation.	Please describe how this condition is met	or 'I declare compliance. A design and installation appraisal is available and it covers at least: — the design and installation features (independence,

<sup>16</sup> To be filled in by the UAS operator.

<sup>17</sup> To be filled in by the UAS operator.

PDRA characterisation and conditions				
Topic	Method of proof	Condition	Integrity <sup>16</sup>	Proof <sup>17</sup>
		<p>6.14 The vertical extension of the operational volume should be 150 m above the surface (or any other reference altitude defined by the Member State).</p> <p><i>Note: The term 'probable' should be understood in its qualitative interpretation, i.e. 'anticipated to occur one or more times during the entire system/operational life of an item'.</i></p>	<i>Please describe how this condition is met</i>	<p>separation, and redundancy); and</p> <p>— the particular risks (e.g. hail, ice, snow, electromagnetic interference, etc.) relevant to the type of operation.'</p>
		<p>6.15 The following enhanced containment additional conditions should apply if the adjacent area includes an assembly of people or if the adjacent airspace is classified as ARC-d (in accordance with the SORA):</p>		
	Declaration supported by data	<p>6.15.1 The UAS should be designed to standards that are considered adequate by the competent authority and/or in accordance with a means of compliance that is acceptable to that competent authority such that:</p>	<i>Please include a reference to the relevant chapter/section of the OM or indicate 'n/a'.</i>	'N/A since the basic containment applies' or
		<p>6.15.1.1. the probability of the UA leaving the operational volume should be less than <math>10^{-4}</math>/FH; and</p>	<i>Please include a reference to the relevant chapter/section of the OM or indicate 'n/a'.</i>	'I declare compliance with MoC Light-UAS.2511.'
		<p>6.15.1.2 no single failure of the UAS or of any external system that supports the operation should lead to operation outside the ground risk buffer.</p> <p><i>Note: The term 'failure' should be understood as an occurrence that affects the operation of a component, part, or element in such a way that it can no longer function as intended. Errors may cause failures but are not considered to be failures. Some structural or mechanical failures may be excluded from this criterion if</i></p>	<i>Please include a reference to the relevant chapter/section of the OM or indicate 'n/a'.</i>	Analysis and/or test data with supporting evidence is available.' or 'The UAS has a DVR demonstrating compliance with the enhanced containment requirements.'

PDRA characterisation and conditions				
Topic	Method of proof	Condition	Integrity <sup>16</sup>	Proof <sup>17</sup>
		<p><i>it can be shown that these mechanical parts were designed according to aviation industry best practices.</i></p> <p>6.15.2 SW and AEH whose development error(s) could directly lead to operations outside the ground risk buffer should be developed according to an industry standard or methodology that is recognised as adequate by <del>the competent authority</del> EASA.</p> <p><i>Note 1: The proposed additional safety conditions cover both the integrity and the assurance levels.</i></p> <p><i>Note 2: The proposed additional safety conditions do not imply a systematic need to develop the SW and AEH according to an industry standard or methodology that is recognised as adequate by the competent authority. For instance, if the UA design includes an <u>independent</u> engine shutdown function that systematically prevents the UA from exiting the ground risk buffer due to single failures or an SW/AEH error of the flight controls from occurring, the intent of the conditions of point 6.15.1 above could be considered met.</i></p>	<p><i>Please include a reference to the relevant chapter/section of the OM or indicate 'n/a'.</i></p>	



## AMC3 Article 11 Rules for conducting an operational risk assessment

PREDEFINED RISK ASSESSMENT PDRA-G02 Version 1.12

EDITION ~~January~~ September 2023~~2~~

[...]

Remote pilot	Self-declaration	5.3 The remote pilot has the authority to cancel or delay any or all flight operations under the following conditions:	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		5.3.1 when the safety of persons is jeopardised;	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		5.3.2 when property on the ground is jeopardised;	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		5.3.3 when other airspace users are in jeopardy;	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		5.3.4 when there is a violation of the terms of the operational authorisation.	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		5.4 The remote pilot should:		
		5.4.1 not perform any duties under the influence of psychoactive substances or alcohol, or when they are unfit to perform their tasks due to injury, fatigue, medication, sickness or other causes;	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		5.4.2 be familiar with the manufacturer's instructions provided by the manufacturer of the UAS;	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		<del>5.4.3 ensure that the UA remains clear of clouds;</del>	<del><i>Please include a reference to the relevant chapter/section of the OM.</i></del>	<del>'I declare compliance.'</del>
		<del>5.4.4 perform unaided visual scan of the airspace as required to avoid any potential collision hazard;</del>	<del><i>Please include a reference to the relevant chapter/section of the OM.</i></del>	<del>'I declare compliance.'</del>
		5.4.3 <sup>5</sup> obtain updated information relevant to the intended operation about any geographical zones defined in accordance with Article 15 of the UAS Regulation; and	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		5.4.4 <sup>6</sup> ensure that the UAS is in a safe condition to complete the intended flight safely and, if applicable, check whether the direct remote identification is active and up to date.	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'

