



Unmanned Aircraft Systems

Consultation: UK Acceptable Means of Compliance and Guidance Material

For

Regulation (EU) 2019/947 as retained (and amended in UK domestic law) under the European Union (Withdrawal) Act 2018

REVISION HISTORY

Date	Revision
January 2021	EASA AMC and GM applicable within the UK, and adopted on 01 January 2021.
July 2022	<i>Published for consultation.</i>

EDITORIAL NOTE

This document contains acceptable means of compliance and guidance material adopted by the UK CAA. Acceptable Means of Compliance (AMC) is followed by the related Guidance Material (GM). The reference number indicates the Article or paragraph in the corresponding Regulation which it relates to.

Each element is colour-coded and can be identified as follows:

Acceptable Means of Compliance
Guidance Material

Line numbers are included in this version, for consultation response purposes only.

The latest version of the regulation can be found in [CAP 1789A](#). It is advised that, when reviewing this document for consultation, this is read alongside the regulation itself.

What is AMC and GM?

Acceptable Means of Compliance (AMC) and Guidance Material (GM) sits below regulation, in order to support it. Regulations are binding in their entirety and must be followed.

Acceptable means of compliance AMC is the accepted way in which the regulation may be complied with. Although AMC is non-binding, if an alternative way of complying with the regulations is proposed, then this must be assessed, and accepted by the CAA.

If an operator wishes to deviate from the AMC provided within this document, then an alternative method must be provided to the CAA for review, using form [SRG 1840](#). The CAA RPAS Policy Team should be contacted for further information on this process. In this case presumption of compliance with the law, provided by the CAA AMC, is lost, and the applicant must demonstrate that their version is compliant with the law.

GM supports AMC and is non-binding. It provides interpretation and advice where necessary, including examples, to help explain the AMC.

Purpose

This document is the AMC and GM to Regulation (EU) 2019/947 (*the UAS Implementing Regulation*) as retained (and amended in UK domestic law) under the European Union (Withdrawal) Act 2018.

The purpose of this document is to set out the AMC and GM to each regulatory article within UK Regulation (EU) 2019/947 and its annexes.

This document replaces the EASA version of the AMC and GM to EU 2019/945 and EU 2019/947 that was adopted by the UK, upon its exit from the EU on 31 December 2020.

This document may be supported by separate policy and guidance material.

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LIST OF ABBREVIATIONS

This list of abbreviations is included to explain terms referred to throughout this AMC and GM. A comprehensive list of abbreviations, and definitions, can be found in CAP 722D, which draws together a consolidated list of definitions from various regulations.

AIP	Aeronautical Information Publication
ANO 2016	Air Navigation Order 2016
ANSP	Air Navigation Service Provider
AO	Airspace Observer
AMC	Acceptable Means of Compliance
ATC	Air Traffic Control
ATS	Air Traffic Service
BVLOS	Beyond Visual Line of Sight
BRLOS	Beyond Radio Line of Sight
C2	Command and Control
CU	Command Unit
DAA	Detect and Avoid
ECCAIRS	European Coordination Centre for Accident and Incident Reporting Systems
GM	Guidance Material
GNSS	Global Navigation Satellite System
HMI	Human-Machine Interface
MTOM	Maximum Take-Off Mass
OA	Operational Authorisation
OC	Operating Certificate
OSC	Operating Safety Case
OM	Operations Manual
PDRA	Predefined Risk Assessment
RF	Radio Frequency
RP	Remote Pilot
RT	Radiotelephony
RLOS	Radio Line of Sight
RAE	Recognised Assessment Entity
TAF	Terminal Area Forecast
UA	Unmanned Aircraft
UAS	Unmanned Aircraft System
VLOS	Visual Line of Sight

COVER REGULATION

GM1 Article 2 Definitions

This Article defines a number of terms that are used within UK Regulation (EU) 2019/947. The definitions appear in the order that they appear in the regulation, rather than being listed alphabetically. Definitions that are published in the Basic Regulation (UK Regulation (EU) 2018/1139) or Delegated Regulation (UK Regulation (EU) 2019/945) are not replicated in this Article.

GM1 Article 2(1) Definitions

DEFINITION OF 'UAS'

The following are considered 'flying objects' rather than unmanned aircraft:

- Paper aeroplane
- Hand launched glider, but only those with no moveable control surfaces or remote-control link
- Frisbees, darts and other thrown 'toys'.

This is because the definition of an unmanned aircraft is:

'Any aircraft operating or designed to operate autonomously or to be piloted remotely without a pilot on board'.

And the definition of an aircraft is:

'Any machine that can derive support in the atmosphere from the reactions of the air other than reactions of the air against the earth's surface.'

GM1 Article 2(3) Definitions

DEFINITION OF 'ASSEMBLIES OF PEOPLE'

Assemblies of people have been defined by the ability of people to move around freely, and therefore move out of the way of an out-of-control UA.

There are no strict numbers defined above which a group of people would turn into an assembly of people as different situations would result in different conclusions. An assembly must be evaluated qualitatively, based on the ability of people within that group to move away from any risk posed by the UAS operation.

Qualitative examples of assemblies of people are:

- a) sport, cultural, religious or political events;
- b) music festivals and concerts;
- c) marches and rallies;
- d) parties, carnivals and fêtes.

GM1 Article 2(4) Definitions

36 **DEFINITION OF 'UAS GEOGRAPHICAL ZONE'**

37 The definition provided does not include airspace restrictions established under other regulations, such
38 as the Air Navigation Order (ANO). A UAS Geographical zone is an airspace restriction, established under
39 Article 15.

40

41 **AMC1 Article 2(7) Definitions**

42 **DEFINITION OF 'VISUAL LINE OF SIGHT OPERATION'- 'UNAIDED VISUAL CONTACT'**

43 'Unaided', in this context means without the use of any other equipment, such as binoculars, telescopes,
44 cameras or any other such equipment.

45 This does not include corrective lenses, which may be worn.

46 **Note:** Provision is made in Article 4(1)(d), and UAS.OPEN.060(4), for an UA to be flown in the Open
47 Category, beyond the visual line of sight of the remote pilot (due to the remote pilot using 'follow-me'
48 mode, or when making use of an unmanned aircraft observer).

49

50 **DEFINITION OF 'VISUAL LINE OF SIGHT OPERATION'- 'CONTROL THE VISUAL FLIGHT PATH'**

51 In order to control the visual flight path of the UA, it must be kept within a suitable distance of the
52 remote pilot such that they can monitor the aircraft's position, orientation and the surrounding airspace
53 at all times.

54

55 **GM1 Article 2(7) Definitions**

56 **DEFINITION OF 'VISUAL LINE OF SIGHT OPERATION'- 'CONTROL THE VISUAL FLIGHT PATH'**

57 Being able to control the visual flight path of the UA means keeping it within a suitable distance of the
58 remote pilot. This distance depends on a number of factors, including:

- 59
- 60 ▪ The eyesight of the remote pilot;
 - 61 ▪ The size of the UA (and its visual conspicuity);
 - 62 ▪ Any navigation lighting on board the UA;
 - 63 ▪ The weather conditions (fog, sun-glare etc);
 - 64 ▪ Terrain and any other obstacles that may obscure the view of the UA from the remote pilot;
 - 65 ▪ Whether the operation is during the hours of daylight, or night. Although there are not specific
66 limitations on operating at night, the visual conspicuity of the UA and ambient lighting, may
affect the distance to which the UA may be flown from the remote pilot.

67 This distance will likely vary on each flight depending on these factors, and the remote pilot should be
68 able to identify at what point VLOS can no longer be maintained.

69 Just because the UA is still *visible* (for example, a dot in the sky), this does not mean that it meets the
70 definition of VLOS. A RP must be able to determine the aircraft's orientation at all times.

71

72 AMC1 Article 2(11) Definitions

73 DEFINITION OF 'DANGEROUS GOODS'- CARRIAGE OF BLOOD

74 Under the definition of dangerous goods, blood may be capable of posing a hazard to health when it is
75 contaminated or unchecked (potentially contaminated).

76 Medical samples, such as uncontaminated blood, can be transported in the Open, Specific or Certified
77 categories.

78 Unchecked or contaminated blood must only be transported in the Specific or the Certified categories.
79 If the transport may result in a high risk for third parties in the case of an accident, the UAS operation
80 must be conducted in the Certified category (see Article 6(1)(b)(iii)).

81 If the blood is enclosed in a container such that in the case of an accident, the blood will not be spilled,
82 the UAS operation may be conducted in the Specific category provided there are no other causes of high
83 risk for third parties.

84 The carriage of any dangerous goods, regardless of whether it is held within a container as described
85 above, must be authorised by the CAA.

86

87 GM1 Article 2(16) Definitions

88 DEFINITION OF 'PRIVATELY BUILT'

89 The modification of a UAS that previously conformed to the requirements of UK Regulation (EU)
90 2019/945 (i.e. a Class Marked UAS), means that the UAS no longer confirms to these requirements. As
91 such, the UAS may be considered privately built.

92

93 GM1 Article 2(17) Definitions

94 DEFINITION OF 'AUTONOMOUS OPERATION'

95 The implementation of a pre-programmed emergency procedure; for example, the automatic RTH
96 function due to the loss of C2, does not constitute an autonomous operation.

97 An autonomous operation should not be confused with an automatic or automated operation, which
98 refers to an operation following pre-programmed instructions that the UAS executes whilst the remote
99 pilot is still able to intervene in the flight.

100

101 GM1 Article 2(18) Definitions

102 DEFINITION OF 'UNINVOLVED PERSONS'

103 The primary focus for UAS operations is the protection of people that are not a part of the flying
104 operation (i.e., third parties). Within the UAS regulations, they are referred to as 'uninvolved persons'.

105 A person may be considered 'involved' 'in a UAS operation if they:

106 (a) are solely present for the purpose of participating in the flight operation; or

107 (b) have given explicit consent to the UAS operator or to the remote pilot to be part of the UAS
108 operation; and

- 109 (c) have received from the UAS operator or from the remote pilot clear instructions and safety
110 precautions to follow in case the UAS exhibits any unplanned behaviour.

111

112 GM1 Article 2(22) Definitions

113 DEFINITION OF 'MAXIMUM TAKE-OFF MASS (MTOM)'

114 This MTOM is the maximum possible mass defined by the manufacturer or, in the case of a privately built
115 UAS, the builder. The MTOM includes all the elements on board the UA:

- 116 (a) all the structural elements of the UA;
117 (b) the motors;
118 (c) the propellers, if installed;
119 (d) all the electronic equipment and antennas;
120 (e) the batteries and the maximum capacity of fuel, oil and all fluids; and
121 (f) the heaviest payload allowed by the manufacturer of the UA, including sensors and their
122 ancillary equipment.

123 Privately built unmanned aircraft, and some off the shelf unmanned aircraft do not have a MTOM
124 defined. In this case, the mass of the aircraft at the time of take-off should be used instead, when
125 interpreting the term 'MTOM' within the regulation.

126 Although the UAS Regulations refer to 'maximum take-off mass' (MTOM) throughout, this term creates
127 some confusion when referring to home built or other non-class marked unmanned aircraft where an
128 MTOM has not been defined by the manufacturer.

129 Take-off Mass (Article 22)

130 The term 'take-off mass' is also used when referring to non-class marked aircraft, but only within one
131 article (Article 22 – transitional arrangements) and the term is not specifically defined.

132 For these aircraft, any reference to 'take-off mass' should be taken to mean the weight of the unmanned
133 aircraft at the point of take-off for that particular flight.

134

135 GM1 Article 3 Categories of UAS operations

136 BOUNDARIES BETWEEN THE CATEGORIES OF UAS OPERATIONS

- 137 (a) Boundary between Open and Specific

138 A UAS operation is not in the Open category when at least one of the general criteria listed in Article 4 of
139 the UAS Regulation is not met (e.g., when operating beyond visual line of sight (BVLOS)) or when the
140 detailed criteria for a subcategory are not met (e.g., operating a 10 kg UA close to people when
141 subcategory A2 is limited to 4 kg UA).

- 142 (b) Boundary between Specific and Certified

143 Article 6 of the UK Regulation (EU) 2019/947 and Article 40 of UK Regulation (EU) 2019/945 define the
144 boundary between the Specific and the Certified category. The first article defines the boundary from
145 an operational perspective, while the second one defines the technical characteristics of the UA; they

146 should be read together.

147 UAS operations must be carried out within the Certified category when they:

- 148 1. are conducted over assemblies of people with a UA that has characteristic dimensions of
149 3m or more; or
- 150 2. involve the transport of people; or
- 151 3. involve the carriage of dangerous goods that may result in a high risk for third parties in
152 the event of an accident.

153 In addition, a UAS operation is deemed within the Certified category when, based on the safety risk
154 assessment as detailed in Article 11, the competent authority considers that the safety risk cannot be
155 mitigated adequately without it being operated within the Certified category.

156

157 GM1 Article 4(1)(e) Open Category UAS Operations

158 MAXIMUM HEIGHT

159 Where maximum vertical height is described within the regulation as 120m this may also be
160 approximated to 400ft, for the purpose of this document.

161

162 GM1 Article 6 Certified category of UAS operations

163 UAS OPERATIONS IN THE CERTIFIED CATEGORY

164 Article 6 should be read alongside UK Regulation (EU) 2019/945 Article 40.

165 Article 6 addresses UAS operations and UK Regulation (EU) 2019/945 Article 40 addresses the UAS itself.
166 This separation was necessary to comply with UK Regulation (EU) 2018/1138 (*the Basic Regulation*),
167 which sets out that the requirements for UAS operations and registration are in UK Regulation (EU)
168 2019/947, and that the technical requirements for UAS are in UK Regulation (EU) 2019/945. The reading
169 of the two articles results in the following:

170

- 171 (a) the transport of people is always in the Certified category. The UAS must be certified in
172 accordance with Article 40 and the transport of people is one of the UAS operations identified in
173 Article 6 as being in the Certified category;
- 174 (b) flying over assemblies of people with a UA that has a characteristic dimension of less than 3m
175 may be carried out in the Specific category unless one of the conditions outlined within 'GM1
176 Article 3 Categories of UAS operations (b)' is met; and
- 177 (c) the transport of dangerous goods is in the Certified category if, following an accident, it would
178 pose a high risk to third parties.

179

180 AMC1 Article 6(1)(b)(iii) Certified category of operations

181 CARRIAGE OF DANGEROUS GOODS

182 The carriage of dangerous goods must be carried out within the Certified category if there is a high safety

183 risk to third parties following an accident.

184 **Note:** The operation may be carried out within the Specific category if this safety risk is mitigated
185 sufficiently. This may be achieved with the use of a crash protected container or by adjusting the
186 scope/location/nature of the operation, or by a combination of both.

187

188 AMC1 Article 7(2) Rules and procedures for the operation of UAS

189 STANDARDISED EUROPEAN RULES OF THE AIR

190 Article 7(2), states that “UAS operations in the ‘Specific’ category shall be subject to the applicable
191 operational requirements laid down in UK (EU) Commission Implementing Regulation No 923/2012”.

192 This text refers to the Standardised European Rules of the Air (SERA).

193 Not all requirements within SERA are relevant to UAS in the Specific Category. UAS Operators should
194 consider the requirements listed below and their relevance to the intended operation, and incorporate
195 the requirements of those within their Ops Manual as necessary.

196 The CAA may apply any additional applicable requirements of Regulation 923/2012 to operations via
197 Operational Authorisations (OA) as conditions and limitations, depending on the operation and the
198 result of the risk assessment process.

199 The table below sets out some applicable operational requirements from SERA and their applicability to
200 UAS Operations in the Specific Category.

201

Item	Description	Applicability
SERA.2020 - Psychoactive Substances	Requirement not to undertake a function critical to safety of aviation when under the influence of any psychoactive substance, which impairs human performance, and not to engage in any problematic use of such substances.	All Specific Category UAS Operations
SERA.3101 - Negligence	Requirement to not operate an aircraft in a negligent or reckless manner, so as to endanger life or property.	All Specific Category UAS Operations.
SERA.3145 – Prohibited and Restricted Areas	Requirement not to fly within a Prohibited or Restricted area, unless in accordance with the conditions of the area.	All Specific Category UAS Operations.
SERA.3205 - Proximity	Requirement to not operate an aircraft in proximity to other aircraft, such that it may create a collision hazard.	All Specific Category UAS Operations.
SERA.3135 - Formation Flights	Certain requirements to follow when flying within a formation, and to not fly in a formation unless pre- arranged with each pilot.	As required- for example, certain BVLOS operations with multiple aircraft.

SERA.3201 - Collision Avoidance	Explanation that nothing within SERA relieves the pilot from the responsibility to take collision avoidance action.	As required- for example, certain BVLOS operations.
SERA.3210 - Right of way	Requirements on the right of way between certain types of aircraft, and manoeuvres that must be taken to avoid collisions.	As required- for example, certain BVLOS operations.
SERA.3215 - Lighting	Certain requirements for aircraft lighting.	As required- for example, certain BVLOS operations.
SERA.3401 - Time	Certain requirements on the use of coordinated universal time (UTC).	As required- for example, certain BVLOS operations.
SERA Section 4- Flight Plans	Certain requirements on the use of flight plans.	As required- for example, certain BVLOS operations.
SERA.6005 (b) – Operations within a TMZ	Requirement to carry and operate a transponder when operating within a Transponder Mandatory Zone.	As required- for example, certain BVLOS operations.

202

203 AMC1 Article 8 Remote Pilot Competence

204 SPECIFIC CATEGORY REMOTE PILOT COMPETENCE

205 The necessary level of pilot competence will be identified by the UAS Operator, as set out in
 206 UAS.SPEC.050(1)(d)(i).

207 In order to demonstrate pilot competence for Specific category VLOS operations a remote pilot must
 208 hold a General VLOS Certificate (GVC) GVC, as a minimum

209 The UAS Operator may identify further qualifications that the remote pilot must have, within the risk
 210 assessment process, especially for BVLOS operations.

211 ‘NQE full recommendations’ are a previous version of the GVC course, and although no longer issued,
 212 some remote pilots may still hold these qualifications. These qualifications have been superseded by the
 213 GVC, and as such the CAA will no longer recognise them after 01 January 2024; until this date, the CAA
 214 will recognise their use for operations under an existing OA. Any UAS Operator applying for a new OA,
 215 will need to select an alternative pilot competence qualification, such as the GVC.

216

217 GENERAL VLOS CERTIFICATE

218 In order to qualify for the issue of a GVC, a remote pilot must:

- 219 ▪ Have completed the Open category online training material (AMC1UAS.OPEN.20(4)(b) &
 220 UASOPEN.040(3) & UASOPEN.0302(a)
- 221 ▪ Complete the Open category online assessment, and have obtained a Flyer ID.
- 222 ▪ Complete the necessary theoretical knowledge training
- 223 ▪ Complete the necessary practical training in order to pass the practical flight test
- 224 ▪ Have an Operations Manual (OM), that can be provided for the practical flight test

225 ▪ Complete the theoretical knowledge examination

226 ▪ Complete the practical flying test

227

228 The theoretical knowledge examination and the practical flying test shall take place at a Recognised
229 Assessment Entity (RAE).

230 On successful completion of the above elements, the RAE may issue the candidate with a General VLOS
231 Certificate.

232 The format of this certificate, shall follow this template:

233



234

235 **Note:** The CAA will provide RAEs with full versions of these templates for use.

236 THEORETICAL KNOWLEDGE EXAMINATION

237 The examination will comprise a minimum of 40 questions, which cover the syllabus sufficiently, as set
238 out in the syllabus below.

239 The questions may be multiple choice, with a choice of no fewer than 4 answer options. Questions may
240 also be long answer questions.

241 The examination may be electronic, or paper based, but must be closed book format (i.e. without
242 reference to external material). The pass mark shall be no less than 75%. The duration of the exam is to
243 be agreed between the RAE and the CAA.

