

Title:	<b>Opinion and Instruction Document</b>
Package Number	<b>0174</b>
Package Title	Review of UK Unmanned Aircraft Systems (UAS) Regulations
Headline Purpose:	Improvements to UAS regulation that aim to simplify regulation, increase education and understanding of UAS regulations, mitigate safety and security risks from UAS, and support the UAS sector transition to new regulations.
Proposed action:	<p>The proposed actions include updates to <a href="#">UK Regulation (EU) 2019/945</a> and <a href="#">UK Regulation (EU) 2019/947</a>, relating to:</p> <ol style="list-style-type: none"> <li>1. Operational requirements in the Open category</li> <li>2. Change of Open category sub-category names</li> <li>3. Updates to scope of registration and pilot competency requirements</li> <li>4. Updates to UAS product requirements</li> <li>5. Changes to transitional arrangements for 'legacy' UAS</li> </ol>

## Policy Objective

- 1.1. Unmanned Aircraft Systems (UAS, also known as RPAS or Remotely Piloted Aircraft Systems) are forming an increasingly significant part of society – delivering transformational benefits to businesses and providing services that improve lives. However, increased adoption of UAS may increase safety and security risks e.g. UAS flying dangerously close to people, buildings, objects or aircraft, transporting illegal substances, or capturing sensitive personal data without consent.
- 1.2. Feedback from the UAS community suggests the regulatory framework for UAS can be complex and, in some cases, poorly understood. In addition, certain regulatory requirements may be disproportionately costly for some users to comply with. Consequently, the Civil Aviation Authority (CAA) is recommending a range of changes to the regulatory framework for UAS, to simplify regulation, improve education and understanding, improve safety and security, and support the UAS sector.
- 1.3. The following regulations are affected:
  - [UK Regulation \(EU\) 2019/945](#)
  - [UK Regulation \(EU\) 2019/947](#)

## Background

### Policy context

- 2.1. At present, regulations for UAS operations are applied through a system of categories (Open, Specific, and Certified), and, within the Open category, sub-categories (A1, A2 and A3), reflecting the characteristics of the operation. These requirements are mostly set out in [UK Regulation \(EU\) 2019/947](#), and include operational safety, registration and pilot competency requirements.
- 2.2. In addition, [UK Regulation \(EU\) 2019/945](#) sets out product requirements for UAS manufacturers and other economic operators placing UAS on the market. These regulations set out a tiered system of product requirements (i.e. 'class-marking') for different categories of UAS (e.g. C0 for UAS weighing 250g or less, C1-C3 for heavier UAS and C4 for model aircraft). These product requirements relate to:

- UAS performance: requirements including the weight, maximum speed, maximum attainable height, mechanical strength, safety and controllability of the UAS.
  - Direct Remote ID: requirements for a UAS to locally communicate identification and location information during flight.
  - Geo-Awareness: requirements for UAS to identify if the UAS is flying near or in restricted airspace, and to notify the UAS remote pilot.
  - Flashing Light: requirements for UAS to have a green flashing light, to enable the UAS to be visible during nighttime operations.
- 2.3. These regulations also determine the framework that enables the implementation of product requirements in practice, including the role of Conformity Assessment Bodies (organisations approved by the Secretary of State to carry out conformity assessment of UAS) and the MSA (Market Surveillance Authority - the function responsible for oversight of product requirements for UAS used in the Open category, fulfilled by an organisation appointed by the Secretary of State). Whilst these regulations were retained in UK law in 2019, they have yet to be implemented in the UK in practice.
- 2.4. The Department for Transport (DfT) has sponsored the CAA to identify and recommend improvements to the regulatory framework for UAS in the UK. These changes aim to help unlock the benefits of UAS while ensuring we continue to mitigate safety and security risks robustly.

### **Call for Input**

- 2.5. In August 2023, the CAA published a Call for Input that set out 15 high level opportunities to improve UAS regulation. Opportunities to improve operational requirements for UAS users included simplifying the operational sub-categories and the scope of different operational requirements. Opportunities to enable the adoption of product requirements included simplifying the regulatory framework for technical standards and improving how manufacturers can help UAS users understand how to use their UAS responsibly. It also discussed opportunities to adopt new technologies, such as Hybrid Remote ID and geo-fencing (described in paragraph 2.9).
- 2.6. The Call for Input received 2,629 responses<sup>1</sup>. These responses generally agreed with the case to improve UAS regulation, particularly supporting proposals to simplify operational requirements and implement product requirements for UAS. However, responses also demonstrated concern with proposals viewed as particularly burdensome or disproportionate, such as Remote ID.

