European Union Aviation Safety Agency

Notice of Proposed Amendment 2024-06(A)

in accordance with Article 6 of MB Decision 01-2022

Introduction of a regulatory framework for the operation of drones

Enabling the initial airworthiness of unmanned aircraft systems subject to certification, and the continuing airworthiness of those unmanned aircraft systems operated in the 'specific' category

RMT.0230 — SUBTASK C#4

EXECUTIVE SUMMARY

This Notice of Proposed Amendment (NPA) puts forward a proposal for the establishment of a set of new, as well as the amendment of existing, acceptable means of compliance (AMC) and guidance material (GM) associated with the applicable regulatory framework (Commission Delegated Regulations (EU) 2024/1107 and (EU) 2024/1108, and Commission Implementing Regulations (EU) 2024/1109 and (EU) 2024/1110) for the initial airworthiness requirements for unmanned aircraft systems (UAS) that are subject to certification, and the continuing airworthiness of those certified UAS operated in the 'specific' category. The NPA addresses new operational and mobility concepts that are based on innovative technologies, such as UAS, and fosters and promotes their acceptance and adoption by European citizens.

The specific objectives of the proposed new and amended AMC and GM are to:

— ensure a high and uniform level of safety for UAS subject to certification and operated in the 'specific' category;

— create the conditions for the safe operation of UAS in the U-space airspace;

— promote innovation and development in the field of innovative air mobility (IAM) while establishing an efficient, proportionate, and well-designed regulatory framework which does not unnecessarily hinder the development of the UAS market;

— provide guidance to the competent authorities of the EU Member States for the application of the UAS Regulations;

— support the implementation of the new regulatory framework applicable to UAS;

— help affected stakeholders understand the specificities of the new regulatory framework;

— address the novelties of UAS compared to manned aviation.

ED DECISIONS TO BE AMENDED	**ED DECISIONS TO BE ISSUED**
— ED Decision 2022/021/R 'AMC & GM to Part 21 — Issue 2, Amendment 16' — ED Decision 2022/002/R 'AMC & GM to Regulation (EU) 2019/947 — Issue 1, Amendment 2'; 'AMC & GM to Part-UAS — Issue 1, Amendment 2'	— ED Decision .../.../R 'AMC & GM to Commission Delegated Regulation (EU) 2024/1107' — ED Decision .../.../R 'AMC & GM to Commission Implementing Regulation (EU) 2024/1109'

AFFECTED STAKEHOLDERS

UAS operators; competent authorities (CAs); UAS manufacturers; control and monitoring unit (CMU) manufacturers; maintenance organisations; continuing airworthiness management organisations (CAMOs); other airspace users; general public

WORKING METHODS

Development	**Impact assessment(s)**	**Consultation**
By EASA with external support	Detailed	Public — NPA

RELATED DOCUMENTS / INFORMATION

ToR RMT.0230 Issue 4 issued on 19.12.2022; NPA 2022-06 issued on 30.6.2022; Opinion No 03/2023 issued on 31.8.2023

PLANNING MILESTONES: Refer to the latest edition of EPAS *Volume II*.

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1. About this NPA

1.1. How this regulatory material was developed

The European Union Aviation Safety Agency (EASA) developed this NPA with the objective to establish an initial set of AMC and GM to the draft delegated and implementing acts proposed with Opinion No 03/2023[1] and subsequently adopted by the European Commission[2] with regard to new operational and mobility concepts based on innovative technologies, like UAS.

This rulemaking activity is included in the 2024 edition of *Volume II* of the European Plan for Aviation Safety (EPAS) for 2023–2025[3] under Rulemaking Task (RMT).0230 Subtask C#4. That subtask addresses specifically the initial airworthiness of UAS subject to certification, and the continuing airworthiness of those UAS operated in the 'specific' category.

EASA developed the regulatory material in question in line with Regulation (EU) 2018/1139[4] (the Basic Regulation) and the Rulemaking Procedure[5], as well as in accordance with the objectives and working methods described in the Terms of Reference (ToR) for this RMT[6].