PDRA characterisation and conditions				
Topic	Method of proof	Condition	Integrity <sup>18</sup>	Proof <sup>19</sup>
Containment	Declaration supported by data	6.9 To ensure a safe recovery from a technical issue that involves the UAS or an external system that supports the operation, the UAS <del>operator</del> should comply with the following basic containment provisions <del>ensure that</del> :		
		6.9.1 no probable failure of the UAS or of any external system that supports the operation would lead to operation outside the operational volume; and	<i>Please describe how this condition is met</i>	'n/a since enhanced containment applies.'
		6.9.2 it is reasonably expected that a fatality will not occur due to any probable failure of the UAS or of any external system that supports the operation.	<i>Please describe how this condition is met</i>	or 'I declare compliance.'
		6.10 The following enhanced containment <del>additional</del> conditions should apply if the adjacent area includes an assembly of people or if the adjacent airspace is classified as ARC-d (in accordance with <del>the</del> SORA):		A design and installation appraisal is available and it covers at least: — the design and installation features (independence, separation, and redundancy); and — the particular risks (e.g. hail, ice, snow, electromagnetic interference, etc.) relevant to the type of operation.
		6.10.1 The UAS should be designed to standards that are considered adequate by the competent authority and/or in accordance with a means	<i>Please include a reference to the relevant chapter/section of the OM or indicate 'n/a'.</i>	'n/a since basic containment applies,'

<sup>18</sup> To be filled in by the UAS operator.

<sup>19</sup> To be filled in by the UAS operator.

PDRA characterisation and conditions				
Topic	Method of proof	Condition	Integrity <sup>18</sup>	Proof <sup>19</sup>
	Declaration supported by data	of compliance that is acceptable to that competent authority such that:		<p>'I declare compliance with MoC Light-UAS.2511.1.2. Analysis and/or test data with supporting evidence is available.'</p> <p>or</p> <p>'The UAS has a DVR demonstrating compliance with the enhanced containment requirements.'</p>
		6.10.1.1. the probability of the UA leaving the operational volume should be less than $10^{-4}$ /FH; and	Please include a reference to the relevant chapter/section of the OM or indicate 'n/a'.	
		6.101.1.2 no single failure of the UAS or of any external system that supports the operation should lead to operation outside the ground risk buffer. <i>Note: The term 'failure' should be understood as an occurrence that affects the operation of a component, part, or element in such a way that it can no longer function as intended. Errors may cause failures but are not considered to be failures. Some structural or mechanical failures may be excluded from this criterion if it can be shown that these mechanical parts were designed according to aviation industry best practices.</i>	Please include a reference to the relevant chapter/section of the OM or indicate 'n/a'.	
		6.10.2 SW and AEH whose development error(s) could directly lead to operations outside the ground risk buffer should be developed according to an industry standard or methodology that is recognised as adequate by the competent authority EASA. <i>Note 1: The proposed additional safety conditions cover both the integrity and the assurance levels.</i> <i>Note 2: The proposed additional safety conditions do not imply a systematic need to develop the SW and AEH according to an industry standard or methodology that is recognised as adequate by the competent authority. For instance, if the UA design</i>	Please include a reference to the relevant chapter/section of the OM, otherwise indicate 'n/a'.	

PDRA characterisation and conditions				
Topic	Method of proof	Condition	Integrity <sup>18</sup>	Proof <sup>19</sup>
		includes an <i>independent</i> engine shutdown function that systematically prevents the UA from exiting the ground risk buffer due to single failures or an SW/AEH error of the flight controls from occurring, the intent of the conditions of point 6.10.1 above could be considered met		

## AMC4 Article 11 Rules for conducting an operational risk assessment

### PREDEFINED RISK ASSESSMENT PDRA-S01 Version 1.12

EDITION ~~January~~ September 2023

#### (a) Scope

This PDRA addresses the same type of operations that are covered by the standard scenario STS-01 (Appendix 1 to the Annex to the UAS Regulation); however, it provides the UAS operator with the flexibility to use UASs that do not need to be marked as class C5.

This PDRA addresses UAS operations that are conducted:

- (1) with UA with maximum characteristic dimensions (e.g. wingspan, rotor diameter/area or maximum distance between the rotors tips in the case of a multicopter) of up to 3 m and MTOM of up to 25 kg;
- (2) in VLOS of the remote pilot;
- (3) over a controlled ground area that might be located in a populated area;
- (4) below 150 m above ground level (AGL) (except when close to obstacles); and

(5) in controlled or uncontrolled airspace, provided that there is a low probability of encountering manned aircraft<sup>20</sup>.

(b) PDRA characterisation and conditions

The characterisation and conditions for this PDRA are summarised in **Table PDRA-S01.1** below:

---

<sup>20</sup> Member States are required to establish the appropriate measures (e.g. UAS geographical zones) to ensure this low probability of encounter. Such a low probability of encounter is equivalent to an ARC that is no higher than ARC-b. Thus, ARC-b is to be considered here as the highest residual (final) ARC.

PDRA characterisation and conditions				
Topic	Assurance level	Condition	Demonstration of integrity <sup>21</sup>	Demonstration of assurance <sup>22</sup>
1. Operational characterisation (scope and limitations)				
Level of human intervention	Self-declaration	1.1 No autonomous operations: the remote pilot should have the ability to maintain control of the UA, except in case of a loss of the command-and control (C2) link.	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		1.2 The remote pilot should operate only one UA at a time.	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		1.3 The remote pilot should not operate the UA from a moving vehicle.	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		1.4 The remote pilot should not hand the control of the UA over to another command unit.	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
UA range limit	Self-declaration	1.5 VLOS distance from the remote pilot at all times.	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
Overflown areas	Self-declaration	1.6 UAS operations should be conducted over a controlled ground area.	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		1.7 For the operation of a tethered UA, the area should have a radius equal to the tether length plus 5 m, and should be centred on the point of the surface of the Earth where the tether is fixed.	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
UA limitations	Self-declaration	<del>1.8 The UA should have an MTOM of less than 25 kg, including payload.</del> 1.89 The UA should have a maximum characteristic dimension (e.g. wingspan, rotor diameter/area or maximum distance between rotors tips in the case of a multirotor) of less than 3 m.	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
Flight height limit		1.910 The remote pilot should maintain the UA within 120 m (unless making use of the option defined in point 1.12) from the closest point of the surface of the Earth. The	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'

<sup>21</sup> To be filled in by the UAS operator.