### **Consultation**

- 2.7. In November 2023, the CAA published a consultation<sup>2</sup>, setting out a range of proposals in full. These proposals were informed by feedback provided to the Call for Input and covered five strategic objectives:
- **Simplifying regulation:** UAS operators and remote pilots need to be confident that they are compliant with the law before flying their UAS. However, users can find regulation difficult to understand, due to its breadth, complexity, and communication in places. This can prevent UAS from being used with confidence and increase non-compliance. It can also create challenges for authorities to enforce regulation. By making regulation simpler to understand and comply with, it will be more effective.
  - **Increasing education and understanding:** For regulation to be effective, UAS users must understand regulatory requirements and what they must do to comply. However, survey data demonstrates that understanding of regulations is lower than it could be. For example, only 21% of surveyed drone users were aware of the 400ft UAS height restriction without prompting<sup>3</sup>. We aim to help UAS users better understand regulations through greater education and more effective communication.
  - **Product safety and security:** We aim to ensure products are safe and secure by design, to minimise the likelihood and impact of UAS causing harm. It will also make it easier for users to comply with regulations by preventing misuse from taking place at all.

<sup>1</sup> [Call for Input response summary \(https://consultations.caa.co.uk/rpas/review-of-uk-uas-regulations-consultation/supporting\\_documents/Review\\_of\\_UK\\_UAS\\_Regulation\\_Call\\_for\\_Input\\_Response\\_Summary\\_v1.0\\_Final\\_CAP2609.pdf\)](https://consultations.caa.co.uk/rpas/review-of-uk-uas-regulations-consultation/supporting_documents/Review_of_UK_UAS_Regulation_Call_for_Input_Response_Summary_v1.0_Final_CAP2609.pdf)

<sup>2</sup> [Consultation document - CAP2610 \(https://www.caa.co.uk/publication/download/20843\)](https://www.caa.co.uk/publication/download/20843)

<sup>3</sup> [Drone Awareness Tracker April 2023 \(https://www.caa.co.uk/publication/download/20399\)](https://www.caa.co.uk/publication/download/20399)

- **Safe and secure airspace:** The widespread availability of UAS and advances in UAS technology present a threat to the safety and security of our airspace. Whilst regulation exists today to prevent UAS operators and remote pilots from misusing UAS, more robust solutions will help enable action to be taken when unlawful activity occurs. Specifically, solutions will be required to enable enforcement bodies to identify users misusing UAS, and to make it harder for UAS to enter restricted airspace (such as airports and prisons) without the appropriate permissions.
- **Supporting the UAS sector:** Effective regulation will be essential to enable the UAS sector to deliver value to society. The CAA has an important role in helping the UAS sector transition to new regulatory frameworks, and ensuring the regulatory burden and cost of compliance is proportionate, particularly for amateur users. However, current regulations that impose new operational restrictions for 'legacy' UAS (UAS which do not comply with the UK Regulation (EU) 2019/945, are placed on the market before 1 January 2026 and which are not privately built) from 2026 could be disproportionately burdensome, forcing UAS operators to replace their UAS before their end of useful life, resulting in cost and e-waste. In addition, manufacturers will incur costs in demonstrating compliance of their UAS with product requirements. We aim to help the sector transition more smoothly, delivering the targeted benefits whilst removing sources of cost or complexity for the sector.

2.8. The consultation proposals are summarised below:

- Simplify operational requirements in the A1 and A3 sub-categories;
- Re-name operational sub-categories to 'Over', 'Near' and 'Far';
- Remove exclusions for 'toy' UAS from registration requirements;
- Require pilots flying UAS weighing less than 250g to take the online, free Flyer ID test;
- Digitalise safety information provided to flyers at product set-up;
- Improve our policy and guidance information;
- Implement UAS product safety and security standards;
- Introduce UK-specific product marking for class-marked UAS;
- Enable the implementation of a Market Surveillance Authority;
- Implement Hybrid Remote ID for UAS;
- Implement geo-awareness and geo-fencing;
- Require flashing lights for UAS operations in the dark;
- Extend the transition period for adopting class-marked UAS; and
- Introduce more flexible conformity assessment requirements.

