



Opinion No 06/2026

issued in accordance with Article 76(1) of Regulation (EU) 2018/1139

Regular update of Regulations (EU) 2019/947 and (EU) 2019/945 Security

RMT.0729 SUBTASK 2

WHAT THIS OPINION IS ABOUT

This Opinion puts forward amendments to Implementing Regulation (EU) 2019/947 and Delegated Regulation (EU) 2019/945 with a view to enhancing the security of UAS operations, in response to the European Commission's [Action Plan on Drone and Counter Drone Security](#) of 11 February 2026.

The proposed amendments require Member States to verify the identity of UAS operators before registration, lower the mass threshold for mandatory registration and direct remote identification from 250 g to 100 g, and clarify the framework for UAS geographical zones by introducing national conditions to improve the accessibility and consistency of information on UAS operations across the EU.

The proposed regulatory material is intended to enhance the security and traceability of UAS operations and support effective enforcement action by competent authorities while limiting the impact on lower-risk operators, in particular by retaining the discretionary nature of Member States' power to establish UAS geographical zones and national conditions, subject to a risk-assessment safeguard, and by allowing alleviations for UAS operated within model aircraft clubs and associations.

REGULATIONS INTENDED TO BE AMENDED

- [Implementing Regulation \(EU\) 2019/947](#)
- [Delegated Regulation \(EU\) 2019/945](#)

ED DECISION TO BE AMENDED

n/a

AFFECTED STAKEHOLDERS

UAS operators (private and commercial); Member States (MSs); national aviation authorities (NAAs); remote pilots; UAS manufacturers; other airspace users (manned aircraft); model aircraft clubs and associations; general public

WORKING METHODS

Development	Impact assessment(s)	Consultation
By EASA with external support (UAS TeB and D.CSTG)	Light safety impact assessment and detailed economic assessment	Focused and workshop

RELATED DOCUMENTS/INFORMATION

- [ToR RMT.0729 - Regular update of Commission IR \(EU\) 2019/947 on the rules and procedures for the operation of unmanned aircraft and of Commission Delegated Regulation \(EU\) 2019/945 on UAS and on third-country operators of UAS | EASA](#) dated 26 July 2019
- [European Commission — Action Plan On Drone And Counter Drone Security](#) dated 11 February 2026

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



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1. About this Opinion

1.1. How this regulatory material was developed

The European Union Aviation Safety Agency (EASA) was tasked by the European Commission with proposing security measures to improve the identification of illegal flights and eventually reduce them. Following an assessment of the possible intervention options and their expected impacts, EASA concluded that rulemaking is the appropriate intervention action.

EASA developed the proposed regulatory material in line with Regulation (EU) 2018/1139¹ (the Basic Regulation) and the Rulemaking Procedure², as well as in accordance with the objectives and working methods described in the Terms of Reference (ToR) for RMT.0729³.

When developing the regulatory material in question, EASA considered the European Commission's *Action Plan on Drone and Counter Drone Security*⁴.

The draft regulatory material was consulted in accordance with the ToR for this RMT through NPA 2026-103⁵ and a focused consultation workshop was conducted on 16 June 2026. The NPA included proposals for both simplification and security measures. This Opinion addresses only the security measures.

In accordance with Article 6(9) of MB Decision No 01-2022, EASA sought the MAB's advice from 14 August to 4 September 2026. Following the MAB advice phase, EASA held an online workshop on 8 September 2026 to present the draft Opinion and address the comments received during that period.

EASA reviewed the comments received and duly considered them for the preparation of the regulatory material presented here.

¹ 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, <http://data.europa.eu/eli/reg/2018/1139/oj>).

² 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 ([EASA MB Decision No 01-2022 on the Rulemaking Procedure, repealing MB Decision 18-2015 \(by written procedure\) | EASA \(europa.eu\)](#)).

³ [ToR RMT.0729 - Regular update of Commission IR \(EU\) 2019/947 on the rules and procedures for the operation of unmanned aircraft and of Commission Delegated Regulation \(EU\) 2019/945 on UAS and on third-country operators of UAS | EASA](#)

⁴ [Action Plan on Drone and Counter Drone Security | Shaping Europe's digital future](#)

⁵ <https://www.easa.europa.eu/en/document-library/notices-of-proposed-amendment/focused-consultations/npa-2026-103>



1.2. The next steps

The Opinion is submitted to the European Commission which, based on its content, shall decide whether to adopt the amendments to Regulations (EU) 2019/945 and 2019/947 as proposed in the Opinion.

EASA plans to issue the Opinion on the simplification measures in 2026/Q4.