244 If a candidate is re-sitting the examination, they shall answer a different set of questions.

245 THEORETICAL KNOWLEDGE SYLLABUS

246

Subject	Areas to be covered
Air Law/Responsibilities	<p>Terminology</p> <p>The UAS Regulation Package</p> <ul style="list-style-type: none"> ▪ Overall principles ▪ UAS operating categories <p>Specific requirements</p> <p>ANO</p> <ul style="list-style-type: none"> ▪ Residual articles and definitions - Article 241 <p>General overview</p> <ul style="list-style-type: none"> ▪ Responsibilities – UAS operator, remote pilot ▪ Avoidance of collisions ('See and Avoid', i.e. Visual Line of Sight principles) <p>Other Regulation</p> <ul style="list-style-type: none"> ▪ Incident and accident reporting and investigation: Mandatory Occurrence Reporting (MOR) & European Coordination Centre for Accident and Incident Reporting Systems (ECCAIRS) Portal, Air Accident Investigation Branch (AAIB) notification ▪ Airprox reporting ▪ Investigation handling/ assistance <p>Insurance</p> <ul style="list-style-type: none"> ▪ aircraft and third-party liability (EU785/ 2004 compliance)
UAS Airspace Operating Principles	<p>Airspace overview</p> <ul style="list-style-type: none"> ▪ Flight Information Regions (FIR) ▪ Airspace classifications ▪ Differing considerations, controlled airspace <p>Specific airspace types</p> <ul style="list-style-type: none"> ▪ Flight Restriction Zone (FRZ), Aerodrome Traffic Zone (ATZ), gliding/ parachuting/ microlight sites etc <p>Airspace reservations</p> <ul style="list-style-type: none"> ▪ Danger Areas, Prohibited Areas, Restricted Areas <p>- Temporary Airspace Reservations</p> <p>Obtaining information/approvals</p> <ul style="list-style-type: none"> ▪ UK Aeronautical Information Publication (AIP) ▪ Aeronautical Information Circulars (AICs)

Subject	Areas to be covered
	<ul style="list-style-type: none"> ▪ Notices to Airmen (NOTAMs) ▪ Permission and ENSF process ▪ Whom to contact <p>UAS Operations</p> <ul style="list-style-type: none"> ▪ Visual Line of Sight (VLOS) <p>- Segregated Airspace</p>
Airmanship and Aviation Safety	<p>Good airmanship principles</p> <ul style="list-style-type: none"> ▪ Aircraft safe to operate ▪ Remote pilot fit to operate aircraft ▪ Proper planning and preparation ▪ Hazard identification <p>Flight Safety</p> <ul style="list-style-type: none"> ▪ Avoiding collisions ▪ 'See and Avoid' with respect to manned aircraft and other air users <p>Perception</p> <ul style="list-style-type: none"> ▪ Distance, height and speed awareness ▪ Planning, go/ no go decisions ▪ Overflight of people, crowds and gatherings ▪ Congested area operations ▪ Flights at night <p>Operational mitigations for ground and air risks</p> <p>Remote pilot logbooks</p>

Subject	Areas to be covered
Human Performance Limitations	<p>Medical fitness</p> <ul style="list-style-type: none"> ▪ Crew health precautions ▪ Alcohol, drugs, medication ▪ Medical restrictions <p>Fatigue</p> <ul style="list-style-type: none"> ▪ Flight duration/ flight workload ▪ Time of flight ▪ Working hours ▪ Effects of weather ▪ Outdoor, remote and lone working ▪ Crew/colleague management ▪ Depth perception ▪ Blind spot ▪ Scan technique ▪ Decision process ▪ Public/ third parties ▪ Stress/ pressure from 'customers'
Meteorology	<p>Introduction to obtaining and interpreting weather information</p> <ul style="list-style-type: none"> ▪ Weather reporting resources ▪ Reports, forecasts and meteorological conventions appropriate for typical UAS flight operations ▪ Local weather assessments <p>Effects of weather on the unmanned aircraft</p> <ul style="list-style-type: none"> ▪ Wind – urban effects, gradients, masking, turbulence ▪ Temperature – precipitation, icing, turbulence ▪ Visibility factors ▪ Clouds – Cumulonimbus (CB) hazards (including lightning)
Navigation/Charts	<p>Basic map reading (OS) – 1:50,000 and 1:25,000</p> <p>Aviation charts – 1:500,000 and 1:250,000</p> <ul style="list-style-type: none"> ▪ Interpretation ▪ Specialised charts (e.g. London helicopter routes) ▪ Understanding of basic terms: <p>Aeronautical units of measurement (Ft, km, Nm)</p>

Subject	Areas to be covered
	Elevation Altitude GPS principles <ul style="list-style-type: none"> ▪ How it works and limitations
UAS General Knowledge	Basic principles of flight Fixed-wing, rotary wing and multi-rotor Command and Control <ul style="list-style-type: none"> ▪ Datalink frequencies/ spectrum ▪ Manual intervention/ override ▪ Flight control modes Limitations <ul style="list-style-type: none"> ▪ Operational envelope ▪ Stability ▪ Mass and MTOM ▪ Centre of gravity ▪ Effect of payload on flight Operating guides <ul style="list-style-type: none"> ▪ Flight procedures/ basic drills ▪ Emergencies Maintenance of system <ul style="list-style-type: none"> ▪ Scheduled maintenance and repairs ▪ Security of aircraft/ attached items ▪ Manufacturer's recommendations ▪ Assessment - 'safe to be flown?' Technical mitigations <ul style="list-style-type: none"> ▪ For ground and air risks
Operator Responsibilities	Development of operational procedures <ul style="list-style-type: none"> ▪ Development of an OM
Operating Procedures	Pre-planning <ul style="list-style-type: none"> ▪ Consideration of intended task Site assessment <ul style="list-style-type: none"> ▪ Establishing a safe operating environment ▪ Hazard identification & risk assessment ▪ Mitigating measures ▪ Site owner's permission Situational awareness

Subject	Areas to be covered
	<ul style="list-style-type: none"> ▪ Location ▪ Airspace ▪ Aerodromes ▪ Obstructions ▪ Public right of way <p>Communications</p> <ul style="list-style-type: none"> ▪ Operating alone ▪ Liaison with Air Traffic Control ▪ Operating with other air users <p>Pre-flight</p> <ul style="list-style-type: none"> ▪ Pre-flight checklist ▪ Security of attachments/ payload ▪ Airworthiness ▪ Failsafe check ▪ Battery condition ▪ Weather <p>In Flight</p> <ul style="list-style-type: none"> ▪ In-flight monitoring ▪ Fuel/ battery status ▪ Visual Line of Sight ▪ Emergency actions: (Emergency Response Plan), loss of control/ flyaway, malfunctions ▪ Deconfliction/ separation ▪ Designated landing area not clear <p>Post-flight</p> <ul style="list-style-type: none"> ▪ Post-flight actions - debrief/ logging of flight details ▪ Post-flight maintenance <p>Security</p> <ul style="list-style-type: none"> ▪ Public access to aircraft and control ▪ Other security considerations

247

248 **PRACTICAL FLYING TEST**

249 The practical test element assesses whether the remote pilot can safely undertake a range of VLOS
 250 operations whilst adhering to a set of procedures in the OM. The test will be conducted against the OM
 251 produced by the candidate. This can either be developed by the candidate themselves, or by the UAS
 252 Operator (if separate to the remote pilot).

253

254 The RAE staff responsible for the assessment tasks will have adequate knowledge and competence of

255 the operations of the type of unmanned aircraft that is to be flown during the test. The person
256 responsible for conducting the practical flight assessment may also offer suitable training to the student
257 prior to conducting the assessment.

258 The practical flying test will be conducted outdoors and at a location that is suitable for conducting the
259 test (i.e. of suitable dimensions, volume and airspace class).

260 The RAE will include practical demonstrations of manoeuvres, relevant to the candidate's OM, that
261 display the remote pilot's ability to safely position and control the aircraft. Manoeuvres may be
262 demonstrated individually, or as part of a more generalised operating scenario; they must be clearly
263 described and illustrated within the RAE's application documentation and will be subject to assessment
264 for suitability during the approval process.

265 The RAE will define the pass/fail criteria for the practical flight test assessment. As a guide, the criteria
266 should consist of a combination of:

- 267 ▪ 'Minor' errors – cumulative up to a maximum of 7, at which point the test is failed;
- 268 ▪ 'Major' errors – cumulative up to a maximum of 3, at which point the test is failed;
- 269 ▪ 'Safety' errors – any single safety error will result in an automatic failure.

270

271 The practical test must be summarised in a written report that details the test scenario that was used,
272 the manoeuvres undertaken and an assessment of the examinee's performance for each 'section' of the
273 test, along with guidance on areas for improvement where applicable. Reports must also contain details
274 of the examinee, the assessor, any additional personnel involved and the date and location of the test.

275 A record of each practical assessment must be retained by the RAE for a minimum of 5 years.

276

277 PRACTICAL FLYING TEST ASSESSMENT CRITERIA

Subject	Areas to be covered
Pre-Flight Actions	Mission planning (to include meteorological checks), airspace considerations, and site risk-assessment <ul style="list-style-type: none"> ▪ Identify the objectives of the intended operation ▪ Ensure that the defined operational volume and relevant buffers (e.g. ground risk buffer) are suitable for the intended operation ▪ Identify any obstacles in the operational volume that could hinder the intended operation ▪ Consider whether the air flow may be affected by topography or by obstacles in the operational volume ▪ Consider any external factors that may affect the flight, and assess their impact on the operation ▪ Review the relevant airspace information (including on UAS geographical zones) that can have an impact on the intended operation

Subject	Areas to be covered
	<ul style="list-style-type: none"> ▪ Confirm that the UAS is suitable for the intended operation ▪ Ensure that the selected payload is compatible with the UAS being used for the operation ▪ Determine the measures necessary to comply with the limitations and conditions applicable to the operational volume and ground risk buffer for the intended operation in accordance with the OM procedures for the relevant scenario ▪ Identify and, where necessary, implement the procedures to operate in FRZs or controlled airspace, including a protocol to communicate with ATC and obtain clearance and instructions ▪ Confirm that all the necessary documents for the intended operation are on site ▪ Ensure all participants are sufficiently briefed on the details of the planned operation <p>Aircraft pre-flight inspection and set-up (including flight controller modes and power-source hazards)</p> <ul style="list-style-type: none"> ▪ Assess the general condition of the UAS in accordance with the procedures contained within the ex and manufacturer’s instructions ▪ Ensure the set-up procedures are completed correctly in accordance with the manufacturer’s instructions ▪ Ensure that all the removable components of the UAS are properly secured ▪ Make sure that the UAS software configurations are compatible/ up to date ▪ Check that the UAS instruments are calibrated appropriately, as required by the intended operation ▪ Identify any fault, damage or configuration that may compromise the intended operation ▪ Ensure the propulsion energy level (e.g. battery life, or other fuel supply) is sufficient for the intended operation ▪ Confirm that the flight termination system of the UAS and its triggering system are compliant ▪ Check the correct functioning of the C2 link ▪ Activate the geo-awareness system and upload the information to it (if geo-awareness system is available)

Subject	Areas to be covered
	<ul style="list-style-type: none"> ▪ Set the height, speed and distance limitation systems (if available) ▪ Set the direct remote identification system (if fitted) ▪ 'Pre-take-off verbal briefing' given by the examinee stating the basic actions to be taken in the event of an aircraft emergency or if a mid-air collision hazard arises during the flight
In Flight Procedures	<ul style="list-style-type: none"> ▪ Maintain an effective look-out and keep the aircraft within Visual Line of Sight (VLOS) at all times ▪ Maintain situational awareness, particularly with respect to: <ul style="list-style-type: none"> ○ Location of the aircraft in relation to other airspace users ○ Meteorological conditions ○ Obstacles, terrain and uninvolved persons ▪ Perform accurate and controlled flight manoeuvres at representative heights and distances (including flight in manual/ non-GNSS assisted mode or equivalent where fitted) ▪ Take-off procedures; <ul style="list-style-type: none"> ○ Perform after take-off/functionality checks ○ Hover in position (Multirotor/ Helicopter/ VTOL FW only) ○ Transition from hover into forward flight (Multirotor/ Helicopter/ VTOL FW) <ul style="list-style-type: none"> - Climb and descent to/ from level flight - Turns in level flight - Speed control in level flight - Transition from forward flight into hover (Multirotor/ Helicopter/ VTOL FW) - Precision manoeuvring in hover (Multirotor/ Helicopter/ VTOL FW) - Approach and landing

Subject	Areas to be covered
	<ul style="list-style-type: none"> - Actions following failure of a motor/ propulsion system (according to aircraft type) - Evasive action (manoeuvres) to avoid collisions - Real-time monitoring of aircraft status and endurance limitations <ul style="list-style-type: none"> ▪ Flight under abnormal conditions ▪ Display continuous awareness of, and consideration for, the safety of third parties on the ground ▪ Deal correctly with a partial or complete loss of power to the unmanned aircraft system while ensuring the safety of any third parties ▪ Manage the unmanned aircraft’s flight path in abnormal situations ▪ Manage a situation when the unmanned aircraft system positioning equipment is impaired ▪ Manage a situation where an uninvolved person enters the zone of operation and take appropriate measures to maintain safety ▪ React to, and take the appropriate corrective action for, a situation where the unmanned aircraft is likely to exceed the limits of the intended operating area ▪ Take the appropriate action for a situation when another aircraft approaches the operating area and is in conflict with the unmanned aircraft ▪ Demonstrate the recovery method following a deliberate (simulated) loss of the C2 Link. In place of any rotary wing ‘return to home’ function, fixed-wing aircraft may demonstrate an equivalent procedure that results in a suitably automated, low-impact descent and landing. When demonstrating this function, the student must also demonstrate how collisions will be avoided
Post-flight Actions	<ul style="list-style-type: none"> ▪ Shut down and secure/make safe the UAS ▪ Post-flight inspection and recording of any relevant data relating to the general condition of the UAS (its systems, components and power-sources), controller functionality and crew fatigue

Subject	Areas to be covered
	<ul style="list-style-type: none"> <li data-bbox="724 282 1401 353">▪ Conduct a debriefing of the operation with all relevant personnel <li data-bbox="724 371 1401 479">▪ Identify situations where an occurrence report may be necessary and complete the required occurrence report

278

279 GM1 to Article 11 Rules for conducting an Operational Risk 280 Assessment

281 The CAA is currently adapting the previously published AMC for Article 11. Until this is complete, and
282 adopted as AMC/ GM to Article 11, then UAS Operators should continue to use CAP 722A for guidance
283 when producing a risk assessment.

284 GM2 to Article 11 Rules for conducting an Operational Risk 285 Assessment

286 Predefined Risk Assessment

287 When a UAS operator applies for an operational authorisation, they must submit a risk assessment as
288 required by Article 11 of the IR. This may be conducted using the methodology as described in GM1
289 Article 11.

290 Alternatively, a UAS operator may submit a request for an operational authorisation based on the
291 mitigations and provisions described within a predefined risk assessment (PDRA), as published by the
292 CAA. In the case of a PDRA, the CAA has conducted a risk assessment that is compliant with Article 11.

293 A PDRA significantly reduces the administrative burden on both the operator and the CAA for simple,
294 repeatable type operations. A UAS operator provides a 'shortened' application to the CAA based on a
295 series of requirements covering topics such as remote pilot competency, OM contents, etc.
296 Accompanying any PDRA based authorisation will be a set of prescriptive conditions an operator must
297 comply with. These conditions form part of the risk mitigation measures identified by the CAA during
298 the creation of a given PDRA.

299 The CAA will publish PDRAs separately to this AMC/ GM. Operators wishing to make use of PDRAs should
300 use the relevant PDRA to complete the necessary parts of the OM. Completion of the risk assessment
301 part of the OM (Volume 3) is not required, as this has already been carried out. Full instructions on how
302 to make use of a PDRA, and what to submit to the CAA, can be found within CAP 722H.

303 **Note:** A PDRA only addresses safety risk; consequently, additional limitations and provisions might exist
304 within an operation such as security, privacy, environmental protection, the use of the radio frequency
305 (RF) spectrum, etc. It is for the operator to identify and mitigate against non-safety risks.

306

307 GM1 to Article 14(1) Registration of UAS Operators and Certified UAS

308 ACCURACY OF THE REGISTRATION SYSTEMS

309 UAS operators, when registering themselves or their certified UAS, are required to provide accurate

310 information and update the registration data when it changes.

311 The CAA will keep this registration data accurate within the Registration database.

312 An example of data that may change over time includes the UAS operator address, email address,
313 telephone number, and name by proof of deed poll.

314 UAS operators, especially those conducting UAS operations for leisure, may decide to fly their UAS only
315 for a short period; therefore, it is possible that even if the database of the registration system contains
316 many registered UAS operators, only some of them are active.

317 The CAA defines a duration period for the validity of 1 year, for the registration of all UAS operators. If
318 the UAS Operator does not renew their registration, it will expire. The CAA may also decide to suspend
319 or revoke the registration number if the UAS operator's conduct justifies such a measure.

320 UAS Operators have the ability to request to deactivate their registration if they no longer wish to have
321 it active, this feature allows the CAA to improve level of accuracy of active operators in the database.

322

323 **GM1 Article 14 (5)(a)(ii) Registration of UAS Operators and Certified** 324 **UAS**

325 **Article 14(5)(a)(ii) Sensor able to capture personal data**

326 The capture of images or other data solely for the use of controlling or monitoring the aircraft is not
327 considered to be applicable to the meaning of 'a sensor able to capture personal data' in relation to the
328 registration of UAS operators under this article.

329 A camera used solely for the purpose of first-person view flying (when accompanied by a UA observer),
330 that is not recording, is not considered a sensor able to capture personal data.
331

332 **GM1 Article 14(5A) Registration of Small Control Line Model Aircraft**

333 Small control line model aircraft are attached via a restraining device to the ground, or to a person, via
334 a cable, or series of cables. As such, the need to identify the remote pilot and operator via an Operator
335 ID is not required, as the remote pilot will either be attached to the aircraft by these cables or will be in
336 the immediate vicinity of the aircraft, if it is fixed to the ground.

337 Control of the aircraft is maintained by manoeuvring the control cables, which manipulate the control
338 surfaces in order to maintain control of the aircraft.

339 The restraining device must be of a sufficient strength to secure the aircraft safely to a point on the
340 ground, either fixed, or to the remote pilot, taking into account the force exerted on the restraining
341 device, from the mass of the aircraft and the acceleration experienced during flight.

342

343 **AMC1 Article 14(6) Registration of UAS Operators and Certified UAS**

344 **UAS OPERATOR REGISTRATION NUMBER**

345 The unique UAS operator digital registration number that is issued by the CAA consists of seventeen (17)
346 alphanumeric in total split into 3 sections, arranged as follows:

347 (1) the first three alphanumeric (upper-case only) shall be 'GBR' corresponding to the ISO 3166 Alpha-3

348 code;

349 (2) The characters 'OP', which is a fixed field, meaning 'Operator'; and

350 (3) Twelve randomly generated characters that consist of alphanumeric (upper-case) characters, with
351 the exception of the following characters: A, E, I, O, U, 1 and 0.

352

353 **AMC1 Article 14(8) Registration of UAS Operators and Certified UAS**

354 **DISPLAY OF REGISTRATION INFORMATION**

355 UAS operators must display their registration number (known as an 'Operator ID') on every unmanned
356 aircraft that they operate within the Open and Specific categories.

357

358 (a) The Operator ID must be displayed in a manner that ensures it is readable when the UA is
359 on the ground, without the need to use any special devices other than corrective
360 spectacles or lenses.

361 (b) If the size of the UA does not allow the Operator ID to be clearly displayed externally, or
362 the UA is a model aircraft that represents a real manned aircraft where an external
363 marking would spoil the realism of the representation, a marking inside the UA, in a
364 compartment that can be accessed easily and without the need for any tools is acceptable.

365 A QR code (quick response code) may be used, in addition to a printed Operator ID. This may link to the
366 CAA registration check service, on the CAA website.

367 UA whose design is subject to certification are required to be registered in accordance with Annex IX of
368 UK Regulation (EU) 2018/1139 (*the Basic Regulation*) (and Articles 24 to 32 of ANO 2016 unless they are
369 flying under an exemption). Once the CAA has processed the application, the aircraft will be issued with
370 a registration ID consisting of five characters starting 'G-' (e.g., G-ABCD) and the details will be entered
371 into the Aircraft Register. The registration must be displayed permanently on the aircraft in accordance
372 with Article 32 of the ANO.

373 A QR code (quick response code) may be used, in addition to a printed Operator ID. This may link to the
374 CAA registration check service, on the CAA website.