<sup>22</sup> To be filled in by the UAS operator.

PDRA characterisation and conditions				
Topic	Assurance level	Condition	Demonstration of integrity <sup>21</sup>	Demonstration of assurance <sup>22</sup>
	Self-declaration	measurement of the distances should be adapted according to the geographical characteristics of the terrain, such as plains, hills, and mountains.		
		1.10 <del>1</del> When flying a UA within a horizontal distance of 50 m from an artificial obstacle that is taller than 105 m, the maximum height of the UAS operation may be increased up to 15 m above the height of the obstacle, at the request of the entity responsible for the obstacle.	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		1.11 <del>2</del> When UAS operators intend to operate at a height above 120 m, up to 150 m, they should define a risk buffer according to point 3.8 below.	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
Airspace	Self-declaration	1.12 <del>3</del> The UA should be operated:		
		1.12 <del>3</del> .1 in uncontrolled airspace, unless different limitations are provided for by the Member States for their UAS geographical zones in areas where the probability of encountering manned aircraft is not low; or	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		1.12 <del>3</del> .2 in controlled airspace after coordination and flight authorisation in accordance with the published procedures for the area of operation, to ensure that the probability of encountering manned aircraft is low. <i>Note: Airspace with an air risk that is classified as not higher than ARC-b can be considered having a low probability of encountering manned aircraft.</i>	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
Visibility	Self-declaration	1.13 <del>4</del> The flight visibility should allow the remote pilot to conduct the entire flight in VLOS.	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
Others	Self-declaration	1.14 <del>5</del> The UA should not be used to carry dangerous goods, except for dropping items in connection with agricultural, horticultural	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'



PDRA characterisation and conditions				
Topic	Assurance level	Condition	Demonstration of integrity <sup>21</sup>	Demonstration of assurance <sup>22</sup>
		<p>or forestry activities where the carriage of such items does not contravene any other applicable regulations.</p> <p><b>Note:</b> The operator shall comply with applicable national or international regulations on the use of plant protection products, chemicals, dangerous substances, and preparations as appropriate. This includes Directive 2009/128/EC establishing a framework for Community action to achieve the sustainable use of pesticides, if applicable.</p>		
<b>2. Operational risk classification (according to the classification defined in AMC1 Article 11 of the UAS Regulation)</b>				
Final GRC	<b>3</b>	Final ARC	<b>ARC-b</b>	SAIL
<b>3. Operational mitigations</b>				
Operational and adjacent volume (see Figure 2 of AMC1 Article 11)	Self-declaration	3.1 The UAS operator should define the operational volume, ground risk buffer and adjacent volume for the intended operation, including:	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		3.1.1 the flight geography; and	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		3.1.2 the contingency volume, with its external limit(s) at least 10 m beyond the limit(s) of the flight geography if the operation is conducted with untethered UA.	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		3.2 To determine the operational volume, the UAS operator should consider the position-keeping capabilities of the UAS in 4D space (latitude, longitude, height, and time).	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		3.3 In particular, the accuracy of the navigation solution, the flight technical error of the UAS, as well as the flight path definition error (e.g. map error) and latencies should be	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'

PDRA characterisation and conditions																	
Topic	Assurance level	Condition	Demonstration of integrity <sup>21</sup>	Demonstration of assurance <sup>22</sup>													
		considered and addressed when determining the operational volume.															
		3.4 The size of adjacent volume should be defined.	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'													
		3.5 The remote pilot should apply emergency procedures as soon as there is an indication that the UA may exceed the limits of the operational volume, as per point 5.3.8(d) below.	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'													
		3.6 No persons should be overflown when spraying liquids or dropping substances. Infrastructure or facilities can be overflown on request of the entity responsible for the infrastructure or facility.	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'													
Ground risk	Self-declaration	3.75 The UAS operator should establish a ground risk buffer to protect third parties on the ground outside the operational volume.	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'													
		3.86 For the operation of untethered UA, the ground risk buffer should cover a distance beyond the external limit(s) of the contingency area. That distance should be at least as defined below:	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'													
		<table><tr><th>Max height AGL<sup>23</sup></th><th colspan="2">Minimum distance for ground risk buffer</th></tr><tr><td></td><th>with MTOM of up to 10 kg</th><th>with MTOM greater than 10 kg</th></tr><tr><td>10 m</td><td>5 m</td><td>10 m</td></tr><tr><td>30 m</td><td>10 m</td><td>20 m</td></tr></table>				Max height AGL <sup>23</sup>	Minimum distance for ground risk buffer			with MTOM of up to 10 kg	with MTOM greater than 10 kg	10 m	5 m	10 m	30 m	10 m	20 m
		Max height AGL <sup>23</sup>				Minimum distance for ground risk buffer											
	with MTOM of up to 10 kg	with MTOM greater than 10 kg															
10 m	5 m	10 m															
30 m	10 m	20 m															

<sup>23</sup> The closest point from the Earth should be considered.

