1. Do you agree with the challenges with operational requirements identified by stakeholders, and why?

A. Somewhat Agree

The basic concept of the Open, Specific and Certified Categories remains sound, though some simplification to the Open Category would perhaps make it easier for recreational drone operators to understand/comply with if they have no previous aviation background.

The wording suggests that some stakeholders view the threshold for some operational requirements as being too low. The counter to this is that many within the recreational drone and model flying community still view the thresholds as being too high and disproportionate for their established activities. In terms of model flying, the EU regulations which are the basis of what is in place currently state clear intent to 'allow model flying to continue as it did before' but many in the community feel that this is not the case and the current regulatory requirements seem disproportionate, especially in comparison with other recreational air sport activities (such as hang gliding and paragliding).

The approach to authorisations and risk assessment for commercial drone operators clearly needs to be reviewed as it demands too much resource from the CAA leading to slow response times.

2. Should CAA adopt the following policy objectives for operational requirements and why? Mitigate safety and security risks; User-centric; Enforceable; Growth enabling; Scalable. Please describe any other objectives we should consider.

A. Definitely Yes (to all)

Yes, provided regulations remain proportionate and gold plating is avoided. The regulatory burden (and costs) for all stakeholders should be kept to the minimum level required to meet the objectives.

3. Do you value international alignment in operational requirements, and why?

A. Definitely Yes

The EU concept of cross border recognition of Operator Registration and Competencies was sound. Post BREXIT, any drone or model flyers operating internationally must register in the EU and comply with local competency requirements, leading many to further question the merits of UK Operator Registration for model flyers.

4. Should CAA re-name operational categories and sub-categories (Opportunity 1) and why?

A. No, to an extent

If manufacturers are building aircraft to fit in with the EU operational categories, it would seem sensible to remain aligned with EU regulations, otherwise manufacturers will have to produce country specific aircraft.

The speed of regulatory change is also an issue for some, with people not being given long enough to adapt to changes before further changes are made. This leads to errors in understanding the detail of current regulations.

5. Should CAA simplify how operational requirements are categorised (Opportunity 2) and why?

A. No, to an extent

Again, it makes sense to retain some alignment with our nearest neighbours on this. Combining A1-A3 will remove some of the flexibility currently afforded to A1. We would suggest reintroduction of a clearer separation between commercial and recreational operations.

6. Should CAA update how model aircraft operations are regulated (Opportunity 3) and why?

A. Neither yes or no

In terms of model flying, the Call for Input is focussed entirely on the Open Category.   The EU accommodated model flying in the Open Category with the A3, C4 classification but could have made it clearer.

There is perhaps a danger in defining model aircraft and this is something which EASA considered at length, instead considering model flying (including FPV Drone Racing) as an activity and this approach remains our preference.

The model flying community's preference from the outset was for model flying to be excluded entirely from the drone regulations and this was achieved to some extent for those operating within the framework of an Association with the provision of Article 16, which (so far) has minimised the regulatory burden on members.

Our hope is that in the worst case, the current status quo will be retained with Article 16. Ultimately, we would like to see model flying (in its entirety) returned to the pre-EU regulatory position, being regulated in the proportionate way it used to be, along the lines of how Hang Gliding and Paragliding is still dealt with.

7. Should CAA simplify exclusions from operational requirements (Opportunity 4) and why? Please describe any alternative exclusions that should be considered.

A. yes, to an extent

Based on the text presented in this Call for Input we would suggest simply removing "toy" from the exclusions, with all UAS under 250g being excluded.

8. Should CAA change transitional arrangements for users of UAS without class marks (Opportunity 5) and why?

A. Definitely yes

Yes. If the CAA is content for these non-class marked aircraft to be operating today to the existing operating limits there can be no compelling safety reason to restrict their operations. Unless that situation changes, it follows that the CAA should allow aircraft without class marks built before 2026 to fly as they do now indefinitely. Provision for self-built aircraft must also be retained.

9. Do you agree with the issues identified by stakeholders relating to product requirements, and why?

A. Somewhat agree

There is a danger that shifting away from the EU product requirements and class markings will require manufacturers to provide UK specific aircraft, perhaps discouraging them to make aircraft available to the UK market.

