

Call for Input Response Summary: Review of UK Unmanned Aircraft System (UAS) Regulations

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Chapter 1

Introduction and Document Summary

Introduction

- 1.1 The Review of UK Unmanned Aircraft Systems (UAS) Regulation Call for Input¹ (the 'Call for Input' hereafter) was published by the CAA in August 2023. The Call for Input received 2,629 responses in total. These responses have informed the proposals put forward in the Review of UK UAS Regulation consultation.
- 1.2 This document provides a qualitative and quantitative summary of the Call for Input responses, and how we taken forward feedback to inform the proposals outlined in the consultation.

Document Summary

- 1.3 The Call for Input was open for 4 weeks, from the 9th August 2023 to the 7th September 2023. It set out our early thinking on the opportunities to improve UAS regulation.
- 1.4 The Call for Input put forward 15 opportunities that covered operational requirements and product requirements, amongst others. For each of the 15 opportunities, we invited stakeholders to provide feedback on whether the CAA should progress with that proposal, on a 5-point scale.
- 1.5 The Call for Input also sought views on the issues our proposals were trying to address, the principles for future policy development, and other opportunities for improvement.
- 1.6 Overall, the Call for Input received 2,568 responses via the online feedback form and 61 responses via email.

¹ <https://consultations.caa.co.uk/rpas/call-for-input-review-of-uk-uas-regulations/>

Chapter 2

Our Approach

- 2.1 To understand the overall level of support for each of the proposals put forward, we developed a quantitative analysis of the Call for Input responses. This included taking into consideration how responses varied by different stakeholder groups.
- 2.2 All qualitative responses submitted as part of the Call for Input were read and reviewed. As part of the policy development process, we shared a summary of the responses with stakeholders from other government departments to gather their input, such as Department for Transport, Home Office and the Police.
- 2.3 The quantitative and qualitative responses have been important in informing the proposals put forward in the Review of UK UAS Regulation consultation. However, in developing the proposals in the consultation, we have considered:
 - Information and analysis that has not been published in the public domain, including data on the safety and security of UAS activity.
 - How the proposals will likely affect certain user groups. As an example, for proposals that will require changes to UAS manufacturing, we gave particular considerations to feedback from UAS manufacturers as they will be the most affected user group.
 - Consumer research regarding UAS regulation, such as the Drone Awareness Tracker.
- 2.4 Overall, feedback to the Call for Input validated our view that there are opportunities to improve, simplify and strengthen UAS regulation. However, there was limited support for overhauling existing regulatory frameworks, such as operational categorisations and class-marking, due to the cost and wider impacts of change. Collectively, this feedback enabled us to develop a set of proposals that make incremental and targeted improvements to the regulations, while maintaining stability in the overall regulatory framework where possible.

Chapter 3

Demographic Characteristics

- 3.1 This chapter outlines the key demographic characteristics of respondents to the Review of UK UAS Regulation's Call for Input.
- 3.2 Of the responses submitted via the online feedback form, 95.1% of responses were personal views, and 4.9% were views on behalf of an organisation. Out of those representing the views of an organisation, 36.5% of respondents were from 'UAS Operator and Pilot' organisations and 33.3% were from 'Other' organisations.
- 3.3 The greatest subset of respondents were aged 61 – 70, which made up 29.6% of respondents. Participation by those aged 30 and under was disproportionately low, as this group contributed to 3.5% of total respondents. Conversely, 71.2% of respondents were aged 41 – 70, which is disproportionately high relative to the UK population.

