

# Review of UK Unmanned Aircraft Systems (UAS) Regulations: Consultation Reply Document

CAP 3105

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# Contents

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Contents.....	3
Executive Summary.....	4
Chapter 1: Introduction.....	7
Chapter 2: Simplifying Regulation.....	9
Chapter 3: Increasing Education and Understanding .....	12
Chapter 4: Product Safety and Security.....	15
Chapter 5: Safe and Secure Airspace .....	18
Chapter 6: Supporting the UAS Sector.....	23
Chapter 7: Next steps .....	27
Demographic Characteristics.....	28
Quantitative Breakdown of Consultation Responses .....	30

## Executive Summary

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In 2023, the Department for Transport (DfT) sponsored the Civil Aviation Authority (CAA) to review the regulation of Unmanned Aircraft Systems (UAS) in the UK. As part of this review, the CAA published the “Review of UK UAS Regulations consultation” (CAP 2610) on 22<sup>nd</sup> November 2023. This consultation set out proposals to simplify regulation, deliver greater education for UAS users, improve safety and security, and support the UAS sector transition to new regulations.

The consultation received 3,499 responses from individuals and organisations across the UAS sector. The CAA read, reviewed and engaged with all responses. We reconsidered each of our proposals, in collaboration with the DfT, Home Office and police. This document sets out the CAA’s final policy recommendations, as part of the review.

Our policy recommendations aim to foster growth within the UAS sector by simplifying the regulatory framework and enabling new and innovative use cases through the implementation of UK class marking. The proposed regulatory changes are designed to provide industry and operators with a smooth transition to the new framework, minimising disruption while ensuring that safety and security benefits are realised without delay. We are committed to reducing unnecessary red tape, and are therefore proposing to enable operators who have already invested in the UAS sector to continue using their existing devices in most cases. Our approach aims to create a world-leading regulatory environment for UAS that balances safety and security needs with supporting the sector to flourish.

Our first set of recommendations focuses on simplifying regulation for users. We propose to:

- Amend regulation to allow C1/UK1 class-marked UAS to overfly uninvolved people, harmonising the operational requirements in the A1 sub-category for different types of UAS.
- Amend regulation to allow C0/UK0 and C1/UK1 UAS to fly in the A3 sub-category, to make it easier for users to understand what class of UAS can be used in each sub-category.
- Amend regulation to clarify that UAS operating in the A3 sub-category must fly a minimum of 50m horizontally from uninvolved people, to ensure the safety of uninvolved people.
- Amend regulation to require UAS operating in the A3 sub-category to fly a minimum of 50m horizontally from individual buildings, to ensure regulations are clear and proportionate for UAS operations away from congested areas but near buildings.
- Amend regulation to rename the operational sub-categories to ‘Over people (A1)’, ‘Near people (A2)’, and ‘Far from people (A3)’, so that sub-category names are more intuitive and descriptive for UAS users.
- Amend regulation to replace the current exclusions from registration and pilot competency requirements for ‘toy’ UAS operations, with an exclusion for UAS weighing less than 100g, making the criteria for these exclusions more objective and easier to understand.

Our second set of recommendations focuses on improving the knowledge of UAS regulations. We propose to:

- Amend regulation to require remote pilots of UAS weighing 100g or more to take the online, free Flyer ID test for UAS operations in the 'Open' Category, to ensure pilots of light-weight UAS have a foundational understanding of UAS regulations to improve the level of safety for all UAS users.
- Develop and publish updated, user-friendly guidance material, making it easier for users to understand how to comply with the regulations.

Our third set of recommendations focuses on ensuring that UAS have an effective minimum level of safety, security and performance. We propose to:

- Implement UAS product requirements for UAS intended to be used in the Open Category from 1<sup>st</sup> January 2026, such that UAS placed on the market are safe and secure by design, to minimise the likelihood and impact of UAS causing harm.
- Amend regulation to use UK-specific class-identification labels on class-marked UAS, replacing the C0 label with UK0 and so forth, to differentiate between compliance in the UK and EU.
- Formally appoint the CAA as the Market Surveillance Authority for UAS under statute, to oversee product requirements in the UK.