375

376 **AMC1 Article 14 (10)- Small Control Line Model Aircraft Definition**

377 The restraining device must be of a sufficient strength to secure the aircraft safely to a point on the
378 ground, either fixed, or to the remote pilot, taking into account the force exerted on the restraining
379 device, from the mass of the aircraft and the acceleration experienced during flight.

380

381 **GM1 Article 15 Operational conditions for UAS geographical zones**

382 **Availability of UAS Geographical Zone data**

383 Information on airspace restrictions which affect the operation of UAS are notified within the AIP
384 (Section ENR 5.1), and all restrictions which impact UAS can be accessed via a downloadable file
385 contained within the AIS website.

386

387 **Article 16- UAS operations in the framework of model aircraft clubs**
388 **and associations**

389 AMC and GM for Article 16 can be found in Annex B to this document.

390

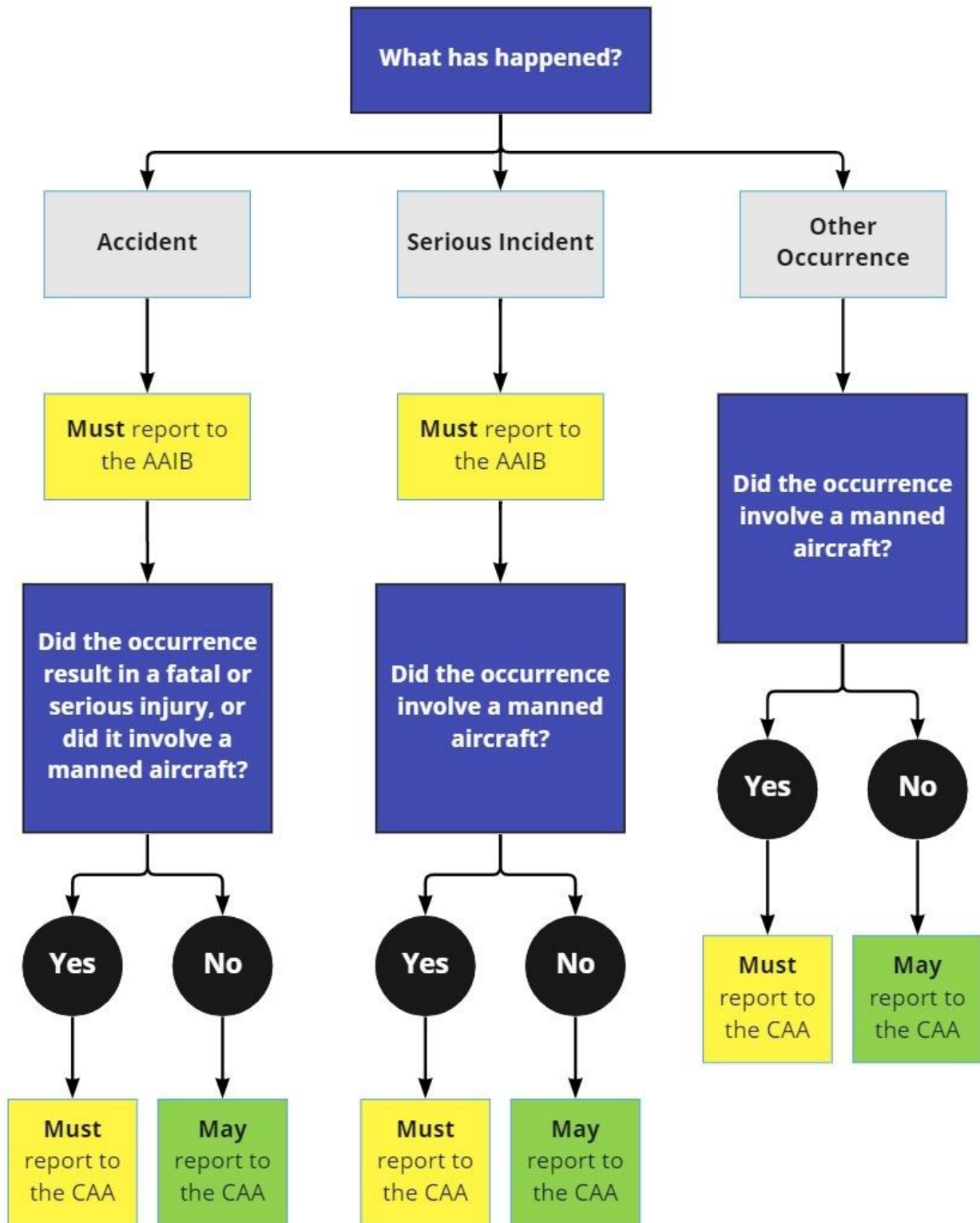
391 **AMC1 Article 19(2) Safety Information**

392 **OCCURANCE REPORTING- CAA**

393 Occurrence reports must be submitted through the MOR process, using the ECCAIRS portal , which can
394 be found [here](https://aviationreporting.eu) (https://aviationreporting.eu). When making a report, UAS operators should also include
395 their registration number (Operator ID), and state whether an Operational Authorisation is held. Further
396 guidance can be found in CAP1496.
397

398
399

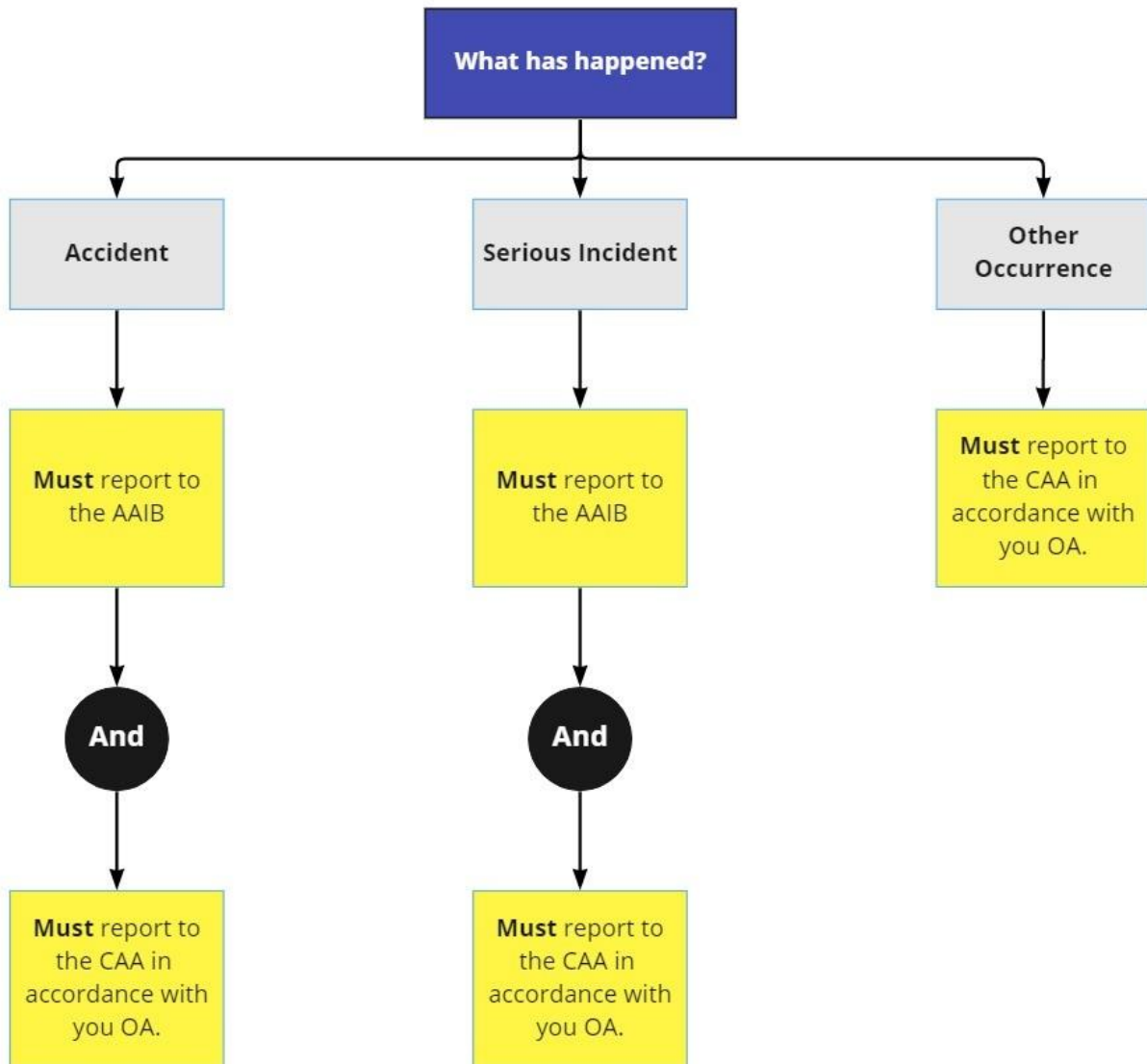
OPEN CATEGORY REPORTING REQUIREMENTS



400

401
402

SPECIFIC CATEGORY REPORTING REQUIREMENTS



403

GM1 Article 19(2) Safety information

404

USE OF THE ECCAIRS PORTAL

405

406 Reporting to the CAA should take place via the ECCAIRS portal (AMC1Article 19(2), above). It should be
407 noted that when selecting the UK, within this system, it explains that the user is reporting as an ICAO
408 state, and not under regulation EU 376/2014. This is because the UK has left the EU, and so reports are
409 made under UK Regulation (EU) 376/2014, rather than the European version of that regulation.

OCCURRENCE REPORTING - CAA

410

411 According to UK Regulation (EU) 376/2014, occurrences shall be reported when they refer to a condition
412 which endangers, or which if not corrected or addressed would endanger an aircraft, its occupants, any
413 other person, equipment or installation affecting aircraft operations.

414 Obligations to report apply in accordance with UK (EU) Regulation No 376/2014, Article 3(2). This limits
415 the mandatory reporting of UA occurrences to those that involve a fatal or serious injury, or involve a
416 manned aircraft. Other occurrences may be reported voluntarily.

417 Occurrence reporting systems are not established to attribute blame or liability.

418 Occurrence reporting systems are established to learn from occurrences, improve aviation safety and
419 prevent recurrence.

420 The purpose of occurrence reporting is to improve aviation safety by ensuring that relevant safety
421 information is reported, collected, stored, protected, exchanged, disseminated and analysed.
422 Organisations and individuals with a good air safety culture will report effectively and consistently. Every
423 occurrence report is an opportunity to identify root causes and prevent them contributing to accidents
424 where people are harmed.

425 The safe operation of UAS is as important as that of manned aircraft. Injuries to third parties, or damage
426 to property, can be just as severe. Proper investigation of each accident, serious incident or other
427 occurrence is necessary to identify causal factors and to prevent repetition. Similarly, the sharing of
428 safety related information via good reporting is critical in reducing the number of future occurrences.

ANNEX TO REGULATION (EU) 2019/947 UAS OPERATIONS IN THE 'OPEN' AND 'SPECIFIC' CATEGORIES

PART A — UAS OPERATIONS IN THE 'OPEN' CATEGORY

GM1 UAS.OPEN.010 General provisions

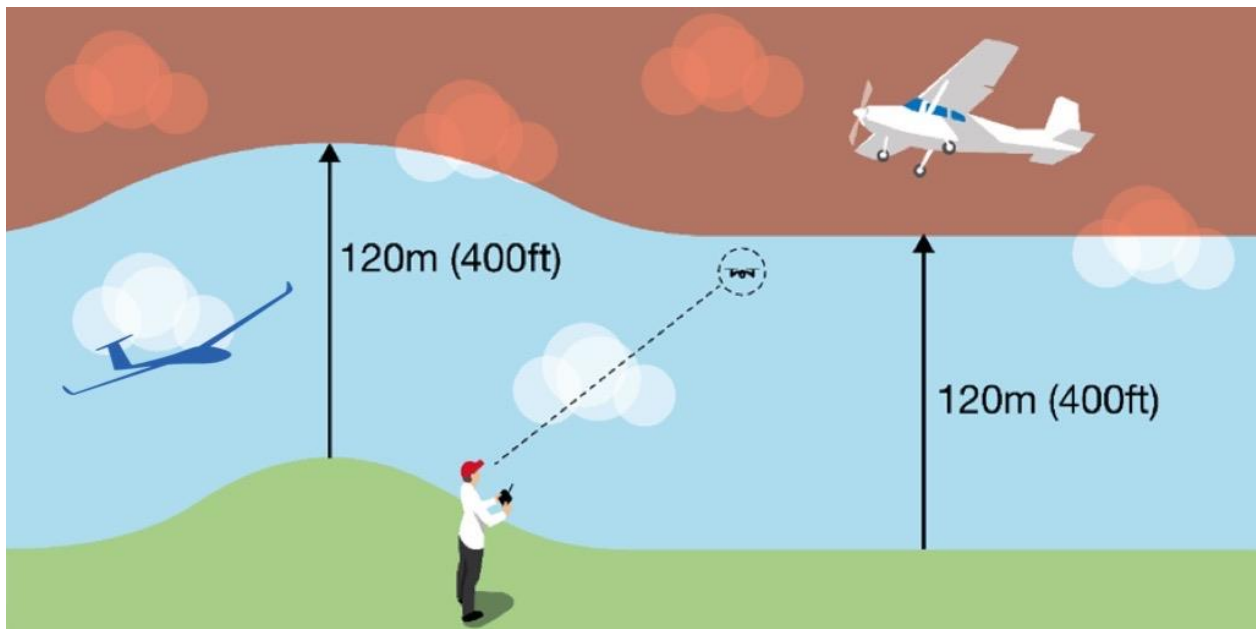
MAXIMUM HEIGHT

The remote pilot must ensure that the unmanned aircraft (UA) is kept at a distance less than 120m (*approximated to 400 ft for the purpose of this document*) from the terrain. This is not a 'vertical height', but a distance between the UA and the closest point of the surface of the Earth.

This height limit applies from the surface of the Earth, and not from an elevated point on a structure or building.

The picture below shows how the maximum height that the UA may reach changes according to the topography of the terrain. In addition, if the flight is being conducted within a geographical zone with a lower maximum height or altitude (as defined in the associated restrictions of the geographical zone), the remote pilot must ensure that the UA always complies with those limitations.

The entity responsible for an artificial obstacle, referred to in point UAS.OPEN.010(3), must explicitly grant the UAS operator permission to conduct an operation close to a tall man-made obstacle, e.g., a building, or antenna.



448 GM1 UAS.OPEN.010(4) General provisions

449 OPERATIONS WITH UNMANNED SAILPLANES

450 This derogation was included to allow model gliders to continue to operate along slopes. Strictly applying
451 the 120 metres distance from the closest point of the surface of the earth would have had
452 disproportionate consequences. These operations have been conducted successfully for decades. Two
453 measures have been put in place to reduce the risk:

- 454 (a) A MTOM limited to 10 kg to reduce the consequences of an impact. 10 kg covers the vast
455 majority of gliders in operation.
- 456 (b) The maximum height above the remote pilot is limited to 120 m, which reduces the air risk.

457

458 AMC1 UAS.OPEN.020(1) and (2) UAS operations in subcategory A1

459 OPERATIONAL LIMITATIONS IN SUBCATEGORY A1

460 As a principle, the rules prohibit overflying assemblies of people. There is a distinction between class
461 C1/C0 UAS and privately built UAS with MTOM of less than 250 g.

- 462 (a) For UAS in class C1, or those flying under the ‘A1 Transitional’ provisions of Article 22(a): Before
463 starting the UAS operation, the remote pilot must assess the area and must reasonably expect
464 that no uninvolved person will be overflowed. This evaluation must be made taking into account
465 the configuration of the site of operation (e.g., the existence of roads, streets, pedestrian or
466 bicycle paths), the ability to secure the site, and the time of the day. In case of an unexpected
467 overflight, the remote pilot must reduce as much as possible the duration of the overflight, for
468 example, by flying the UAS in such a way that the distance between the UA and the uninvolved
469 people increases, or by positioning the UAS over a place where there are no uninvolved people.
- 470
- 471 (b) UAS in class C0, non-class marked UAS with MTOM less than 250g, or privately built UAS with
472 MTOM less than 250 g: These UAS may fly over uninvolved people (but not over assemblies of
473 people) however, flight over uninvolved people should be avoided whenever possible however,
474 and extreme caution should still be used.

475 Uninvolved people should only be overflowed when absolutely necessary, to achieve the aim of the flight
476 and should be minimised as much as possible.

477 When overflying uninvolved people, some horizontal separation should be maintained. The necessary
478 horizontal separation depends on factors, such as wind direction, trajectory of the UA and height of the
479 UA.

480 The remote pilot must be aware of their responsibilities as set out in UAS.OPEN.060(2)(d) , and in GM1
481 UAS.OPEN.060(2)(d), with regard to maintaining control of the UA.

482

483

484

485 **AMC1 UAS.OPEN.020(4)(b) and UAS.OPEN.030(2)(a) and**
486 **UAS.OPEN.040(3) UAS operations in subcategories A1, A2 and A3**

487 **COMPLETION OF OPEN CATEGORY ONLINE TRAINING**

488 The online training course and test must be completed by remote pilots of UA with a mass of 250g or
489 more, i.e.

- 490 - A1 subcategory- Class C1
491 - A2 subcategory- all UA (note- in the A2 subcategory, an additional qualification must also be
492 held- see AMC1 UAS.OPEN.030(2)(c).
493 - A3 subcategory- all UA.

494

495 The remote pilot must complete the training course and test provided by the CAA Drone and Model
496 Aircraft Registration System (DMARES) (<https://register-drones.caa.co.uk/>).

497 In certain circumstances, where provision is included within a model aircraft association Article 16
498 Authorisation, remote pilots may complete a model aircraft association training course and test instead
499 of the CAA DMARES test.

500 Following completion of this test, the CAA will issue the remote pilot with a 'Flyer ID' number.

501

502 **AMC2 UAS.OPEN.020(4)(b) and UAS.OPEN.030(2)(a) and**
503 **UAS.OPEN.040(3) UAS operations in subcategories A1, A2 and A3**

504 **PROOF OF COMPLETION OF OPEN CATEGORY ONLINE TRAINING**

505 Upon receipt of proof of a remote pilot passing the online theoretical examination, the CAA will provide
506 the following proof of completion to the remote pilot. The proof may be provided in electronic form

507 The certificate will contain the following two elements:

- 508 (1) The identifier provided by the CAA (the 'Flyer ID'). The identifier has the following format:

509 **NNN-RP-XXXXXXXXXXXX**

510 Where:

- 511 I. **NNN** is the ISO 3166 Alpha-3 code of the country issuing the certificate (GBR);
512 II. **RP** is a fixed field, meaning remote pilot; and
513 III. **XXXXXXXXXXXX** are 12 alphanumeric characters (upper-case only)) with the
514 exception of the following characters: A, E, I, O, U, 1 and 0 defined by the CAA.

515 As an example: (GBR-RP-9WM5CGTWGC37); and

516

- 517 (2) QR code providing a link to the UK *Flying drones and model aircraft* web page where the
518 information related to the remote pilot is stored. Through the ‘remote pilot identifier’ (‘Flyer
519 ID Number’) information related to the Open category competence of the remote pilot can be
520 retrieved by the remote pilot.

521



522 **AMC1 UAS.OPEN.020(5)(c) and (d), UAS.OPEN.030(3) and**
523 **UAS.OPEN.040(4)(c), (d) and (e) UAS operations in subcategories A1,**
524 **A2 and A3**

525 **MODIFICATION OF A UAS WITH A CLASS MARK**

526 UAS operators must not make any modifications to a class marked UAS that breaches compliance with
527 the product requirements. If the UAS operator carries out such a modification on a UAS, then that UAS
528 is no longer considered to have a Class mark and it may only be operated within the bounds of the
529 provisions for privately built UAS, or in the Specific category with a suitable Operational Authorisation
530 issued by the CAA.

531

532 **GM1 UAS.OPEN.020(5)(c) UAS operations in subcategory A3**

533 **MODIFICATION OF A UAS WITH A CLASS MARK**

534 Modifications to UAS that breach compliance with the requirements for the Class marking are those that
535 affect the weight or performance so that they are outside the specifications, or the instructions provided
536 by the manufacturer in the user manual.