When developing the draft regulatory material, EASA received support from Member State competent authorities' and industry experts that participated in dedicated working groups for each of the domains concerned.

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1 Opinion No 03/2023 - Introduction of a regulatory framework for the operation of drones — Enabling innovative air mobility with MVCA, the initial airworthiness of UAS subject to certification, and the continuing airworthiness of those UAS operated in the 'specific' category | EASA (europa.eu)

2 Commission Delegated Regulation (EU) 2024/1107 of 13 March 2024 supplementing Regulation (EU) 2018/1139 of the European Parliament and of the Council by laying down detailed rules for the continuing airworthiness of certified unmanned aircraft systems and their components, and on the approval of organisations and personnel involved in these tasks (http://data.europa.eu/eli/reg_del/2024/1107/oj)

Commission Delegated Regulation (EU) 2024/1108 of 13 March 2024 amending Regulation (EU) No 748/2012 as regards the initial airworthiness of unmanned aircraft systems subject to certification and Delegated Regulation (EU) 2019/945 as regards unmanned aircraft systems and third-country operators of unmanned aircraft systems (http://data.europa.eu/eli/reg_del/2024/1108/oj)

Commission Implementing Regulation (EU) 2024/1109 of 10 April 2024 laying down rules for the application of Regulation (EU) 2018/1139 of the European Parliament and of the Council as regards competent authority requirements and administrative procedures for the certification, oversight and enforcement of the continuing airworthiness of certified unmanned aircraft systems, and amending Implementing Regulation (EU) 2023/203 (http://data.europa.eu/eli/reg_impl/2024/1109/oj)

Commission Implementing Regulation (EU) 2024/1110 of 10 April 2024 amending Regulation (EU) No 748/2012 as regards the initial airworthiness of unmanned aircraft systems subject to certification and Implementing Regulation (EU) 2019/947 as regards the rules and procedures for the operation of unmanned aircraft (http://data.europa.eu/eli/reg_impl/2024/1110/oj)

3 European Plan for Aviation Safety (EPAS) 2024 - 13th edition | EASA (europa.eu)

4 Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1535612134845&uri=CELEX:32018R1139).

5 EASA is bound to follow a structured rulemaking process as required by Article 115(1) of Regulation (EU) 2018/1139. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the 'Rulemaking Procedure'. See MB Decision No 01-2022 of 2 May 2022 on the procedure to be applied by EASA for the issuing of opinions, certification specifications and other detailed specifications, acceptable means of compliance and guidance material ('Rulemaking Procedure'), and repealing Management Board Decision No 18-2015 (https://www.easa.europa.eu/the-agency/management-board/decisions/easa-mb-decision-01-2022-rulemaking-procedure-repealing-mb).

6 ToR RMT.0230 - Introduction of a regulatory framework for the operation of unmanned aircraft systems and for urban air mobility in the European Union aviation system | EASA (europa.eu)

1.2. How to comment on this NPA

The draft regulatory material is hereby submitted for public consultation.

Please submit your comments using the **Comment-Response Tool (CRT)** available at **http://hub.easa.europa.eu/crt/**[7].

The deadline for the submission of comments is **4 December 2024**.

1.3. The next steps

Following the public consultation of the draft regulatory material, EASA will review all the comments received with the support of the working groups of experts and will duly consider those comments in the subsequent phases of this rulemaking activity.

Considering the above, and following the adoption by the European Commission of the delegated and implementing acts that were proposed with Opinion No 03/2023 and that establish the airworthiness requirements for UAS, EASA may issue a Decision with the associated AMC and GM.

When issuing the Decision, EASA will also provide feedback to the commentators and information to the public on who engaged in the process and/or provided comments during the consultation of the draft regulatory material, which comments were received, how such engagement and/or consultation was used in rulemaking, and how the comments were considered.

EASA will publish at a later stage an additional set of AMC and GM to complement the elements already provided with this NPA.

[7] In case of technical problems, please send an email with a short description at crt@easa.europa.eu.