Our fourth set of recommendations focuses on mitigating the likelihood of UAS posing safety and security issues to ensure a safe and secure airspace. We propose to:

- Implement Direct Remote ID product and operational requirements from 1<sup>st</sup> January 2026. These requirements will come into force for UK1, UK2, UK3, UK5 and UK6 UAS, unless exempted under a Specific Category Operational Authorisation (OA).
- Amend the regulation to extend the implementation of Direct Remote ID product and operational requirements from 1<sup>st</sup> January 2028. The further requirements will come into force for:
  - UK0 UAS weighing 100g or more with a camera;
  - Model Aircraft (e.g. UK4 UAS) unless exempted;
  - Privately built UAS weighing 100g or more with a camera;
  - Legacy UAS (i.e. those not within the scope of UK class marking) weighing 100g or more with a camera.
- Implement geo-awareness for UK1, UK2 and UK3 UAS from 1<sup>st</sup> January 2026. From 1<sup>st</sup> January 2028, geo-awareness will also be required for UK0 UAS with cameras weighing 100g or more. This will help prevent UAS entering restricted airspace without appropriate permission. 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.
- Continue to work with government, industry and operators to progress towards geo-fencing and a full Hybrid Remote ID solution (i.e. Network and Direct Remote ID) over a longer time period. This will support the enforcement of UAS regulations, deter unlawful operations, and will have a low impact to lawful UAS operators. This phased approach provides the time needed to implement geo-fencing and Hybrid Remote ID effectively.
- Amend regulation to require nighttime UAS operations to have an active flashing light, ensuring these UAS are visible in the dark.

Type of UAS	Up to 31 <sup>st</sup> December 2027		1 <sup>st</sup> January 2028 onwards	
	Direct Remote ID	Geo-awareness	Direct Remote ID	Geo-awareness
UK0 99g or less with or without a camera	✗	✗	✗	✗
UK0 100g or more without a camera	✗	✗	✗	✗
UK0 100g or more with a camera	✗	✗	✓	✓
UK1	✓	✓	✓	✓
UK2	✓	✓	✓	✓
UK3	✓	✓	✓	✓
UK5	✓	✓ <sup>a</sup>	✓	✓ <sup>a</sup>
UK6	✓	✓ <sup>a</sup>	✓	✓ <sup>a</sup>
Model Aircraft (e.g. UK4)	✗	✗	✓ <sup>b</sup>	✗
Privately built UAS	✗	✗	✓ <sup>c</sup>	✗
Legacy UAS (i.e. non-class marked)	✗	✗	✓ <sup>c</sup>	✗

**a** = Geo-awareness functionality is optional

**b** = Exemption applies if remote pilot has an active membership with an Article 16 authorised model aircraft flying club; UAS meets defined criteria for model aircraft; flight takes place within model aircraft flying site

**c** = Operator will be required to install a Direct Remote ID add-on module if the device does not have existing Direct Remote ID functionality

The information in the table above is outlined on the previous page.

Our final set of recommendations focuses on broader support for the sector. We propose to:

- Amend regulation to allow most UAS users to continue operating their existing UAS in the same operational sub-categories as today, in most cases. Our approach will deliver further simplification of requirements, whilst ensuring UAS users are not exposed to additional costs or inconvenience.
- Amend regulation to allow EU class-marked UAS to operate in the Open Category, in the same sub-categories as their UK equivalents, prior to 1<sup>st</sup> January 2028. This aims to support UAS users conduct operations in the Open Category before UK class-marked UAS become widely available.
- Introduce more flexible conformity assessment requirements for manufacturers, enabling self-declaration in a wider range of scenarios.

Collectively, these proposals will 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 new regulations. If the DfT chooses to take forward our proposals, changes to the relevant regulations will be progressed through a statutory instrument. The timetable for this statutory instrument will be determined by the DfT. The CAA will work closely with the DfT to communicate this timetable to the UAS sector at the earliest opportunity.