537 The replacement of a part with another that has the same physical and functional characteristics is not
538 considered to be a breach of the requirements for the Class marking (e.g. a replacement of a propeller
539 with another of the same design). The UA user manual should define instructions for performing
540 maintenance and applying changes that do not breach compliance with the Class marking requirements.

AMC1 UAS.OPEN.030(1) UAS operations in subcategory A2**SAFE HORIZONTAL DISTANCE FROM UNINVOLVED PERSONS**

- 543 (a) The horizontal distance of the UA from uninvolved persons is defined as the distance between the
544 points where the UA would hit the ground in the event of a vertical fall and the position of the
545 uninvolved persons.
- 546 (b) The safe horizontal distance of the UA from uninvolved persons is variable and is dependent on
547 the performance and characteristics of the UAS involved, the weather conditions and the
548 segregation of the overflowed area. The remote pilot is ultimately responsible for the
549 determination of this distance however, the distance from uninvolved persons must always be
550 greater than:
- 551 (1) 5 metres, when the low-speed mode function on the UA is activated and set to 3 metres per
552 second as a maximum speed;
 - 553 (2) 5 metres, when operating a UAS balloon or airship; or
 - 554 (3) 30 metres in all other cases.
- 555

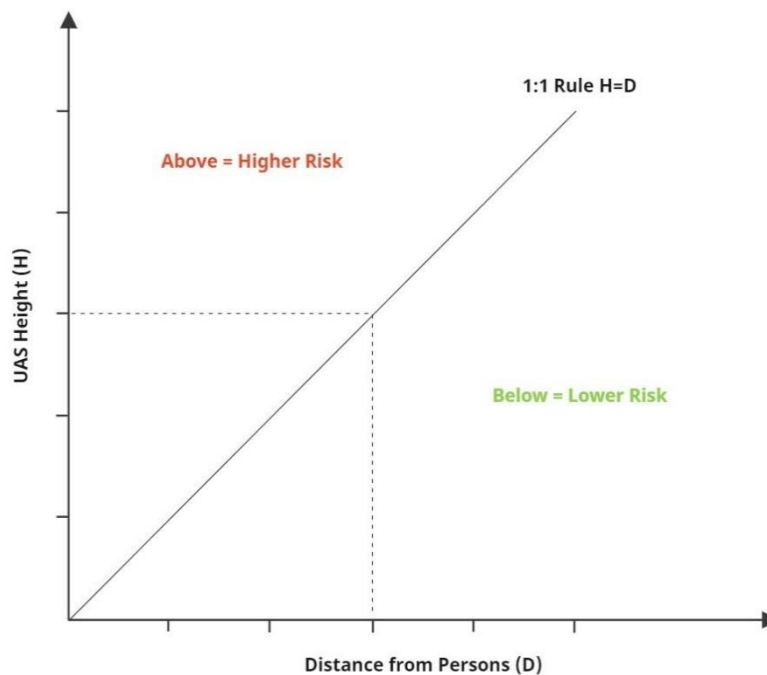
GM1 UAS.OPEN.030(1) UAS operations in subcategory A2

OPERATIONS IN SUBCATGORY A2

Subcategory A2 addresses operations during which flying close to people is intended for a significant portion of the flight. The minimum distance ranges from 30 m to 5 m from uninvolved people. 5 m is only allowed when there is an active low-speed mode function on the UA, and the remote pilot has conducted an evaluation of the situation regarding the weather, the performance of the UA and the segregation of the overflown area. The remote pilot is also required to have successfully passed an additional examination (known as the A2 CofC) in order to fly in sub-category A2.

The 1:1 'rule'

The '1:1 rule' is a principle which can be used to estimate an appropriate separation distance from uninvolved persons, when the minimum distances may need to be increased. It is based on the relationship between the unmanned aircraft's height and its distance from the uninvolved person (the 1:1 line).



When operating in 'low-speed' mode within 30m of uninvolved persons, remote pilots should aim to maintain a horizontal separation distance that is greater than, or equal to, the aircraft's height, using the same units of measurement. (i.e. if the aircraft is at 10m height, it should be kept at least 10m horizontally away from uninvolved people.

Operations where the aircraft's height is greater than the separation distance (i.e. above the 1:1 line) should be avoided or kept to the absolute minimum time necessary, due to the increased risk.

577 **GM1 UAS.OPEN.030(2)(a) UAS Operations in subcategory A2**

578 **COMPLETION OF A1/A3 REMOTE PILOT COMPETENCE**

579 See AMC1 UAS.OPEN.020(4)(b) and UAS.OPEN.030(2)(a) and UAS.OPEN.040(3) UAS operations in
580 subcategories A1, A2 and A3.

581

582 **AMC1 UAS.OPEN.030(2)(b) and (c) UAS operations in subcategory A2**

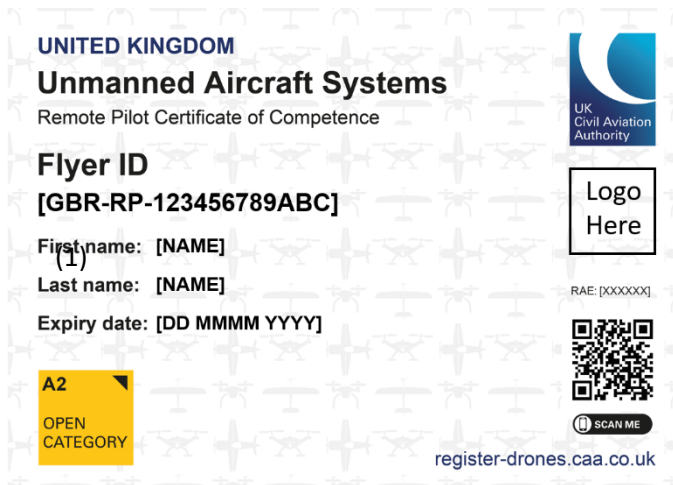
583 **REMOTE PILOT CERTIFICATE OF COMPETENCY**

584 After verification that the applicant:

- 585 ▪ Has Passed the online theoretical knowledge examination; and
- 586 ▪ Has completed and declared the self-practical training; and
- 587 ▪ Has passed the additional theoretical knowledge examination provided by the competent
588 authority or by an entity recognised by the competent authority,

589 The CAA, or an entity designated by the CAA, will provide a certificate of competency to the remote
590 pilot.

591



A2

The holder is competent to act as a remote pilot:

- a. Within the A2 subcategory while flying a Class C2 unmanned aircraft or, until 31 December 2022, with an unmanned aircraft with a mass less than 2kg
- b. Until 31 December 2022, within the A1 subcategory while flying an unmanned aircraft with a mass less than 500g.
- c. In the Specific category if the associated Operational Authorisation explicitly states that the A2 CofC is the level of competence required.

This can be revoked, amended or suspended by the CAA at any time.

592

593 The certificate has the following elements:

594 (1) The identifier provided by the CAA (*Flyer ID*) has the following format:

595 **GBR-RP-XXXXXXXXXXXX**

596 Where:

- 597 1. **GBR** is the ISO 3166 Alpha-3 code of the Great Britain;
- 598 2. **RP** is a fixed field meaning: remote pilot; and
- 599 3. **XXXXXXXXXXXX** are 12 alphanumeric characters that form the unique identifier.

AMC2 UAS.OPEN.030(2)(b) UAS operations in subcategory A2**601 PRACTICAL SELF-TRAINING**

- 602 (a) The aim of the practical self-training is to ensure that the remote pilot can demonstrate at
603 all times the ability to:
- 604 (1) operate a class C2 UAS within its limitations;
- 605 (2) complete all manoeuvres with smoothness and accuracy;
- 606 (3) exercise good judgment and airmanship;
- 607 (4) apply their theoretical knowledge; and
- 608 (5) maintain control of the UA at all times in such a manner that the successful outcome of
609 a procedure or manoeuvre is assured.
- 610 (b) The remote pilot must complete the practical self-training with a UAS that features the same
611 flight characteristics (e.g. fixed wing, rotorcraft), control scheme (manual or automated, human
612 machine interface) and a similar weight as the UAS intended for use in the UAS operation. This
613 implies the use of a UA with an MTOM of less than 4 kg and bearing the Class 2 marking after the
614 transition period defined in Article 22 has ended.
- 615 (c) If a UAS with both manual and automated control functions is used, the practical self-training
616 must be performed with both control functions. If this UAS has multiple automated features,
617 the remote pilot must demonstrate proficiency with each automated feature.
- 618 (d) The practical self-training must contain at least flying exercises regarding take-off or launch and
619 landing or recovery, precision flight manoeuvres remaining in a given airspace volume, hovering
620 in all orientations or loitering around positions when applicable. In addition, the remote pilot
621 must exercise procedures for abnormal situations (e.g., a return-to-home function, if available),
622 as stipulated in the user's manual provided by the manufacturer.
- 623 (e) This must be completed prior to taking the test described in AMC1 UAS.OPEN.030(2)(c). This
624 practical training must be completed within the confines of the A1 or A3 subcategory, and may
625 be completed at either a RAE, or by the individual.

626

627 PRACTICAL COMPETENCIES FOR PRACTICAL SELF-TRAINING

628 When executing the practical self-training, remote pilots should perform as many flights as they deem
629 necessary to gain a reasonable level of knowledge and the skills to operate the UAS safely.

630 The following list of practical competencies must be considered:

- 631 (a) Preparation of the UAS operation:
- 632 (1) make sure that the:
- 633 (i) chosen payload is compatible with the UAS used for the flight;
- 634 (ii) operating area is suitable for the intended operation; and
- 635 (iii) UAS meets the technical requirements of any geographical zone that is being flown
636 within;

-
- 637 (2) define the area of operation in which the intended operation takes place in accordance
638 with UAS.OPEN.040;
- 639 (3) define the area of operation considering the characteristics of the UAS;
- 640 (4) identify the limitations published for any relevant geographical zone (e.g., FRZs around
641 aerodromes, Prohibited, Restricted or Danger areas, etc), and if needed, seek
642 authorisation by the entity responsible for such zones;
- 643 (5) identify any obstacles and the potential presence of uninvolved persons in the area of
644 operation that could hinder the intended UAS operation; and
- 645 (6) check the current meteorological conditions and the forecast for the time planned for the
646 operation.
- 647 (b) Preparation for the flight:
- 648 (1) assess the general condition of the UAS and ensure that the configuration of the UAS
649 complies with the instructions provided by the manufacturer in the user's manual;
- 650 (2) ensure that all removable components of the UA are properly secured;
- 651 (3) make sure that the software installed on the UAS and in the command unit is the latest
652 version published by the UAS manufacturer;
- 653 (4) calibrate the instruments on board the UA, if required;
- 654 (5) identify possible conditions that may jeopardise the safety of the intended UAS operation;
- 655 (6) check the status of the battery and make sure it is sufficient for the intended UAS
656 operation;
- 657 (7) update the geo-awareness system; and
- 658 (8) set the height limitation system, if required.
- 659 (c) Flight under normal conditions:
- 660 (1) using the procedures provided by the manufacturer in the user's manual, familiarise with
661 how to:
- 662 (i) take off (or launch)
- 663 (ii) carry out a stable flight:
- 664 (a) hover in case of multirotor UA;
- 665 (b) perform coordinated large turns;
- 666 (c) perform coordinated tight turns;
- 667 (d) perform straight flight at a constant altitude;
- 668 (e) change direction, height and speed;
- 669 (f) follow a path;
- 670 (g) return of the UA towards the remote pilot after the UA has been placed at a
671 distance that no longer allows its orientation to be distinguished, in case of
672 multirotor UA;

- 673 (h) perform horizontal flight at different speed (critical high speed or critical low
674 speed), in case of fixed wing UA;
- 675 (iii) keep the UA outside any relevant airspace restrictions, unless holding an
676 authorisation to enter;
- 677 (iv) use some external references to assess the distance and height of the UA;
- 678 (v) perform return to home procedure — automatic or manual;
- 679 (vi) land (or recovery); and
- 680 (vii) perform landing procedure and missed approach in case of fixed wing UA; and
- 681 (2) maintain a sufficient separation from obstacles;
- 682 (d) Flight under abnormal conditions, where an abnormal condition is one which involves the use
683 of additional procedures to continue the flight safely:
- 684 (i) manage the UAS flight path in abnormal situations;
- 685 (ii) manage a situation where the UAS positioning equipment is impaired;
- 686 (iii) manage a situation of incursion of a person into the area of operation, and take
687 appropriate measures to maintain safety;
- 688 (iv) manage the exit from the operating area as defined during the flight preparation;
- 689 (v) manage the incursion of a manned aircraft into/ near to the area of operation;
- 690 (vi) manage the incursion of another UAS into the area of operation;
- 691 (vii) identify and select the correct procedure relevant to a situation;
- 692 (viii) deal with a situation of a loss of attitude or position control generated by external
693 phenomena such as Electromagnetic Interference (EMI);
- 694 (ix) resume manual control if fitted of the UAS, when automatic systems render the situation
695 dangerous; and
- 696 (x) carry out the loss of command and control link procedure.
- 697 (e) Briefing, debriefing and feedback:
- 698 (i) conduct a review of the UAS operation; and
- 699 (ii) identify situations when an occurrence report is necessary and complete the occurrence
700 report.

701

702 AMC1 UAS.OPEN.030(2)(c) Additional A2 online test

703 DECLARATION OF COMPLETION OF SELF-PRACTICAL TRAINING

704 The applicant shall declare that they have completed the self-practical training, described in AMC1 and
705 AMC2 UAS.OPEN.030(2)(b). This declaration shall be made in writing to the RAE that the applicant has
706 chosen to attend, for completion of the training course described below.

707 PASS AN ADDITIONAL THEORY TEST

- 708 The additional theory test shall be completed at an RAE.
- 709 The examination may be electronic, or paper based, but must be ‘closed book’ – i.e. without reference
710 to other material, other than that specifically referred to within a question (i.e. charts/maps).
- 711 The examination shall comprise a minimum of 30 multiple choice questions, and is to be 75 minutes in
712 duration. The pass mark shall be at least 75%.
- 713 A candidate with a recognised disability or additional needs will be granted an additional 15 minutes to
714 complete the examination upon request.
- 715 If, following a failure of a previous attempt, an examination is being repeated, the student must sit a
716 different set of questions to that used previously.
- 717 A Flyer ID must be held prior to commencing the additional theory test (see AMC1 UAS.OPEN.020(4)(b)
718 and UAS.OPEN.030(2)(a) and UAS.OPEN.040(3)).
- 719 Following completion of the self-practical training, declaration to the RAE and completion of the
720 additional theory test, the RAE shall issue the applicant with a certificate- the ‘A2 Certificate of
721 Competence’.
- 722 **Note:** the CAA will issue RAEs with copies of templates to be used.

723

724 **QUESTIONS TO BE DISTRIBUTED ACROSS THE FOLLOWING SUBJECTS**

725 The questions shall be comprised from the following topics:

Subject	Areas to be Covered
Meteorology	Introduction to obtaining and interpreting weather information <ul style="list-style-type: none"> ▪ Weather reporting resources ▪ Reports, forecasts and meteorological conventions appropriate for typical UAS flight operations ▪ Local weather assessments Effects of weather on the unmanned aircraft <ul style="list-style-type: none"> ▪ Wind – urban effects, gradients, masking, turbulence ▪ Temperature – precipitation, icing, turbulence ▪ Visibility factors ▪ Clouds – Cumulonimbus (CB) hazards (including lightning) ▪ IP43 (International Protection) IEC/EN 60529 standards with regard to water ingress
UAS Flight Performance	Typical operational envelope of a rotorcraft, fixed wing and hybrid configurations <ul style="list-style-type: none"> ▪ Basic principles of flight Operating guides <ul style="list-style-type: none"> ▪ Flight procedures/basic drills

Subject	Areas to be Covered
	<ul style="list-style-type: none"> ▪ Emergencies <p>Maintenance of system</p> <ul style="list-style-type: none"> ▪ Scheduled and repairs ▪ Manufacturer’s recommendations ▪ Assessment ‘safe to be flown?’ <p>Mass and balance and centre of gravity (CG)</p> <ul style="list-style-type: none"> ▪ Consideration of the overall balance when attaching gimbals, payloads ▪ Understand meaning of MTOM ▪ Security of the payload ▪ Payload characteristics – how differences can affect the stability of a flight <p>- CG – differences between different types of UA</p> <p>Batteries</p> <ul style="list-style-type: none"> ▪ Understand the terminology used for batteries (e.g. memory effect, capacity, c-rate) ▪ Differences in battery types ▪ Understand how a battery functions (e.g. charging, usage, danger, storage) <p>- Battery safety - how to help prevent potential unsafe conditions</p>
UAS Operating Principles	<p>UAS operations</p> <ul style="list-style-type: none"> ▪ Visual Line of Sight (VLOS) <p>- Avoiding collisions – ‘See and Avoid’</p> <p>- Decision process</p> <ul style="list-style-type: none"> ▪ Stress/pressure from ‘customers’ ▪ Occurrence reporting and investigation <p>Congested area operations</p> <ul style="list-style-type: none"> ▪ Planning and preparation ▪ Hazard identification ▪ Overflight of people ▪ Public/third parties – crowds and gatherings <p>Medical fitness</p> <ul style="list-style-type: none"> ▪ Crew health precautions ▪ Alcohol, drugs, medication, medical restrictions <p>Fatigue</p> <ul style="list-style-type: none"> ▪ Flight duration/flight workload ▪ Outdoors and lone working <p>Technical and operational mitigations for ground risk</p>

Subject	Areas to be Covered
	<ul style="list-style-type: none"><li data-bbox="692 338 1043 371">▪ Low speed mode function<li data-bbox="692 394 1118 427">▪ Evaluating distance from people<li data-bbox="692 450 826 483">▪ 1:1 rule

726

727 GM1 UAS.OPEN.030(3) UAS operations in subcategory A2

728 MODIFICATION OF A UAS WITH A CLASS MARK

729 Modifications to UAS that breach compliance with the requirements for the Class marking are those that
730 affect the weight or performance so that they are outside the specifications, or the instructions provided
731 by the manufacturer in the user manual.

732 The replacement of a part with another that has the same physical and functional characteristics is not
733 considered to be a breach of the requirements for the Class marking (e.g. a replacement of a propeller
734 with another of the same design). The UA user manual should define instructions for performing
735 maintenance and applying changes that do not breach compliance with the Class marking requirements.

736

737 AMC1 UAS.OPEN.040(1) Operations in subcategory A3

738 ENDANGERMENT OF UNINVOLVED PEOPLE

739 If an uninvolved person enters the area of the UAS operation, the remote pilot must, where necessary,
740 adjust the operation to ensure the safety of the uninvolved person and discontinue the operation if the
741 safety of the UAS operation cannot be ensured.

742

743 GM1 UAS.OPEN.040(1) Operations in subcategory A3

744 SAFE DISTANCE FROM UNINVOLVED PEOPLE

745 The safe distance of the UA from uninvolved persons is variable and is heavily dependent on the
746 performance and characteristics of the UAS involved, the weather conditions and the segregation of the
747 overflown area. The remote pilot is ultimately responsible for the determination of this distance.

748 It is advised that, as a general rule, a 50m separation distance from uninvolved people is used as a
749 method to comply with the requirement to ensure the safety of uninvolved people. This minimum
750 distance may need to be increased based on other factors, such as kinetic energy, controllability, height
751 and other such factors.

752 Uninvolved people should only be overflown when absolutely necessary, to achieve the aim of the flight
753 and must be minimised as much as possible.

754 When overflying uninvolved people, some horizontal separation should be maintained. The necessary
755 horizontal separation depends on factors, such as wind direction, trajectory of the UA and height of the
756 UA.