2. In summary — why and what

2.1. Why we need to act

Compared to current manned aircraft and ground vehicle operations, operations with UAS create new opportunities as they open the field of possibilities in terms of a multitude of aerial services, as well as different types of air mobility, for the transportation of cargo in different geographical scales ranging from urban environments to regional routes. Although the IAM market is still at an early stage, it shows increasing momentum. Many start-ups and companies are emerging across the entire value chain. In particular, the UAS manufacturing sector is rapidly evolving, especially in Europe, where numerous designs and concepts are currently being investigated and developed, with some already reaching the operational implementation stage. It is, therefore, necessary to support the transition phase and to ensure a smooth integration of these new operational concepts in the current civil aviation domains.

The drivers that trigger the need for regulatory activity include the following:

— new operational concepts enabled by UAS;

— the need to enable IAM as one element of the future 'smart, green and digital' cities;

— the lack of a comprehensive regulatory framework addressing safety, security and environmental aspects to build EU citizens' trust in the use cases of IAM operations, conducted with UAS;

— support EU's industry competitiveness at global level.

The AMC and GM shall be issued to support the implementation of the following regulations:

— Commission Delegated Regulation (EU) 2024/1107, adopted on 10 April 2024 and published in the *Official Journal of the European Union* on 23 May 2024. It supplements Regulation (EU) 2018/1139 of the European Parliament and of the Council by laying down detailed rules for the continuing airworthiness of certified unmanned aircraft systems and their components, and on the approval of organisations and personnel involved in these tasks.

— Commission Delegated Regulation (EU) 2024/1108, adopted on 13 March 2024 and published in the *Official Journal of the European Union* on 23 May 2024. It amends Regulation (EU) No 748/2012 as regards the initial airworthiness of unmanned aircraft systems subject to certification and Delegated Regulation (EU) 2019/945 as regards unmanned aircraft systems and third-country operators of unmanned aircraft systems.

— Commission Implementing Regulation (EU) 2024/1109, adopted on 10 April 2024 and published in the *Official Journal of the European Union* on 23 May 2024. It lays down rules for the application of Regulation (EU) 2018/1139 of the European Parliament and of the Council as regards competent authority requirements and administrative procedures for the certification, oversight and enforcement of the continuing airworthiness of certified unmanned aircraft systems, and amends Implementing Regulation (EU) 2023/203 on information security.

— Commission Implementing Regulation (EU) 2024/1110, adopted on 10 April 2024 and published in the *Official Journal of the European Union* on 23 May 2024. It amends Regulation (EU) No 748/2012 as regards the initial airworthiness of unmanned aircraft systems subject to

certification and Implementing Regulation (EU) 2019/947 as regards the rules and procedures for the operation of unmanned aircraft.

2.1.1. Description of the issues

The issues addressed by this rulemaking activity are as follows:

— Inadequate protection against ground risks (accidents/incidents involving persons on the ground or in sensitive areas)

  — Ground risk involves the probability of a UAS crashing on persons or property on the ground causing injuries/fatalities or damage (including damage to critical infrastructures). The risk is highly dependent on the area overflown in terms of population density or presence of properties and sensitive areas. The risk is normally higher in urban environments not only due to the higher population density but also due to the presence of obstacles during navigation (e.g. buildings, etc.).

  — Risk of damage to critical infrastructures[8].

  — Ground risk also involves the risk associated with ground operations (taxiing, servicing of aircraft, refuelling/recharging of aircraft, and the risk related to parts detaching from the UAS and hitting persons on the ground).

— Lack of a harmonised regulatory framework in Europe

  — Non-harmonised and/or rigid and too prescriptive regulations might create barriers to the UAS market. This might imply high costs for manufacturers to adapt their products to the various regulatory systems of the Member States, additional burden to comply with different technical requirements, and a possible reduction in financial investments on research and development of solutions that would improve the level of safety. This could also lead to the EU industry having a competitive disadvantage due to market barriers.