## Chapter 1

# Introduction

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## Context

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- 1.1 The Department for Transport (DfT) has sponsored the CAA to review regulation for Unmanned Aircraft Systems (UAS) in the UK. As part of this review, the CAA published the Review of UK UAS Regulations consultation (CAP 2610)<sup>1</sup> on 22<sup>nd</sup> November 2023 setting out a range of proposals to improve the regulation of UAS. This consultation explained the benefits UAS can provide to society, whilst also highlighting the challenges with current regulations and the risks posed by UAS. It included a wide range of proposals that aimed to simplify regulation, increase understanding of regulations, mitigate safety and security risks, and support the UAS sector.
- 1.2 These 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.
- 1.3 The consultation closed on 10<sup>th</sup> January 2024 and received 3,477 responses via the online feedback form and 22 responses via email from across the UAS sector, including recreational and commercial UAS operators, UAS manufacturers, and UAS service providers, amongst others. Model aircraft flyers provided 2,681 responses (77.1%) through the online form. Organisations provided 182 responses (5.2%).

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<sup>1</sup> [CAP 2610 \(caa.co.uk\)](https://www.caa.co.uk/cap2610)

- 1.4 The CAA has read, reviewed and engaged with all responses provided. We have also collaborated with the DfT, Home Office and police since publication and considered other analysis and evidence available to the CAA, such as the Drone Awareness Tracker<sup>2</sup>.
- 1.5 The process of finalising the consultation reply has incorporated the latest policy direction from government Ministers and aims to support their current objectives whilst prioritising the continued safety and security of UK airspace. This process has taken longer than expected due to emerging new evidence and the desire for alignment across government, ensuring that the views of a new government following the general election of summer 2024 could be taken into account. Our final recommendations are set out in this document.

## Document Summary

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- 1.6 This consultation reply takes the following structure:
  - Chapter 1 sets out the context of the CAA's review of UK UAS regulation, the structure of this document and a summary of next steps.
  - Chapters 2 to 6 consider each strategic objective in turn and set out our final proposed changes to UAS regulations. Each proposal includes a summary of relevant feedback provided to the consultation and the rationale for our final proposals.
  - Chapter 7 restates a summary of next steps.
- 1.7 In addition, the Appendices to this document provide a quantitative analysis of respondent demographics and question responses.

## Next Steps

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- 1.8 Following the publication of this document, we will publish our formal opinion submitted to the DfT. The DfT will in turn consider whether to implement our proposed changes.
- 1.9 If the DfT chooses to take forward our proposals, changes to the relevant regulations will be progressed through a statutory instrument. The timetable for this statutory instrument will be determined by the DfT. The CAA will work with the DfT to communicate this timetable to the UAS sector at the earliest opportunity.
- 1.10 In addition, we will continue to work closely with the police, Home Office and the DfT to ensure any changes are implemented effectively across the public sector.

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<sup>2</sup> [PowerPoint Presentation \(caa.co.uk\)](https://caa.co.uk)



## Chapter 2

## Simplifying Regulation

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### Operational Requirements