2.9. Further detail on the most significant consultation proposals is provided below:

- **Remote ID:** The consultation proposed to implement *Hybrid* Remote ID in product and operational requirements, whereby the UAS would communicate location and identification information to a remote database during flight where this is possible (i.e. 'Network' Remote ID), defaulting to local communication of this information to a proximate mobile receiver where there is no connection ('Direct' Remote ID). This solution aims to address barriers to enforcement bodies identifying UAS users misusing UAS, enabling more effective enforcement of UAS regulations. In turn, this aims to mitigate the security risks that can be associated with use of UAS and promote the integration of UAS in airspace.  
Remote ID has a largely negative public perception, due to concerns regarding data privacy, cost and effectiveness. However, the CAA, Home Office, police and DfT maintain the view that addressing barriers to identifying unlawful UAS operators is essential for the police to effectively enforce UAS regulations, and, in turn, deter unlawful activity.
- **Geo-fencing:** The consultation proposed to implement geo-fencing, in addition to geo-awareness, such that UAS are manufactured with functionality that prevents the UAS from flying in restricted airspace, unless it has the appropriate permission. This intends to provide a more robust mitigation to the risks associated with UAS flying in restricted airspace.
- **Pilot competency:** The consultation proposed to extend the Flyer ID requirement to include remote pilots flying a UAS less than 250g, with or without a camera. It also sought views on whether to introduce a minimum weight threshold, in the region of 50g to 100g, to exclude the lightest UAS from these requirements.

2.10. The consultation received 3,499 responses in total. These responses provided a range of views in response to the consultation proposals. Proposals to implement product requirements, improve guidance and simplify

operational requirements received support, whereas proposals relating to Remote ID and restrictions on the use of 'legacy' (i.e. non-class-marked, see section 2.7) drones received challenge.

## **Final policy proposals**

2.11. In May 2025, the CAA published a consultation reply that set out a summary of responses and final recommended policy proposals<sup>4</sup>. The proposals in the consultation reply relate to the five strategic objectives set out above, and are summarised below:

### **2.12. Simplifying regulation:**

- a. Allow C1/UK1 UAS (class-marked UAS weighing 900g or less) to overfly uninvolved people (people that are not a part of the UAS operation) in the A1 sub-category (for flying over people). This would harmonise requirements for flying over uninvolved persons in the A1 sub-category for different types of UAS, making the regulations simpler to understand.
- b. Allow C0/UK0 (class-marked UAS weighing 250g or less) and C1/UK1 (class-marked UAS weighing 900g or less) to fly in the A3 sub-category (for flying away from people), to help users understand how class-marks relate to operational requirements. Whilst this will not impact the actual operational privileges for these UAS, it will clarify that C0/UK0 and C1/UK1 can be used in these sub-categories and resolve a source of confusion and complexity in the regulation.
- c. Require UAS operating in the A3 sub-category (for flying far from people) to maintain a minimum distance of 50m horizontally from uninvolved persons. The current operational requirements for flights in the A3 sub-category do not specifically define a minimum distance a UAS must fly from an uninvolved person. However, guidance material (e.g. CAP2012 and AMC/GM) sets out that a minimum distance of 50m should be maintained from uninvolved persons. We are proposing to introduce a regulatory requirement in the A3 sub-category for UAS to fly a minimum of 50m from uninvolved persons, to avoid creating confusion for users by ensuring that regulation and guidance are clearly aligned.
- d. Require UAS operating in the A3 sub-category (for flying away from people) to keep a minimum distance of 150m to residential, commercial, industrial or recreational areas. We also require that UAS keep a minimum distance of 50m separation from individual buildings, and propose to use AMC to set out means of compliance relating to the distinction between areas and buildings. This aims to clarify the safe minimum distances for users whilst maintaining a proportionate approach for flying near buildings that are isolated from other buildings.
- e. Re-name operational sub-categories to 'Over people (A1)', 'Near people (A2)', and 'Far from people (A3)'. We intend for these operational sub-category names to be more intuitive and meaningful, which will help users understand and recall UAS regulations, resulting in increased compliance. The inclusion of 'people' in the renaming of the sub-categories ensures operators understand what is permitted in each operational sub-category. Retaining the existing names in parentheses provides alignment with the EU, and avoids creating confusion for those who are well-accustomed to the existing operational sub-category names.
- f. Remove exemptions for 'toy' UAS from registration requirements, whilst introducing a minimum weight threshold of 100g to exclude toy-like UAS from the requirements. This aims to address issues with the ambiguous definition and lack of standard marking for 'toy' UAS, whilst ensuring that the lightest UAS that are only capable of creating a low safety risk remain out of scope of these requirements.
- g. Clarifying that indoor operations are excluded from the scope of UK Regulation (EU) 2019/947.