2. In summary — why and what

2.1. Why we need to act

Recent security events involving the malicious, negligent or unidentified use of drones have highlighted the need to strengthen the identification and accountability of UAS operations. On 11 February 2026, the European Commission published an EU *Action Plan on Drone and Counter Drone Security*⁶, which calls for a drone security package, including the mandatory registration for operators of drones with a take-off mass above 100 g, the extension of the direct remote identification obligation to smaller drones, measures to prevent take-off unless a UAS operator identification number has been uploaded to the system, and simplification and flexibility for certain UAS operations.

This Opinion concerns those elements that can be implemented through amendments to Regulations (EU) 2019/945 and 2019/947.

2.1.1. Description of the issue

Protection against the illegal, negligent or malicious use of UAS needs to be strengthened. The current framework already requires the registration of UAS operators and, in certain cases, the carriage of direct remote identification by drones. However, these requirements do not apply in all cases.

Effective enforcement depends on the accuracy of the registration data, the ability to identify the UAS operator, and the availability of technical means to prevent the use of UAS that cannot be linked to a valid UAS operator registration number.

The *Action Plan on Drone and Counter Drone Security* identifies these gaps and calls for a targeted strengthening of the requirements relating to registration, direct remote identification, geo-awareness, and the placing of UAS on the market.

2.1.2. Who is affected by the issue

National aviation authorities because they provide the system for the registration of UAS operators.

Member States because they are required to establish UAS geographical zones, including for reasons related to privacy and security. Moreover, national security agencies should be able to identify illegal UAS flights.

UAS operators because they are required to register themselves and to use UAS that are equipped with the direct remote identification function.

UAS manufacturers because they are required to place on the market UAS that comply with the applicable requirements for the safe conduct of UAS operations.

2.1.3. Conclusion on the need for rulemaking

EASA concluded, as further explained in Chapter 3, that intervention is necessary and that non-regulatory actions alone cannot effectively address the identified issues. Amendments to Regulations (EU) 2019/945 and (EU) 2019/947 are therefore required.

⁶ [Action Plan on Drone and Counter Drone Security | Shaping Europe's digital future](#)

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 intended to contribute to achieving these overall objectives by addressing the issues described in Section 2.1.

More specifically, with the regulatory material in question, EASA intends to strengthen the identification and accountability of UAS operations through the establishment of enhanced requirements on registration and direct remote identification.

2.3. Stakeholders' views and amendments following the NPA

During the focused consultation on the package of security measures, EASA received over 100 comments from national aviation authorities, model aircraft associations and other industry associations, UAS manufacturers and operators, and air navigation service providers. Comments were also received on the simplification measures included in the same NPA, which will be addressed in a separate Opinion planned to be issued in 2026/Q4.

The comments reflected a broad range of views. Several national aviation authorities and industry associations supported the overall security objectives of the proposal, in particular the reinforcement of operator registration and identity verification and the extension of direct remote identification requirements, describing them as a proportionate means of addressing unregistered or illegal drones.

At the same time, a substantial number of commentators, in particular model aircraft associations and manufacturers of privately built UAS, raised concerns about the proportionality of extending registration and direct remote identification requirements to very light UAS (namely those with a mass of 100 g and above), including for research, development and model-flying purposes. They also raised concerns about the technical and economic burden that such an extension would entail. Further concerns were also expressed regarding the discretionary nature of Article 15, in particular whether UAS geographical zones and national conditions should be established on a mandatory or discretionary basis, the legal uncertainty created by an undefined reference to 'critical infrastructure', and the proportionality and technical feasibility of the geo-awareness function proposed to be retained and extended.

In accordance with Article 6(9) of MB Decision No 01-2022, EASA sought the advice of the Member States Advisory Body (MAB) on the draft Opinion from 14 August until 4 September 2026.

EASA carefully considered all comments received.

As explained in greater detail in the following sections, this led EASA to:

- retain the discretionary character of Article 15(1), expressed by the use of 'may', while introducing, where necessary, a risk-assessment requirement as a safeguard for the categories of risk to which that provision applies;
- limit the requirement to conduct such a risk assessment to cases involving safety, the protection of the privacy of personal data or the environment;
- remove the standalone concept of 'critical infrastructure', relying instead on the general UAS geographical zone mechanism;
- discontinue the proposed extension of the geo-awareness requirement; and



— adjust the wording of the alleviation for model aircraft clubs and associations.

Regarding the core registration and direct remote identification thresholds, which reflect requirements defined by the security authorities responsible for the European Commission's *Action Plan on Drone and Counter Drone Security*, EASA maintained the proposal as consulted.

2.3.1. Amendments to Article 15 of Regulation (EU) 2019/947 — UAS geographical zones and national conditions

Several commentators from industry expressed concern that the introduction of the concept of national conditions, together with the criterion 'where necessary', does not provide sufficiently objective criteria for Member States to establish UAS geographical zones or national conditions. In their view, this creates a risk of disproportionate or inconsistent implementation across the Union. Some commentators requested that EASA develop AMC setting out, as a minimum, means for the identification of the specific risk to be addressed, a documented proportionality assessment, and consultation with affected airspace users before a zone is established. Conversely, one national aviation authority opposed the introduction of any obligation to establish UAS geographical zones or national conditions, noting that airspace management remains a matter of Member State sovereignty, and requested that the discretionary nature of the provision (namely, the use of 'may' instead of 'shall') be preserved.