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- 2.1 Operational requirements are currently structured through a system of categories (i.e. Open, Specific and Certified) and sub-categories (i.e. A1, A2 and A3), reflecting the characteristics of the operation. The consultation included four proposals to simplify operational requirements in the Open Category.
- 2.2 Our first proposal was to allow C1/UK1 UAS to overfly uninvolved people, aiming to harmonise the requirements for flying over uninvolved persons in the A1 sub-category for C0/UK0 and C1/UK1 UAS. Of all respondents who provided a view, 88.1% agreed with the proposal, due to the additional use-cases this change would enable. Only 6.3% of respondents were against this proposal, due to safety concerns from allowing heavier C1/UK1 UAS to overfly uninvolved people. Our analysis has determined that this safety risk is tolerable, due to the higher standard of safety and performance product requirements for C1/UK1 UAS, and other operational safety requirements in the A1 sub-category. We will therefore take forward the proposal to allow C1/UK1 UAS to overfly uninvolved people.
- 2.3 In addition, the consultation proposed to explicitly allow C0/UK0 and C1/UK1 UAS to fly in the A3 sub-category, to help users understand which UAS can be used in operational sub-categories. Overall, 87.3% of respondents supported this proposal, agreeing that this would simplify the regulations. We will take forward the proposal to explicitly allow C0/UK0 and C1/UK1 UAS to fly in the A3 sub-category.
- 2.4 We also proposed to introduce a regulatory requirement in the A3 sub-category for UAS to fly a minimum of 50m from uninvolved persons, to clarify the legislative requirement which underpins existing Acceptable Means of Compliance and Guidance Material. In total, 67.4% of respondents favoured this proposal, as it would make regulations easier to understand and enforce. Several respondents requested further clarification on whether the proposed minimum distance was horizontal, or horizontal and vertical (a 'bubble'). Based on this, we therefore propose to introduce a regulatory requirement in the A3 sub-category for UAS to fly a minimum *horizontal* distance of 50m from uninvolved persons.
- 2.5 Our final proposal in this section was to require UAS flights in the A3 sub-category to be at least 150m away from residential, commercial, industrial, recreational areas *and buildings*. Including buildings in this requirement aimed to avoid confusion for users in interpreting current regulation. This proposal received opposition from 78.8% of respondents and support from 15.4% of individuals. The most common reason against this proposal was that it is disproportionate to require a greater minimum distance to fly from buildings than from uninvolved persons. Based on this, we therefore propose to introduce a regulatory requirement in the A3 sub-category for

UAS to fly a minimum horizontal distance of 50m from individual buildings. This will ensure regulations are clear and proportionate for UAS operations away from congested areas. If this proposal is accepted by DfT, we will also clarify relevant AMC, including to set out that we do not consider an individual building separated from another building by more than 50m to be an 'area'.

## Operational Category Names

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- 2.6 The consultation considered whether to re-name operational categories and sub-categories, to make them more intuitive for UAS users. It recommended to maintain the existing names for the Open, Specific and Certified operational categories, as they are well-embedded in the sector. Of those who provided a response, 87.4% of respondents were in favour of the proposal to maintain the existing operational category names, as they are intuitive and align with EU legislation. We therefore propose to maintain the Open, Specific, and Certified category names.
- 2.7 We also proposed to rename sub-categories from A1, A2, and A3, to 'Over', 'Near' and 'Far', to reflect the key operational differences between each sub-category. Excluding those who did not provide a view, 86% of respondents agreed with this proposal and our rationale. Of the 5.7% of respondents who disagreed with the proposal, some argued that the revised names could be misinterpreted. For example, 'Far' could be misinterpreted as allowing Beyond-Visual-Line-of-Sight (BVLOS) operations 'far' from the remote pilot. Based on this, we are therefore proposing to rename the operational sub-categories to 'Over people (A1)', 'Near people (A2)', and 'Far from people (A3)'. This change will help users understand UAS regulations, resulting in increased compliance. Retaining the previous names in parentheses will help to avoid confusion for those accustomed to the existing names.

## Operational Exclusions

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- 2.8 In the consultation, we proposed to replace exclusions from registration and pilot competency requirements for 'toy' UAS operations, instead, using weight to decide whether they are required. This aimed to address issues caused by the ambiguity of the definition of 'toy' UAS that can make it hard for a UAS user to know what requirements apply to them.
- 2.9 Responses to the question were 20.0% positive and 74.9% negative. The negative responses challenged the proportionality of the proposal and raised concerns regarding the impact on some UAS users. Whilst we agree that it is disproportionate to apply registration and pilot competency requirements for the lowest risk UAS operations, we also maintain the view that the current criteria for 'toy' UAS is confusing for users and enforcement bodies. We believe a weight-based criteria would simplify regulation for users and avoid increasing the regulatory burden for users of UAS that are genuinely 'toys'.