— Reluctant acceptance of the use cases by EU citizens in the domain of IAM (lack of trust due to safety, security, and environmental risks)

  — Despite the initial positive attitude shown by European citizens, there is a need to foster the actual adoption of the IAM use cases by future users, and also the acceptance of IAM use cases by urban residents. Regulatory authorities shall endeavour to ensure an adequate level of safety, security and environmental protection, and that no citizen will suffer undue and unbalanced nuisance from IAM.

2.1.2. Who is affected by the issues

The issues described in Section 2.1.1 will have an impact on the following stakeholders:

— UAS manufacturers,

— UAS operators,

— CMU manufacturers,

[8] A similar approach has been proposed by JARUS in its SORA 2.5 document under development and to be published at http://jarus-rpas.org/publications.

— competent authorities,

— maintenance organisations,

— continuing airworthiness management organisations,

— other airspace users (manned and unmanned aircraft),

— the general public.

2.1.3. Conclusion on the need for rulemaking

EASA concluded, as explained in Section 2.5 of Opinion No 03/2023, that intervention was necessary and that non-regulatory actions cannot effectively mitigate and address the issues.

2.2. What we want to achieve — objectives

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

RMT.0230 Subtask C#4 shall particularly contribute to achieving the objectives laid down in Articles 1(1) and (2)(a), (b), (e), (f), (i) and (k) of the Basic Regulation, and in particular:

(a) contribute to the wider Union aviation policy and to the improvement of the overall performance of the civil aviation sector;

(b) facilitate […] the free movement of goods, persons, services and capital, providing a level playing field for all actors in the internal aviation market, and improve the competitiveness of the Union's aviation industry;

(e) promote cost-efficiency, by, inter alia, avoiding duplication, and promoting effectiveness in regulatory, certification and oversight processes as well as an efficient use of related resources at Union and national level;

(f) contribute […] to establishing and maintaining a high uniform level of civil aviation security;

(i) promote research and innovation, inter alia, in regulatory, certification and oversight processes;

(k) support passenger confidence in a safe civil aviation.

The specific objectives of RMT.0230 Subtask C#4 are to:

— ensure a high and uniform level of safety for UAS subject to certification which are operated in the 'specific' category;

— explain to affected stakeholders the conditions for the safe operation of UAS in the U-space airspace;

— promote innovation and development in the field of IAM while establishing an efficient, proportionate, and well-designed regulatory framework which does not unnecessarily hinder the development of the UAS market;

— provide guidance to the competent authorities of the EU Member States for the application of the regulations applicable to UAS;

— provide guidance to UAS and CMU manufacturers;

— provide guidance to organisations involved in the continuing airworthiness of UAS and CMUs;

— support the implementation of the applicable regulatory framework for UAS;

— help affected stakeholders understand the specificities of the new regulatory framework;

— address the novelties of UAS compared to manned aviation.

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

The following sections address the proposed amendments to the existing AMC and GM, as well as the establishment of new AMC and GM, associated with:

— the initial airworthiness (IAW) of UAS subject to certification;

— the UAS Regulations; and

— the continuing airworthiness (CAW) of UAS subject to certification which are operated in the 'specific' category,

and summarise the underlying assumptions and criteria adopted for their amendment/creation.

2.3.1. Initial airworthiness (IAW) of UAS subject to certification

Commission Delegated Regulation (EU) 2024/1108 amended Commission Regulation (EU) No 748/2012[9] in order to accommodate the certification procedures for the issuance of:

— unmanned aircraft (UA) type certificates (TCs) for UAS (defined as the UA and its CMU);

— CMU TCs for cases where CMUs are certified separately.

Complementary to these amendments, the concept of critical CMU components and their implications on the airworthiness process was identified to require clarification by means of AMC and GM. Furthermore, the need for guidance was determined on how point 21.A.35 'Flight Tests' should be complied with in the context of UAS. In particular, the provision of guidance on the minimum number of flight test hours for UAS depending on the degree of design complexity and operational scenario was deemed necessary[10].