### **2.13. Increasing education and understanding:**

- a. To require remote pilots of UAS weighing between 100g and 250g to complete the Flyer ID test – a free, online competency test for UAS pilots to demonstrate a basic understanding of the regulations. Our view is that greater education would help UAS pilots know how to comply with the regulations and would improve the safety,

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<sup>4</sup> [CAP3105: Review of UK Unmanned Aircraft Systems \(UAS\) Regulations: Consultation Reply Document | UK Civil Aviation Authority](#)

security and compliance of UAS operations. This requirement should come into force three months after the proposed statutory instrument comes into force, to allow sufficient time for remote pilots to comply.

#### 2.14. **Product safety and security:**

- a. Require manufacturers and other economic operators to comply with product safety and security standards ('class-marking') for UAS used in the Open category, ensuring that UAS meet the minimum level of safety, security and performance requirements set out in Parts 1 to 5, 16 and 17 of the Annex of UK Regulation (EU) 2019/945. In turn, we would expect that this would reduce safety and security incidents caused by UAS and help build confidence in the UAS sector. This requirement should come into force on 1<sup>st</sup> January 2026.

Manufacturers and other economic operators of UAS weighing less than 100g should not be subject to mandatory class-marking requirements, to ensure that product requirements are only applied to UAS that are capable of creating a material safety or security concern.

- b. Introduce UK-specific class identification labels for class-marked UAS in the Open category, to differentiate between UAS compliant with UK regulations and those compliant with regulations. In practice, we propose to replace the letter 'C' with 'UK' – such that C0 becomes UK0, and so forth. This should be implemented in both the legislative text itself, as well as in the physical labels illustrated in Parts 1 to 6, 16 and 17 of the Annex to UK Regulation (EU) 2019/945. UK-specific class identification labels are necessary where there is divergence from the EU product requirements and provides a future proof solution against EU and UK regulation diverging further over time.
- c. Introduce a requirement for manufacturers to provide information to the MSA on UAS product codes, make, model, and relationship to serial numbers when products are placed on the market. This will enable the MSA to be more effective in understanding the sector, providing oversight and producing guidance for UAS users.
- d. Provide the MSA with the responsibility of approving Conformity Assessment Bodies (CABs), instead of the Secretary of State as is currently set out in regulation. This aims to simplify how the regulatory framework for product standards is delivered in practice, by giving more responsibility to a single organisation and preventing complex interdependencies between the MSA and Secretary of State.
- e. Use AMC/GM for the acceptance and use of existing industry standards to comply with the class marking requirements under conformity assessment procedures, subject to further consultation.

#### 2.15. **Safe and secure airspace:**

- a. Introduce a requirement that UAS must be remotely identifiable during flight, by requiring active and up to date Direct Remote ID functionality (the requirement for a UAS to locally communicate identification and location information during flight) for UK0 weighing 100g or more with a camera, UK1 to UK3, UK5 and UK6 class-marked UAS.

Operations with UK0 UAS weighing 100g or more with a camera and UK1, UK2, UK3, UK5 and UK6 UAS would be required to have active and up to date Direct Remote ID functionality, as well as privately built UAS, legacy UAS and model aircraft operations. In the Specific Category, operators should have active and up to date direct Remote ID functionality, unless exempted under an Operational Authorisation issued by the CAA under Article 12 of UK Regulation (EU) 2019/947.

Model aircraft should be exempt from Direct Remote ID requirements where all three of the following criteria are met:

- The model aircraft operation is being conducted under a valid Article 16 authorisation, and is operating within the relevant rules;
- The UAS meets defined criteria for a low-risk model aircraft; and
- The flight takes place within the bounds of a model aircraft flying site that is exempted from the Remote ID requirements, as set out in the Article 16 authorisation.

From 1<sup>st</sup> January 2026, the Direct Remote ID requirement should be implemented by operators in respect of UK1, UK2, UK3, UK5 and UK6 UAS.

From 1<sup>st</sup> January 2028, the Direct Remote ID requirement should be implemented by operators in respect of UK0 UAS weighing 100g or more with a camera, model aircraft unless exempted through the conditions outlined above, privately built UAS weighing 100g or more with a camera, and legacy UAS weighing 100g or more with a camera.

The CAA maintains the view that Hybrid Remote ID is the preferred long-term solution for the UK, with Direct Remote ID only being an interim solution. However, the legislative change for the Hybrid Remote ID solution is not addressed within this OI.