- 2.10 We therefore propose to replace exclusions from registration and pilot competency requirements for ‘toy’ UAS operations with a weight threshold of 100g. This means that all UAS weighing less than 100g would be excluded from Operator ID and Flyer ID requirements. In addition, we will maintain exclusions for indoor UAS operations. Collectively, these proposals will simplify the regulatory framework for lightweight UAS, whilst ensuring proportionality for the lowest risk UAS (with or without cameras). More detail on these proposals is provided in Chapter 3.

## Chapter 3

## Increasing Education and Understanding

### Flyer Education

- 3.1 At present, remote pilots flying a UAS weighing 250g or more must obtain a Flyer ID and take a free online theory test. This test ensures that UAS flyers have a foundational understanding of UAS regulations. The consultation proposed to extend this 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.
- 3.2 Of those who provided a view, 70.1% of respondents disagreed with our proposal to extend the scope of the Flyer ID test, and 78.9% disagreed with the idea of a new weight threshold. Most of these respondents argued that this proposal would be disproportionate, given the low risk of lightweight UAS. Support varied significantly between model aircraft flyers (13.8% supportive) and all other respondents (46.4%)<sup>3</sup>.
- 3.3 We maintain the view that greater education would improve the safety, security and compliance of UAS operations. Whilst the 250g threshold may have been appropriate in the past, there are now many highly capable UAS weighing below 250g available on the market that can pose a safety and security risk.
- 3.4 Evidence confirms that more could be done to improve flyer understanding – for example, only 21% of drone users were aware of the 400ft height restriction, without being prompted.<sup>4</sup> Requiring compliance with Flyer ID requirements is proportionate, as the test is free, accessible and quick to complete. However, we recognise that UAS weighing less than 100g pose limited safety and security risks.
- 3.5 For these reasons, we propose to require remote pilots of UAS weighing 100g or more to obtain a Flyer ID for UAS operations in the Open Category. As is the case today, indoor UAS operations will be out of scope of the regulatory requirement. The combined impact of our proposed changes to registration and pilot competency requirements is set out in the tables below.

Flying weight	ID needed	
	Flyer ID	Operator ID
Below 250g – toy	No	No
Below 250g – not a toy – no camera	No	No
Below 250g – not a toy – with camera	No	Yes
250g and above	Yes	Yes

Table 1: Current Operator ID and Flyer ID requirements

<sup>3</sup> Average support across the proposals to extend Flyer ID and introduce a minimum weight threshold.

<sup>4</sup> [PowerPoint Presentation](#)

Flying weight	ID needed	
	Flyer ID	Operator ID
Below 100g	No	No
Between 100g and 249g – no camera	Yes	No
Between 100g and 249g – with camera	Yes	Yes
250g and above	Yes	Yes

Table 2: Proposed Operator ID and Flyer ID requirements

- 3.6 The timelines for these requirements will be dependent on the DfT, who will need to lay a statutory instrument with these regulatory changes. We will recommend these requirements come in to force 3 months after the statutory instrument is laid in Parliament, allowing UAS users appropriate time to complete the Flyer ID test. Further communication will be issued to UAS operators in due course.

## Product Guidance

- 3.7 In the consultation, we proposed to require C0, C1, C2 and C3 UAS to display a summary of regulatory information on the UAS user interface or controller app during product set-up, where this is possible. This aimed to improve how essential safety and security information is communicated to users, and to improve understanding of regulation.
- 3.8 Of those who provided a view, 23.0% were in favour of the proposal, and 71.5% were against it. Levels of support varied between model aircraft flyers and all other respondents, with 15.0% and 49.8% supporting the proposal respectively. Many model aircraft flyers were concerned that it would be infeasible to impose this requirement on model aircraft, as they do not have a digital user interface. Other respondents also raised concerns regarding the impact of diverging from EU class marking requirements. Those in support of the proposal commented that the digital information notice would provide a more effective and accessible solution to help users understand how to fly UAS safely.
- 3.9 Based on the evidence analysed, we have decided not to take forward the proposal to require UAS to display a summary of key regulatory information on the UAS user interface during product set-up. This will ensure continued alignment with the EU on product requirements. However, we would recommend that manufacturers explore the possibility of including this functionality as an optional requirement alongside any additional features which can promote the accessibility of critical information.