10. Should CAA adopt policy objectives for product requirements, and why? Mitigates safety and security risks; User-centric; Growth enabling; Scalable; Internationally aligned. Please describe any other objectives we should consider.

A. Definitely Yes (to all)

The objectives are largely aligned with EASA's original objectives when developing the current regulatory framework which we would support subject them remaining proportionate.

A further objective should be to ensure that there is minimal regulatory burden on all stakeholders. Any rules should meet the safety/security objective at minimum cost to stakeholders (in manhours and/or money) and should remain proportionate.

11. Should CAA implement manufacturer standards (Opportunity 8) and why?

A. Definitely Yes

Yes, but the UK should remain consistent with the EU to avoid obstacles to import/export and confusion over design/build quality expectations for users.

12. Should CAA implement a product labelling scheme (Opportunity 9) and why?

A. Definitely Yes

Yes. Anything that makes it easier for the end user to understand what they are buying and how it may be used both legally and safely is a good thing. But again, the UK should remain consistent with the EU to avoid obstacles to import/export and confusion over expectations for users. Continued provision for self-build aircraft should remain an essential requirement.

13. Should CAA simplify exclusions from product requirements (Opportunity 10) and why?

A. No, to an extent

For recreational drone operators, the current exclusions for aircraft under 250g are already one of the simplest and best understood elements of the existing regulations. The BMFA would support retention of the existing exclusions for aircraft under 250g without imposition of additional requirements which would surely serve to confuse rather than simplify.

14. Should CAA implement Remote ID (Opportunity 11) and why?

A. Neither yes nor no

Many drones being introduced onto the marked already incorporate the facility for Remote I.D. and this is probably appropriate due to the locations they can be operated from and the increased potential for security/privacy concerns due to them being equipped with cameras.

Interrogation of the Remote I.D. should be limited to enforcement agencies and the BMFA would be opposed to the information being accessible by the general public.

Existing/Legacy UAS under 250gm should be excluded from the Remote ID requirements and there should be a suitable transition period for existing/legacy UAS over 250gm before they must comply.

However, the BMFA would be strongly opposed to any Remote ID requirements for model aircraft. Our members have a collective fleet of around 500,000 aircraft which are usually operated from fixed remote locations well away from areas likely to require Remote ID interrogation and within VLOS of the pilot (generally making it easy for them to be identified in the unlikely event of there being a requirement). The BMFA believes that Remote ID would be disproportionate and unnecessary imposition on the model flying community.

The EU regulations do not mandate any Remote ID requirements for aircraft operated under an Article 16 Authorisation within the framework of model flying associations, or for model aircraft within the Open Category (A3, C4) and the BMFA requests that this position is maintained in any amendments made to the UK regulations.

15. Should CAA implement geo-awareness (Opportunity 12) and why?

A. Neither yes nor no

On-board automated Geo-fencing and Geo-awareness are features increasingly incorporated into UAS/drones but would not be appropriate for model aircraft as they are manually piloted.

The BMFA supports the concept of Geo-Awareness, provided that model aircraft are excluded from any such requirements.

16. Should CAA introduce requirements for manufacturers to provide user guidance during product set-up or pre-flight, via the controller or other interface (Opportunity 13) and why?

A. Yes, to an extent

The BMFA supports proportionate measures that increase user understanding of the regulations but again provision should remain to permit the continued use of self-built aircraft.

17. Should CAA introduce user validation requirements on manufacturers (Opportunity 14) and why?

A. Definitely No

It is the responsibility of the Operator to comply with the law, not the manufacturer and placing responsibility on them would seem to be a disproportionate requirement.

18. Should CAA simplify policy and guidance document structure (Opportunity 15) and why?

A. Definitely yes

Yes. Anything that makes it easier for end users and other stakeholders to understand the rules and the reasons for them must be a good thing.

19. What other opportunities to improve UAS regulation, beyond those described in this Call for Input, would you like to see progressed?

Deregulation of model flying within established model flying organisations – i.e. a return to the more proportionate way in which model flying was regulated prior to the EU regulations (and the way in which some other activities such as hang gliding and paragliding continue to be regulated), perhaps

by delegating additional authority to the model flying associations (in a similar way to the delegations given to the BGA/BMAA/LAA/BHPA).

Acceptance of Association Membership numbers as an equivalent to Operator ID's, removing the need for duplicate registration requirements.