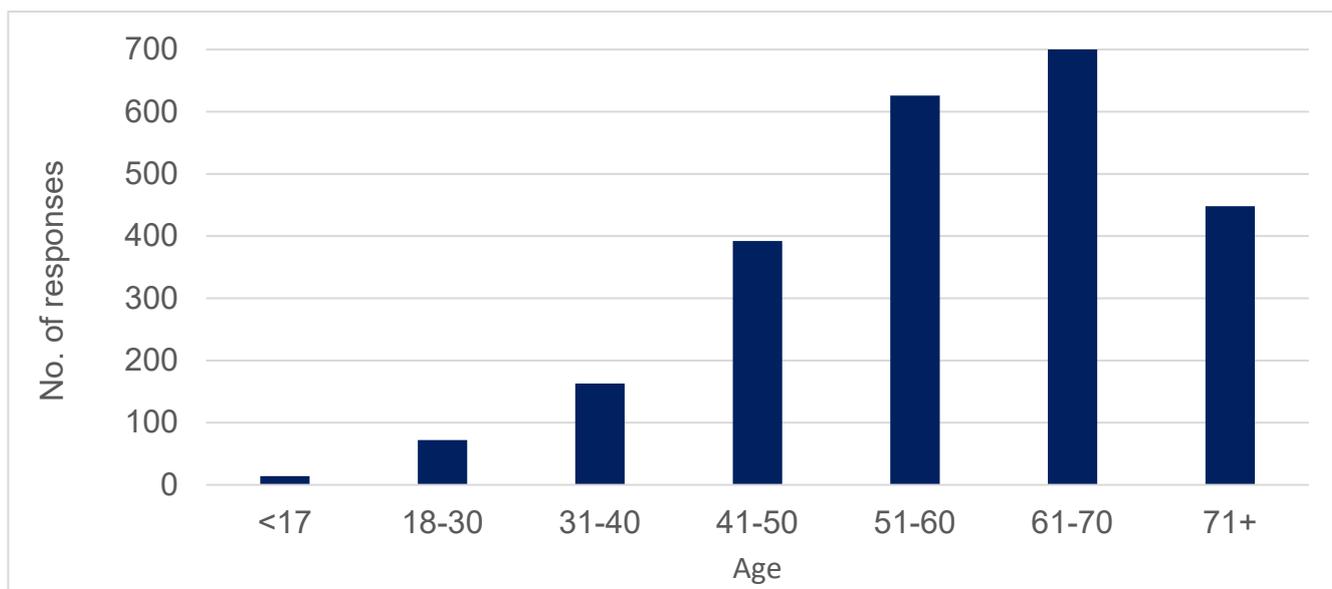


Figure 1: Age of respondents to the Call for Input

- 3.4 Overall, the largest subset of respondents stated that the only UAS they own are drones, which made up 52.5% of respondents. Representation from Model Aircraft flyers was disproportionately high relative to our expectations of the UAS flying population. Model Aircraft flyers made up 34.0% of the total respondents.
- 3.5 Less than 1% of respondents did not own any UAS or model aircraft.