## Policy and Guidance Documentation

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- 3.10 We proposed to introduce new user-friendly guidance and phase out the CAP 722 series, to make it easier for users to understand how to comply with the regulations. Feedback to the consultation strongly supported the proposal, with 89.6% providing positive responses and 4.1% submitting negative responses. Respondents in favour of the proposal stated that the CAP 722 series is difficult to understand and navigate, and recognised the benefits of clear, concise, and consolidated documentation.
- 3.11 We are already taking forward the proposal to introduce updated user-friendly guidance on the CAA website, aiming to eventually phase out the CAP 722 series. Introducing guidance that uses non-technical language and is easy to navigate should increase the understanding of the regulations. We will ensure the new material covers requirements in regulation, AMC/GM and guidance from the current CAP 722 suite of documents.

## Chapter 4

## Product Safety and Security

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### Class Marking and Product Standards

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- 4.1 Product requirements ensure that UAS meet a minimum level of safety, security and performance. We proposed to require UAS manufacturers (and other economic operators) to comply with product requirements from 1<sup>st</sup> January 2026, for UAS intended to be used in the Open Category. This would be implemented through a framework of class marking, whereby different categories of UAS would need to comply with different sets of requirements, using product standards.
- 4.2 Respondents largely supported the proposal to implement class marking and product standards, with 86.3% in favour and 6.9% against the proposal. Those who supported the proposal highlighted that product standards would ensure UAS benefits from safety features built into the devices, such as geo-awareness and flashing lights.
- 4.3 We will therefore progress the proposal to implement class marking and product standards for UAS intended to be used in the Open Category from 1<sup>st</sup> January 2026.
- 4.4 We also sought feedback on the extent to which the UK should align to the EU regulatory framework for product requirements. Of those who provided a view, 55.6% believed the UK should fully align to the EU regulatory framework, due to the economic, price and consumer choice benefits from alignment. In total, 37.5% responded that the UK should align to EU regulations, unless there is a safety, security, or user benefit that requires divergence. Many of these responses suggested the UK should seek to benefit from harmonisation unless it is not in the UK's interests. Only 6.9% of respondents believed we should not align with the EU regulatory framework at all. These respondents generally argued that this would enable the UK to tailor its regulations to support domestic priorities.
- 4.5 We recognise the benefits of harmonisation with international regulations and standards. However, we also maintain that it would not be in the UK's interests to align to EU regulation in every scenario. We therefore propose to align to EU regulations for class marking and product standards, unless there is a safety, security or user benefit that requires divergence.
- 4.6 In this section of the consultation, we also proposed several small changes to product requirements for tethered UAS, C0 UAS with cameras, C5 and C6 UAS. Overall, 76.0% of respondents were against these proposals. Many raised concerns that these divergences would produce little benefit but cause unintended consequences, such as increased costs or reduced consumer choice. Based on the evidence analysed, we propose to:
- Maintain the existing regulatory approach for tethered UAS, to maintain greater

alignment to EU requirements. Specifically, we will no longer take forward the initial proposal to align requirements across UK1, UK2 and UK3 UAS to exempt tethered UAS from command-and-control link protection and link recovery requirements. In addition, we are proposing to maintain the exemption of tethered UAS from Remote ID requirements.

- Require UK0 UAS with cameras weighing 100g or more to have a unique serial number, to enable the implementation of Remote ID for these UAS. UK4 UAS will not be required to have a unique serial number.
- Maintain the existing regulatory approach for C5/UK5 and C6/UK6 UAS intended for use in the Specific Category, given there may be use cases for these class-marked UAS in the future.

4.7 The consultation also described how the Secretary of State will need to designate the technical standards that will allow manufacturers to demonstrate conformity in relation to class marking. Collaboration is ongoing between the CAA, the British Standards Institute (BSI) and the DfT to identify and develop these standards against the regulatory requirements, alongside the optimal approach to deliver this framework. This includes the potential use of AMC and GM as a means of publishing the relevant standards. Further detail will be published by the CAA in due course.

