



**Notice of Proposed Amendment 2020-03 DP**  
**Regular update of the acceptable means of compliance and guidance material to**  
**Commission Implementing Regulation (EU) v 2019/947 on the rules and procedures for**  
**the operation of unmanned aircraft (drones in the ‘open’ and ‘specific’ categories)**

**Additional predefined risk assessments (PDRAs) and acceptable means of compliance**  
**and guidance material on the UAS operator registration number**

**RMT.0730**

**Drone Alliance Europe Comments**

Drone Alliance Europe (“DAE” or “the Alliance”) supports the use of the Special Operations Risk Assessment (“SORA”) model in the specific category to determine the air and ground risk of a particular operation to obtain an operational authorisation by the competent authority. Therefore, DAE also supports the development of predefined risk assessments (“PDRAs”) that can be used commonly by all Member States, with the promise that the operational authorisation processes may be uniform among Member States, as well as expedited.

Two of the four PDRAs in this NPA are developed from the Standard Scenarios (STS-01 and STS-02), which the Alliance previously supported. One is developed from STS-02, developed by the Joint Authorities for Rulemaking on Unmanned Systems (“JARUS”), and one was previously developed and is being amended by this NPA.

DAE has consistently supported the work of JARUS and commends EASA and the Commission for adopting JARUS work product on both Standard Scenarios and SORA.

SORA, as developed by JARUS and adopted by the Commission, is a risk-based, performance-based, and operations-centric approach that provides a consistent evidence-based review and approval framework for operations in the specific category.

As a general matter, DAE has always supported harmonisation of rules and standards throughout the EU, as well as the world. DAE supported the Commission’s decision in Implementing Regulation 2019/947 (“UAS Regulation” in this NPA) to create a Repository to allow for the exchange of UAS and UAS operator registration among Member States; DAE recognises, however, that a regulation to create this Repository will not be in place in time for the effective date of the UAS Regulation on 31 December 2020.

This NPA provides an interim framework (described in the NPA as the “broker solution”) in which UAS operators and certified UAS registrations in one Member State may be accessed by other Member States online. DAE supports this interim proposal.