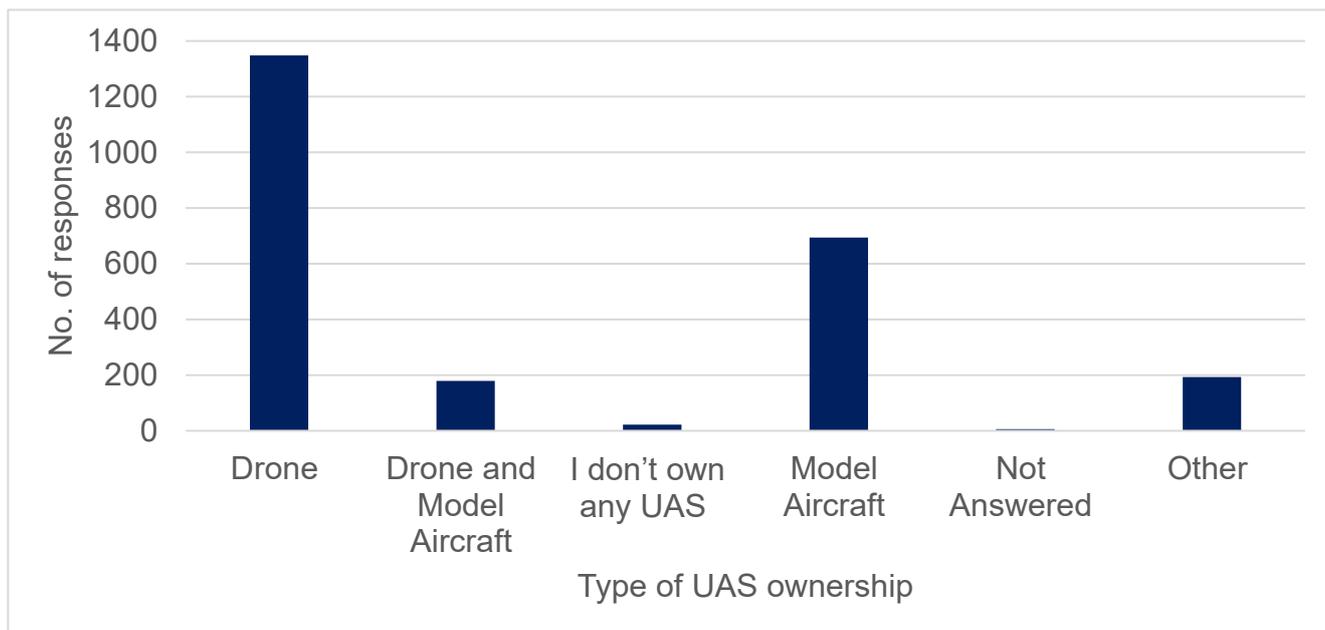


Figure 2: Type of UAS ownership of respondents to the Call for Input

3.6 The majority of respondents to the Call for Input are more frequent flyers, with 60.5% of participants flying their UAS at least once a week.

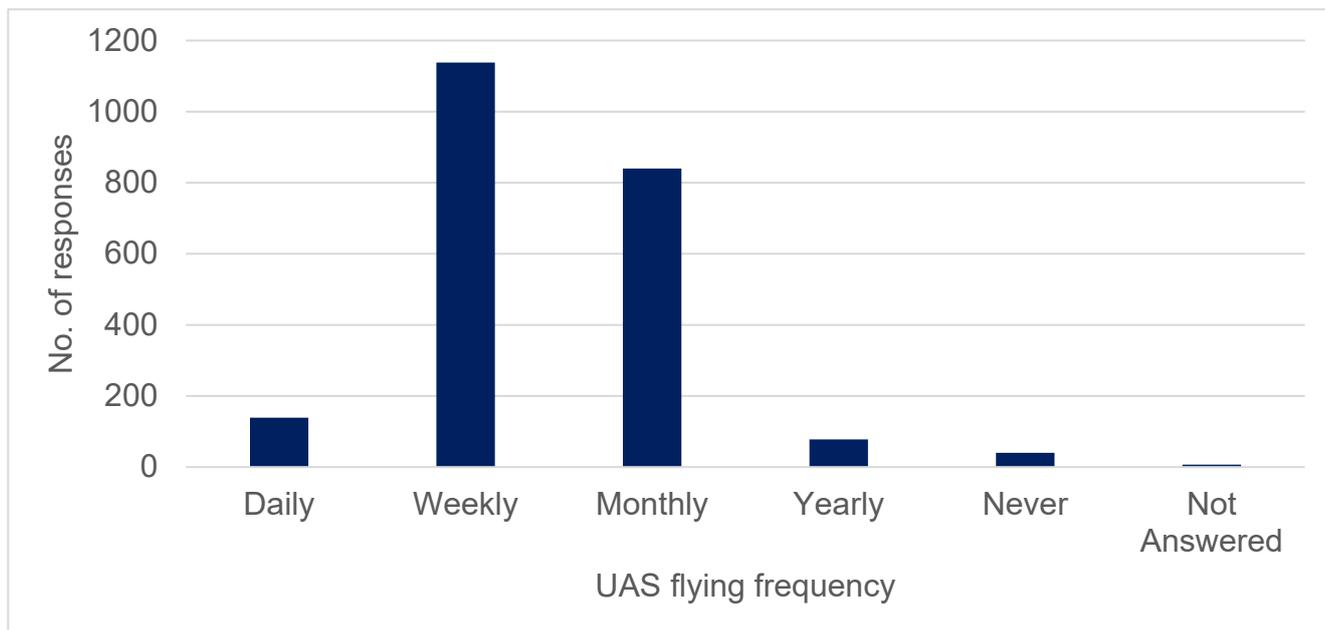


Figure 3: UAS flying frequency of respondents to the Call for Input

3.7 A large proportion of the individuals who contributed to the Call for Input owned over 3 UAS, with this group making up 50.4% of the total respondents.