757 The remote pilot must be aware of their responsibilities as set out in UAS.OPEN.060(2)(d), and in GM1

758 UAS.OPEN.060(2)(d), with regard to maintaining control of the UA.

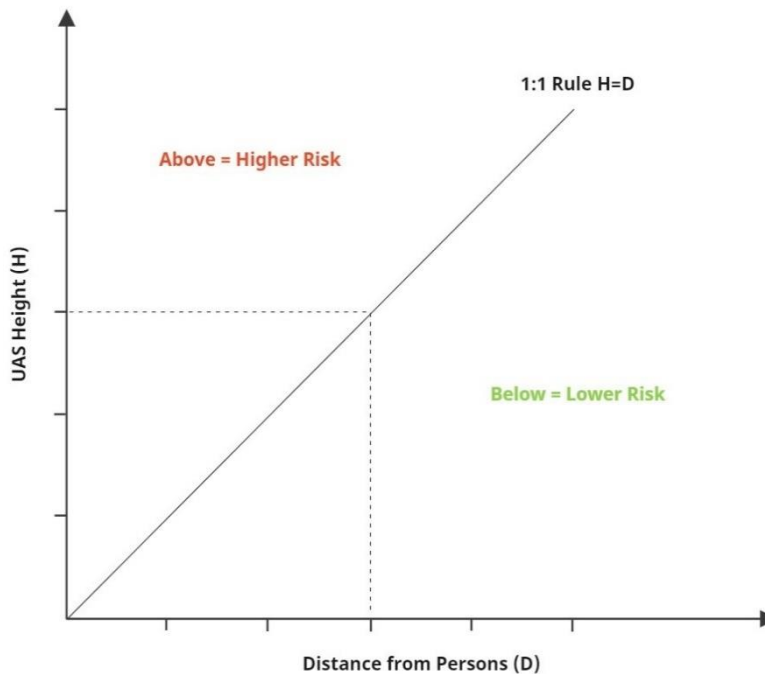
759

760 The 1:1 rule:

761 The '1:1 rule' is a principle which can be used to estimate an appropriate separation distance from
762 uninvolved persons. It is based on the relationship between the unmanned aircraft's height and its
763 distance from the uninvolved person (the 1:1 line).

764

765 **The horizontal separation between the unmanned aircraft and uninvolved people should not be less**
766 **than the height of the aircraft.** The higher the aircraft, the further it will travel should it suffer a
767 catastrophic failure, and therefore the higher the likelihood of it colliding with uninvolved people, and
768 so the separation distance must be increased (or the height reduced). This is so that, in the event of a
769 propulsion failure, the UA is not likely to fall in an area with uninvolved people present.



770

771 GM1 UAS.OPEN.040(3) UAS operations in subcategory A3

772 COMPLETION OF A1/A3 REMOTE PILOT COMPETENCE

773 See AMC1 UAS.OPEN.020(4)(b) and UAS.OPEN.030(2)(a) and UAS.OPEN.040(3) UAS operations in
774 subcategories A1, A2 and A3.

775 GM1 UAS.OPEN.040(4)(c), (d) and (e) UAS operations in subcategory 776 A3

777 MODIFICATION OF A UAS WITH A CLASS MARK

778 Modifications to UAS that breach compliance with the requirements for the Class marking are those that
779 affect the weight or performance so that they are outside the specifications, or the instructions provided
780 by the manufacturer in the user manual.

781 The replacement of a part with another that has the same physical and functional characteristics is not
782 considered to be a breach of the requirements for the Class marking (e.g. a replacement of a propeller
783 with another of the same design). The UA user manual should define instructions for performing
784 maintenance, and applying changes that do not breach compliance with the Class marking requirements.

785

786 AMC1 UAS.OPEN.050(1) Operations in subcategory A3

787 OPERATIONAL PROCEDURES

788 The UAS operator is responsible for developing procedures that are adapted to the type of operations
789 and to the risks involved, and for ensuring that those procedures are complied with. The extent of the
790 detail that needs to be provided within those procedures will vary depending on the relative complexity
791 of the operation and/or the organisation involved.

792 Written procedures may not always be necessary, especially if the UAS operator is also the only remote
793 pilot. The limitations of the Open category and the operating instructions provided by the UAS
794 manufacturer may be considered sufficient.

795 If the UAS operator employs more than one remote pilot, the UAS operator must:

- 796 (a) develop procedures for UAS operations in order to coordinate the activities between its
797 employees; and
- 798 (b) establish and maintain a list of their personnel and their assigned duties.

799 For UAS Operators who wish to develop procedures, guidance can be found in the AMC and GM to Article
800 11.

801

802 GM1 UAS.OPEN.050(2) Responsibilities of the UAS Operator

803 EFFICIENT USE OF RADIO SPECTRUM TO AVOID HARMFUL INTERFERENCE- VHF RADIO 804 COMMUNICATIONS

805 The incorrect and illegal use of VHF radiotelephony (RT) can cause significant impact to airspace users
806 who require its use for communication with an ATS provider, especially in critical phases of flight or
807 during an emergency. VHF radio communication should not be required in the Open category.

808 It should be noted that the use of VHF RT is strictly controlled, and requires the pilot to hold an
809 appropriate licence, and to use a licenced radio.

810 It is the responsibility of the UAS operator to ensure that the radio spectrum used for the C2 Link and
811 for any payload communications complies with the relevant Ofcom requirements and that any licenses

812 required for its operation have been obtained.

813 Frequency bands are allocated by Ofcom, details can be found on the Ofcom website and include [IR 2030](#)
814 [– UK Interface Requirements 2030](#) which covers licence exempt short range devices. Applications for the
815 assignment of frequencies within the bands must be addressed to Ofcom.

816 Licencing of frequency allocations is the responsibility of Ofcom and hence, where required, all
817 applications for a frequency assignment should be directed in the first instance to Ofcom. In frequency
818 bands where the CAA is the assigning authority, then the application will be passed to the CAA by Ofcom
819 so that the CAA can conduct the technical work, but Ofcom still remains the licencing authority.

820 Where a frequency licence is required (e.g., in protected frequency bands or where powers exceed the
821 current regulatory limits) the CAA will not be able to issue a permission or exemption.

822 There are no specific frequencies allocated for use by UAS in the UK. However, the most used frequencies
823 are 35 MHz, 2.4 GHz and 5.8 GHz.

824 35 MHz is a frequency designated for model aircraft use only, with the assumption that clubs and
825 individuals will be operating in a known environment to strict channel allocation rules. It is therefore not
826 considered to be a suitable frequency for more general UAS operations (i.e. outside a club environment)
827 where the whereabouts of other users is usually difficult to assess.

828 2.4 GHz is a licence free band used for car wireless keys, household internet and a wide range of other
829 applications. Although this is considered to be far more robust to interference than 35 MHz, operators
830 must act with appropriate caution in areas where it is expected that there will be a high degree of 2.4
831 GHz activity.

832 5.8 GHz is a licenced band which requires a minimum payment and registration with Ofcom. This band
833 is in use with other services including amateur-satellite, weather and military radars. Details can be
834 found on the [Ofcom website](#).

835 Operations close to any facility that could cause interference (such as a radar station) could potentially
836 disrupt communications with the UAS, whatever the frequency in use. GNSS jamming activities may also
837 disrupt communications as well as command and control signals. Information on scheduled GNSS
838 jamming exercises can be found on the [Ofcom website](#), and should be promulgated via NOTAM.

839

840 **AMC1 UAS.OPEN.050(4)(c) Responsibilities of the UAS operator**

841 **OBTAIN UPDATED INFORMATION ABOUT GEOGRAPHICAL ZONES**

842 The UAS operator must download the latest version of the geographical zone data and make available
843 this to the remote pilot such that they can upload it into the geo-awareness system, if such a system is
844 available on the UA used for the operation.

845

846 **GM1 UAS.OPEN.060(1)(b)**

847 **UPDATED INFORMATION ON GEOGRAPHICAL ZONES**

848 Although UAS.OPEN.060(1)(b) specifically refers to geographical zones established under Article 15. The
849 primary means for restricting flight of aircraft (including UA) in the UK, is under the ANO article 239. The
850 remote pilot must be familiar with these restrictions, and obtain any necessary permissions required to

851 fly within them. This information can be found within the AIP.

852
853 **AMC1 UAS.OPEN.060(1)(c) Responsibilities of the remote pilot**

854 **OPERATING ENVIRONMENT**

- 855 (a) The remote pilot should observe the operating environment and check any conditions that might
856 affect the UAS operation such as; the locations of people, property, vehicles, public roads,
857 obstacles, aerodromes, critical infrastructure, and any other elements that may pose a risk to
858 the safety of the UAS operation.
- 859 (b) Familiarisation with the environment and obstacles should be conducted, when possible, by
860 walking around the area where the operation is intended to be performed.
- 861 (c) It must be verified that the weather conditions at the time when the operation starts and those
862 that are expected for the entire period of the operation are within limits defined in the
863 manufacturer's manual.
- 864 (d) The remote pilot must be familiar with the operating environment and the light conditions, and
865 make a reasonable effort to identify potential sources of electromagnetic energy, which may
866 cause undesirable effects, such as electromagnetic interference (EMI) or physical damage to the
867 operational equipment of the UAS.

868
869 **AMC1 UAS.OPEN.060(1)(d) Responsibilities of the remote pilot**

870 **UAS IN A SAFE CONDITION TO COMPLETE THE INTENDED FLIGHT**

871 The remote pilot must:

- 872 (a) Update the UAS with data for the geo-awareness function if it is available on the UA, including
873 relevant airspace restrictions;
- 874 (b) Ensure that the UAS is fit to fly and complies with the instructions and limitations provided by
875 the manufacturer, or the best practice in the case of a privately built UAS;
- 876 (c) Ensure that any payload carried is properly secured and installed and that it complies with the
877 limits of the mass and Centre of Gravity (CG) of the UA;
- 878 (d) Ensure that the charge of the battery of the UA (and quantify of fuel, if applicable) is enough for
879 the intended operation based on:
- 880 (1) the planned operation; and
- 881 (2) the need for extra energy in case of unpredictable events; and
- 882 (e) For UAS equipped with a loss-of-data-link recovery function, ensure that the recovery function
883 allows a safe recovery of the UAS for the envisaged operation; for programmable loss-of-data-
884 link recovery functions, the remote pilot may have to set up the parameters of this function to
885 adapt it to the envisaged operation prior to flight.
- 886 (f) Ensure any lighting or remote identification systems (if applicable) are functioning correctly.

887

888 GM1 UAS.OPEN.060(2)(a) Responsibilities of the remote pilot

889 PSYCHOACTIVE SUBSTANCES OR ALCOHOL

890 It is the responsibility of the remote pilot to ensure that they are fit to fly and are not under the influence
891 of alcohol. While the general message is *'don't drink and fly'*, additional information is provided below
892 for reference and guidance.

893 While no actual limits are specified, the alcohol consumption limitations that are prescribed for driving
894 a car may be considered as an appropriate limit when flying in the Open category. (i.e. if you are fit to
895 drive a car, then you should be considered fit to fly in the Open category.

896

897 INJURY, FATIGUE, MEDICATION OR SICKNESS

898 While there are no specific requirements or medical standards set out for operations in the Open
899 category, remote pilots should apply the same considerations that they would before driving a motor
900 vehicle or riding a pedal cycle on the road.

901

902 OTHER CAUSES

903 'Other causes' means any physical or mental disorder or any functional limitation of a sensory organ
904 that would prevent the remote pilot from performing the operation safely.

905

906 AMC1 UAS.OPEN.060(2)(b) Responsibilities of the remote pilot

907 VLOS RANGE

908 The maximum distance of the UA from the remote pilot will depend on the size of the UA and on the
909 environmental characteristics of the area (such as the visibility, presence of tall obstacles, etc.).

910 Remote pilots must keep the UA at a distance such that they are always able to clearly see it and evaluate
911 the distance of the UA from other obstacles.

912 If the operation takes place in an area where there are no obstacles and the remote pilot has
913 unobstructed visibility up to the horizon, the UA can be flown up to a distance such that the UA remains
914 clearly visible, in order that it can be controlled, this includes being able to determine its orientation.

915 If there are obstacles in the operating area, then the distance should be reduced such that the remote
916 pilot is able to evaluate the relative distance of the UA from those obstacles.

917 The remote pilot should also consider other factors that may affect the maximum range of the UA from
918 the remote pilot, including the C2 link range.

919 Ensure VLOS, as defined within GM1 Article 2(7), is maintained at all times during flight.

920 GM1 UAS.OPEN.060(2)(b) Responsibilities of the remote pilot

921 DISCONTINUATION OF THE FLIGHT IF THE OPERATION POSES A RISK TO OTHER AIRCRAFT

922 There is an obligation on the remote pilot to maintain a thorough visual scan of the surrounding airspace
923 to avoid any risk of a collision with manned aircraft. It is likely that the remote pilot will identify other
924 airspace users before they identify the UA, and therefore the remote pilot will usually be the first to
925 manoeuvre away from any conflicting aircraft.

926 Remote pilots should be aware that their unmanned aircraft are generally difficult, if not impossible, to
927 see from another aircraft until they are extremely close.

928 As soon as the remote pilot sees another aircraft, parachute, or any other airspace user, they must
929 immediately keep the UA at a safe distance from it and land if the RP is not confident the flight can
930 continue without posing a risk to the other airspace user.

931 If the remote pilot cannot ensure suitable separation from the other aircraft, the UA must be landed
932 immediately.

933 Although many aerodromes are protected by FRZs, many unlicensed aerodrome sites also exist,
934 including hospital helipads. Such aircraft may loiter at low-level or land and take off unexpectedly. All of
935 these types of helicopter operations may therefore be affected by VLOS operations particularly when
936 approaching to land or departing from a site; UAS operators and remote pilots must take active
937 precautionary measures to avoid affecting the safety of other airspace users, either by requiring them
938 to take avoiding action, disrupting a mission or distraction (for example, aborting an air ambulance
939 landing due to a UA sighting).

940

941 DISCONTINUE THE FLIGHT IF THE OPERATION POSES A RISK TO ANIMALS AND THE ENVIRONMENT

942 In order to help assess whether the flight may pose a risk to animals, or the environment, the remote
943 pilot should check whether or not the flight is to take place within a Site of Special Scientific Interest
944 (SSSI). When a flight may take place in such an area, the remote pilot should contact Natural England for
945 further advice.

946

947 DISCONTINUE THE FLIGHT IF THE OPERATION POSES A RISK TO PEOPLE OR PROPERTY

948 This requirement also includes people inside vehicles. A collision, or even a distraction, caused by a UA
949 to a motor vehicle, or any other passenger carrying vehicle, is likely to lead to a risk to the occupants of
950 the vehicle.

951

952 GM1 UAS.OPEN.060(2)(c)

953 GEOGRAPHICAL ZONES

954 Although this requirement relates specifically to geographical zones established under Article 15, remote
955 pilots should be aware of other airspace restrictions established under the ANO. These airspace
956 restrictions must also be complied with. Details of these can be found within the AIP.

957

AMC1 UAS.OPEN.060(2)(d) Responsibilities of the remote pilot

958

ABILITY TO MAINTAIN CONTROL OF THE UA

959

960 (a) in order to maintain control of the UA, the remote pilot should:

960

961 (1) be focused on the operation of the UA, as appropriate; and

961

962 (2) not operate a UA while also operating a moving vehicle;

962

963 (3) Operate only one UA at a time

963

964 (b) If, as a passenger, the remote pilot operates a UA from a moving ground vehicle or boat, the speed
965 of the vehicle must be slow enough for the remote pilot to maintain a VLOS of the UA, maintain
966 control of the UA at all times and maintain situational awareness and orientation.

964

965

966

967 (c) Autonomous operations are not allowed in the Open category, and the remote pilot must be
968 able to take control of the UA at any time, except in the event of a free-flight UA. This includes
969 when required to land the UA at any point during the flight, by maintaining VLOS.

967

968

969

970 (d) In the event of a lost C2 Link, while it is clear that the remote pilot will no longer be able to take
971 control of the UA, the remote pilot must take all reasonable steps to ensure that the UA is not
972 flown into a situation where the C2 Link might be lost (e.g. due to excessive range from the
973 command unit, or in an area where the potential for RF interference is increased). In addition,
974 remote pilots must always fly their UA in a manner that, should a lost C2 Link situation occur,
975 the UA will not subsequently endanger persons or property (e.g. while flying its 'return to home'
976 procedure.

970

971

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977

GM1 UAS.OPEN.060(2)(d) Responsibilities of the remote pilot

978

ABILITY TO MAINTAIN CONTROL OF THE UA

979

980 In order to help maintain control of the UA, the remote pilot should fly cautiously, with the expectation
981 that control of the UA may be lost without notice. The remote pilot should avoid flying at excessive
982 speeds when not necessary, especially near people.

980

981

982

983 The remote pilot and UAS operator should consider any environmental factors that may increase the
984 potential for loss of control of the aircraft, or loss of propulsion. These factors may include terrain, other
985 nearby sources of RF interference or weather conditions that may degrade the performance of the C2
986 link, and systems on the UA including batteries.

983

984

985

986

987 Precipitation may lead to water ingress into various systems on the UA, low temperatures may affect
988 battery performance, and high wind speeds will result in a faster battery drain than in nil-wind
989 conditions.

987

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989

990

GM2 UAS.OPEN.060(2)(d) Responsibilities of the remote pilot

991

FREE-FLIGHT UA

992

993 'Free flight' means performing flights with no external control, taking advantage of the ascending
994 currents, dynamic winds and the performance of the model. Outdoor free flights are carried out with

993

994

995 gliders or with models equipped with means of propulsion (e.g. rubber-bands or thermal engines) that
996 raise them in altitude, before they freely glide and follow the air masses.

997

998 **GM1 UAS.OPEN.060(3) and GM1 UAS.SPEC.060(3)(e) Responsibilities** 999 **of the remote pilot**

1000 **EMERGENCY RESPONSE DEFINITION**

1001 The term 'emergency response effort' covers any activities by police, fire, ambulance, coastguard, or
1002 other similar services where action is ongoing in order to preserve life, protect the public or respond to
1003 a crime in progress. This includes activities such as road traffic collisions, fires, flooding events, rescue
1004 operations and firearms incidents, although this list is not exhaustive.

1005 'Emergency response' is an action taken in response to an unexpected and dangerous event in an
1006 attempt to mitigate its impact on people, property or the environment.

1007

1008 **EMERGENCY RESPONSE EFFORT**

1009 When there is an emergency response effort taking place within the operational area of a UAS, the UAS
1010 operation must be immediately discontinued unless it was explicitly authorised by the responsible
1011 emergency response services.

1012 When an emergency response effort is taking place close to the operational area, a safe distance must
1013 be maintained between the UA and the emergency response site so that the UA does not interfere with,
1014 or endanger, the activities of the emergency response services. The UAS operator should take particular
1015 care not to hinder any possible aerial support to the emergency services, and to protect the privacy rights
1016 of persons involved in the emergency event.

1017

1018 **GM1 UAS.OPEN.060(4) Responsibilities of the remote pilot**

1019 **ROLE OF THE UA OBSERVER AND FIRST-PERSON VIEW**

1020 Remote pilots may be assisted by UA observers in helping them to keep the UA away from other aircraft
1021 and obstacles. The UA observer must be situated alongside the remote pilot and observers may not use
1022 any form of aided vision (e.g. binoculars) other than corrective spectacles or contact lenses.

1023 UA observers may also be used when the remote pilot conducts UAS operations in first-person view
1024 (FPV), which is a method used to control the UA with the aid of a visual system connected to the camera
1025 of the UA. Again, the UA observer must be situated alongside the remote pilot and may not use aided
1026 vision other than corrective spectacles or contact lenses.

1027 In all cases, the remote pilot is still fully responsible for the safety of the flight.

1028 The UA observer's purpose is not to extend the range of the UA beyond the VLOS distance from the
1029 remote pilot. However, in emergency situations, such as the need to perform an emergency landing away
1030 from the remote pilot's position, binoculars may be used to assist the remote pilot in safely performing the
1031 landing.

1032

1033 **GM1 UAS.OPEN.070 Duration and Validity of Remote Pilot**
1034 **Competency**

1035 **DURATION OF FLYER-ID VALIDITY**

1036 A Flyer ID that was obtained under national regulations, or before this regulation became applicable,
1037 holds a validity period of 3 years. On renewal, these Flyer IDs will hold a validity of 5 years.

1038

PART B — UAS OPERATIONS IN THE ‘SPECIFIC’ CATEGORY

AMC2 UAS.SPEC.030(2) Application for an operational authorisation

SIGNIFICANT CHANGES TO THE OPERATIONAL AUTHORISATION

Any non-editorial change that affects the operational authorisation, or affects any associated documentation that is submitted to demonstrate compliance with the requirements established for the authorisation, is considered a significant change.