To meet these needs and help design and production organisations prepare for the implementation of the amendments that were introduced by Commission Delegated Regulation (EU) 2024/1108, EASA has elaborated AMC and GM for points 21.A.35 'Flight Tests' and 21.A.308 'Eligibility of a component for installation in a control and monitoring unit (CMU)', and included them in this NPA.

For the formulation of these AMC and GM, available material has been taken into consideration, in particular the following:

[9] Commission Regulation (EU) No 748/2012 of 3 August 2012 laying down implementing rules for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations (recast) (OJ L 224, 21.8.2012, p. 1) (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32012R0748&qid=1692183458123).

[10] The currently published version of AMC and GM applicable to Annex I to Regulation (EU) No 748/2012 has not been adapted yet for UAS. In many cases, no adaptation may be needed, or only terminology adaptation. This task will be addressed with a future NPA.

— For the AMC and GM to point 21.A.35 'Flight Tests', the proposed Certification Memorandum CM-21.A-B-003 on Function and Reliability Flight Testing for VTOL-capable aircraft (Issue 01), issued on 19 December 2023)[11].

— For the AMC and GM to point 21.A.308 'Eligibility of a component for installation in a control and monitoring unit (CMU)', the draft EUROCAE WG105 SG4 ED-311 'MOPS for CMU critical components of certified category UAS'.

While the operational requirements for VTOL-capable aircraft (VCA) have also been addressed by Opinion No 03/2023, Part 21 requirements concerning VCA did not need modifications (apart from points 21.A.90B and 21.A.431B linked with standard changes and standard repairs). As EASA CM 21.A-B-003, issued on 19 December 2023, was in the meantime consulted, EASA has decided to introduce in this NPA, as part of the AMC and GM dedicated to flight tests, the content of this CM, improved by addressing the comments received during its public consultation.

The draft AMC and GM have been further discussed and improved with the support of the authorities and industry involved in the Initial Airworthiness WG.

2.3.2. UAS Regulations

The amendments introduced to Commission Delegated Regulation (EU) 2019/945 and Commission Implementing Regulation (EU) 2019/947 were very limited; therefore, also the proposed AMC and GM material is very limited. During the public consultation phase of NPA 2022-06, some commentators requested to be clarified that the UAS Regulations are not applicable to small balloons and small free flight aircraft. Even if the definition of UAS is quite broad, it is recognised that this type of systems poses a negligible risk to people.

It was also clarified that the transportation of consumer commodities in the 'specific' category is possible when it complies with the dangerous goods regulations.

Some requests for clarification in relation to the amendments to Article 40 of Commission Delegated Regulation (EU) 2019/945 were made. A GM was introduced to clarify the exclusion of 'UAS specifically designed or modified for research, experimental or scientific purposes, and are likely to be produced in very limited numbers'. This reflects the same exclusion introduced for manned aircraft in Annex I to the Basic Regulation.

It was also clarified that lighter-than-air UAS may be classified in the 'specific' category even if they have a dimension greater than 3 metres and are operated over an assembly of people.

Finally, a clarification was introduced as regards the applicability of Commission Delegated Regulation (EU) 2024/1107): it does not apply if the manufacturer voluntarily decides to apply for a certificate or a restricted type certificate for a UAS intended to be operated in SAIL IV.

2.3.3. Continuing airworthiness (CAW) of UAS subject to certification which are operated in the 'specific' category

The continuing airworthiness requirements established in Commission Delegated Regulation (EU) 2024/1107 and Commission Implementing Regulation (EU) 2024/1109 apply to UA that are issued

[11] Certification Memorandum CM-21.A-B-003 Function and Reliability Flight Testing for VTOL-capable aircraft | EASA (europa.eu)

with a certificate of airworthiness (CofA) or a restricted certificate of airworthiness (RCofA). However, for certain types of operations, a CofA is not required. In such cases, complying with the continuing airworthiness requirements can be burdensome for owners/operators. Therefore, this NPA proposes guidance (GM1 to Article 1) to help owners and operators determine the most suitable approach for their current and future operations. This may include surrendering the CofA or applying for one, even if it is not required for a specific operation, thus allowing for a more efficient and tailored airworthiness process.