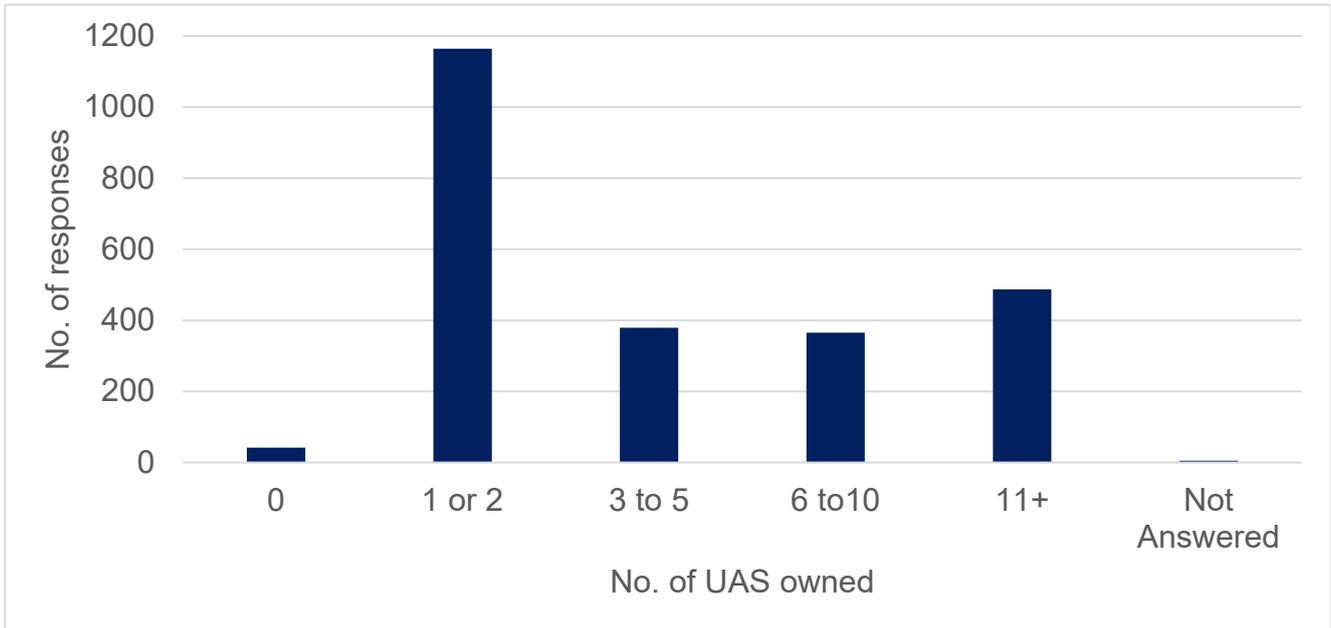
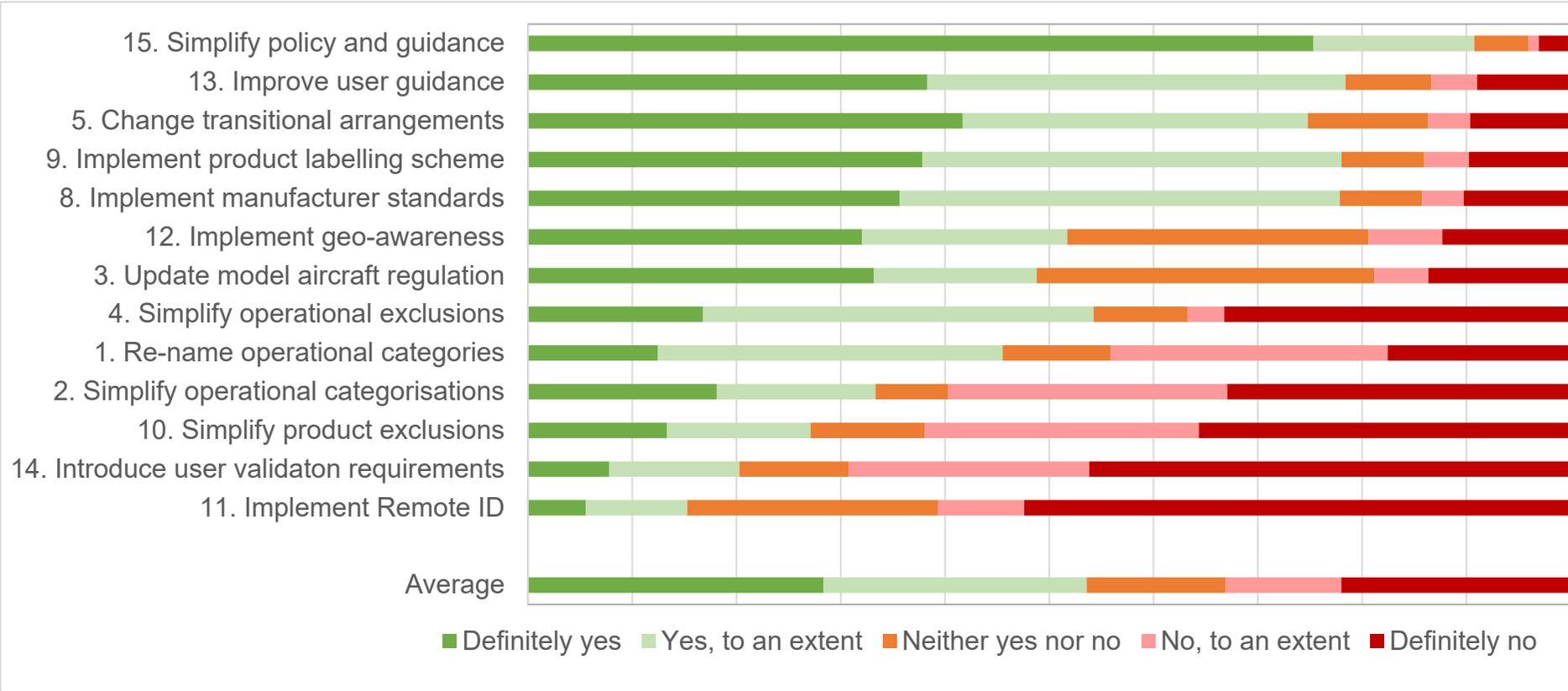