In response, it is proposed to add paragraph 1bis requiring Member States, before establishing a UAS geographical zone or a national condition, to ensure that the measures concerned are necessary and proportionate to the risk or objective to be addressed. In addition, where appropriate, the entity proposing the establishment of the UAS geographical zone shall document the assessment underpinning those measures. This introduces an objective and verifiable basis for the exercise of Member State discretion under this provision, without imposing a specific risk-assessment methodology. It therefore addresses the substance of the concerns raised, while avoiding the level of prescriptive detail requested by some commentators, such as mandatory consultation or a formal proportionality methodology, which was considered to go beyond what is proportionate for this provision at implementing regulation level. The risk-assessment requirement introduced by new paragraph 1bis applies to cases where a UAS geographical zone or national condition is established to address a risk to safety, privacy, the protection of personal data or the environment. It does not apply to cases where the UAS geographical zone or national condition is established to address a security risk. This distinction reflects the need for Member States to retain the ability to establish UAS geographical zones and national conditions for security reasons, for example in response to a specific threat, without being required to conduct, and potentially publicly justify, a formal risk assessment of the kind appropriate for the other categories of risk covered by that provision.

National conditions are not a new concept introduced by this proposal. Member States already define conditions for operations in their territory. These conditions derive from national legislation and cover domains in which Member States retain sovereignty, and may range from insurance requirements to minimum age requirements for remote pilots. An example of GM1 to Article 15 that EASA will publish is provided in Appendix 6 to NPA 2026-103 (A) 'Explanatory Note'. National conditions should not introduce new requirements — rather, they should require Member States to make available, from a single source and for the benefit of UAS operators, all conditions applicable to UAS operations.



The term ‘may’ has been retained, instead of ‘shall’ as initially proposed in NPA 2026-103 (C) ‘Proposed amendments to Implementing Regulation (EU) 2019/947’, in view of the sovereignty-related concern raised. It should be noted that the simplification package includes new paragraph 2 of Article 15. That paragraph establishes a mandatory basis specifically addressing risks to aviation safety and will be included in the upcoming Opinion on simplification. Paragraph 1 of Article 15, by contrast, addresses a broader, and inherently more discretionary, set of safety, security, privacy and environmental interests, for which the exercise of Member State discretion, now subject to the risk-assessment requirement, remains appropriate.

One national aviation authority queried whether the concept of national conditions could provide a legal basis for Member States to impose requirements such as electronic conspicuity in uncontrolled airspace. However, Regulation (EU) 2019/947 cannot impose requirements on operations other than UAS operations and, therefore, cannot serve as a legal basis for imposing e-conspicuity requirements in other aviation domains, such as general aviation. EASA confirmed that national conditions are intended to capture requirements or limitations that are not bound to a defined portion of airspace, and that Member States retain flexibility in defining their content, subject to the risk-assessment requirement introduced in paragraph 1bis. Another national aviation authority noted that the establishment of a UAS geographical zone, including for security reasons, remains a Member State responsibility and should not be tailored to individual UAS operator requests. This was confirmed.

Regarding the publication of information on UAS geographical zones and national conditions (paragraphs 3 and 4), several national aviation authorities and industry associations requested that the requirement to publish information in a human-readable format be complemented by an explicit requirement to publish it in a digital format, and that the information be made available at least in English to facilitate cross-border operations. However, a few national aviation authorities opposed those requirements. It was considered that, even though national conditions are not managed by the geo-awareness system of the UAS, information on those conditions may still be provided in a digital format to facilitate its exchange with, and display by, the ground stations used by UAS operators. Providing the information in a digital format would also make it possible to display UAS geographical zones and national conditions on the IAM HUB being developed by EASA. As regards the provision in English of information on national conditions and UAS geographical zones, some national aviation authorities opposed this requirement in view of the limited number of non-national UAS operators conducting operations in their territory. However, it was considered that the effort required to provide the information in both the national language and English would be limited compared to the benefit of making it accessible to non-national remote pilots and UAS operators. It should also be borne in mind that this information is relevant to UAS operators operating in the ‘open’ category, including tourists, whose numbers may not be fully known to Member States. Paragraph 3 has been amended to require such information to be published in a machine- and human-readable format, at least in the English language. A cross reference has also been added to clarify that the information to be published under paragraph 3 includes the data referred to in paragraph 4, namely the geometry, temporal validity, and applicable conditions and restrictions of a UAS geographical zone encoded in a common unique digital format defined by EASA. This addresses a comment noting that the relationship between the two paragraphs was not sufficiently explicit in the text consulted.

