



Mr. Liam Broderick,  
IAA Liaison Officer,  
Model Aeronautics Council of Ireland,  
10 December 2020

Dear Mr. Broderick

Thank you for your recent letter of 2 December 2020 and your ongoing dialogue in relation to the transition from National to European regulation in the area of Unmanned Aerial Systems which incorporates model aircraft.

From the outset I wish to acknowledge the ongoing support of the Model Aeronautics Council of Ireland (MACI) for the work being carried out by EASA and the IAA and note your commitment to amend your regulations to have all your members compliant at all times.

It is noted that you have made some representations on behalf of some of your members and while we are unable to discuss individual cases with you, it is hoped that the following points of clarification may assist you and your members in maintaining compliance from 1 January 2021.

## Legal Background

On 1 January 2021, Commission Delegated Regulation (EU) 2019/945 (on unmanned aircraft systems and on third-country operators of unmanned aircraft systems and Commission Delegated Regulation (EU) 2019/947 (on the rules and procedures for the operation of unmanned aircraft) become effective in Ireland. The scope of these regulations includes those unmanned aircraft systems (UAS) known as model aircraft.

Persons wishing to operate model aircraft must meet the requirements of the above Regulations from 31 December 2020.

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### Oifig Chláraithe:

Foirgneamh na hAmanna, 11-12 Sráid D'Olier  
Baile Átha Cliath 2, D02 T449, Éire  
Uimhir Chláraithe: 211082. Áit Chláraithe: Éire  
Cuideachta Dlíteanais Theoranta

### Registered Office:

The Times Building, 11-12 D'Olier Street  
Dublin 2, D02 T449, Ireland  
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## **Operator Requirements**

It is expected that the majority of model aircraft operators will operate in what is known as the Open category of UAS operations<sup>1</sup>. Specific requirements for the available subcategories may be viewed in the Regulations.

It is expected that most operations will occur in the A1/A3 and A2 sub-categories. For those aircraft over 25 kg, additional requirements will be required that must be agreed in advance with the Flight Operations Department of the IAA.

The operators shall register themselves in the Member State where they have their residence for natural persons and ensure that their registration information is accurate. A UAS operator cannot be registered in more than one Member State at a time.

Please note that it is not possible to import a list of persons into our systems as identity verification is required for each entry.

### **“Juniors”**

The following relates to the subject of “Juniors” under 16 as you refer to them.

Regulation (EU) 2019/947 Unmanned Aircraft Systems provides the requirements:

Article 9 details Minimum age for remote pilots.

Paragraph (1) states the minimum age for remote pilots operating a UAS in the ‘open’ and ‘specific’ category shall be 16 years.

Paragraph (2) states no minimum age for remote pilots shall be required: subparagraph (c) states when they operate under the direct supervision of a remote pilot complying with paragraph 1 and Article 8.

Article 8 provides - Rules and procedures for the competency of remote pilots.

To summarise, a person who is under the age of 16 cannot register to be a remote pilot or operator. However, a competently qualified natural or legal person who is prepared to supervise the underage person for all operations (in the authorised category) and for remote pilot flying can facilitate underage persons.

The supervisor must register in MySRS and obtain an Operator ID and remote pilot Proof of Online training and any additional training as required by the regulation. Their Operator ID will be associated with the aircraft in use.

You must (a) Register as an UAS/Drone Operator and (b) Do ‘UAS Proof of On Line Training (as minimum training)

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<sup>1</sup> Article 4 - ‘Open’ category of UAS operations - Regulation (EU) 2019/947

### **Third-Country visitors**

Requirements for third country UAS operators<sup>2</sup> state that those resident in a third-country shall comply with Implementing Regulation (EU) 2019/947 for the purpose of UAS operations within Irish airspace. If you have members or expect to have members who are resident outside the EU (e.g. UK and NI), you should ensure those members are familiar with the relevant requirements and comply with same prior to operating a model aircraft in single European sky including Irish airspace.

### **Visitor Tags**

The use of visitor tags as you outline will no longer be a requirement under the new requirements after 31 December 2020. If you wish to maintain a similar system within your organisation, that and any associated requirements will be a matter for yourselves. The use of visitor tags will not provide any alleviation to the requirements detailed in the EU Regulations.

### **Fees**

The fee for registration is presently set at €5. The IAA expects that this fee will remain at that level until 31 March. An increase in that fee may be expected thereafter to €30 which will be valid for a period of 2 years.

### **Insurance**

Users of UAS including model aircraft are strongly encouraged to have insurance cover in place that is appropriate to the level and scope of the intended operation.

### **Further Information**

There are several sources that provide information on the introduction of European requirements in the area of Unmanned Aerial Systems which includes model aircraft.

#### IAA Sources

The website has a dedicated page including an FAQ section at <https://www.iaa.ie/general-aviation/drones>

The IAA My SRS YouTube site provides information on registration on the portal - <https://www.youtube.com/channel/UCmzmPPL5nO5NVs6bGcmxIMQ>.

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<sup>2</sup> Article 41 - Third-country UAS operators - Regulation (EU) 2019/945

EASA

EASA's website is also a good source of information and related resources - <https://www.easa.europa.eu/domains/civil-drones-rpas>

The EASA YouTube channel has some information on UAS with more to come in the next days - [https://www.youtube.com/channel/UC71zEXeufZ3nfBhs\\_QUiFeg](https://www.youtube.com/channel/UC71zEXeufZ3nfBhs_QUiFeg)

### Summary

EU regulations which govern the use of UAS including model aircraft become effective from 31 December 2020.

Model aircraft operators are required to register using the My SRS portal.

Registration is open to those 16 and above.

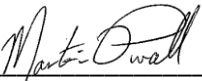
Third-country visitors wishing to operate an UAS (including model aircraft) shall meet the requirements outlined in Implementing Regulation (EU) 2019/947.

The use of visitor tags ceases to be an IAA requirement after 31 December 2020.

The fee for registration is not expected to rise before 31 March 2021.

Users of UAS are strongly encouraged to have appropriate insurance in place

Kind regards,



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Manager Personnel Licensing

Regulatory Performance & Personnel Licensing

Safety Regulation Division

Irish Aviation Authority