Figure 4: Number of UAS owned by respondents to the Call for Input

Chapter 4

Response Summary

- 4.1 Overall, we saw a mixed level of support for the opportunities we identified in the Call for Input.
- 4.2 The opportunities presented to simplify UAS regulations and to improve how regulations are communicated to users received greatest support. The proposal to simplify the policy and guidance structure received the most support, with 90.7% responding positively. In addition, 78.4% of respondents were in favour of the opportunity to improve user guidance by requiring manufacturers to digitally communicate safety information.
- 4.3 Some of the opportunities presented in the Call for Input received mixed views on whether the proposals should be introduced. In response to the opportunity to simplify operational exclusions, 54.3% of respondents were in favour of the proposal, and 36.7% were against it. Furthermore, the opportunity presented to re-name operational categorisations divided opinions, as 45.6% provided a positive response compared to 44.1% offering a negative response.
- 4.4 Overall, Remote ID received the most opposition out of all the opportunities, with 52.4% responding 'definitely no' to the implementation of Remote ID. Introducing user validation requirements also received more negative feedback, as the proportion of respondents that answered 'definitely no' and 'no, to an extent' to the proposal was 46.1% and 23.1%, respectively.
- 4.5 Figure 5 provides a quantitative summary of the responses to the opportunities identified in the Review of UK UAS Regulation's Call for Input. The opportunities to improve UAS regulation are ranked from those most in favour to those least in favour, based on a methodology of attributing a score to each of the response options. Table 1 provides a full breakdown of the number of responses for each opportunity to improve UAS regulations.
- 4.6 Table 2 displays a full quantitative breakdown of the number of responses to the other questions included in the Call for Input that do not explicitly relate to the opportunities to improve UAS regulations.
- 4.7 Table 3 supplies a qualitative summary of the most common reasons put forward by respondents in favour and not in favour of the opportunities identified to improve UAS regulations.