One national aviation authority requested the introduction of minimum requirements on publication timelines, update frequency, data integrity and service availability for the digital publication of UAS geographical zone data. This request was not accepted, as such operational and technical parameters



are considered more appropriately addressed through guidance material than through the implementing regulation. EASA will develop such guidance to support harmonised implementation by Member States.

2.3.2. Registration of UAS operators

Article 14(1) is proposed to be amended to explicitly require Member States to verify the identity of a UAS operator before completing that operator's registration. This addresses a gap identified through standardisation inspections, which have shown differing interpretations and levels of implementation of the existing registration obligation across Member States. Such differences undermine the ability of competent authorities to identify UAS operators and take effective enforcement action, including in response to security threats.

Several national aviation authorities and industry associations asked how the identity verification requirement should be implemented, including with regard to third-country operators and digital identity verification. These comments were noted. The specific means of verifying a UAS operator's identity are considered to be a matter for Member States to determine, in line with their national administrative and legal frameworks, and go beyond what can be prescribed at implementing regulation level. EASA will consider developing AMC to support a harmonised approach.

Article 14(5) is proposed to be amended to base the registration requirement in the 'open' category on a single mass threshold of 100 g. This replaces the previous criteria based on a 250 g threshold or, irrespective of mass, the carriage of a sensor capable of capturing personal data, which also referred to the exemption for toys within the meaning of Directive 2009/48/EC⁷). UAS operators that operate exclusively tethered UAS with a take-off mass of up to 1 kg remain exempt from the registration requirement, reflecting both the inherently lower risk profile of such operations and the fact that EU competence extends only to tethered UA with a take-off mass exceeding 1 kg. In the 'specific' category, the requirement for all UAS operators to register, irrespective of mass, has been retained.

Some national aviation authorities and industry associations questioned the basis for the 100 g threshold, in some cases proposing that it be increased. These comments were not accepted as regards the threshold itself. The 100 g threshold, and the associated direct remote identification requirement described below, reflect requirements defined by the security authorities responsible for the European Commission's *Action Plan on Drone and Counter Drone Security*, rather than a safety-driven assessment carried out by EASA. The reference to Directive 2009/48/EC has, however, been removed from the registration criteria, as it is no longer needed once a single mass-based threshold applies.

One national aviation authority requested that tethered UAS also be subject to registration. This request was not accepted. The safety level of an operation conducted with a tethered UAS is generally higher than that of the same operation conducted with a non-tethered UAS, given the inherent limitation on the UAS's range of movement. Registration of the operator was therefore not considered to meaningfully increase that safety level.

⁷ 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, ELI: <http://data.europa.eu/eli/dir/2009/48/oj>).



2.3.3. Direct remote identification

In line with the European Commission's *Action Plan on Drone and Counter Drone Security*, it is proposed to extend the requirement to be equipped with, and to operate, an active direct remote identification function to all UAS with a take-off mass of 100 g or more operated in the 'open' category (point UAS.OPEN.050(9)), and to all UAS operated in the 'specific' category at a height below 120 m above the surface, irrespective of mass (point UAS.SPEC.050(1)(l)(ii)). This is consistent with the corresponding registration requirements described above.

A UAS with a take-off mass of less than 100 g is not required to be class-marked and, if operated in the 'open' category, is not required to comply with the direct remote identification requirement. However, all UAS that bear a CIL, irrespective of take-off mass, must be equipped with a direct remote identification function as required by the applicable parts of the Annex. A reference to Part 6 of the Annex to Delegated Regulation (EU) 2019/945, which sets out the technical requirements for the direct remote identification function, has been added throughout, in response to a comment from a national aviation authority.

A number of national aviation authorities and industry associations opposed the extension of the direct remote identification requirement, and of the associated function preventing take-off in cases where the consistency check of the UAS operator registration number is not passed, to privately built UAS with a take-off mass as low as 100 g. Concerns were raised in particular in relation to research and development or prototype UAS, or to UAS operated within the framework of model aircraft clubs and associations. These comments were not accepted, for the same reason as set out above in relation to the registration threshold: the requirement has been defined by the security authorities responsible for the *Action Plan on Drone and Counter Drone Security* and applies irrespective of whether the UAS is privately built.

One air navigation service provider association asked why there is no equivalent direct remote identification requirement for legacy UAS with a mass between 100 g and 900 g.

For the purposes of this proposal, legacy UAS are:

- UAS operated in the 'open' category and placed on the market before the date on which the UAS Regulation became applicable, namely 1 January 2024;
- UAS marked as class C0 or C4 and placed on the market before this Regulation enters into force; and
- UAS operated in the 'specific' category under an operational authorisation issued before this proposed amendment is adopted by the European Commission and enters into force.