Given that the same UA and CMU(s) could be subject to continuing airworthiness requirements at certain times, there is a need to clarify how to include a new UA and/or CMU(s) in the scope of work of the CAO.UAS organisations. Therefore, this NPA indicates the elements to be considered during the phase-in of the UA and CMU(s) (ref. AMC1 CAO.UAS.020). This will ensure, among other things, that CAO.UAS organisations verify the accuracy and completeness of the records and information received, thereby mitigating the risk associated with the phase-in of UA or CMUs that were not previously subject to continuing airworthiness requirements.

Contrary to manned aircraft where continuing airworthiness requirements and responsibility apply only to the aircraft and its components, for unmanned aircraft, continuing airworthiness requirements also extend to the CMU used to operate the UA. This introduces new challenges in implementing the requirements due to the various possible configurations of a UAS. For example, a UA may be operated by one or more CMUs, and a single CMU may be used to operate multiple UA from different owners or operators (ref. GM1 ML.UAS.201(a)).

Since Commission Delegated Regulation (EU) 2024/1107 establishes that the owner is accountable for the continuing airworthiness of both the UA and the CMU(s), and given the various UAS configurations, it is necessary to clarify the boundaries of the responsibilities, especially when a CMU is used to operate different UA with different owners (even if this may be a rare case) (ref. GM1 ML.UAS.201(e)(1)). To mitigate the risks associated with such set-up, it is proposed that when an organisation approved under Part-UAS.CAO is contracted to manage the continuing airworthiness of an UA, an arrangement with another involved organisation is established to ensure the sharing of relevant records and information (ref. AMC1 ML.UAS.201(e)(1)). An AMC (ref. AMC1 AR.UAS.GEN.010) is also proposed to address the oversight duties of NCAs with respect to a CMU that is used to operate different UA registered in different Member States.

This NPA also proposes guidance on how to release maintenance performed on the UA, the CMU, and its components (ref. GM1 ML.UAS.502(b), GM1 ML.UAS.520(e), AMC1 ML.UAS.801, GM1 ML.UAS.803(a), and AMC1 ML.UAS.803). Additionally, a dedicated release statement is proposed for the installation of the CMU (ref. AMC1 ML.UAS.805). Guidance is provided on the installation process, emphasising on certain aspects and standards to be met during maintenance work (ref. GM1 ML.UAS.805). These include ensuring a clean work area, proper segregation of components, and an appropriate physical environment for the CMU installation.

Regarding the airworthiness review, the corresponding CMU(s) used to operate the UA should be part of the documented review and physical survey, unless they were recently part of another airworthiness review. To clarify the responsibilities of airworthiness review staff (ARS) when conducting such reviews, it is proposed in this NPA that ARS be responsible for both the documented and physical surveys of the UA and the respective CMU(s) (ref. AMC1 ML.UAS.903). Additionally, guidance is proposed to address situations where non-compliances are detected in the CMU(s) during

the airworthiness review, particularly when multiple CMUs are used for a single UA (ref. GM1 ML.UAS.903(g)). In such cases, it is proposed that an airworthiness review certificate (ARC) may be issued provided that at least one CMU complies, or that any non-compliance on that CMU has been properly deferred. The remaining CMU(s) for which non-compliances have been detected cannot be used to operate the UA. To mitigate the risks associated with issuing an ARC while one or more CMUs have non-compliances not properly addressed, a statement should be included in the airworthiness review report indicating that the particular CMU (or CMUs) should not be used to operate the UA until detected non-compliances are corrected, or properly deferred in accordance with point ML.UAS.403 (ref. AMC1 ML.UAS.903).

To achieve standardisation regarding organisation manuals and to facilitate NCAs fulfil their responsibilities when reviewing these manuals, an AMC is proposed (AMC1 CAO.UAS.025) that outlines the expected layout of the organisation manual.

