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Annex I to EASA Opinion No 06/2026

COMMISSION IMPLEMENTING REGULATION (EU) .../...

of XXX

**amending Implementing Regulation (EU) 2019/947 as regards the
introduction of specific security requirements applicable to UAS operations**

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**amending Implementing Regulation (EU) 2019/947 as regards the introduction of
specific security requirements applicable to UAS operations**

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) 2018/1139 of the European Parliament and of the Council 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 216/2008 and (EC) No 552/2004 ⁽¹⁾, and in particular Article 57(a) and (d) thereof,

Whereas:

- (1) In order to ensure a high and uniform level of safety and security across the Union with regard to UAS operations, and to safeguard the privacy and protection of personal data, it is necessary to enhance the effectiveness of the registration systems for UAS operators which are established and maintained by Member States pursuant to Article 14 of Implementing Regulation (EU) 2019/947 ⁽²⁾. Inaccurate or unverified registration data undermines the ability of competent authorities to identify UAS operators and to take effective enforcement action, including in response to security threats. Member States should therefore verify the identity of UAS operators before completing their registration.
- (2) In the interest of clarifying the criteria for the registration of UAS operators, the ‘open’ category should be based on a single, clearly defined maximum take-off mass threshold, rather than on multiple cumulative criteria.
- (3) To enhance the situational awareness of UAS operators and remote pilots, thereby ensuring the safety and security of UAS operations and the protection of privacy of personal data, it is necessary to improve the accessibility, clarity and consistency of information on the conditions applicable to UAS operations in each Member State. Member States should therefore be empowered to define, through the establishment of UAS geographical zones, the conditions, restrictions or prohibitions applicable to defined portions of their territory and, through national conditions, those applicable throughout their territory. That information should be made available in both human-readable and digital formats.
- (4) In view of the specific characteristics of operations conducted within the framework of model aircraft clubs and associations, and taking into account their demonstrated safety record, it is appropriate to allow a degree of regulatory flexibility regarding the conditions applicable to such operations. Member States should therefore decide, in the authorisations issued in accordance with Article 16 of Implementing Regulation (EU) 2019/947, to exempt UAS operated within that framework from the requirement to be equipped with a direct remote identification function for cases where it is justified by

⁽¹⁾ OJ L 212, 22.8.2018, p. 1.

⁽²⁾ Commission Implementing Regulation (EU) 2019/947 of 24 May 2019 on the rules and procedures for the operation of unmanned aircraft (OJ L 152, 11.6.2019, p. 45).

the local operating environment and the organisational structure, management system and safety arrangements of the model aircraft club or association concerned.

- (5) Recent security incidents involving the unauthorised, malicious or negligent operation of UAS have highlighted the need to enhance the traceability and accountability of such operations. To address the enforcement gaps identified in the Commission's Action Plan on Drone and Counter Drone Security ⁽³⁾ of 11 February 2026, it is necessary for competent authorities and law enforcement agencies to increase their ability to identify UAS operations remotely without relying on physical access to unmanned aircraft. While the risks posed by products with a take-off mass of less than 100 g remain inherently limited, UA with a higher take-off mass may pose risk especially to security and privacy. It is therefore necessary to extend the obligations concerning the direct remote identification function to lower-mass categories of UAS starting from 100 g.
- (6) The European Union Aviation Safety Agency has prepared draft implementing rules and submitted them to the Commission with Opinion No 06/2026 ⁽⁴⁾ in accordance with points (b) and (c) of Article 75(2) and with Article 76(1) of Regulation (EU) 2018/1139.
- (7) The measures provided for in this Regulation are in accordance with the opinion of the committee established in accordance with Article 127 of Regulation (EU) 2018/1139,

HAS ADOPTED THIS REGULATION:

Article 1

Implementing Regulation (EU) 2019/947 is amended as follows:

- (1) Article 2 is amended as follows:

- (a) paragraph 4 is replaced by the following:

‘(4) “UAS geographical zone” means a portion of airspace with defined dimensions and temporal validity, established by a Member State, within which specific conditions or prohibitions apply or other operational information relevant to UAS operations is provided, in order to address risks relating to safety, privacy, the protection of personal data, security or the environment, or to facilitate UAS operations;’;

- (b) the following paragraphs (36) and (37) are added:

‘(36) “national conditions” means the requirements or conditions established by a Member State, other than through UAS geographical zones, which apply to UAS operations throughout the territory of that Member State and are intended to address risks relating to safety, privacy, the protection of personal data, security or the environment;

(37) “synchronised UA formation” means a UAS operation where multiple UA are under a common flight management, and the individual UA operates relative to each other;’;