With regard to the information and documentation associated with the authorisation, changes are considered to be significant when they involve, for example:

- (a) changes in the operations that affect the assumptions of the risk assessment;
- (b) changes that relate to the safety management system (if applicable), or safety processes and procedures of the UAS operator (including changes of key personnel), its ownership or its principal place of business;
- (c) non-editorial changes that affect the OM, including the operational risk assessment.;
- (d) non-editorial changes that affect the policies and procedures of the UAS operator; and
- (e) technical changes to the UAS.

AMC1 UAS.SPEC.040(1)(b) Operational authorisation

PROCEDURE FOR COORDINATION WITH SERVICE PROVIDER FOR OPERATION IN CONTROLLED AIRSPACE

Any application for operation in the Specific category must **consider** the need for involvement of the relevant Air Navigation Service Provider (ANSP), when operating within controlled airspace. This must be set out within a procedure, within the OM. This procedure must take into account the risk of the operation, and provide any necessary coordination with the ATS unit.

For VLOS operations within controlled airspace, below 400ft, no permission or notification to the ANSP is required.

For VLOS operations within controlled airspace, above 400ft, this must be coordinated via a notification process when required for that portion of airspace, as set out within the AIP.

For operations beyond the BVLOS or VLOS of the remote pilot, at any height, within controlled airspace, the ANSP responsible for the management of the controlled airspace must be notified.

Although there is not a requirement to notify the ANSP when flying within controlled airspace below 400ft, outside the FRZ, and within visual line of sight, this may still be identified as a risk mitigation within the risk assessment (see Article 11). In such cases, if this is adopted as a procedure within the OM, then this must also be carried out.

When notifying an ANSP of a potential flight within controlled airspace, the ATS unit may advise that the flight should not take place for safety, or other operational reasons. Although the ANSP may not specifically issue, or reject, a permission for entry to such airspace (unless an FRZ/Restricted area), this advice should be followed by the UAS Operator. Failure to follow this advice is likely to lead to a breach of a number of other regulatory requirements, such as ANO article 240, which sets out that a person must not recklessly or negligently act in a manner likely to endanger an aircraft.

1078

1079 GM1 UAS.SPEC.040(1)(b) Operational authorisation

1080 PROCEDURE FOR COORDINATION WITH SERVICE PROVIDER FOR OPERATION IN CONTROLLED 1081 AIRSPACE

1082 The Specific Category covers a wide range of operations, many of which pose only a low air risk to other
1083 airspace users. In such instances, it is not proportionate to require permission from, or notification to,
1084 an ANSP to operate within controlled airspace, much of which extends down to the surface.

1085 The requirements of controlled airspace do not automatically apply to operations in the Open and
1086 Specific categories.

1087 Any operation that has the potential to impact the operation of another airspace user within controlled
1088 airspace, must consider how coordination with the ANSP will be achieved.

1089 ANSPs may choose to be notified about all, or some, or no UAS operations within controlled airspace
1090 above 400ft.

1091 These instructions may be found within AIP Section ENR 2.1. If there are no instructions set out for the
1092 controlled airspace the flight is planned within, then it may be assumed that notification is not required.

1093 The CAA will mandate that the operator of any BVLOS operation within controlled airspace must notify
1094 the ANSP.

1095 A NOTAM is not sufficient for the purpose of this requirement (although may also be required, to
1096 promulgate details of the operation to other airspace users).

1097 The notification of a flight to the ANSP as part of a coordination activity, as set out in UAS.SPEC.040(1)(b),
1098 does not imply the provision of any service, or separation, to the UA.

1099

1100 AMC1 UAS.SPEC.050(1)(a) Responsibilities of the UAS Operator

1101 OPERATIONAL PROCEDURES

1102 The UAS operator is responsible for developing procedures as required by the AO and for ensuring that
1103 those procedures are complied with.

1104 The UAS operator must:

1105 (a) develop procedures for its UAS operations within an OM, detailing the scope of the
1106 organisation and the procedures to be followed as a minimum. This manual should be
1107 expanded as necessary to cover any increased complexity in the types of UAS being flown
1108 (based on the manufacturer's recommendations, if available), or of the types of operation
1109 being conducted; and

1110 (b) compile and maintain a list of their personnel and their assigned duties.

1111 The UAS operator must allocate functions and responsibilities in accordance with the level of autonomy
1112 of the UAS during the operation.

1113 These operational procedures must be set out within the OM as described in the AMC to Article 11.

1114

1115 GM1 UAS.SPEC.050(1)(a)(i) Responsibilities of the UAS Operator

1116 **OPERATIONAL PROCEDURES TO ENSURE THE SAFETY OF THE OPERATION- HIGH VOLTAGE STORAGE**
1117 **DEVICES**

1118 The safe handling of such devices is important, and must be considered within the risk assessment
1119 process, described in the AMC/GM to Article 11. Consideration should be given to any time that any
1120 person may come into contact with such devices, including:

- 1121 ▪ Payload handlers/loaders
- 1122 ▪ Ground staff
- 1123 ▪ The Remote Pilot
- 1124 ▪ Any person discovering the UA following an accident

1125 Procedures should be established to cover all such eventualities, and should include the display of
1126 relevant warnings.

1127 The use of such devices on a UA should be identified and listed within the risk assessment process, and
1128 the display of a suitable warning label should be used as part of a mitigation of injury to third parties
1129 following an accident.

1130

1131 **GM1 UAS.SPEC.050(1)(a)(iv) Responsibilities of the UAS operator**

1132 **PROCEDURES TO ENSURE THAT ALL OPERATIONS ARE IN COMPLIANCE WITH UK REGULATION (EU)**
1133 **2016/679 ON THE PROTECTION OF NATURAL PERSONS WITH REGARD TO THE PROCESSING OF**
1134 **PERSONAL DATA ANDON THE FREE MOVEMENT OF SUCH DATA**

1135 The UAS operator is responsible for complying with UK law and regulations in particular, with regard to
1136 privacy, data protection, liability, insurance, security and environmental protection.

1137 This GM has the purpose of providing guidance to the UAS operator to help them to identify and describe
1138 the procedures to ensure that the UAS operations are in compliance with UK Regulation (EU)2016/679
1139 on the protection of natural persons with regard to the processing of personal data and on the free
1140 movement of such data.

1141 For further information on data-protection responsibilities, see the ICO (Information Commissioner’s
1142 Office) Website, [here](#). The following table is included as an example of how an operator may ensure
1143 their data-protection responsibilities are complied with.

1144

Description of the procedures established by the UAS operator

to ensure that the UAS operation is in compliance with Regulation (EU) 2016/679

1.	Identify the privacy risks ¹ that the intended operation may create
2.	Define your role with respect to personal data collection and processing
<input type="checkbox"/> I am the (joint) data controller <input type="checkbox"/> I am the (joint) data processor	
3.	Data protection impact assessment (DPIA)
Have you assessed the need to perform a DPIA: Yes <input type="checkbox"/> No <input type="checkbox"/>	

If yes, do you have to perform a DPIA? Yes <input type="checkbox"/> No <input type="checkbox"/> - If yes, did you perform a DPIA? Yes <input type="checkbox"/> No <input type="checkbox"/>	
4.	Describe the measures you are taking to ensure data subjects are aware that their data may be collected ⁶
5.	Describe the measures you are taking to minimise the personal data you are collecting or to avoid collecting personal data ⁷
6.	Describe the procedure established to store the personal data and limit access to it
7.	Describe the measures taken to ensure that data subjects can exercise their right to access, correction, objection and erasure
8.	Additional information

1145

1146 **GM1 UAS.SPEC.050(1)(b) Responsibilities of the UAS operator**

1147 **LEVEL OF AUTONOMY AND GUIDELINES FOR HUMAN-AUTONOMY INTERACTION**

1148 Autonomous UAS are not the same as ‘highly automated’ UAS. There are many highly automated UAS
 1149 currently in use today, but an autonomous UAS is one which requires no input or control in order to
 1150 commence, and carry out its flight. It will be able to follow the planned route, communicate with other
 1151 airspace users, detect, diagnose and recover from faults and operate a least as safely as a system with
 1152 continuous human involvement. In essence, an autonomous UAS will be equipped with high authority
 1153 control systems that can act without input from a human.

1154 Nevertheless, the risk assessment of autonomous operations should ensure, as for any other operations,
 1155 that the risks identified are mitigated to an acceptable level.

1156

1157 **GM2 UAS.SPEC.050(1)(b) Responsibilities of the UAS Operator**

1158 **DESIGNATE A REMOTE PILOT FOR EACH FLIGHT**

1159 In the case of UAS Operators that are organisations, the remote pilot does not have to necessarily be an

1160 employee or part of the organisation, in order to be designated a remote pilot for a specific flight by the
1161 UAS Operator. The UAS Operator, however, remains responsible for the safety of the operation and the
1162 remote pilot must follow the procedures of the UAS Operator. The UAS Operator remains responsible
1163 for ensuring the competence of the remote pilot and that the obligations of the remote pilot are met, in
1164 the same way as it would be if the remote pilot was an employee of the UAS Operator's organisation.

1165 The remote pilot remains responsible for adhering to the regulatory responsibilities of the Remote Pilot,
1166 and the UAS Operator remains responsible for adhering to the regulatory Responsibilities of the
1167 Operator.

1168

1169 GM1 UAS.SPEC.050(1)(c) Responsibilities of the UAS Operator

1170 EFFICIENT USE OF RADIO SPECTRUM

1171 It is the responsibility of the UAS operator to ensure that the radio spectrum used for the C2 Link and
1172 for any payload communications complies with the relevant Ofcom requirements and that any licences
1173 required for its operation have been obtained.

1174 It is also the responsibility of the operator to ensure that the appropriate aircraft radio licence has been
1175 obtained for any transmitting radio equipment that is installed or carried on the aircraft, or that is used
1176 in connection with the conduct of the flight and that operates in an aeronautical band.

1177 Licensing of frequency allocations is the responsibility of Ofcom and hence, where required, all
1178 applications for a frequency assignment should be directed in the first instance to Ofcom. In frequency
1179 bands where the CAA is the assigning authority, the application will be passed to the CAA by Ofcom so
1180 that the CAA can conduct the technical work however, Ofcom remains the licensing authority.

1181 Where a frequency licence is required (e.g., in protected frequency bands or where powers exceed the
1182 current regulatory limits) the CAA will not be able to issue a permission or exemption.

1183 There are no specific frequencies allocated for use by UAS in the UK. However, the most used frequencies
1184 are 35 MHz, 2.4 GHz and 5.8 GHz.

1185 35 MHz is a frequency designated for model aircraft use only, with the assumption that clubs and
1186 individuals will be operating in a known environment to strict channel allocation rules. It is therefore not
1187 considered to be a suitable frequency for more general UAS operations (i.e., not in a club environment)
1188 where the whereabouts of other users is usually difficult to assess.

1189 2.4 GHz is a licence free band used for car wireless keys, household internet and a wide range of other
1190 applications. Although this is considered to be far more robust to interference than 35 MHz, operators
1191 must act with appropriate caution in areas where it is expected that there will be a high degree of 2.4
1192 GHz activity.

1193 5.8 GHz is a licenced band which requires a minimum payment and registration with Ofcom. This band
1194 is in use with other services including amateur-satellite, weather and military radars. Details can be
1195 found on the [Ofcom website](#).

1196 Operations close to any facility that could cause interference (such as a radar station) could potentially
1197 disrupt communications with the UAS, whatever the frequency in use. GNSS jamming activities may also
1198 disrupt communications as well as command and control signals. Information on scheduled GNSS
1199 jamming exercises can be found on the [Ofcom website](#).

1200 The risk assessment process described in the AMC and GM to Article 11 is likely to involve a radio
1201 frequency survey, in order to meet UAS.SPEC.050(1)(c).

1202 UAS Operators are advised to carry out such a survey, when assessing the suitability of a site for a
1203 proposed UAS Operation. In doing so, the operator should:

- 1204 • **Explain** how command and control instructions, as well as telemetry data, are relayed between
1205 the command unit and the UA.
- 1206 • **Describe** in detail Operational C2 link management, including frequency switchovers and C2 link
1207 contingency situations.
- 1208 • **Provide** the Link Budget Calculation,¹ wherever possible

1209 The following table may assist in this survey:

1210

C2 Link	RLOS	
	BRLOS	
Transceivers / Modems	Power Levels	
	Transmission Schemes	
Operating Frequencies Used		
Third Party Link Service Provider		
Data Rates		
Latencies		
Means of protection against harmful interference		
Any other relevant information		

1211

1212 Providing a detailed control system architecture diagram that includes informational or data flows and
1213 subsystem performance may assist in explaining the requirements above.

1214 C2 link could include, direct (RLOS) or relayed (BRLOS). BRLOS includes all satellite systems or relaying
1215 C2 link through UA in the air to extend the signal range.

1216 The following examples of technical solutions may help make the C2 link secure: pairing, encryption or
1217 back up link. It is recommended to use licensed spectrum for BVLOS operations to minimise the chances
1218 of external interference and to improve latency.

1219 The UAS Operator should identify what alerts, such as warning, caution and advisory alerts, does the
1220 system provide to the operator and remote pilot, to advise them of C2 link disruption.

1221 The UAS Operator should consider what design characteristics or procedures are in place to maintain
1222 the availability, continuity, and integrity of the datalink. Factors to consider:

- 1223 ▪ RF or other interference
- 1224 ▪ Flight beyond communications range

¹ A link budget calculation is the theoretical calculation of the end-to-end performance of a communications link

- 1225 ▪ Antenna masking (during turns and/or at high attitude angles)
- 1226 ▪ Loss of command unit functionality
- 1227 ▪ Loss of unmanned aircraft functionality
- 1228 ▪ Atmospheric attenuation including precipitation
- 1229 ▪ RF wireless site survey to ensure reliable connectivity, it may include:
 - 1230 ○ Survey for frequency coverage throughout the potential operating area.
 - 1231 ○ Survey for frequency capacity to ensure sufficient bandwidth to support all predicted
 - 1232 operations.

1233

1234 **AMC1 UAS.SPEC.050(1)(d) Responsibilities of the UAS Operator**

1235 **REMOTE PILOT COMPETENCE- CURRENCY**

1236 The UAS Operator should identify the appropriate amount of recent flying experience in order to be
1237 considered ‘current’.

1238 Currency requirements should include:

- 1239 ▪ Regular practise of manoeuvres relevant to the scope of the OA.
- 1240 ▪ Regular practise of abnormal conditions and in-flight failures, such as:
 - 1241 ○ the ability to identify a deteriorating situation and react accordingly;
 - 1242 ○ taking manual control after a failure of any automated system;
 - 1243 ○ practice flight in ‘manual’ modes;
 - 1244 ○ identification of the potential for GNSS and compass loss or degradation.

1245 As a minimum, remote pilots are expected to have logged at least 2 hours of total flight time in the last
1246 3 calendar months on the type of UA applicable to the operational authorisation. For VLOS operations,
1247 this should be ‘live’ flight time, and not carried out on a simulator.

1248

1249 **GM1 UAS.SPEC.050(1)(d) Responsibilities of the UAS operator**

1250 **THEORETICAL KNOWLEDGE SUBJECTS FOR REMOTE PILOT TRAINING FOR THE ‘SPECIFIC’ CATEGORY**

1251 Within the Specific category there exists a wide range of potential UAS operations, each with unique
1252 risk. It is the responsibility of the UAS operator to identify the competency requirements of the remote
1253 pilot (requirements in addition to the GVC), and all personnel involved in the UAS operation, that is
1254 commensurate with the risk assessment for the given operation.

1255 See AMC1 to Article 8 for further information on these requirements.

1256

1257 **AMC1 UAS.SPEC.050(1)(e)(ii) Responsibilities of the UAS operator**

1258 **INFORMATION ABOUT THE UAS OPERATOR’S MANUAL**

1259 The UAS operator must ensure that the personnel in charge of duties essential to the UAS operation,
1260 apply the procedures contained in the operator’s OM.

1261

1262 AMC1 UAS.SPEC.050(1)(g) Responsibilities of the UAS operator

1263 LOGGING OF FLIGHT ACTIVITIES AND RECORD-KEEPING

1264 (a) An acceptable means to log and record the flight activities is to use a logbook, which may be
1265 electronic or paper based.

1266 (b) The information to be recorded must include the following:

1267 (1) the identification of the UAS (manufacturer, model/variant (e.g. serial number);

1268 NOTE: if the UAS itself is not subject to registration (i.e. not certified), the identification of the UAS may
1269 be achieved using the serial number of the UAS.

1270 (2) the date, time, and location of the take-off and landing;

1271 (3) the duration of each flight;

1272 (4) the total number of flight hours/cycles (take off and landings);

1273 (5) The name of the remote pilot responsible for the flight;

1274 (6) the activity performed (including the operational authorisation number, and whether
1275 the flight was VLOS or BVLOS);

1276 (7) any significant incident or accident¹ that occurred during the operation;

1277 (8) a completed pre-flight inspection and any site risk assessments and radio frequency
1278 surveys carried out;

1279 (9) any defects and rectifications;

1280 (10) any repairs and changes to the UAS configuration; and

1281 (11) the information required to comply with UAS.SPEC.100.

1282 (c) Records must be stored for 3 years in a manner that ensures their protection from unauthorised
1283 access, damage, alteration, and theft.

1284 (d) The logbook can be generated in either electronic or paper format. If the paper format is used,
1285 it must contain, in a single volume, all the pages needed to log the holder's flight time. When
1286 one volume is completed, a new one will be started based on the cumulative data from the
1287 previous one.

1288

1289 GM1 UAS.SPEC.050(1)(g)(iii) Responsibilities of the UAS Operator

1290 UP TO DATE RECORD OF INFORMATION ON UAS OPERATIONS- FLIGHT DATA RECORDING

1291 Although there is no legal requirement to make use of a flight data recording system (device, or service),
1292 it is recommended that UAS Operators make use of such systems to assist with the regulatory
1293 requirement set out in UAS.SPEC.050(1)(g)(iii). This would also assist with demonstration of regulatory
1294 compliance during the CAA audit process, to demonstrate that UAS Operations have been conducted
1295 within the conditions and limits of the Operational Authorisation, for example- providing a summary of
1296 the maximum height of all operations.

1297 Such flight data recording systems are invaluable when investigating occurrences, insofar as providing a
1298 recording of the flight parameters, system status and control input.

1299 This should also include the monitoring of high-voltage stored energy devices during the flight, for:

- 1300 ▪ The remaining charge left, i.e. the ‘fuel’ available for the remainder of the flight; and
- 1301 ▪ The health of the batteries (i.e. the temperature/ rate of discharge etc).

1302 It should also be noted that equipment manufacturers are responsible for specifying the minimum
1303 requirements for the monitoring of UAS high-voltage stored energy devices. It is the responsibility of the
1304 UAS Operator to define procedures for satisfying these minimum requirements as part of their risk
1305 assessment process, as described in the AMC and GM to Article 11.

1306

1307 GM1 UAS.SPEC.050(1)(h) Responsibilities of the UAS Operator

1308 A POSSIBLE FAILURE WILL NOT LEAD THE UAS TO FLY OUTSIDE THE OPERATIONAL VOLUME

1309 In order to identify whether a possible failure may lead the UA to fly outside the operational volume, a
1310 detailed description of the volume is necessary.

1311 The UAS Operator should describe the proposed area(s) of operation, using relevant, up to date and
1312 suitable maps and diagrams, with photographs if necessary. This should also include details of any
1313 relevant airspace.

1314 The accuracy of any maps used must be verified, and preferably from an authoritative cartographic
1315 source, such as Ordnance Survey.

1316 Where appropriate, aeronautical charts must be sourced and used.

1317 This may be a brief description and should include information such as:

- 1318 ▪ Type of area – congested (urban), building sites, open countryside (rural), road, marine
1319 environment (offshore), airport etc.;
- 1320 ▪ Geographic location;
- 1321 ▪ Population density;
- 1322 ▪ Features considered important to the operation(s) – roads, railways, tall obstacles and
1323 surrounding terrain;
- 1324 ▪ Any operation at an aerodrome can be supported with relevant aeronautical information and
1325 charts, sourced from the AIP;
- 1326 ▪ Any relevant airspace restrictions may be described using information from the AIP;

1327 Simplistic descriptions such as, ‘all of the UK’ or ‘as clients request’, are not suitable operating area
1328 definitions.