It was clarified that the requirement applies to all UAS with a take-off mass of 100 g or more, including privately built UAS. However, installing a direct remote identification add-on is not technically feasible for very light legacy UAS. For that reason, the transitional provisions described below exempt UAS with a take-off mass of 900 g or less, placed on the market before [12 months after the date of entry into force of this Regulation], from the retrofit obligation.

Several national aviation authorities and an industry association requested that network remote identification be accepted as an equivalent alternative to direct remote identification. This request was not accepted. Network remote identification does not provide the same level of assurance as direct remote identification for the purposes of the security authorities' requirements, in particular

because it depends on network connectivity and on the availability of functioning network identification service provider infrastructure. Direct, locally broadcast remote identification does not rely on such conditions.

2.3.4. Applicability of security measures to model aircraft clubs and associations

Article 16(5) is proposed to be amended to allow Member States to specify, in the authorisation issued under Article 16(1), whether UAS operated within that framework are to be equipped with a direct remote identification function.

A national aviation authority and an industry association requested clarification of this provision. In response, the wording has been revised from an exemption from the requirement to a positive discretion for Member States to ‘specify if’ the requirement should apply. This better reflects the fact that the applicability of the requirement is a matter for Member State assessment. Further guidance on the exercise of this discretion is intended to be developed at AMC level.

2.3.5. Amendments to Delegated Regulation (EU) 2019/945

This Opinion also proposes consequential and complementary amendments to Delegated Regulation (EU) 2019/945 to ensure that UAS are designed and equipped in such a way as to meet the security requirements described above, in particular the extended direct remote identification requirement and the associated function preventing take-off in cases where the UAS operator registration number has not been uploaded to the system.

Consistent with the decision not to pursue the proposed extension of the geo-awareness requirement (see Section 2.3.6), the corresponding geo-awareness module proposed in NPA 2026-103 (D) ‘Proposed amendments to Delegated Regulation (EU) 2019/945’ has not been carried forward into the scope of Article 2 of Delegated Regulation (EU) 2019/945.

Class identification label (CIL) and the 100 g take-off mass threshold

Point 1 of Article 4 is proposed to be amended to reflect the new 100 g threshold described in Section 2.3.2. Several commentators sought clarification of the regulatory treatment of UAS below 100 g, including whether such UAS should be excluded altogether from the scope of Delegated Regulation 2019/945. EASA confirmed that such an exclusion is not possible, as some manufacturers may wish to voluntarily affix a class identification label (CIL) to a UAS with a take-off mass below 100 g. Such UAS must therefore remain within the scope of Chapter II.

Since the UAS regulatory framework is operation centric, the requirements applicable to a UAS with a take-off mass below 100 g depend on the category of operation for which it is intended. A UAS with a take-off mass below 100 g intended to be operated in the ‘open’ category is not subject to mandatory technical requirements, due to the limited safety and security risks involved, unless a CIL is voluntarily affixed. A UAS intended to be used under a standard scenario (STS) must comply with the requirements of the relevant class (namely C5 or C6), reflecting the higher risk of STS operations. A UAS intended to be used in the ‘specific’ category below 120 m above the surface must be equipped with direct remote identification, as such operations may involve characteristics (for example, longer range, the capability to fly beyond visual line of sight, or longer flight times) that may create security risks. In view of several comments questioning the meaning of ‘majority of the time’, EASA has retained the current formulation ‘below 120 m’ for UAS operated in the ‘specific’ category.

One commentator queried whether the exception for UAS below 100 g in point 1 of Article 4 refers to the maximum take-off mass (MTOM) declared by the manufacturer or to the actual take-off mass of the UA. Since UAS below 100 g are not subject to technical requirements and therefore have no declared MTOM, EASA confirmed that the relevant criterion is the actual take-off mass of the UA. The text has been amended accordingly to refer to 'take-off mass' instead of 'MTOM'.

Manufacturer's instructions

Some commentators considered that it was not sufficiently clear which value the manufacturer's instructions should indicate under the various parts of the Annex to Delegated Regulation (EU) 2019/945, for example whether 'UA mass' referred to a reference mass, a typical production mass, or a maximum mass with or without standard accessories.

In response, the generic reference to 'UA mass' has been removed from the requirements on manufacturer's instructions throughout the Annex to Delegated Regulation (EU) 2019/945. The applicable parts now refer instead to the maximum take-off mass (MTOM), which is already a defined term.

In response to a related comment, EASA also clarified that the manufacturer's instructions are not the appropriate place to set out manufacturing requirements for direct remote identification, which continue to be addressed in Part 6 of the Annex to Delegated Regulation (EU) 2019/945. A further comment suggested adding more detail on how manufacturer's instructions should be prepared. EASA did not consider this necessary, as it is for the applicable harmonised standard, rather than the regulation itself, to define in detail how compliance with a given requirement may be achieved.