PDRA characterisation and conditions						
Topic	Assurance level	Condition			Demonstration of integrity <sup>21</sup>	Demonstration of assurance <sup>22</sup>
		60 m	15 m	30 m		
		90 m	20 m	45 m		
		120 m	25 m	60 m		
		150 m	30 m	75 m		
		3.97	For the operation of tethered UA, the ground risk buffer is considered in point 1.7 above.			Please include a reference to the relevant chapter/section of the OM.
Air risk	Declaration supported by data	3.108	If the UAS operation is performed above 120 m and up to 150 m, the UAS operator should:			
		3.108.1	establish an air risk buffer to protect third parties in the air outside the operational volume; and		Please include a reference to the relevant chapter/section of the OM, otherwise indicate 'n/a'.	'I declare compliance and that supporting evidence is included in the OM.' Justification supporting the reduction of the air risk buffer is documented in [...] or 'n/a'.
		3.108.2	if the air risk buffer is part of controlled airspace, coordinate the operation with the respective ANSP;		Please include a reference to the relevant chapter/section of the OM, otherwise indicate 'n/a'.	'I declare compliance and that supporting evidence is included in the OM.' 'or n/a'
		3.108.3	develop appropriate procedures to not jeopardise other airspace users.		Please include a reference to the relevant chapter/section of the OM. Please describe how the remote pilots and, if employed, the AOs are able to assess the height of the UA compared to other airspace users <sup>24</sup> , otherwise indicate 'n/a'.	'I declare compliance and that supporting evidence is included in the OM.' 'or n/a'

<sup>24</sup> The UAS operator should demonstrate that they have sufficient confidence in the accuracy of the information about the height of the UA and the means to advert and avoid other airspace users and obstacles in the vicinity of the UA.

PDRA characterisation and conditions				
Topic	Assurance level	Condition	Demonstration of integrity <sup>21</sup>	Demonstration of assurance <sup>22</sup>
	Self-declaration	3.11 <sup>9</sup> The operational volume should be outside any geographical zone corresponding to a flight restriction zone of a protected aerodrome or of any other type, as defined by the responsible authority, unless the UAS operator has been granted appropriate permission.	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		3.12 <sup>9</sup> Prior to the flight, the UAS operator should assess the proximity of the planned operation to manned aircraft activity.	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		3.13 The UAS operator should establish a de-confliction scheme that allows the remote pilot to take efficient decisions in case of incoming traffic.	<i>Please include a reference to the relevant chapter/section of the OM</i>	'I declare compliance.'
Observers		Airspace observers (AOs): n/a UA observers: refer to point 5.3.8(b) below.		

4. UAS operator and UAS operations conditions				
UAS operator and UAS operations	Declaration supported by data	4.1 The UAS operator should:		
		4.1.1 develop an operations manual (OM) (for the template, refer to AMC1 UAS.SPEC.030(3)(e) and to the complementary information in GM1 UAS.SPEC.030(3)(e));	Please describe how this condition is met.	'I declare compliance and that supporting evidence is included in the OM.'
		4.1.2 define, and include in the OM, the procedure to determine the operational volume and ground risk buffer for the intended operation, as per points 3.1 to 3.6 above, and the adjacent volume; <del>include them in the OM;</del>	Please describe how this condition is met.	'I declare compliance and that supporting evidence is included in the OM.'
		4.1.3 develop procedures to ensure that the operation is conducted safely and that the security requirements applicable to the area of operations are complied with during the intended operation;	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance and that supporting evidence is included in the OM.'
		4.1.4 develop measures to protect the UAS against unlawful interference and unauthorised access;	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance and that supporting evidence is included in the OM.'
		4.1.5 develop procedures to ensure that all operations comply with Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data. In particular, the UAS operator should carry out a data protection impact assessment, when this is required by the data protection national authority of the Member State with regard to the application of Article 35 of that Regulation;	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance and that supporting evidence is included in the OM.'

		4.1.6 develop guidelines for its remote pilots to plan UAS operations in a manner that minimises nuisance, including noise and other emissions-related nuisance, to people and animals;	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance and that supporting evidence is included in the OM.'
		4.1.7 ensure the adequacy of the contingency and emergency procedures and prove it through any of the following: (a) dedicated flight tests; or (b) simulations, provided that the representativeness of the simulation means is proven <b>valid</b> for the intended purpose with positive results; or (c) any other means acceptable to the competent authority;	<i>Please describe how this condition is met</i>	'I declare compliance and that evidence is available to the competent authority for review.'
		4.1.8 develop an effective emergency response plan (ERP) that is suitable for the intended operation (see GM1 UAS.SPEC.030(3)(e));	<i>Please describe how this condition is met</i>	'I declare compliance and that evidence is available to the competent authority for review.'
		4.1.9 upload updated information into the geo-awareness function, if such system is installed on the UAS, when required by the UAS geographical zone for the intended location of the operation;	<i>Please describe how this condition is met</i>	'I declare compliance and that supporting evidence is included in the OM.'
		4.1.10 ensure that before starting the operation, the controlled ground area is in place, effective, and compliant with the minimum distance that is defined in points 3.1 and 3.5 above and, when required, coordination with the appropriate authorities has been established;	<i>Please describe how this condition is met</i>	'I declare compliance and that supporting evidence is included in the OM.'
		4.1.11 ensure that before starting the operation, all persons that are present in the controlled ground area:		