1329 The UAS Operator should, as part of the risk assessment process, identify how the **operational** and
1330 **technical** factors may lead to a delay between the RP commanding a control response, and the UA
1331 responding accordingly. This includes the following steps, that the UAS Operator should consider.

1332



1333

1334 These steps are affected by multiple factors, such as HMI considerations, decision taking time, time
1335 taken to action a response, latency, and time taken to execute the command.

1336 This time should be used to estimate the overall time taken between identifying the need to manoeuvre
1337 the aircraft, and the aircraft manoeuvring. This should be used when considering the operational
1338 volume, and the likelihood of the UA leaving it.

1339

1340 SAFETY SYSTEMS

1341 Several modern commercially available UAS are fitted with safety systems as standard such as, GNSS
1342 position monitoring systems, which can aid navigation but also enable electronic safety measures. These
1343 include geo-fencing or geo-caging, automated return to the home, controlled descents, hovering and
1344 automatic landing. Other safety systems are available including propeller guards, flight termination
1345 functions, tethering systems, airbags and an automatic parachute recovery system which, on detecting
1346 a problem, shuts off the UA's power supply and deploys a recovery parachute.

1347 The UAS Operator should consider the use of any safety systems on a UA that could substantially reduce
1348 the risk to other aircraft and the public. Whilst the incorporation of such safety systems is not mandated
1349 their inclusion may be a significant factor in assuring appropriate levels of safety in the event of an UAS
1350 malfunction.

1351 A number of different safety systems may be used to help meet this requirement.

1352 The UAS Operator should explain, within the OM, any systems fitted to the unmanned aircraft or
1353 command unit that contribute to safe handling or recovery of the UA in the event of loss of control or
1354 situational awareness.

1355 If independent 'kill switches' are relied on as safety risk mitigations, these must be fully described.

1356 Use of schematic diagrams may help describe the system layout and how this is constructed.

1357 The UAS Operator should include any manufacturer supplied data relating to equipment or components
1358 included in the system i.e. data sheets, specification sheets, performance data etc.

1359

1360 GM1 UAS.SPEC.050(1)(L) Responsibilities of the UAS operator

1361 GREEN FLASHING LIGHT

1362 Although this text remains in the regulation; the requirement to install, and use, a green flashing light
1363 on UAS within the Specific category has not been retained within the UK version of this regulation,
1364 because the applicability date of this requirement (set out in Article 23) was after the UK EU exit date,
1365 and as such was not retained.

1366

1367 REMOTE ID

1368 Although this text remains in the regulation; the requirement to install an active remote identification

1369 system within the Specific category has not been retained within the UK version of this regulation,
1370 because the applicability date of this requirement (set out in article 23) was after the UK EU exit date,
1371 and as such was not retained.

1372

1373 GM1 UAS.SPEC.060(2)(a) Responsibilities of the Remote Pilot

1374 UPDATED INFORMATION ON GEOGRAPHICAL ZONES

1375 Although UAS.SPEC.060(2)(a) specifically refers to geographical zones established under Article 15, the
1376 primary means for restricting flight of aircraft (including UA) in the UK, is under the ANO Article 239. The
1377 remote pilot must be familiar with these restrictions, and obtain any necessary permissions required to
1378 fly within them. This information can be found within the AIP.

1379

1380 GM1 UAS.SPEC.060(1)(a) Responsibilities of the Remote Pilot

1381 THE REMOTE PILOT SHALL NOT PERFORM DUTIES UNDER THE INFLUENCE OF PSYCHOACTIVE 1382 SUBSTANCES OR ALCOHOL

1383 UAS Operators should propose procedures, including alcohol limits, within their OM. Although no limits
1384 currently exist in law, it is advised that UAS Operators make use of the current Railways and Transport
1385 Safety Act 2003 Section 93 limits, which are:

1386

Level of alcohol	All UK nations
Micrograms per 100 millilitres of breath	9
Micrograms per 100 millilitres of blood	20
Micrograms per 100 millilitres of urine	27

1387

1388 THE REMOTE PILOT SHALL NOT PERFORM DUTIES WHEN THEY ARE UNFIT TO PERFORM TASKS DUE 1389 TO INJURY, FATIGUE, MEDICATION, SICKNESS OR OTHER CAUSES

1390 The medical requirements for operations within the Specific category will be set out in the operational
1391 authorisation. Normally, this will be achieved by reference to the medical requirements that have been
1392 set out by the UAS operator in its OM, although in some cases, additional requirements may be
1393 expressed more precisely.

1394 UAS operators will be expected to propose details of their required medical standards through the risk
1395 assessment associated with the particular operation.

1396 AMC1 UAS.SPEC.060(2)(b) Responsibilities of the remote pilot

1397 OPERATING ENVIRONMENT

1398 The remote pilot, or the UAS operator in the case of an autonomous operation, must check any
1399 conditions that might affect the UAS operation, such as the locations of people, property, vehicles, public
1400 roads, obstacles, aerodromes, critical infrastructure, and any other elements that may pose a risk to the
1401 safety of the UAS operation.

1402 Familiarisation with the environment and obstacles should be conducted through a survey of the area
1403 where the operation is intended to be performed.

1404 It must be verified that the weather conditions at the time when the operation starts and those that are
1405 expected for the entire period of the operation are within limits defined in the manufacturer's manual, as
1406 well as with the operational authorisation or declaration, as applicable.

1407 The remote pilot must be familiar with the light conditions and make a reasonable effort to identify
1408 potential sources of electromagnetic energy, which may cause undesirable effects, such as EMI or physical
1409 damage to the operational equipment of the UAS.

1410 1411 AMC1 UAS.SPEC.060(2)(c) Responsibilities of the remote pilot

1412 THE UAS IS IN A SAFE CONDITION TO COMPLETE THE INTENDED FLIGHT

1413 The remote pilot, or the UAS operator in the case of an autonomous operation, must:

- 1414 (a) update the UAS with data for the geo-awareness function if one is available on the UA;
- 1415 (b) ensure that the UAS is fit to fly and complies with the instructions and limitations provided by
1416 the manufacturer;
- 1417 (c) ensure that any payload carried is properly secured and installed, respecting the limits for the
1418 mass and CG of the UA;
- 1419 (d) ensure that the UA has enough available propulsion energy for the intended operation based
1420 on:
 - 1421 (i) the planned operation; and
 - 1422 (ii) the need for extra energy in case of unpredictable events;
- 1423 (e) for a UAS equipped with a loss-of-data-link recovery function, ensure that the recovery function
1424 allows a safe recovery of the UAS for the envisaged operation; for programmable loss-of-data-
1425 link recovery functions, the remote pilot may have to set up the parameters of this function to
1426 adapt it to the envisaged operation.
- 1427 (f) Ensure that any lighting or remote ID systems (if applicable) are functioning correctly.

1428 1429 GM1 UAS.SPEC.060(2)(d) Responsibilities of the remote pilot

1430 INFORMATION RELEVANT TO THE OPERATION MADE AVAILABLE TO THE ATS UNIT

1431 For AMC on this requirement, in relation to controlled airspace, see AMC1 UAS.SPEC.040(1)(b).

1432

1433 INFORMATION PROVIDED TO OTHER AIRSPACE USERS WHEN INSIDE AN FRZ

1434 The AIP (Section ENR 1.1 – 4.1.8) sets out when a NOTAM should be used to promulgate UAS operations,
1435 when operating within an FRZ, including inside/outside hours of operation of the aerodrome.

1436

1437 VHF RADIO COMMUNICATIONS TO PROVIDE INFORMATION TO THE ATS UNIT

1438 The use of VHF RT to help meet this requirement should only be used when absolutely necessary. Such
1439 circumstances *may* include:

- 1440 ▪ Operations within the close vicinity of an aerodrome, where permission for entry into an
1441 FRZ/ATZ has been arranged and the use of VHF RT has been requested by the aerodrome.
- 1442 ▪ BVLOS operations outside segregated airspace.
- 1443 ▪ Operations in close vicinity to other airspace users, such as air shows and displays.

1444 It is not possible to give an exhaustive list of such circumstances when the use of VHF RT is appropriate,
1445 and it is the responsibility of the operator to apply such a mitigation appropriately. Acceptance of such
1446 a mitigation within the OM does not authorise its use. A number of requirements must also be met in
1447 order to legally make use of VHF RT, which are detailed below.

1448 If the operation is approved with such a mitigation, then the following requirements must be met and
1449 detailed within the OM, and may also be set out within the conditions of the Operational Authorisation:

- 1450 ▪ Suitable VHF radio must be installed on the unmanned aircraft, and a relay to the ground
1451 station provided to enable remote pilot communication. The equipment and installation
1452 must be approved by the CAA. A ground-based VHF radio must not be used.
- 1453 ▪ Appropriate licence held by the remote pilot; this will normally be a Flight Radio Telephony
1454 Operator's Licence (FRTOL), which must be issued by the CAA following recommendation
1455 from an examiner.
- 1456 ▪ Appropriate radio licence: the radio must either be licenced, or have an exemption from the
1457 wireless telegraphy act, to operate. Ofcom issue these licences.

1458 Further information on radio requirements can be found in AIP GEN 1.5 section 5.

1459 The use of RT on aeronautical band radios within the Specific category for contact with ATC should be
1460 limited to exceptional circumstances and be carried out as directed by the ATS unit with which the
1461 remote pilot needs to communicate. In the majority of circumstances VHF RT is not required, and other
1462 methods of communication and/or procedural mitigations are sufficient.

1463

1464 AMC1 UAS.SPEC.060(3)(b) Responsibilities of the remote pilot**1465 AVOID RISK OF COLLISION WITH ANY MANNED AIRCRAFT- WHEN BEYOND VISUAL LINE OF SIGHT**

1466 When operating BVLOS, the risk of collision with a manned aircraft must be mitigated sufficiently. This
1467 is achieved using either:

- 1468 ▪ A **technical** capability which shall reduce the overall risk of a mid-air collision, to an
1469 acceptable level (as set out in the AMC to article 11) based on the environment in which the
1470 aircraft is operating; or
- 1471 ▪ An **operational** mitigation, which reduces the likelihood of encountering another aircraft to
1472 an acceptable level.

1473

1474 The use of a probabilistic safety argument, to assess the likelihood of encountering other aircraft, is not
1475 an operational mitigation if used as the sole component of a safety argument.

1476

1477 **AVOID RISK OF COLLISION WITH ANYMANNED AIRCRAFT- WHEN OPERATING IN CLOSE PROXIMITY**
1478 **TO HELICOPTER LANDING SITES**

1479 When preparing a risk assessment for an operation, UAS Operators should consider the risk of
1480 interaction with un-notified aerial activity such as Air Ambulance arrivals and departures.

1481 Remote Pilots and UAS Operators are reminded of the difficulty in visually observing UA, and the impact
1482 this is likely to have on the ability of other airspace users to avoid a collision with a UA.

1483 Therefore, when operating in the vicinity of a Helicopter Landing Site, the UAS operator should submit
1484 a NOTAM request to the [Airspace Regulation Unit](#) using the online [application form](#), in order to increase
1485 helicopter crew awareness of planned UAS activity.

1486 It should be noted, that a NOTAM may not be issued, following such a request. This does not indicate
1487 that the UAS Operation should not take place, but that it does not require a NOTAM.

1488 Similarly, if a NOTAM is generated, this does not constitute 'permission' for the operation, or mean that
1489 the UAS Operator may disregard other restrictions, requirements or regulations that may otherwise
1490 apply.

1491

1492 **GM1 UAS.SPEC.060(3)(b) Responsibilities of the remote pilot**

1493 **AVOID RISK OF COLLISION WITH ANY MANNED AIRCRAFT- WHEN BEYOND VISUAL LINE OF SIGHT**

1494 An operational mitigation to reduce the likelihood of encountering other aircraft, may include airspace
1495 segregation.

1496 **AVOID RISK OF COLLISION WITH ANYMANNED AIRCRAFT- WHEN OPERATING IN CLOSE PROXIMITY**
1497 **TO HELICOPTER LANDING SITES**

1498 The issuing of a NOTAM when operating in close proximity to a HLS is one way of alerting the air crew
1499 to the UAS operation, so that they are aware of it. It is the responsibility of the operator to determine:

- 1500 ▪ Whether there is a HLS nearby;
- 1501 ○ The UAS Operator should determine whether there is an HLS in close proximity to their
1502 operation, although it should be expected that helicopters may take off and land
1503 anywhere. Although there is no authoritative source of all HLSs in the UK, the following
1504 list includes common examples of HLS;
- 1505 ○ Hospitals, air ambulance and police helicopter bases, HLS on office blocks and temporary
1506 HLS at large events such as horse racing events (these are normally subject to NOTAM).
- 1507 ○ The following list contains examples of ways of checking whether an operation is likely
1508 to be in proximity to an HLS:
- 1509 ▪ Military AIP, VFR charts, online GA mapping software, and satellite-based
1510 imagery analysis.
- 1511 ▪ Whether the UAS operation is likely to affect the helicopter operation.

- 1512
- 1513
- Factors to consider include the planned height of the operation, the distance from the HLS and the planned flight path of the UA.

1514

1515 GM2 UAS.SPEC.060(3)(b) Responsibilities of the remote pilot

1516 AVOID RISK OF COLLISION WITH ANY MANNED AIRCRAFT

1517 There is an obligation on the remote pilot to maintain a thorough visual scan of the surrounding airspace
1518 to avoid any risk of a collision with manned aircraft. It is likely that the remote pilot will identify other
1519 airspace users before they identify the UA, and therefore the remote pilot will usually be the first to
1520 manoeuvre away from any conflicting aircraft.

1521 Remote pilots are reminded of the applicable requirements of SERA, as set out in AMC1 Article 7(2).

1522 Remote pilots should be aware that their unmanned aircraft are generally difficult, if not impossible, to
1523 see from another aircraft until they are extremely close.

1524 As soon as the remote pilot sees another aircraft, or parachute, or any other airspace user, they must
1525 immediately keep the UA at a safe distance from it and land if the UA is on a trajectory towards the other
1526 object.

1527 If the remote pilot cannot ensure suitable separation from the other aircraft such that there is no risk of
1528 a collision, then the UA must be landed immediately (*see AMC1 Article 7(2)*).

1529 Although many aerodromes are protected by FRZs, many unlicensed helicopter landing sites also exist,
1530 including hospital helipads. Such aircraft may loiter at low-level or land and take off unexpectedly. All of
1531 these types of helicopter operations may therefore be affected by UAS operations particularly when
1532 approaching to land or departing from a site; UAS operators and RPs must take active precautionary
1533 measures to avoid affecting the safety of other airspace users, either by requiring them to take avoiding
1534 action, disrupting a mission or distraction (for example, aborting an air ambulance landing due to a UAS
1535 sighting).

1536

1537 GM1 UAS.SPEC.060(3)(c) Responsibilities of the Remote Pilot

1538 GEOGRAPHICAL ZONES

1539 Although this requirement relates specifically to geographical zones established under Article 15, remote
1540 pilots should be aware of other airspace restrictions established under the ANO. These airspace
1541 restrictions must also be complied with. Details of these can be found within the AIP.

1542

1543 GM1 UAS.SPEC.060(3)(e) Responsibilities of the Remote Pilot

1544 EMERGENCY RESPONSE EFFORT

1545 See section: *GM1 UAS.OPEN.060(3)* and *GM1 UAS.SPEC.060(3)(e)* for further information.

1546

1547 GM1 UAS.SPEC.100 The use of certified equipment and certified 1548 unmanned aircraft

1549 GENERAL

1550 For the purposes of UAS.SPEC.100, ‘certified equipment’ is considered to be any equipment for which
1551 the relevant design organisation has demonstrated compliance with the applicable certification
1552 specifications and received a form of recognition from the CAA that attests such compliance (e.g., a TSO
1553 approval). This process is independent from the UAS Class marking process or the UK marking process.

1554 The use of certified equipment or certified UA in the Specific category does not imply an automatic
1555 transfer of the flight activities into the Certified category. However, the use of certified equipment or
1556 certified UA in the Specific category should be considered as a risk reduction and/or mitigation measure
1557 in the risk assessment. If the certification of those products is relied upon within the risk assessment,
1558 then all aspects/conditions related to that certification (such as performance limitations, routine
1559 maintenance, scheduled servicing and the qualifications/ approvals of the organisations and personnel
1560 carrying out those duties) must also be complied with.

1561 An ETSO/ TSO approval approves the equipment, and not the installation of it on an aircraft. Therefore,
1562 the applicant needs to demonstrate via their risk assessment how this equipment does not impact on
1563 other aircraft systems or airspace users, an example is the electrical power requirements, i.e. this should
1564 not draw more power than the electrical distribution system can provide. This equipment should also
1565 not induce any electromagnetic interference on other equipment installed on the platform.

1566

PART C Light UAS Operators Certificate

1567

1568 Part C of the annex refers to the Light UAS Operator Certificate. The CAA is commencing a programme
1569 of work to fully define the LUC, including relevant requirements, processes and new AMC/GM, which
1570 will be subject to a separate rulemaking task. As a result, the extant AMC/GM to this part of the annex
1571 has been removed, subject to this work being carried out. Any enquiries regarding the LUC should be
1572 directed to the CAA RPAS Policy Team.

1573 **APPENDIX A – Article 16- UAS Operations in the framework of** 1574 **model aircraft clubs and associations**

1575 Due to the size of the AMC and GM for Article 16, it has been included as an Appendix to this document.

1576

1577 **GM1 Article 16**

1578 **DEFINITION OF A MODEL AIRCRAFT**

1579 The CAA has adopted the following two definitions:

1580 **Model aircraft** – An unmanned aircraft used for sporting and recreational purposes, flown by direct
1581 control inputs made by the remote pilot without any autonomous capability other than for flight
1582 stabilisation purposes.

1583 **Note:**

1584 The definition of a model aircraft may include multi-rotor type ‘drones’. Any unmanned aircraft
1585 being flown in accordance with the definition above is considered a model aircraft. The use of any
1586 automation, such as automatic flight modes which alter the position of the aircraft, places the
1587 operation outside the definition of a model aircraft, and therefore outside the scope of Article 16.
1588 The aircraft must be flown with direct control inputs from the remote pilot.

1589 It is acknowledged that many unmanned aircraft have built in failsafe modes, which may be activated in
1590 some instances, for example- loss of control link. Activation of such a mode, although possibly automatic
1591 in nature, does not necessarily place the aircraft outside the scope of the definition of a model aircraft.

1592

1593 **Large model aircraft** – A model aircraft with a maximum take-off mass greater than 25kg.

1594

1595 **GM2 Article 16 UAS operations in the framework of model aircraft** 1596 **clubs and associations**

1597 **GENERAL**

1598 A model aircraft club or association may obtain an authorisation from the CAA that is valid for all their
1599 members to operate UA according to conditions and limitations tailored for the club or association.

1600 The model aircraft club or association will submit the procedures that all members are required to follow
1601 to the CAA. When the CAA is satisfied with the procedures, organisational structure and management
1602 system of the model aircraft club or association, it may provide an authorisation that defines different
1603 limitations and conditions from those in the Open Category. The authorisation will be limited to the
1604 operations conducted within the authorised club or association and within the United Kingdom.

1605 The authorisation cannot exempt members of the club or association from the requirement to register
1606 in accordance with Article 14 of the UAS Regulation; however, the CAA may allow a model club or
1607 association to register their members on their behalf.

1608 The authorisation may also include operations by persons who temporarily join in with the activities of
1609 the club or association (e.g., for leisure during holidays or for a contest), as long as the procedures
1610 provided by the club or association define conditions acceptable to the CAA.

1611 An application from an association for an Article 16 authorisation must contain a suitable safety case,
1612 detailing each requested 'exclusion' from the Open Category requirements, and why those exclusions
1613 are safe. The association must be able to demonstrate how it maintains oversight of its membership,
1614 and clubs, and must provide details of any competency scheme, safety reporting scheme, handbooks
1615 and guidelines and any other appropriate documentation.