Privately built UAS

A number of commentators, including manufacturers of privately built UAS, questioned the extension of product legislation to functional capabilities integrated into UAS that are not placed on the market. EASA clarified that, in order to operate under a STS, UAS must bear a CIL under Union harmonisation legislation, including cases where they are privately built. This Opinion makes the possibility for privately built UAS to operate under a STS more explicit. UAS operators that wish to conduct STS-like operations without a CIL may still do so; however, the declarative STS framework does not apply in that case and an operational authorisation is required instead. EASA also confirmed that the direct remote identification function must be identical, comply with the same standard and be subject to the same oversight across all UAS categories, to ensure that authorities and the public can reliably obtain the relevant data regardless of the category of UAS operation. For that reason, and in the interest of legal certainty, the requirement on direct remote identification applicable to the UAS referred to in point (c) of Article 2(1), previously addressed under Article 40 in Chapter III, is now addressed under Article 4 in Chapter II, which governs products subject to Union harmonisation legislation. It is recalled that certain product legislation, such as the Radio Equipment Directive (RED)⁸, already applies to functional capabilities of UAS, including cases where the UAS is not placed on the market.

⁸ Directive 2014/53/EU of the European Parliament and of the Council of 16 April 2014 on the harmonisation of the laws of the Member States relating to the making available on the market of radio equipment and repealing Directive 1999/5/EC (OJ L 153, 22.5.2014, p. 62, ELI: <http://data.europa.eu/eli/dir/2014/53/oj>).



Mass tolerances

To address a comment requesting greater legal certainty regarding mass tolerance, Parts 1 to 5 of the Annex to Delegated Regulation (EU) 2019/945 are proposed to be amended to specify an explicit tolerance of 2 % or 3 %, depending on the class, between the actual mass of the UA in its possible configurations and its declared MTOM. For similar reasons, tolerances have been specified also for other parameters.

Direct remote identification and take-off prevention

Part 6 of the Annex to Delegated Regulation (EU) 2019/945 is proposed to be substantially revised to set out the requirements for a direct remote identification component and add-on. Some commentators proposed that the function preventing take-off in cases where the consistency check is not passed should be specified in Part 6 of the Annex to Delegated Regulation (EU) 2019/945, while others considered that this function does not pertain to direct remote identification as such. EASA agrees with the latter view. Although the take-off prevention function relies on the outcome of the consistency check performed by the direct remote identification component or add-on, it is a function of the UAS itself. It is therefore specified in Parts 1 to 5 of the Annex, as applicable to the relevant UAS class, rather than in Part 6 of the Annex to Delegated Regulation (EU) 2019/945. Some commentators proposed a web-based alternative to local broadcast. This proposal was not accepted, as the direct remote identification function must operate independently of any infrastructure to ensure its reliability. Views on the take-off prevention function itself were divided among commentators. EASA clarified that, beyond addressing unintentional non-compliance, a fundamental purpose of the function is to support enforcement of the obligation to register, which is not always complied with and is, in turn, linked to the new obligation on Member States to verify the identity of UAS operators at registration, as described in Section 2.3.2. EASA therefore maintained the function as a proportionate measure to support the security objectives of this Opinion, while confirming, as noted above, that it is specified as a function of the UAS rather than of the direct remote identification component or add-on.

Some commentators requested clarification of the terminology used throughout the Annex, including the terms ‘component’, ‘add-on’, ‘accessory’, ‘conversion kit’ and ‘module’. Part 6 of the Annex to Delegated Regulation (EU) 2019/945 clarifies that a direct remote identification ‘component’ is a part intended to be integrated into a UAS by its manufacturer, where ‘part’ should be understood as defined in Regulation 2018/1139, namely as any element of a product as defined by that product’s type design. By contrast, an ‘add-on’ is an accessory intended to be installed on a UAS by its operator to provide the same function. The terms ‘conversion kit’ and ‘module’ are no longer used in the Opinion.

Some commentators noted that the term ‘aircraft category’, used to describe part of the data broadcast by the direct remote identification function, is not defined in the Regulation. They considered that this created uncertainty as to whether it corresponds to the UAS ‘class’. EASA intends to clarify the applicable categories in guidance material.

Tethered UAS

In response to a comment on the rationale for the minimum tether strength required for tethered UAS, the applicable factor for heavier-than-air tethered UAS has been set at 4 times the maximum



thrust capability of the aircraft, rather than the factor of 10 initially proposed, which industry considered unachievable.

The factor of 4 aligns the requirement for heavier-than-air tethered UAS with the factor already applicable to lighter-than-air tethered UAS and is comparable to the safety factor applied to tethered gas balloons under CS-31TGB⁹.

Unique serial numbers and EU declaration of conformity

Some commentators queried why a requirement for a unique serial number was proposed to be added to Article 6 while been removed from the EU declaration of conformity.