- b. Implement geo-awareness (i.e. functionality to notify UAS remote pilots when they are flying near or in restricted airspace) for UK0 UAS weighing 100g or more with a camera, UK1, UK2 and UK3 UAS, which will help prevent UAS entering restricted airspace without the appropriate permissions. From 1<sup>st</sup> January 2026, geo-awareness should come into force for UK1, UK2 and UK3 UAS. From 1<sup>st</sup> January 2028, geo-awareness should come into force for UK0 UAS weighing 100g or more with a camera. The geo-awareness requirements for UK5 and UK6 UAS will continue to be optional. UK4 UAS, legacy UAS and privately built UAS will remain out of scope.
- c. The geo-awareness requirement for UK0 UAS between 100g and 250g with a camera, and UK1, UK2, UK3 UAS, should go beyond those airspace limitations designated in accordance with Article 15 of UK Regulation (EU) 2019/947 and should instead encompass all restrictions that exist within UK airspace.

#### 2.16. **Supporting the UAS sector:**

- a. Enable the use of legacy UAS (non-class marked UAS placed on the market before 1st January 2026, see section 2.7) in the A2 sub-category after 1st January 2026, under the same restrictions as today (if the remote pilot has A2 Certificate of Competency, the UAS weighs <2kg and is flown a minimum horizontal distance of 50m from uninvolved people). This will reduce the costs and impact of regulations for UAS operators in the A2 sub-category.
- b. Remove current regulations that allow legacy UAS (see section 2.7) weighing 500g to operate in the A1 sub-category whereby the remote pilot has an A2 Certificate of Competency. The impact of this change should be that UAS weighing less than 250g can be allowed to fly in the A1 sub-category under existing provisions, and UAS weighing more than 250g but less than 500g can be allowed to fly in the A2 sub-category under the existing provisions for legacy UAS weighing <2kg (i.e. minimum distance of 50m from uninvolved persons and where the remote pilot has an A2 certificate of competency). This aims to simplify regulations by removing the phasing out of existing requirements on 1st January 2026, whilst ensuring an acceptable level of safety, particularly with regard to overflight of uninvolved persons.
- c. Enable UAS that have been class-marked under EU regulations to be used in the Open category, in the same sub-categories as UAS with equivalent class-marking under UK regulations until 1<sup>st</sup> January 2028. Specifically, allow C0 and C1 EU-class-marked UAS to be operated in the A1 sub-category, C2 UAS to operate in the A2 sub-category, and C0-C4 UAS to operate in the A3 sub-category. This change would aim to give additional operational privileges to users with class-marked drones for the period before UK class-marked drones are widely available.
- d. Introduce more flexible conformity assessment requirements by allowing self-declaration via internal production control or type examination from an EU-certified conformity assessment body for C1-C3 class-marked UAS until 1<sup>st</sup> January 2028. From 1st January 2028 onwards, we are proposing to require manufacturers to obtain a type-examination certificate from a UK conformity assessment body for UK1, UK2 and UK3 class-marked UAS. This approach should reduce the costs to manufacturers in demonstrating compliance, and address risks to product availability as the sector transitions to new regulations.

2.17. Unless otherwise stated, all proposals should take effect upon the proposed statutory instrument coming into force.

- 2.18. In addition, the Secretary of State should prescribe the CAA as the MSA for class-marked UAS in the UK. This will provide CAA with the responsibility to oversee class-marking through assessing the compliance of manufacturers and other economic operators with UK Regulation (EU) 2019/945 and taking corrective action where there is non-compliance, as well as approving conformity assessment bodies.
- 2.19. Collectively, these proposals will help future-proof the regulatory framework for UAS, by making regulations more suitable for end users, providing stronger safety and security mitigations, and helping the UAS sector to transition to these new regulations.

## Legal powers relied upon to achieve the change(s) sought

- 3.1 The changes proposed can be implemented by amending the UK Regulation (EU) 2019/945, which was created under article 58 of UK Regulation (EU) 2018/1139 ("the Basic Regulation"); and amending UK Regulation (EU) 2019/947, which was created under article 57 of the Basic Regulation.

## Further considerations

- 4.1 The proposed rule changes aim to improve safety and security of UAS operations through making regulations simpler to comply with, improving understanding of requirements and strengthening requirements where appropriate to do so. In addition, the proposed changes provide for UK conformity assessment of technical requirements for UAS.
- 4.2 If the proposed changes are not made, there will be safety, security and commercial impacts. The commercial impacts are detailed in a separate Impact Assessment document created by the DfT. The safety and security impact is the potential for increased volumes of unsafe drone operations as a result of reduced compliance with operational safety mitigations.