1616

1617 **GM3 Article 16 UAS operations in the framework of model aircraft** 1618 **clubs and associations**

1619 **OPTIONS TO OPERATE A MODEL AIRCRAFT**

1620 Model flyers have the following options to conduct their operations:

- 1621 (a) They may operate as members of a model club or association that has received an authorisation
1622 from the CAA, as defined in Article 16. In this case, they must comply with the procedures of the
1623 model club or association in accordance with the authorisation.
- 1624 (b) In accordance with Article 15(2) the UK may define zones where UAS are exempted from certain
1625 technical requirements, and/or where the operational limitations are extended, including mass
1626 or height limitations.
- 1627 (c) The UAS may be operated in Subcategory A3, in which the following categories of UAS are
1628 allowed to fly according to the limitations and conditions defined in UAS.OPEN.040:
- 1629 (1) UAS with a class C0, C1, C2, C3, C4 mark;
- 1630 (2) UAS that meet the requirements defined in Article 20(b) ; and
- 1631 (3) privately built UAS with MTOM of less than 25 kg.
- 1632 (d) An Article 16 authorisation will set out conditions and limitations of any agreement between the
1633 association and the CAA, including any Operator registration data transfer, and the issuing of
1634 Open category pilot competence certificates on behalf of the CAA, where appropriate.
- 1635 (e) Where necessary, a permission or exemption to the ANO necessary for the purpose of an Article
1636 16 authorisation will be included as an annex to the Authorisation.

1637

1638 **AMC1 Article 16(1) UAS operations in the framework of model aircraft** 1639 **clubs and associations**

1640 **REQUEST BY A MODEL AIRCRAFT CLUB OR ASSOCIATION**

1641 An article 16 authorisation will be issued following application from a model aircraft club or association.
1642 The application needs to demonstrate to the CAA which parts of the regulation the association wishes
1643 to be excluded from, and the proposed scope of the model aircraft operations.

1644 An application should be submitted via the [UAS online form](#), and include a safety case, which outlines
1645 why each area of regulatory exclusion is safe, and what mitigations are applied.

1646 An Article 16 authorisation will be issued for a period of 12 months, at which point the association may
1647 renew it.

1648

1649 **REGISTRATION**

1650 An Article 16 authorisation may not exclude UAS operators from the need to register with the CAA.
1651 AMC1 Article 16 (4) sets out the AMC for using the provision within the regulation to register members
1652 on their behalf, into the CAA registration system.

1653

1654 **LARGE MODEL AIRCRAFT**

1655 The operation of large model aircraft is not normally automatically included within the scope of an
1656 Article 16 authorisation, and should be requested by the association on application.

1657 An association may permit the operation of a large model aircraft, within the terms of the authorisation,
1658 if this has been included within the Article 16 authorisation, however the risk assessment within the
1659 Article 16 application will need to identify suitable mitigations. These need to include assessment of the
1660 design and construction of the aircraft, and assessment of pilot competence to fly it.

1661 Once the UAS Operator of the large model aircraft holds a suitable certificate confirming the design and
1662 construction, and completion of a flight test programme, they may apply to their association for a permit
1663 to operate the large model aircraft.

1664 The relevant pilot competence requirement shall be set out within the application for an Article 16
1665 Authorisation, which will need to demonstrate the following:

- 1666 ▪ Basic flying competence;
- 1667 ▪ Theoretical knowledge, including regulatory requirements;
- 1668 ▪ Flying competence on the specific large model aircraft that the remote pilot intends to fly. This
1669 should be assessed by the Association.

1670 **MODEL AIRCRAFT ASSOCIATION PERMITS**

1671 A system of permits may be included within the Article 16 authorisation, to enable the association to
1672 permit certain activity, by the association within the scope of the authorisation. The CAA will use this
1673 system of permits to allow certain activity to take place, following specific conditions set out within the
1674 authorisation, that requires additional oversight from the association.

1675 Examples of such permits include a large model aircraft permit, model aircraft display permit and flight
1676 above 400ft permit. Associations should consider implementation of such a scheme, as part of a
1677 mitigation within their risk assessment for higher risk activities.

1678 A description of the association procedures that would support such a scheme should be provided to
1679 the CAA on application for an Article 16 authorisation. These include:

- 1680 ▪ Process to assess an application from a club or individual within the association, for a permit
- 1681 ▪ Process to issue and revoke permits where safe, necessary and appropriate to do so
- 1682 ▪ Process to carry out suitable and sufficient oversight of activity permitted

1683

1684 **FLIGHT ABOVE 400FT**

1685 If the association requests an exclusion from the 120m height limit applied in the Open category, then
1686 the operation of model aircraft may take place above 120m, either using:

- 1687 ▪ A 'standing' authorisation within the Article 16 authorisation, which allows regular flight
1688 above 400ft, within certain conditions. One such condition of this is a mass limit, set out

1689 within the article 16 authorisation. This mass limit is usually 7.5kg.

- 1690 ▪ A permit issued by the association for the routine operation of model aircraft above
1691 400ft at a designated flying club. The association may issue a permit for routine flight
1692 above 400ft, to any suitable club which requests it, following successful completion of
1693 the association's process.
- 1694 ▪ A model aircraft display permit, which may permit flight above 400ft for the purpose of
1695 a display event.

1696

1697 **MODEL AIRCRAFT FLYING DISPLAYS**

1698 A model aircraft flying display is defined as: 'Any flying activity deliberately performed, by model aircraft,
1699 for the purpose of providing an exhibition or entertainment at an advertised event'.

1700 One condition of an Article 16 authorisation, is that a model aircraft operating within it, may not take
1701 part in a model aircraft flying display, unless that display has been permitted by the association
1702 responsible, within the terms of the Article 16 authorisation they hold.

1703 Model aircraft flying displays often involve flight of model aircraft above 400ft. There are mechanisms
1704 built into the Article 16 process, which may adjust the maximum height of 400ft, specifically for the
1705 purpose of a model aircraft flying display:

- 1706 ▪ For **large model aircraft**, within the large model aircraft permit; or
- 1707 ▪ For **model aircraft less than 25kg**, within the maximum height section of the Article 16
1708 authorisation.

1709 Both of these mechanisms are activated within the model aircraft flying display permit issued by the
1710 relevant association.

1711 Operators of model aircraft being flown as part of a full-sized aircraft flying display, should read CAP 403,
1712 Chapter 17. These displays are subject to regulatory requirements, and the model aircraft elements of
1713 the display must be flown safely, in accordance with the display authorisation and CAP 403, and in
1714 accordance with the Article 16 authorisation and any necessary requirement to obtain a permit for the
1715 display

1716 Model aircraft operating in the Open or Specific category are excluded from the scope of ANO Article 86
1717 (Flying Display) regulations, by the provisions of ANO Article 23, however any model aircraft operating
1718 as part of a display which is outside the limits of a suitable Article 16 Authorisation, or the Open category
1719 limits, must be authorised to do so within the Specific category.

1720 Anyone wishing to undertake a model aircraft display should contact their relevant association for
1721 further advice. Only an association that is permitted to do so within their Article 16 Authorisation, may
1722 issue a permit for a model aircraft flying display.

1723 Operators of any model aircraft operating **outside** an Article 16 Authorisation, and outside the limits of
1724 the Open category, must obtain an operational authorisation from the CAA for operating in the Specific
1725 category.

1726 An Article 16 application will include within it any requirements relating to model aircraft displays,
1727 including the need for suitable risk assessments and the need to obtain any relevant airspace permission
1728 (such as FRZ permission from an aerodrome).

1729 Model aircraft associations wishing to establish a risk assessment format for clubs to use as part of a
1730 model aircraft display plan, are encouraged to make reference to [CAP 403](#), and [SRG1303T](#).

1731

1732 **THIRD COUNTRY OPERATORS WITHIN THE UK**

1733 Provisions for issuing an Article 16 Authorisation are made within this regulation, which (*in its European*
1734 *form*) has been implemented in all EU member states on 31 December 2020. As such, model aircraft
1735 operators from overseas may be able to operate in accordance with an Article 16 Authorisation issued
1736 **by their own authority**, within **their own member state**. Regulation EU 2019/947 (the current European
1737 Commission version) sets out within Article 16, paragraph 3, that such an authorisation is limited to the
1738 territory of the Member State in which it is issued.

1739 Remote pilots must meet the UK requirement for pilot competence, which is to hold a valid Flyer ID, in
1740 addition to any other competence requirement set out within the Article 16 authorisation.

1741 The UK does not recognise UAS operator registrations in third countries, and so the UAS operator must
1742 comply with the UK registration requirements, set out in Article 14.

1743 Third country model aircraft remote pilots and operators may operate within the limits of a UK CAA
1744 issued Article 16 Authorisation, with agreement from the relevant association. Any such operation must
1745 adhere to applicable UK regulations. Advice should be sought from the relevant association in the first
1746 instance.

1747

1748 **UK OPERATORS IN THIRD COUNTRIES**

1749 Any UK remote pilot and operator wishing to operate overseas must comply with the local regulations
1750 in place within the destination country. Any UK issued Article 16 Authorisation is only valid for use within
1751 the UK, and may not be used in any third country.

1752 Currently no other countries recognise UK issued operator registrations, or pilot competence
1753 certificates.

1754

1755 **GM1 Article 16(1) UAS operations in the framework of model aircraft** 1756 **clubs and associations**

1757 **APPLICATION GUIDANCE**

1758 An application for an Article 16 authorisation will need to include a risk assessment. It is advised to use
1759 the risk assessment guidance described in GM1 Article 11, as a basis for the risk assessment. This should
1760 include the following (this list is not exhaustive):

- 1761 ▪ Description of the Association and its membership, including current total number of members;
- 1762 ▪ Description of flying activity, including locations and type of flying carried out;
- 1763 ▪ Description of competence and achievement schemes;
- 1764 ▪ Organisational structure, including organogram;
- 1765 ▪ Relevant procedures and processes within the association- including occurrence reporting and
1766 membership oversight;
- 1767 ▪ Description of which parts of the regulatory framework the association wishes to be excluded
1768 from. This should be included in a suitable tabular format, for example

1769

Article of Regulation	Requirement	Requested change	Reason	Supporting Evidence
Article 4 (1)(e)	<i>During flight, the unmanned aircraft is maintained within 120m from the closest point on the surface of the Earth.</i>	<i>During flight, the unmanned aircraft is maintained within 450m from the closest point on the surface of the Earth, for model aircraft with a mass less than 7.5kg.</i>	<i>Requirement to regularly fly above 120m for flight training and displays.</i>	<i>Risk assessment Volume 3</i>

- 1770 ▪ Safety case to provide evidence supporting the application. This should support any requests
1771 made in the table above.

1772

1773 Before submitting the application, the association should engage with the CAA RPAS and GA Unit to
1774 establish whether the Article 16 Authorisation is likely to be granted, and to answer any initial queries.
1775 Some basic feedback may be given at this stage, but a full review and feedback will not be given until
1776 the application is submitted.

1777 Following submission of the application, an initial meeting will be arranged to discuss the application
1778 with the association, and once issued, regular meetings will be held with the association.

1779

1780 **NOTIFICATION OF MODEL AIRCRAFT ACTIVITY TO OTHER AIRSPACE USERS**

1781 Consideration should be given to the need to notify other airspace users of model aircraft activity, when
1782 operating within the terms of an Article 16 authorisation. This should be identified at the time of
1783 application, during the risk assessment process.

1784 Generally, this includes when operating above 400ft as part of a display, or when operating a large model
1785 aircraft.

1786 Model aircraft operating within an aerodrome FRZ may be notified to other airspace users, via a NOTAM.
1787 This is at the discretion of the aerodrome ATS unit, and the recommendations set out in AIP section ENR
1788 1.1 – 4.1.8.13.

1789 Generally, a VLOS operation of a model aircraft does not require notification when above 400ft, when
1790 stated within the terms of the Article 16 authorisation and when outside controlled airspace.

1791 The primary means of notification is via a NOTAM. A NOTAM highlights important operational
1792 information to pilots, which is checked as part of the brief before departure. NOTAMs are issued by the
1793 NOTAM office at NATS, and can be arranged by the CAA, individual operators, aerodromes or other
1794 agencies as necessary.

1795 A NOTAM should be used to highlight unusual model aircraft activity to other pilots for awareness. This
1796 includes displays above 400ft, large model aircraft operating above 400ft and in some cases, when
1797 operating within an aerodrome FRZ. A NOTAM may be requested via ARops@caa.co.uk or for an
1798 aerodrome ATZ, by the aerodrome contacting the NOTAM office

1799 In general, a NOTAM should not be raised for an activity which is also notified within the AIP (section 5.5

1800 (aerial sporting and recreational activities). However, it is acknowledged that some sites in some
1801 instances (large display events for example) may need additional notification, in order to improve their
1802 visibility to airspace users, particularly the VFR GA community. In this case, a NOTAM *in addition* to the
1803 AIP entry **may** be requested for ‘*an intense area of model aircraft activity*’. These should be requested
1804 when necessary via AROps@caa.co.uk.

1805

1806 **NOTIFICATION OF MODEL AIRCRAFT ACTIVITY TO THE ANSP**

1807 Model aircraft operations within controlled airspace, above 400ft, are expected to be considered within
1808 the Article 16 risk assessment. Compliance with procedures set out within the AIP is expected, and may
1809 form part of the air risk mitigations.

1810 In this case, when a model aircraft operates above 400ft within controlled airspace, the UAS operator
1811 should identify whether the portion of airspace requires a notification to the ATS unit responsible. This
1812 will be set out within the AIP, section ENR 2.1. This process is set out in GM1 UAS.SPEC.040(1)(b), and
1813 should be followed.

1814

1815 **MILITARY LOW FLYING SYSTEM**

1816 The military operate a system of low flying routes throughout the UK, and frequently fly below 500ft,
1817 often to heights as low as 100ft. The vast majority of military low flying takes place between 250ft and
1818 500ft, and usually on weekdays between 0700-2300 (GMT).

1819 In order to assist deconfliction between low flying military aircraft and other civil airspace users, the low-
1820 level Civil Aircraft Notification Procedure (CANP) has been established to provide a means of notification
1821 to the low flying cell.

1822 Model aircraft displays and any other intense model aircraft activity should be notified through the CANP
1823 process, by emailing the low flying booking cell. Contact details for the cell are published in the AIP, in
1824 section ENR 1.10 - 5.1.

1825 Charts of the low flying system are available from the AIP (ENR 6-20 and 6-21), which show the tactical
1826 training areas, boundaries and areas of avoidance.

1827

1828 **AMC1 Article 16(2)(b)(ii) Remote Pilot Competence**

1829 **MINIMUM COMPETENCE REQUIRED TO OPERATE THE UAS SAFELY**

1830 There is no exclusion from the need to demonstrate basic Open category pilot competence, when
1831 operating under an Article 16 authorisation. As such, every remote pilot is expected to hold (as a
1832 minimum) a ‘Flyer ID’. This may either be obtained through the CAA, or issued on the CAA’s behalf by
1833 the association.

1834 The association shall identify additional pilot competence requirements, based on the scope of their
1835 application for an Article 16 authorisation. This pilot competence scheme shall be set out within the
1836 Article 16 application, including the syllabus, assessment criteria, currency requirements and how the
1837 scheme is administered.

1838 The level of pilot competence required will be dependent on the risk of the operation, but will always
1839 be at a level that is equal to, or greater than the Open category pilot competence requirement set out
1840 in UAS.OPEN.020(4)(b), and members will demonstrate this by holding a ‘Flyer ID’.

1841 In order to meet the be equivalent standard of the CAA Flyer ID test, it must be comprised of at least 40
1842 questions, which may be multiple choice. A verbal assessment of a selection of questions is not
1843 considered sufficient.

1844 The pass mark shall be set by the association, but must be greater than 75%. The test may be 'open
1845 book', such that the candidate can make reference to copies of information material to support them
1846 during the exam, if the association decides that this is appropriate.

1847

1848 The subject areas to assess include:

- 1849 ▪ Aviation Safety
- 1850 ▪ Airspace restrictions
- 1851 ▪ Aviation regulation
- 1852 ▪ Human performance limitations
- 1853 ▪ Operational procedures
- 1854 ▪ Model aircraft general and technical knowledge
- 1855 ▪ Privacy and data protection
- 1856 ▪ Insurance
- 1857 ▪ Security

1858

1859 Some of these subjects may be of more relevance to some associations than others. The association
1860 should decide on the appropriate distribution of questions across these subject areas. If an association
1861 wishes to miss out an entire subject areas, the reason for this must be detailed within the Article 16
1862 application.

1863 An association may wish to expand the selection of questions within the assessment, to cover a wider
1864 range of topics than is covered by the CAA DMARES test.

1865

1866 **MODEL AIRCRAFT DISPLAY COMPETENCE**

1867 Within the risk assessment for an Article 16 authorisation, if requesting the ability to permit model
1868 aircraft displays, the association should identify additional pilot competence and currency requirements.

1869 In general, these include for the operation of large model aircraft within a display, or jet turbine powered
1870 model aircraft within a display. This is due to the large amount of kinetic energy carried by such aircraft,
1871 that may be transferred following a collision.

1872 It is recommended that this includes additional training, and demonstration of currency – such as the
1873 flying of three complete display routines within the preceding 90 days of the event, one of which should
1874 have been flown within the preceding 30 days of the event- on an aircraft which is reasonably
1875 representative of the aircraft to be flown within the display- preferably on the same aircraft.

1876 'Reasonably representative', in this context, refers to an aircraft of a similar mass, flying characteristics
1877 and type.

1878

1879 **FLYER ID ISSUED ON BEHALF OF THE CAA**

1880 An association may apply for the scope of their Article 16 authorisation to enable them to issue a Flyer
1881 ID on behalf of the CAA, to their members. This means that their members do not need to read the CAA
1882 Drone Code and sit the CAA Flyer ID test, but that they may demonstrate competence through the
1883 association pilot competence scheme instead. This Flyer ID is proof of competence to operate within the
1884 Open category, as well as forming part of the competence requirement to fly under the terms of the
1885 Article 16 authorisation.

1886 The association will need to demonstrate that the training material and pilot competence test meets the
1887 requirements set out in UAS.OPEN.020(4)(b), and therefore is at least equivalent to the CAA Drone Code
1888 and Flyer ID test.

1889 On application for an Article 16 Authorisation, the association will need to provide:

- 1890 ▪ A copy of all questions used in their pilot competence assessment;
- 1891 ▪ The procedures relating to the administration of the competence assessment;
 - 1892 ○ Exam conditions
 - 1893 ○ Pass mark
 - 1894 ○ Time limit
 - 1895 ○ Number of re-sits available
- 1896 ▪ The details of any practical assessment, if required;
- 1897 ▪ A copy of the training material used to support the competence scheme;

1898

1899 **AMC1 Article 16(2)(b)(iii) UAS operations in the framework of model**
1900 **aircraft clubs and associations**

1901 **ACTION IN CASES OF OPERATIONS/FLIGHTS THAT EXCEED THE CONDITIONS AND LIMITATIONS**
1902 **DEFINED IN THE OPERATIONAL AUTHORISATION**

1903 When a model club or association is informed that a member has exceeded the conditions and
1904 limitations defined in the operational authorisation, appropriate measures will be taken, proportionate
1905 to the risk posed, and in line with the agreed association/club procedures. Considering the level of risk
1906 of harm, the model club or association decides whether the competent authority should be informed.
1907 In any case, occurrences that cause an injury to persons or where the safety of other aircraft was
1908 compromised, must be reported by the model club or association to the CAA.

1909

1910 **AMC1 Article 16(4) Registration**

1911 **REGISTER MEMBERS INTO THE CAA REGISTRATION SYSTEM ON THEIR BEHALF**

1912 A facility to register model aircraft member into the CAA Operator registration system may be provided,
1913 if this is requested by the model aircraft association in the application for an Article 16 authorisation.

1914 The terms of use of this facility shall be set out within the Article 16 authorisation, and data exchange
1915 requirements will be agreed between the association and the CAA prior to issuing the Article 16

-
- 1916 authorisation.
- 1917 The CAA will provide the Operator ID to the association, for each member who participates in the
1918 scheme, and the association will issue the Operator ID to the member.
- 1919 The format of the Operator ID will be identical to the format issue directly by the CAA to UAS Operators,
1920 set out in section AMC1 Article 14(6) and the association may not alter the ID or the format of the ID.