	(a)	have been informed of the risks of the operation;	<i>Please describe how this condition is met</i>	'I declare compliance and that supporting evidence is included in the OM.'
	(b)	have been briefed on or trained in, as appropriate, the safety precautions and measures that the UAS operator has established for their protection; and	<i>Please describe how this condition is met</i>	'I declare compliance and that supporting evidence is included in the OM.'
	(c)	have explicitly agreed to participate in the operation; and	<i>Please describe how this condition is met</i>	'I declare compliance and that supporting evidence is included in the OM.'
	4.1.12	designate for each flight a remote pilot with adequate competency and other personnel in charge of duties essential to the UAS operation if needed;	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance and that supporting evidence is included in the OM.'
	4.1.13	in case the operation takes place in a controlled airspace, as part of the procedures that are contained in the OM (point 4.1.1 above), include the description of the following: (a) the method and means of communication with the authority or entity responsible for the management of the airspace during the entire period of operation; (b) the member(s) of personnel in charge of duties essential to the UA operation, who are responsible for establishing that communication;	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance and that supporting evidence is included in the OM.'
	4.1.134	ensure that the UAS operation effectively uses and supports the efficient use of the radio spectrum in order to avoid harmful interference;	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance and that supporting evidence is included in the OM.'
	4.1.145	keep for a minimum of 3 years and maintain up to date a record of the information on UAS operations, including	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance and that recordkeeping data is available to the competent authority.'

		any unusual technical or operational occurrences and other data as required by the declaration or by the operational authorisation.		
UAS maintenance	Self-declaration	4.2 The UAS operator should:		
		4.2.1 ensure that the UAS maintenance instructions that are defined by the UAS operator are included in the OM and cover at least the UAS manufacturer's instructions and requirements when applicable; and	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		4.2.2 ensure that the maintenance staff follow the UAS maintenance instructions when performing maintenance;	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		4.2.3 keep for a minimum of 3 years and maintain up to date a record of the maintenance activities conducted on the UAS;	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		4.2.4 establish and maintain up to date a list of the maintenance staff employed by the operator to carry out maintenance activities;	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		4.2.5 comply with point UAS.SPEC.100, if the UAS uses certified equipment.	<i>Please include a reference to the relevant chapter/section of the OM or n/a.</i>	'I declare compliance.' or 'n/a'
External services	Self-declaration	4.5 The UAS operator should ensure that the level of performance for any externally provided service that is necessary for the safety of the flight is adequate for the intended operation. The UAS operator should declare that this level of performance is adequately achieved.	<i>Please describe how this condition is met.</i>	'I declare compliance.'
		4.6 The UAS operator should define and allocate the roles and responsibilities between the UAS operator and the external service provider(s), if applicable.		



5. Conditions for the personnel in charge of duties essential to the UAS operation					
General		5.1	The UAS operator should keep and maintain up to date a record of all the relevant qualifications and training courses completed by the remote pilot and the other personnel in charge of duties essential to the UAS operation and by the maintenance staff for at least 3 years after those persons have ceased to be employed by the organisation or have changed position within the organisation.	Please describe how this condition is met.	'I declare compliance.' Record-keeping data is available for inspection at the request of the competent authority.
		5.2	The remote pilot should have the authority to cancel or delay any or all flight operations under the following conditions:		
		5.2.1	the safety of persons is jeopardised; or	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'
		5.2.2	property on the ground is jeopardised; or	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'
		5.2.3	other airspace users are in jeopardy; or	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'
		5.2.4	there is a violation of the terms of the operational authorisation.	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'
		Remote pilot	Self-declaration	5.3	The remote pilot should:
5.3.1	not perform any duties under the influence of psychoactive substances or alcohol, or when they are unfit to perform their tasks due to injury, fatigue, medication, sickness or other causes;			Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'
5.3.2	be familiar with the manufacturer's instructions provided by the manufacturer of the UAS;			Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'
5.3.3	ensure that the UA remains clear of clouds;			Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'
5.3.4	hold a certificate of remote pilot theoretical knowledge, in accordance with Attachment A to Chapter I of			Please describe how this condition is met.	'I declare compliance.' or 'n/a'

		Appendix 1 to the Annex to the UAS Regulation, which is issued by the competent authority or by an entity that is designated by the competent authority of a Member State;		
		5.3.5 hold an accreditation of completion of a practical-skills training course for this PDRA, in accordance with Attachment A to Chapter I of Appendix 1 to the Annex to the UAS Regulation, which is issued by: (a) an entity that has declared compliance with the requirements of Appendix 3 to the Annex to the UAS Regulation and is recognised by the competent authority of a Member State; or (b) a UAS operator that has been authorised by the competent authority of the Member State of registration to operate according to this PDRA (or declared to the same competent authority, compliance with STS-01) and with the requirements of Appendix 3 to the Annex to the UAS Regulation.	<i>Please describe how this condition is met.</i>	'I declare compliance.' or 'n/a'
		5.3.6 If operations are conducted at a height between 120 and 150 m, the remote pilot should undergo additional theoretical knowledge training in the following topics:		
		(a) raising awareness about the air risk and about the existence of other airspace users;	<i>Please describe how this condition is met.</i>	'I declare compliance and that the training syllabus is available for inspection at the request of the competent authority.'
		(b) checking height determination/limitation devices; and	<i>Please describe how this condition is met.</i>	'I declare compliance and that the training syllabus is available for