Methodology excludes 'I don't know' responses from the total calculations

Figure 5: Quantitative summary of the Review of UK UAS Regulation's Call for Input responses

| Opportunity | Definitely yes | Yes, to an extent | Neither yes nor no | No, to an extent | Definitely no | Total (excl. I don't know) | I don't know | Total (incl. I don't know) |
|---|-----------------|-------------------|--------------------|------------------|-----------------|----------------------------|--------------|----------------------------|
| 1. Re-name operational categories | 302 (12.5%) | 801 (33.1%) | 251 (10.4%) | 644 (26.6%) | 425 (17.5%) | 2423 (100%) | 145 | 2568 |
| 2. Simplify operational categorisations | 448 (18.1%) | 376 (15.2%) | 172 (7.0%) | 662 (26.8%) | 814 (32.9%) | 2472 (100%) | 96 | 2568 |
| 3. Update model aircraft regulation | 781 (33.2%) | 367 (15.6%) | 762 (32.4%) | 122 (5.2%) | 321 (13.6%) | 2353 (100%) | 215 | 2568 |
| 4. Simplify operational exclusions | 405 (16.8%) | 903 (37.5%) | 217 (9.0%) | 85 (3.5%) | 801 (33.2%) | 2411 (100%) | 157 | 2568 |
| 5. Change transitional arrangements | 961 (41.7%) | 762 (33.1%) | 266 (11.5%) | 93 (4.0%) | 222 (9.6%) | 2304 (100%) | 264 | 2568 |
| 8. Implement manufacturer standards | 876 (35.7%) | 1037 (42.2%) | 194 (7.9%) | 98 (4.0%) | 252 (10.3%) | 2457 (100%) | 111 | 2568 |
| 9. Implement product labelling scheme | 935 (37.8%) | 993 (40.2%) | 196 (7.9%) | 106 (4.3%) | 241 (9.8%) | 2471 (100%) | 97 | 2568 |
| 10. Simplify product exclusions | 320 (13.3%) | 330 (13.8%) | 263 (11.0%) | 630 (26.3%) | 855 (35.7%) | 2398 (100%) | 170 | 2568 |
| 11. Implement Remote ID | 139 (5.6%) | 243 (9.7%) | 601 (24.0%) | 207 (8.3%) | 1310 (52.4%) | 2500 (100%) | 68 | 2568 |
| 12. Implement geo-awareness | 791 (32.0%) | 486 (19.7%) | 714 (28.9%) | 174 (7.0%) | 304 (12.3%) | 2469 (100%) | 99 | 2568 |
| 13. Improve user guidance | 961 (38.3%) | 1007 (40.1%) | 207 (8.2%) | 110 (4.4%) | 225 (9.0%) | 2510 (100%) | 58 | 2568 |
| 14. Introduce user validation requirements | 189 (7.7%) | 303 (12.5%) | 254 (10.5%) | 560 (23.1%) | 1120 (46.1%) | 2426 (100%) | 142 | 2568 |
| 15. Simplify policy and guidance document structure | 1876 (75.3%) | 384 (15.4%) | 130 (5.2%) | 24 (1.0%) | 76 (3.1%) | 2490 (100%) | 78 | 2568 |

Table 1: Full quantitative breakdown of the Review of UK UAS Regulation's Call for Input responses on questions on opportunities

