



Mr Luc Tytgat
Strategy and Safety Management Director
European Aviation Safety Agency

Dear Mr Tytgat

The European Small UAV Coalition is pleased to have the opportunity to respond to your A-NPA on the regulation of drones. We welcome the A-NPA and the direction it takes. Drones generally, and small UAVs in particular, are a fast moving and important new sector and it is one that has significant potential for European industry. It is therefore important that there is a clear and stable risk- and performance-based regulatory framework within which our industry can operate and grow.

For the record, the European Small UAV Coalition represents a wide array of manufacturers, operators and suppliers of various services to the small UAV industry. A full list of our members is available on request.

Whilst we have commented on each of your proposals in detail, there are three general comments that we would like to make. These comments are in effect transversal on many of the proposals you make.

First, we would be grateful if you can be sure to clarify and to crystallise the fact that you are proposing a pan-European system that allows operators to register once, and then perform safety cases that would create the flexibility amongst multiple competent authorities to operate across Europe. Some of the references in the A-NPA to these issues are not as clear as we might hope.

Secondly, we would like to reinforce the view that we expressed in our meeting with your team that regulations should accommodate the fact that many of our members will be performing a variety of use case activities, often in various similar, but not identical locations. We support the view that approvals that are issued based on the overall operational risk picture, regardless of whether the operator one single vehicle or fleets of multiple type vehicles, is far preferable to a framework that would require the operators to obtain safety case approvals on a case-by-case basis.

Finally, we encourage EASA to pay particular attention to the work being done by NASA and others in the US regarding the creation of a traffic management system for UAVs in Class G airspace. This is an exciting development and one that Europe must follow with interest. As far as practicable, we should harmonize approaches in this area.

If you have any questions, please do not hesitate to contact us,

Sincerely

(Signed)

Andrew Charlton
Executive Director
European Small UAV Coalition
29 September 2015