The requirement for a unique serial number was indeed already established in Article 6 and therefore need not be repeated in the EU declaration of conformity. The reference has accordingly been removed from the EU declaration of conformity, as including the serial number there was considered to impose a disproportionate burden for limited added value.

⁹ [CS-31TGB Initial issue | EASA](#)



2.3.6. Other amendments

Critical infrastructure

NPA 2026-103 (C) ‘Proposed amendments to Implementing Regulation (EU) 2019/947’ proposed requiring remote pilots to maintain a safe distance between unmanned aircraft and critical infrastructure. It also proposed allowing UAS operations in the vicinity of critical infrastructure only at the request of the person or entity responsible for that infrastructure and in accordance with the requirements of the applicable UAS geographical zone. A substantial number of commentators, including national aviation authorities, model aircraft associations, industry associations and UAS manufacturers, expressed concern that the proposed text did not define the term ‘critical infrastructure’. They also noted that the initially envisaged reference to the definition in Council Directive 2008/114/EC would create legal uncertainty, as that Directive has been repealed and replaced by Directive (EU) 2022/2557¹⁰.

In response, EASA has decided not to introduce a standalone concept of ‘critical infrastructure’ into Implementing Regulation (EU) 2019/947. Instead, the protection of critical infrastructure and other sensitive sites from UAS operations will continue to be addressed through the general mechanism for establishing UAS geographical zones under Article 15. This mechanism enables Member States to protect any site or area that they consider requiring protection, including but not limited to critical infrastructure, without relying on a term that is either undefined or defined in external legislation. Consequently, the related provisions proposed in NPA 2026-103 (C) have not been carried forward into this Opinion.

Geo-awareness

NPA 2026-103 (C) ‘Proposed amendments to Implementing Regulation (EU) 2019/947’ proposed extending the requirement for UAS to be equipped with a geo-awareness function (a function that automatically alerts the remote pilot when the UAS approaches a UAS geographical zone). This included the introduction of a new geo-awareness module proposed for Delegated Regulation (EU) 2019/945.

A significant number of national aviation authorities, model aircraft associations, UAS manufacturers and other industry stakeholders opposed the proposal. Their concerns related in particular to:

- the technical dependency on a GNSS module, which is not otherwise required for privately built or legacy UAS;
- the disproportionate burden that the requirement would impose on model aircraft and UAS operations in the ‘specific’ category for which such a function is not otherwise required; and
- the fact that geo-awareness is considered, at most, a secondary layer of protection, while the primary layer remaining the remote pilot’s obligation to consult the applicable UAS geographical zones and national conditions before each flight.

In light of these comments and considering the benefits that the geo-awareness service will provide for operations conducted in U-space airspace, EASA has decided not to pursue the proposed extension

¹⁰ Directive (EU) 2022/2557 of the European Parliament and of the Council of 14 December 2022 on the resilience of critical entities and repealing Council Directive 2008/114/EC (OJ L 333, 27.12.2022, p. 164, ELI: <http://data.europa.eu/eli/dir/2022/2557/oj>).

of the geo-awareness requirement in this Opinion. Consequently, the corresponding amendments to points UAS.OPEN.050 and UAS.SPEC.050(1)(k), as proposed in NPA 2026-103 (C), have therefore not been carried forward.

Tasks of the competent authority

It is proposed to add point (n) to Article 18 of Implementing Regulation (EU) 2019/947 to clarify that the tasks of the competent authority include issuing, amending, suspending or revoking UAS operator registrations. This amendment more clearly reflects the responsibilities already associated with the registration system established under Article 14. It did not give rise to any specific comments during the focused consultation.

Minimum age for remote pilots

Article 9(2) of Implementing Regulation (EU) 2019/947 is proposed to be amended to align the mass-based exemption from the minimum-age requirement with the new 100 g threshold introduced in Article 14, thereby ensuring consistency throughout the Regulation. In response to comments from model aircraft associations, it was decided to retain the exemption from the minimum-age requirement for the operation of toy drones.

2.3.7. Transitional provisions for UAS already placed on the market and date of entry into force

Article 20 of Implementing Regulation (EU) 2019/947 is proposed to be replaced. In addition to retaining the existing conditions applicable to certain legacy UAS operated in the ‘open’ category, the revised Article would establish new transitional arrangements for UAS placed on the market before *[12 months after the date of entry into force of this Regulation]*. All such UAS would be exempt from the requirement to incorporate a function preventing take-off when the UAS operator registration number has not been uploaded to the system, as compliance would require a major modification of the UAS. UAS with a take-off mass of 900 g or less would also be exempt from the requirement to be equipped with a direct remote identification add-on as installing such an add-on has been assessed as technically unfeasible for very light UAS. UAS with a take-off mass exceeding 900 g would be required to be equipped, by *[48 months after the date of entry into force of this Regulation]*, with a direct remote identification add-on compliant with Part 6 of the Annex to Delegated Regulation (EU) 2019/945.