				inspection at the request of the competent authority.'
		(c) using applicable procedures in case a manned aircraft is detected.	<i>Please describe how this condition is met.</i>	'I declare compliance and that the training syllabus is available for inspection at the request of the competent authority.'
		5.3.7 As an alternative to holding a certificate of remote pilot theoretical knowledge, according to point 5.3.4, and to holding an accreditation of completion of a practical-skills training course according to point 5.3.4, the operator may propose a dedicated training syllabus to the competent authority;	<i>Please describe how this condition is met.</i>	'I declare compliance and that the training syllabus is available for inspection at the request of the competent authority.' or 'n/a'.
		5.3.8 Before starting the UAS operation, the remote pilot should:		
		(a) verify that the means to terminate the UA flight and the remote identification system are operational;	<i>Please describe how this condition is met.</i>	'I declare compliance.'
		(b) obtain updated information relevant to the intended operation about any geographical zones defined in accordance with Article 15 of the UAS Regulation; and	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		(c) ensure that the UAS is in a safe condition to complete the intended flight safely and, if applicable, check whether the direct remote identification is active and up to date.	<i>Please include a reference to the relevant chapter/section of the OM.</i>	'I declare compliance.'
		5.3.9 During the flight:		
		(a) keep the UA in VLOS and maintain thorough visual scan of the airspace that surrounds the UA to avoid any risk of collision with manned aircraft; the remote pilot should discontinue	<i>Please describe how this condition is met.</i>	'I declare compliance.'

6.	Technical conditions		the flight if the operation poses a risk to other aircraft, people, animals, environment or property;		
		(b)	for the purpose of point (a) above, <del>be</del> possibly being assisted by a UA observer <sup>25</sup> ; clear and effective communication should be established between the remote pilot and the UA observer;	Please describe how this condition is met.	'I declare compliance.'
		(c)	use the contingency procedures that are defined by the UAS operator for abnormal situations, including situations where the remote pilot has an indication that the UA may exceed the limits of the flight geography; and	Please describe how this condition is met.	'I declare compliance.'
		(d)	use the emergency procedures that are defined by the UAS operator for emergencies, including triggering the means to terminate the flight when the remote pilot has an indication that the UA may exceed the limits of the operational volume; the means to terminate the flight should be triggered at least 10 m before the UA reaches the limits of the operational volume;	Please describe how this condition is met.	'I declare compliance.'
		(e)	keep the UA at a ground speed of less than 5 m/s in case of untethered UA;	Please describe how this condition is met.	'I declare compliance.'
		(f)	activate the direct remote identification system <sup>26</sup> .	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'

<sup>25</sup> Please refer to point UAS.STS-02.050 for the responsibilities of the UA observer.

<sup>26</sup> Applicable from 1 July 2022.

UAS	Self-declaration <sup>27</sup>	6.1 The UAS operator should use a UAS marked as class C5 and complies with the requirements of that class, as defined in Part 16 of the Annex to Regulation (EU) 2019/945.		'I declare that the UAS is marked with a class C5 identification label.' or 'n/a'
		<p>6.2 As an alternative to point 6.1, the UAS operator may use a UAS that complies with the requirements of Part 16 of the Annex to Regulation (EU) 2019/945, except that the UAS does <u>not</u> need to:</p> <ul style="list-style-type: none"> <li>• bear a class C3 UAS or a class C5 UAS identification label;</li> <li>• have an MTOM of less than 25 kg;</li> <li>• be exclusively powered by electricity, if the UAS operator ensures that the environmental impact that is caused by the use of non-electric UAS is minimised;</li> <li>• include an information notice that is published by EASA and provides the applicable limitations and obligations, as required by the UAS Regulation; and</li> <li>• include the manufacturer's instructions for the UAS, if it is privately built; however, information on its operation and maintenance, as well as on the training of the remote pilot, should be included in the OM.</li> </ul> <p><b>Note 1:</b> The UAS can comply with point (9) of Part 4 of the Annex to Regulation (EU) 2019/945 by using an add-on that complies with Part 6 of the Annex to that Regulation.</p>	Please describe how this condition is met.	'I declare compliance.' or 'n/a'

<sup>27</sup> The containment requirements (reference to point 5 of Part 16 of Regulation (EU) 2019/945) should be demonstrated with a medium assurance level.

		<p><b>Note 2:</b> If the UA does not bear a physical serial number that is compliant with standard ANSI/CTA 2063-A ‘Small Unmanned Aerial Systems Serial Numbers’ and/or does not have an integrated system of direct remote identification, it can comply with point (9) of Part 4 of the Annex to Regulation (EU) 2019/945 by using an add-on that complies with Part 6 of the Annex to that Regulation.</p>		
		<p>6.3 In addition, if:</p> <ul style="list-style-type: none"> <li>the adjacent area does not include a populated area or an assembly of people; and</li> <li>the adjacent airspace is classified as ARC-a or ARC-b,</li> </ul> <p>point 5 of Part 16 of the Annex to Regulation (EU) 2019/945 may be replaced with the following basic containment conditions:</p> <ul style="list-style-type: none"> <li>no probable failure of the UAS or of any external system that supports the operation would lead to operation outside the operational volume; and</li> <li>it is reasonably expected that a fatality will not occur due to any probable failure of the UAS or of any external system that supports the operation.</li> </ul>	<p><i>Please describe how this condition is met.</i></p>	<p>‘Basic containment applies and I declare that a design and installation appraisal is available and it covers at least:</p> <ul style="list-style-type: none"> <li>the design and installation features (independence separation, and redundancy); and</li> <li>the particular risks (e.g. hail, ice, snow, electromagnetic interference, etc.) relevant to the type of operation.’ <p>or</p> <p>‘Enhanced containment applies and I declare compliance with MoC Light-UAS.2511. Analysis and/or test data with supporting evidence is available.’</p> <p>or</p> <p>‘The UAS has a DVR demonstrating compliance with the enhanced containment requirements.’</p> </li></ul>
		<p><del>6.2.1 bear a class C3 UAS or a class C5 UAS identification label;</del></p> <p><del>6.2.2 be exclusively powered by electricity, if the UAS operator ensures that the</del></p>		