| Question | Definitely agree / definitely yes | Somewhat agree / yes, to an extent | Neither agree nor disagree / neither yes nor no | Somewhat disagree / no, to an extent | Definitely disagree / definitely no | Total (excl. I don't know / no answer) | I don't know / no answer | Total (incl. I don't know / no answer) |
|--|-----------------------------------|------------------------------------|---|--------------------------------------|-------------------------------------|--|--------------------------|--|
| Do you agree with the challenges with operational requirements identified | 228 (9.4%) | 1016 (41.7%) | 778 (31.9%) | 206 (8.5%) | 208 (8.5%) | 2436 (100%) | 132 | 2568 |
| Should CAA adopt policy objectives for operational requirements - mitigate safety and security risks | 881 (40.6%) | 421 (19.4%) | 111 (5.1%) | 573 (26.4%) | 182 (8.4%) | 2168 (100%) | 400 | 2568 |
| Should CAA adopt policy objectives for operational requirements – user-centric | 1492 (70.1%) | 362 (17.0%) | 144 (6.8%) | 43 (2.0%) | 89 (4.2%) | 2130 (100%) | 438 | 2568 |
| Should CAA adopt policy objectives for operational requirements – enforceable | 799 (37.0%) | 944 (43.7%) | 166 (7.7%) | 103 (4.8%) | 149 (6.9%) | 2161 (100%) | 407 | 2568 |
| Should CAA adopt policy objectives for operational requirements – growth enabling | 944 (44.6%) | 823 (38.9%) | 189 (8.9%) | 54 (2.6%) | 107 (5.1%) | 2117 (100%) | 451 | 2568 |
| Should CAA adopt policy objectives for operational requirements – scalable | 859 (41.2%) | 849 (40.7%) | 204 (9.8%) | 46 (2.2%) | 128 (6.1%) | 2086 (100%) | 482 | 2568 |
| Do you value international alignment in operational requirements | 1091 (43.6%) | 914 (36.5%) | 185 (7.4%) | 114 (4.6%) | 198 (7.9%) | 2502 (100%) | 66 | 2568 |
| Do you agree with the challenges with product requirements identified | 189 (8.1%) | 899 (38.7%) | 335 (14.4%) | 133 (5.7%) | 769 (33.1%) | 2325 (100%) | 243 | 2568 |
| Should CAA adopt policy objectives for product requirements – mitigate safety and security risks | 1019 (41.4%) | 441 (17.9%) | 178 (7.2%) | 613 (24.9%) | 211 (8.6%) | 2462 (100%) | 106 | 2568 |
| Should CAA adopt policy objectives for product requirements – user-centric | 1616 (66.8%) | 395 (16.3%) | 244 (10.1%) | 43 (1.8%) | 123 (5.1%) | 2421 (100%) | 147 | 2568 |
| Should CAA adopt policy objectives for product requirements – growth enabling | 1544 (64.2%) | 425 (17.7%) | 260 (10.8%) | 50 (2.1%) | 127 (5.3%) | 2406 (100%) | 162 | 2568 |
| Should CAA adopt policy objectives for product requirements – scalable | 1477 (61.9%) | 450 (18.9%) | 271 (11.4%) | 57 (2.4%) | 132 (5.5%) | 2387 (100%) | 181 | 2568 |
| Do you value international alignment in product requirements | 1099 (44.9%) | 881 (36.0%) | 190 (7.8%) | 85 (3.5%) | 194 (7.9%) | 2449 (100%) | 119 | 2568 |

Table 2: Full quantitative breakdown of the Review of UK RPAS Regulations Call for Input responses on questions (excl. opportunities)