A similar approach would apply to UAS operated in the ‘specific’ category under an operational authorisation or a light UAS operator certificate (LUC) issued before *[12 months after the date of entry into force of this Regulation]*. This would also apply in cases where the authorisation or certificate is extended or amended until *[48 months after the date of entry into force of this Regulation]*. Operators could continue operating such UAS without complying with the direct remote identification requirement and the take-off prevention requirement, provided that they do not change the UAS model used.

The amendments to the definition of ‘UAS geographical zone’ and to points UAS.OPEN.050(4)(c), UAS.OPEN.050(8), UAS.OPEN.060(1)(b), UAS.SPEC.060(2)(a) and UAS.SPEC.060(3)(c) of the Annex to Delegated Regulation (EU) 2019/945 would apply from *[12 months after the date of entry into force of this Regulation]*. This transitional period would give Member States and UAS operators sufficient



time to adapt their processes to the proposed provisions governing the publication of, and access to, information on UAS geographical zones and national conditions.

EASA has not identified a need for transitional arrangements for the remaining amendments. Those amendments either clarify an existing obligation, such as the identity verification requirement in Article 14(1)), or lower a threshold associated with an obligation that already applies above 250 g, such as the reduction of the UAS operator registration threshold to 100 g. They may therefore apply from the date of entry into force of the Regulation.

2.4. The legal basis

The legal basis for this Opinion is Article 57 of Regulation (EU) 2018/1139, which empowers the Commission to adopt implementing rules concerning unmanned aircraft. These include rules and procedures for their operation, as well as rules concerning the competent authorities responsible for the tasks referred to in that Regulation. Article 14 of Implementing Regulation (EU) 2019/947, which this Opinion proposes to amend, was adopted on the same legal basis.

The legal basis for the proposed amendments to Delegated Regulation (EU) 2019/945 is provided by Articles 58 and 61 of Regulation (EU) 2018/1139, which empower the Commission to adopt detailed rules concerning the design and production of UAS intended to be operated in accordance with the rules and conditions laid down in Implementing Regulation (EU) 2019/947.



3. Benefits and drawbacks of the proposed regulatory material

The proposed amendments will require all UAS operators that use UAS with a take-off mass of 100 g or more to register themselves. Under the current requirements, UAS operators must register themselves when the UAS has a take-off mass of 250 g or more or, irrespective of mass, when the UAS is equipped with a sensor capable of capturing personal data. As a result, operators of very small UAS (below 100 g) equipped with such a sensor, which are currently subject to the registration requirement, would no longer be required to register under the proposed threshold. This could be considered a drawback, since these UAS may still raise privacy concerns. However, it should be noted that, in the absence of a remote identification requirement for UAS below 100 g, the registration requirement would in any case have limited practical effect, as it would remain very difficult to identify the UAS operator responsible for a potential privacy infringement.

All UAS with a take-off mass of 100 g or more will need to be equipped with a direct remote identification function. This may pose a challenge for some very small model aircraft. However, an alleviation is proposed for UAS operated within the framework of model aircraft clubs and associations.

4. Proposed regulatory material

The proposed regulatory material is laid down in Annexes I and II to this Opinion, which contain the proposed amendments to Implementing Regulation (EU) 2019/947 and to Delegated Regulation (EU) 2019/945 respectively.



5. Monitoring and evaluation

EASA will monitor the implementation and effectiveness of the proposed requirements concerning registration, identity verification and direct remote identification through its established safety data collection and analysis processes, Member State standardisation inspections, and the operation of the IAM Hub.

If this monitoring indicates that the proposed requirements do not achieve their intended security objectives, or that they impose a disproportionate burden on affected stakeholders, EASA will consider whether further rulemaking action is warranted.



6. Actions to support implementation

EASA intends to develop AMC and/or GM to support the implementation of:

- Article 14, concerning the verification of UAS operators' identities;
- Article 15, concerning risk assessments for UAS geographical zones and national conditions, as well as the format for publishing national conditions; and
- Article 16(5), concerning alleviations for model aircraft clubs and associations.

EASA will also continue developing the UAS geographical zone module within the IAM Hub to assist Member States in meeting the publication requirements laid down in Article 15.



7. References

- 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, ELI: <http://data.europa.eu/eli/reg/2018/1139/oj>) (the Basic Regulation)
- [EASA MB Decision No 01-2022 on the Rulemaking Procedure, repealing MB Decision 18-2015 \(by written procedure\) | EASA \(europa.eu\)](#)
- [ToR RMT.0729 - Regular update of Commission IR \(EU\) 2019/947 on the rules and procedures for the operation of unmanned aircraft and of Commission Delegated Regulation \(EU\) 2019/945 on UAS and on third-country operators of UAS | EASA](#)
- European Commission's [Action Plan on Drone and Counter Drone Security](#) of 11 February 2026