		<p><del>environmental impact that is caused by the use of non-electric UAS is minimised;</del></p> <p><del>6.2.3 include a notice that is published by EASA and provides the applicable limitations and obligations, as required by the UAS Regulation; and</del></p> <p><del>6.2.4 include the manufacturer's instructions for the UAS if it is privately built; however, information on its operation and maintenance, as well as on the training of the remote pilot, should be included in the OM.</del></p> <p><del><b>Note 1:</b> The UAS can comply with point (9) of Part 4 of the Annex to Regulation (EU) 2019/945 by using an add-on that complies with Part 6 of the Annex to that Regulation.</del></p> <p><del><b>Note 2:</b> If the UA does not bear a physical serial number that is compliant with standard ANSI/CTA-2063-A 'Small Unmanned Aerial Systems Serial Numbers' and/or does not have an integrated system of direct remote identification, it can comply with point (9) of Part 4 of the Annex to Regulation (EU) 2019/945 by using an add-on that complies with Part 6 of the Annex to that Regulation.</del></p> <p><del><b>Note 3:</b> If the UAS is privately built, there may be no identification on the UA of its MTOM. In that case, the UAS operator should ensure that the MTOM of the UA, in the configuration of the UA before take-off, does not exceed 25 kg.</del></p> <p>6.4 If designed to spray, the UA should:</p> <p>6.4.1 be designed to avoid an accidental release of any substance;</p>		
--	--	---	--	--

		6.4.2 have means for the remote pilot to immediately stop the spraying of liquids or dropping of substances in case of an emergency.		
--	--	--	--	--

**Table PDRA-S01.1 — Main limitations and conditions for PDRA-S01**

## AMC6 Article 11 Rules for conducting an operational risk assessment

PREDEFINED RISK ASSESSMENT PDRA-G03 Version 1.01

EDITION ~~January~~ September 2023~~2~~

[...]

Air risk	Self-declaration	<p>3.9 The UAS operation should be conducted:</p> <p>3.9.1 in ‘atypical airspace’ which, for the purpose of this PDRA, is one of the following:</p> <p>3.9.1.1 in reserved or segregated airspace; the claim for ARC-a is met if a reserved or segregated airspace is established and approved for the purpose of conducting UAS operations under this PDRA, with the operational volume and air risk buffer, if applicable, being entirely contained in that reserved or segregated airspace;</p> <p>3.9.1.2 at a height of the flight geography of less than 30 m;</p> <p>3.9.1.3 when operating in the proximity of natural or artificial</p>	<p><i>Please include a reference to the relevant chapter/section of the OM.</i></p>	‘I declare compliance.’
----------	------------------	--	---	-------------------------



		<p>obstacles (e.g. trees, buildings, towers, cranes, fences, power lines, etc.) whose height is below 20 m, keeping the UA within the following distances:</p> <ul style="list-style-type: none"> <li>(i) 30 m horizontal distance;</li> <li>(ii) <del>15</del>30 m vertical distance from the top of the overflown obstacle;</li> </ul> <p>3.9.1.4 when operating in the proximity of natural or artificial obstacles (e.g. trees, buildings, towers, cranes, fences, power lines, etc.) whose height is above 20 m, keeping the UA within the following distances:</p> <ul style="list-style-type: none"> <li>(i) <del>15</del>30m horizontal distance;</li> <li>(ii) 15 m vertical distance from the top of the overflown obstacle;</li> </ul>		
--	--	---	--	--

[...]

Remote pilot	Self-declaration	5.3 The remote pilot has the authority to cancel or delay any or all flight operations under the following conditions:		
		5.3.1 the safety of persons is jeopardised;	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'
		5.3.2 property on the ground is jeopardised;	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'
		5.3.3 other airspace users are in jeopardy;	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'
		5.3.4 there is a violation of the terms of the operational authorisation.	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'
		5.4 The remote pilot should:		
		5.4.1 not perform any duties under the influence of psychoactive substances or alcohol, or when they are unfit to perform their tasks due to injury, fatigue, medication, sickness or other causes;	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'
		5.4.2 be familiar with the manufacturer's instructions provided by the manufacturer of the UAS;	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'
		<del>5.4.3 ensure that the UA remains clear of clouds;</del>	<del>Please include a reference to the relevant chapter/section of the OM.</del>	<del>'I declare compliance.'</del>
		<del>5.4.4 perform unaided visual scan of the airspace as required to avoid any potential collision hazard;</del>	<del>Please include a reference to the relevant chapter/section of the OM.</del>	<del>'I declare compliance.'</del>
		5.4.5 obtain updated information relevant to the intended operation about any geographical zones defined in accordance with Article 15 of the UAS Regulation; and	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'
		5.4.6 ensure that the UAS is in a safe condition to complete the intended flight safely and, if applicable, check whether the direct remote identification is active and up to date.	Please include a reference to the relevant chapter/section of the OM.	'I declare compliance.'