| Opportunity | 'Yes' Rationale | 'No' Rationale |
|---|--|---|
| 1. Re-name operational categories | <ul style="list-style-type: none"> Re-naming operational categories will provide greater clarity to the regulation, making it easier to comply with. | <ul style="list-style-type: none"> The issue is the communication of existing regulation, not the naming of categories. The existing categories are sufficient. Adopting changes will be expensive and time-consuming. |
| 2. Simplify operational categorisations | <ul style="list-style-type: none"> The existing regulation is too complicated for most UAS flyers to understand. The more straightforward the categorisation of UAS, the more likely people will fly safely. | <ul style="list-style-type: none"> Combining the A1- A3 regulation will remove flexibility afforded to the A1 sub-category. Changing the regulations can cause further confusion and encourage people to ignore them. |
| 3. Update model aircraft regulation | <ul style="list-style-type: none"> Model aircraft does not pose the same risks as other UAS. Therefore, alternative regulatory requirements are justified. | <ul style="list-style-type: none"> Creating a whole new set of rules will be time-consuming and expensive to create little benefit. Model aircraft operations under Article 16 is sufficient. |
| 4. Simplify operational exclusions | <ul style="list-style-type: none"> The definition of a "toy" is too vague and non-descriptive. Use of sub-250g gives a clearer distinction. Definitions need to be clearer for fliers to understand what is and what is not exempt. | <ul style="list-style-type: none"> The lack of reported accidents for excluded UAS suggest that the current measures are already effective. |
| 5. Change transitional arrangements | <ul style="list-style-type: none"> UAS that were safe before class-marking will continue to be safe. There will be a negative impact for operators who bought UAS and can no longer use them. | <ul style="list-style-type: none"> Changing the requirements introduces uncertainty. Accelerating the transition to class-marked UAS will help mitigate risks in the future. |
| 8. Implement manufacturer standards | <ul style="list-style-type: none"> Class marking will promote safety and security of UAS. The UK should remain consistent with the EU and other internationally recognised frameworks to avoid barriers for import and export. Alignment with international frameworks is recommended to avoid confusion for users. | <ul style="list-style-type: none"> Class-marking standards, the introduction of a market surveillance authority and conformity assessment bodies are expensive, which will transfer costs to the end user. |
| 9. Implement product labelling scheme | <ul style="list-style-type: none"> Implementing a product labelling scheme will make it easier for users to navigate regulations, and enables safer drone usage. Labelling makes it easier for law enforcement to identify misuse. | <ul style="list-style-type: none"> Implementing a UK-centric product labelling scheme creates misalignment with other international frameworks. An additional labelling scheme to C-marking would be duplicative and confusing for users. |

| Opportunity | 'Yes' Rationale | 'No' Rationale |
|---|---|---|
| 10. Simplify product exclusions | <ul style="list-style-type: none"> The update to product exclusions should focus on simplicity, which could involve reducing the number of exemptions. This will ensure harmonisation with the EU framework. | <ul style="list-style-type: none"> The current exemptions for drones below 250g are well understood and do not need to be updated. |
| 11. Implement Remote ID | <ul style="list-style-type: none"> Remote ID should be implemented for security purposes to protect against unlawful operators and to protect the safety of the airspace. | <ul style="list-style-type: none"> The CAA will not achieve the security benefits of identifying illegal operators, as criminals will circumvent Remote ID. Remote ID creates data privacy risks. |
| 12. Implement geo-awareness | <ul style="list-style-type: none"> Geo-awareness should be part of a wider strategy for airspace management and should include management of permissions for specific operations. | <ul style="list-style-type: none"> Model aircraft are manually piloted without automatic features, meaning geo-awareness may not work technically. Geo-awareness/-fencing is disproportionate for some/all types of drone. Manufacturers should not be responsible for preventing users entering restricted airspace. |
| 13. Improve user guidance | <ul style="list-style-type: none"> User guidance will create safety benefits for users by helping them to comply with the regulations. User guidance will be especially useful for first time operators. | <ul style="list-style-type: none"> User guidance is unnecessary as the pilot goes through training when registering. User guidance alerts will create distractions that reduces flight safety. It is the responsibility of the user to be competent before flying, not the manufacturer. |
| 14. Introduce user validation requirements | <ul style="list-style-type: none"> Flight restrictions should be implemented until a user's Flyer/Operator ID has been validated to ensure only safe operators are in the sky. Validating users will help to increase awareness of the regulations and to ensure operators are responsible. | <ul style="list-style-type: none"> It is the responsibility of the operator to register and comply with the law, not the manufacturer. User validation will add an additional layer of complexity, which could create operational issues. |
| 15. Simplify policy and guidance document structure | <ul style="list-style-type: none"> To a new user, the technical language in the current supplementary guidance does not help to increase their understanding. The language needs to be simple and effective. | <ul style="list-style-type: none"> The current policy documentation is usable, clear, and concise. Changing regulations from the rest of the EU creates confusion for both users and law enforcement. |

Table 3: Qualitative summary of the Review of UK UAS Regulations Call for Input responses