Due to the characteristics of UAS and the nature of UAS operations, it is foreseeable that maintenance may need to be carried out at various locations, making it impractical to seek approval for each location and to list all locations in the organisation manual. Consequently, Commission Delegated Regulation (EU) 2024/1107 establishes provisions that allow organisations approved under Part-CAO.UAS to maintain UA, CMUs or CMU components specified in the scope of work at locations not listed in the organisation manual. When carrying out maintenance outside the locations listed in the organisation manual, certain safeguards offered by these locations are not present. Therefore, this NPA proposes guidance on the prerequisites and conditions that should be met before and during such maintenance activities (ref. AMC1 CAO.UAS.025(b)(6)).

Contrary to the continuing airworthiness requirements for manned aircraft, certifying staff for unmanned aircraft do not need to obtain an aircraft maintenance licence to release the maintenance carried out. It is the responsibility of organisations approved under Part-CAO.UAS to ensure that their staff are competent and properly trained. To set a minimum standard for the qualification of certifying staff, this NPA proposes objectives for basic and initial training relevant to specific UA, CMUs and CMU components (ref. AMC1 CAO.UAS.035(e), AMC1 CAO.UAS.040(b) and AMC2 CAO.UAS.040(b)). Additionally, guidance is also proposed on determining when two aircraft or two CMUs are considered similar, so that relevant maintenance experience in one can be deemed equivalent to demonstrate proficiency in another (ref. GM1 CAO.UAS.040(b) and AMC2 CAO.UAS.035(e)).

With respect to the information security requirements established in Commission Delegated Regulation (EU) 2024/1107, the NPA proposes concrete measures to help CAO.UAS organisations protect themselves against cyberthreats (ref. AMC1 CAO.UAS.102(a) and GM1 CAO.UAS.102).

3. Expected benefits and drawbacks of the proposed regulatory material

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

The AMC and GM proposed in this NPA do not create any further impacts beyond those that were identified by the proposed amendments to the related Regulations. The assessment of these impacts is presented in NPA 2022-06 and in Opinion No 03/2023. They remain valid for the AMC and GM provided here. Please, refer to Chapter 4 of NPA 2022-06 and Section 2.5 of Opinion No 03/2023 for details.

4. Proposed regulatory material

— **NPA 2024-06(B): Proposed AMC and GM to the initial airworthiness requirements for UAS subject to certification**

— **NPA 2024-06(C): Proposed AMC and GM to the UAS Regulations**

— **NPA 2024-06(D): Proposed AMC and GM to continuing airworthiness requirements for organisations**

— **NPA 2024-06(E): Proposed AMC and GM to continuing airworthiness requirement for authorities**

5. Monitoring and evaluation

EASA plans to evaluate the application of the AMC and GM during Advisory Body meetings and standardisation inspections.

6. Proposed actions to support implementation

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

— focused communication for Advisory Body meeting(s) (MAB/SAB)

— provision of clarification via electronic communication tools between EASA and NCAs (EUSurvey or other)

— provision of detailed explanations / clarification on the EASA website

— dedicated thematic workshop(s)/session(s)

— combination of any of the above-mentioned actions

Appendix — Quality of the NPA

To continuously improve the quality of its documents, EASA welcomes your feedback on the quality of this document with regard to the following aspects:

Please provide your feedback on the quality of this document as part of the other comments you have on this NPA. We invite you to also provide a brief justification, especially when you disagree or strongly disagree, so that we consider this for improvement. Your comments will be considered for internal quality assurance and management purposes only and will not be published (e.g. as part of the CRD).

1. The regulatory proposal is of technically good/high quality

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

2. The text is clear, readable and understandable

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

3. The regulatory proposal is well substantiated

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

4. The regulatory proposal is fit for purpose (achieving the objectives set)

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

5. The regulatory proposal is proportionate to the size of the issue

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

6. The regulatory proposal applies the 'better regulation' principles[1]

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

7. Any other comments on the quality of this document (please specify)

[1] For information and guidance, see:

- https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how_en
- https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how/better-regulation-guidelines-and-toolbox_en