[...]

PDRA characterisation and conditions				
Topic	Method of proof	Condition	Integrity <sup>28</sup>	Proof <sup>29</sup>
Containment	Declaration supported by data	6.12 To ensure a safe recovery from a technical issue that involves the UAS or an external system that supports the operation, the UAS <del>operator</del> should comply with the following basic containment provisions <del>ensure that:</del>		
		6.12.1 no probable failure of the UAS or of any external system that supports the operation would lead to operation outside the operational volume; and	<i>Please describe how this condition is met</i>	'n/a since enhanced containment applies.'
		6.12.2 it is reasonably expected that a fatality will not occur due to any probable failure of the UAS or of any external system that supports the operation. <i>Note: The term 'probable' should be understood in its qualitative interpretation, i.e. 'anticipated to occur one or more times during the entire system/operational life of an item'.</i>	<i>Please describe how this condition is met</i>	or 'I declare compliance.'
		6.13 The following enhanced containment <del>additional</del> conditions should apply if the adjacent area includes an assembly of people or if the adjacent airspace is classified as ARC-d (in accordance with <del>the</del> SORA):		'A design and installation appraisal is available and it covers at least: — the design and installation features (independence, separation, and redundancy); and — the particular risks (e.g. hail, ice, snow, electromagnetic interference, etc.) relevant to the type of operation.'

<sup>28</sup> To be filled in by the UAS operator.

<sup>29</sup> To be filled in by the UAS operator.

PDRA characterisation and conditions				
Topic	Method of proof	Condition	Integrity <sup>28</sup>	Proof <sup>29</sup>
	Declaration supported by data	6.13.1 The UAS should be designed to standards that are considered adequate by the competent authority and/or in accordance with a means of compliance that is acceptable to that competent authority such that:	<i>Please include a reference to the relevant chapter/section of the OM or indicate 'n/a'.</i>	'N/A since the basic containment applies' or 'I declare compliance with MoC Light-UAS.2511.'
		6.13.1.1. the probability of the UA leaving the operational volume should be less than 10 <sup>-4</sup> /FH; and	<i>Please include a reference to the relevant chapter/section of the OM or indicate 'n/a'.</i>	Analysis and/or test data with supporting evidence is available.'
		6.13.1.2 no single failure of the UAS or of any external system that supports the operation should lead to operation outside the ground risk buffer. <i>Note: The term 'failure' should be understood as an occurrence that affects the operation of a component, part, or element in such a way that it can no longer function as intended. Errors may cause failures but are not considered to be failures. Some structural or mechanical failures may be excluded from this criterion if it can be shown that these mechanical parts were designed according to aviation industry best practices.</i>	<i>Please include a reference to the relevant chapter/section of the OM or indicate 'n/a'.</i>	'The UAS has a DVR demonstrating compliance with Light-UAS.2511.'
		6.13.2 SW and AEH whose development error(s) could directly lead to operations outside the ground risk buffer should be developed according to an industry standard or methodology that is recognised as adequate by the competent authority EASA. <i>Note 1: The proposed additional safety conditions cover both the integrity and the assurance levels.</i> <i>Note 2: The proposed additional safety conditions do not imply a systematic need to develop the SW and AEH according to an industry standard or methodology that is recognised as adequate by the competent authority. For instance, if the UA</i>	<i>Please include a reference to the relevant chapter/section of the OM or indicate 'n/a'.</i>	

PDRA characterisation and conditions				
Topic	Method of proof	Condition	Integrity <sup>28</sup>	Proof <sup>29</sup>
		<p>design includes an <u>independent</u> engine shutdown function that systematically prevents the UA from exiting the ground risk buffer due to single failures or an SW/AEH error of the flight controls from occurring, the intent of the conditions of point 6.13.1 above could be considered met.</p> <p>Note 3: For this PDRA, having adjacent airspace classified as ARC-c like a hospital heliport in uncontrolled airspace is also deemed subject to the above additional conditions (in addition to ARC-d, as per SORA Step #9 (c)).</p>		
Remote identification <sup>30</sup>	Self-declaration	6.14 <sup>5</sup> The UAS bears a unique serial number compliant with standard ANSI/CTA2063-A-2019, <i>Small Unmanned Aerial Systems Serial Numbers</i> , 2019, according to Article 40(4) of Regulation (EU) 2019/945.	Please describe how this condition is met.	'I declare compliance.'
		6.15 <sup>6</sup> The UAS is equipped with a remote identification system according to Article 40(5) of Regulation (EU) 2019/945.	Please describe how this condition is met.	'I declare compliance.'
Lights <sup>31</sup>	Self-declaration	6.16 <sup>7</sup> If the UAS is operated at night, it is equipped with at least one green flashing light according to point UAS.SPEC.050(1)(I)(i) of the UAS Regulation.	Please describe how this condition is met or indicate 'n/a'.	'I declare compliance.' or 'n/a'

<sup>30</sup> Applicable from 1 July 2022.

<sup>31</sup> Applicable from 1 July 2022.

## **AMC7 Article 11 Rules for conducting an operational risk assessment**

### **OPERATIONS OF UNMANNED FREE BALLOONS**

An operation using an unmanned free balloon that complies with the provisions defined in Appendix 2 to Regulation (EU) No 923/2012 is considered meeting the safety objectives of the operational risk assessment laid down in Article 11 and thus implies compliance with this Article.