## Affected Law (and, if Applicable, UK AMC)

What is the existing UK legal framework which is relevant here?	<a href="#">UK Regulation (EU) 2019/947</a> and <a href="#">UK Regulation (EU) 2019/945</a>
Identify the law that the CAA proposes be changed:	<p>The change affects multiple articles and annexes of UK Regulation (EU) 2019/947 and UK Regulation (EU) 2019/945.</p> <p>Further legislative amendments beyond these regulations may be required to ensure that the scope of existing relevant criminal offences is expanded to encompass the amended and new requirements set out in this OID.</p>
Are any consequential amendments needed to other pieces of law?	As above, consequential amendments may be required beyond these regulations to ensure that criminal offences attach to all amended and new requirements.
If the change proposed is to assimilated EU Implementing Rules made under the UK Basic Regulation is there any UK Acceptable Means of Compliance ("AMC"), Guidance Material ("GM") or	<p>CAP722, CAP2320 and AMC/GM to UK Regulation (EU) 2019/947 are affected by the change.</p> <p>AMC/GM will also be created in respect of UK Regulation (EU) 2019/945.</p>

Certification Specification ("CS") that will be changed/newly adopted as a consequence?	
If the change is to the ANO, will the CAA be amending any CAA Policy documents?	No substantive policy change to the ANO is proposed and therefore we do not anticipate amendments to CAA policy documents being required.
Is there an EU Notice of Proposed Amendment considering the same issue?	There is no EU Notice of Proposed Amendments considering the same issues.
Does this proposal relate to an international treaty or obligation (e.g. an ICAO SARP)?	The proposal does not relate to an international treaty or obligation.
Is a consultation required?	A consultation has been completed - see <a href="#">CAP2610</a> .
Has a consultation already occurred?	A consultation has been completed - see <a href="#">CAP2610</a> . The consultation was published 22 <sup>nd</sup> November 2023 and can be found <a href="#">here</a> .
If yes, has a consultation response document been published?	The consultation response document was published on 08 May 2025. <a href="#">CAP3105: Review of UK Unmanned Aircraft Systems (UAS) Regulations: Consultation Reply Document   UK Civil Aviation Authority</a>
Does the Proposal have an impact on Other Government Departments	<p><b>Home Office (HO):</b> Introducing product and operational requirements should enhance national security and decrease the incidence of crimes involving UAS and enhance detection and tracking of UAS.</p> <p><b>Department for Business and Trade (DBT):</b> Divergence from EU product requirements for UAS may negatively impact the ability of UAS manufacturers to export their products, as manufacturers and other economic operators would need to meet separate regulatory requirements in different jurisdictions. Overall, we consider that these divergences are relatively minor and unlikely to have a material impact on trade.</p> <p><b>Ministry of Justice (MOJ):</b> Introducing product and operational requirements should decrease the incidence of crimes involving UAS around prisons and enhance detection and tracking of UAS.</p> <p><b>Department for Transport (DFT):</b> Requiring the Civil Aviation Authority as the MSA to approve Conformity Assessment Bodies rather than the Department for Transport will streamline the oversight functions across the different aviation domains.</p>
Will an Impact Assessment be necessary?	A full Impact Assessment (IA) has been completed in accordance with <a href="#">HMT Green Book</a> and <a href="#">Better Regulation Unit</a> guidance. A full IA was necessary as the impact was greater than the +/- £5 million de minimis assessment threshold.

	The IA received sign off from DfT's Better Regulation Unit and an independent peer reviewer on behalf of DfT's Chief Analyst in January 2023.
When do we want these provisions to be in force?	These provisions should come into force immediately unless specified in the body of the OID above.
Has an SI "slot" been identified?	September/October 2025
Will there be any criminal offences?	The scope of criminal offences relating to UK Regulations (EU) 2019/945 and 947 will need to expand to encompass amended and new requirements. It is also possible that an amendment to the ANO will be required in order to ensure that the scope of criminal offences under that Order also aligns with the changes we are making to regulations made under the Basic Regulation.
If so, is a Justice Impact Test required?	A Justice Impact Test (JIT) has been completed as part of the Regulatory Impact Assessment.
What is the intended extent of the provision?	The whole of the UK: England, Wales, Scotland and Northern Ireland
Are any issues devolved?	No
Are any transitional provisions needed? If so, what are they?	Proposed transitional periods are set out in the body of the OID above.