⁽³⁾ <https://digital-strategy.ec.europa.eu/en/library/action-plan-drone-and-counter-drone-security>

⁽⁴⁾ <https://www.easa.europa.eu/document-library/opinions>

- (2) In Article 9, paragraph 2 is replaced by the following:
- ‘2. There shall be no minimum age required for remote pilots when they operate:
- (a) in subcategory A1, as specified in Part A of the Annex to this Regulation, a UAS Class C0 defined in Part 1 of the Annex to Delegated Regulation (EU) 2019/945 that is a toy within the meaning of Directive 2009/48/EC ⁽⁵⁾; or
 - (b) a UA with a take-off mass of less than 100 g; or
 - (c) under the direct supervision of another remote pilot complying with paragraph 1 and Article 8.’;
- (3) Article 14 is amended as follows:
- (a) paragraph 1 is replaced by the following:

‘1. Member States shall establish and maintain accurate registration systems for UAS whose design is subject to certification and for UAS operators whose operations may present a risk to safety or security, or the protection of privacy of personal data or the environment. Before registering UAS operators, Member States shall verify their identity.’;
 - (b) paragraph 5 is replaced by the following:

‘5. UAS operators shall register themselves:

 - (a) when operating a UAS with a take-off mass of 100 g or more within the ‘open’ category, unless the UA is tethered and has a take-off mass of less than 1 kg;
 - (b) when operating within the ‘specific’ category an UA of any mass.’;
- (4) Article 15 is amended as follows:
- (a) its title is replaced by the following:

‘UAS geographical zones and national conditions’;
 - (b) paragraph 1 is replaced by the following:

‘1. When addressing a risk to safety or security or to the protection of the privacy of personal data or to the environment, Member States may establish UAS geographical zones and national conditions in order to:

 - (a) prohibit certain or all UAS operations, request specific conditions for certain or all UAS operations, or require a prior authorisation for certain or all UAS operations;
 - (b) require UAS operations to comply with specific environmental standards;
 - (c) allow access to certain UAS equipped with certain technical features or marked with one of the classes defined in the Annex to Delegated Regulation (EU) 2019/945;

⁽⁵⁾ Directive 2009/48/EC of the European Parliament and of the Council of 18 June 2009 on the safety of toys (OJ L 170, 30.6.2009, p. 1).

- (d) provide operational information relevant to UAS operations;’;
- (c) the following paragraph 1bis is inserted:
 - ‘1bis. When establishing UAS geographical zones and national conditions to address a risk to safety or to the protection of the privacy of personal data or to the environment, Member States shall ensure that the measures concerned are necessary and proportionate to the risk or objective to be addressed. Where appropriate, the entity proposing the establishment of the UAS geographical zones shall document the assessment underpinning those measures.’;
- (d) paragraph 3 is replaced by the following:
 - ‘3. When establishing UAS geographical zones and national conditions, Member States shall ensure that all relevant information, including the data referred to in point 4, is made publicly available to UAS operators in a single point of access, in both human-readable and digital formats and at least in the English language.’;
- (e) the following paragraph 4 is added:
 - ‘4. When establishing UAS geographical zones, Member States shall ensure that the relevant data, including at least the geometry, temporal validity, applicable conditions and restrictions and, where applicable, the competent authority responsible for issuing the UAS geographical zone authorisation, receiving notifications or providing information concerning UAS operations within that zone, is made publicly available and encoded in a common unique digital format defined by the Agency.’;
- (5) In Article 16, the following paragraph 5 is added:
 - ‘5. In the authorisation referred to in point 1, the competent authority may require that if a UAS is operated in the framework of model aircraft clubs and associations, it shall be equipped with a direct remote identification function compliant with paragraph (3) of Part 6 of the Annex to Delegated Regulation (EU) 2019/945 and shall not be permitted to take off if the consistency check defined in point (3)(b) of Part 6 of the Annex to Delegated Regulation (EU) 2019/945 is not passed.’;
- (6) In Article 18, the following paragraph (n) is added:
 - ‘(n) issuing, amending, suspending, or revoking the registration of UAS operators.’;
- (7) Article 20 is replaced by the following:
 - ‘Article 20
 - Specific provisions concerning the use of certain UAS
 - 1. UAS within the meaning of Decision No 768/2008/EC of the European Parliament and of the Council, which:
 - (a) do not comply with Delegated Regulation (EU) 2019/945 and which are not privately built shall be allowed to continue to be operated under the following

conditions, provided they have been placed on the market before 1 January 2024:

- (i) in subcategory A1 as defined in Part A of the Annex, provided that the unmanned aircraft has a take-off mass of less than 250 g, including its payload;
 - (ii) in subcategory A3 as defined in Part A of the Annex, provided that the unmanned aircraft has a take-off mass of less than 25 kg, including its fuel and payload;
 - (b) comply with Delegated Regulation (EU) 2019/945, except for all the following requirements:
 - (i) it is equipped with a direct remote identification function compliant with paragraph (3) of Part 6 of the Annex to Delegated Regulation (EU) 2019/945;
 - (ii) it is not permitted to take off if the consistency check, defined in point (3)(b) of Part 6 of the Annex to Delegated Regulation (EU) 2019/945, is not passed;
 - (iii) it has a unique serial number compliant with standard ANSI/CTA-2063-A-2019, Small Unmanned Aerial Systems Serial Numbers, 2019, shall be allowed to continue to be operated in the ‘open’ category, provided they have been placed on the market before [12 months after the date of entry into force of this Regulation].
2. UAS operated in the ‘specific’ category with an operational authorisation issued in accordance with Article 12 of this Regulation or a LUC issued under point UAS.LUC.050 of the Annex of this Regulation before [12 months after the date of entry into force of this Regulation] may continue to be operated without complying with paragraph 1b of Article 4 of Delegated Regulation (EU) 2019/945.
3. Until [48 months after the date of entry into force of this Regulation] the validity of operational authorisations referred to in paragraph 2 may be extended or the terms of approval of a LUC may be amended without requiring compliance with paragraph 1b of Article 4 of Delegated Regulation (EU) 2019/945, provided that the UAS operator does not change the UAS model used for the authorised operations.
4. Without prejudice to paragraphs 1(a)(ii), 1(b), 2 and 3, after [48 months after the date of entry into force of this Regulation], UAS with a take-off mass exceeding 900 g, including payload, shall be equipped with a direct remote identification add-on compliant with Part 6 of the Annex to Delegated Regulation (EU) 2019/945.’;
- (8) The Annex to Implementing Regulation (EU) 2019/947 is amended as follows:
- (a) point UAS.OPEN.020 is amended as follows:

- (i) point (b) of point (4) is replaced by the following:
 - ‘(b) except in the case of an unmanned aircraft with a take-off mass, including the payload, of less than 100 g, has completed an online training course and successfully passed an online theoretical knowledge examination provided by the competent authority or by an entity designated by the competent authority of a Member State, achieving at least 75 % of the overall marks. The examination shall comprise 40 multiple-choice questions appropriately distributed across the following subjects:
 - (i) air safety,
 - (ii) airspace restrictions,
 - (iii) aviation regulations,
 - (iv) human performance limitations,
 - (v) operational procedures,
 - (vi) UAS general knowledge,
 - (vii) privacy and data protection,
 - (viii) insurance,
 - (ix) security.’;
- (ii) point (5) is replaced by the following:
 - ‘(5) be performed with a single unmanned aircraft that:
 - (a) in the case of a privately built UAS:
 - (i) has a take-off mass, including payload, of more than 100 g and less than 250 g;
 - (ii) is operated at a maximum speed of less than 19 m/s;
 - (iii) is operated with a direct remote identification function compliant with point (9) of point UAS.OPEN.050; and
 - (iv) is not permitted to take off if the consistency check defined in point (3)(b) of Part 6 of the Annex to Delegated Regulation (EU) 2019/945 is not passed; or
 - (b) meets the requirements defined in point (a) of Article 20; or
 - (c) is marked as class C0 and is accompanied by a declaration of conformity stating the class of the UAS and its compliance with Delegated Regulation (EU) 2019/945; or
 - (d) is marked as class C1 and is accompanied by a declaration of conformity stating the class of the UAS and its compliance with Delegated Regulation (EU) 2019/945; or
 - (e) has a take-off mass, including payload, of less than 100 g and a maximum operating speed of less than 19 m/s.’;

- (b) in point UAS.OPEN.030, point (3) is replaced by the following:
 - ‘(3) be performed with a single unmanned aircraft which is marked as class C2 and is accompanied by a declaration of conformity stating the class of the UAS and its compliance with Delegated Regulation (EU) 2019/945.’;
- (c) in point UAS.OPEN.040, point (4) is replaced by the following:
 - ‘(4) be performed with a single unmanned aircraft that:
 - (a) in the case of a privately built UAS:
 - (i) has a take-off mass, including payload, of less than 25 kg;
 - (ii) is operated at a maximum speed of less than 19 m/s;
 - (iii) is operated with a direct remote identification function compliant with point (9) of point UAS.OPEN.050; and
 - (iv) is not permitted to take off if the consistency check defined in point (3)(b) of Part 6 of the Annex to Delegated Regulation (EU) 2019/945 is not passed; or
 - (b) meets the requirements defined in point (b) of Article 20; or
 - (c) is marked as class C2 and is accompanied by a declaration of conformity stating the class of the UAS and its compliance with Delegated Regulation (EU) 2019/945; or
 - (d) is marked as class C3 and is accompanied by a declaration of conformity stating the class of the UAS and its compliance with Delegated Regulation (EU) 2019/945; or
 - (e) is marked as class C4 and is accompanied by a declaration of conformity stating the class of the UAS and its compliance with Delegated Regulation (EU) 2019/945;’;
- (d) point UAS.OPEN.050 is amended as follows:
 - (i) point (c) of point (4) is replaced by the following:
 - ‘(c) are provided with the information relevant to the intended UAS operation concerning any UAS geographical zones and national conditions published by the Member State of operation in accordance with Article 15;’;
 - (ii) the following paragraphs (8), (9) and (10) are added:
 - ‘(8) ensure that the UAS operation is conducted in accordance with the applicable conditions and operational limitations defined in the UAS geographical zones and national conditions published by the Member State of operation in accordance with Article 15;
 - (9) if the unmanned aircraft has a take-off mass, including payload, of 100 g or more, ensure that it is operated with an active direct remote identification function compliant with paragraph (3) of Part 6 of the Annex to Delegated Regulation (EU) 2019/945, with the UAS operator registration number successfully uploaded therein;

- (10) point (9) shall not apply to UAS that have a take-off mass, including payload, of 900 g or less and meet the requirements defined in point 1(b) of Article 20;’;
- (e) point UAS.OPEN.060 is amended as follows:
 - (i) point (b) of point (1) is replaced by the following:
 - ‘(b) obtain updated information relevant to the intended UAS operation concerning UAS geographical zones and national conditions published by the Member State of operation in accordance with Article 15;’;
 - (ii) point (c) of point (2) is replaced by the following:
 - ‘(c) comply with the operational limitations defined in the UAS geographical zones and national conditions published by the Member State of operation in accordance with Article 15;’;
- (f) point UAS.SPEC.050 is amended as follows:
 - (i) point (vi) of point (1)(d) is replaced by the following:
 - ‘(iv) obtain updated information relevant to the intended UAS operation concerning UAS geographical zones and national conditions published by the Member State of operation in accordance with Article 15;’;
 - (ii) point (l) of point (1) is replaced by the following:
 - ‘(l) ensure that each UA is equipped with:
 - (i) at least one flashing green light for the purpose of ensuring its visibility to persons on the ground, when operated at night; and
 - (ii) an active direct remote identification function compliant with paragraph (3) of Part 6 of the Annex to Delegated Regulation (EU) 2019/945, with the UAS operator registration number successfully uploaded therein, if the UA is operated at a height below 120 m above the surface;
 - (iii) the following points (m) and (n) are added:
 - ‘(m) ensure that the UAS operation is conducted in accordance with the applicable conditions and operational limitations defined in the UAS geographical zones and national conditions published by the Member State of operation in accordance with Article 15;
 - (n) by way of derogation from point (l), in the case of UA operated in a synchronised UA formation performing light displays:
 - (i) the UA are not required to be equipped with a flashing green light; and
 - (ii) only one UA in the synchronised UA formation is required to comply with the provision in point (ii) of paragraph (1) of point UAS.SPEC.050.’;

- (g) point UAS.SPEC.060 is amended as follows:
- (i) point (a) of point (2) is replaced by the following:
 - ‘(a) obtain updated information relevant to the intended UAS operation concerning UAS geographical zones and national conditions published by the Member State of operation in accordance with Article 15.’;
 - (ii) point (d) of point (2) is replaced by the following:
 - ‘(d) ensure that the information about the UAS operation has been made available to the relevant air traffic service (ATS) unit, other airspace users and relevant stakeholders, as required by the operational authorisation or by the UAS geographical zones and national conditions published by the Member State of operation in accordance with Article 15.’;
 - (iii) point (c) of point (3) is replaced by the following:
 - ‘(c) comply with the applicable conditions and operational limitations defined in the UAS geographical zones and national conditions published by the Member State of operation in accordance with Article 15.’.

Article 2

1. This Regulation shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.
2. The following points of Article 1 shall apply [*12 months after the date of entry into force of this Regulation*]:
 - (a) point (4);
 - (b) point (8)(a);
 - (c) point (8)(c);
 - (d) point (8)(d)(ii);
 - (e) point (8)(f)(ii).

Done at Brussels,

For the Commission

The President

[\[...\]](#)