## Product Labelling and Identification

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- 4.8 The current regulation sets out that UAS compliant with product requirements should be affixed with a 'class identification label' (e.g. C0, C1). As these regulations are based on EU law, the labels are currently the same in the UK and EU. In the consultation, we proposed to replace these class identification labels for UAS with a UK-specific identification label. This recognised that UK and EU UAS product regulation may not align fully over time, and that a practical solution would be needed to physically differentiate between UAS compliant under UK and EU jurisdictions. We suggested that replacing the letter 'C' with 'UK' (i.e. C1 with UK1) provides the simplest solution, whilst still allowing broad alignment in the approach to class marking and technical standards<sup>5</sup>.
- 4.9 Feedback to this proposal was largely unsupportive, with 76.4% of respondents providing a negative view. Some respondents argued that creating a new UK-specific class identification label would increase costs for manufacturers selling their products in international markets. Furthermore, some highlighted that this requirement could create difficulties for operators using their devices abroad if other countries do not accept UK class-marked UAS. However, 16.2% of respondents agreed with the proposal, recognising that UK-specific class identification labels would future-proof against UK and EU regulations diverging over time.

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<sup>5</sup> This notation has been reflected in the previous chapters of this document (e.g. C0/UK0).



- 4.10 Our view is that maintaining the same class identification labels as the EU is not a viable solution to identifying products compliant under the UK jurisdiction. Using the same label as the EU would create confusion for users and enforcement bodies to understand whether their device is compliant with UK regulations, as we expect there to be some deviations from the EU requirements. We shall therefore progress with the proposal to use UK-specific class identification labels on class-marked UAS, to differentiate between UAS compliant under UK regulations.

## Market Surveillance

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- 4.11 In the consultation, the Market Surveillance Authority (MSA) was described as the function responsible for overseeing compliance with product requirements within the class marking framework and acting when there is non-compliance. Overall, 80.4% of respondents were in favour of implementing the MSA function. Several respondents commented that the MSA would increase safety by ensuring UAS models are compliant with class marking. However, 9.6% of responses were negative, due to the cost and complexity of operating the MSA.
- 4.12 Since the publication of the consultation, the DfT have announced that the CAA will be appointed as the MSA for UAS. In this role, the CAA will provide oversight of UAS product regulations in the Open Category and promote safety, security and consumer protection<sup>6</sup>.
- 4.13 We will progress with proposals for the CAA carrying out the MSA function to approve and manage the organisations responsible for providing conformity assessment against product standards ('Conformity Assessment Bodies') and to ensure the CAA has the data it needs from manufacturers to deliver its role effectively.

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<sup>6</sup> [UK Civil Aviation Authority appointed to oversee safety standards for drones | UK Civil Aviation Authority](#)

## Chapter 5

## Safe and Secure Airspace

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### Remote ID

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- 5.1. Remote ID is the ability of a UAS to communicate identification and location information during flight. Remote ID will make it possible to differentiate between legitimate UAS operators and those misusing UAS, enabling more effective enforcement and deterrence. The consultation set out the CAA, Home Office, the DfT and police's views of why Remote ID will be important in mitigating security risks from UAS.
- 5.2. The consultation proposed Hybrid Remote ID as the favoured technical approach to implementing Remote ID – i.e. Network Remote ID as the default approach, with Direct Remote ID providing a back-up in areas of poor connectivity, technically enforced on the device. Respondents were largely unsupportive of the proposed technical approach to implementing Remote ID, with 85.9% disagreeing. Most respondents viewed the proposal as disproportionate due to the potential costs of the solution. Respondents also questioned the benefits of Remote ID in mitigating security risks and questioned the scale and severity of the security risk posed by UAS.
- 5.3. The consultation also set out how Remote ID could be achieved from a policy perspective. This included implementing product requirements for UAS manufacturers, and operational requirements for UAS operators and remote pilots to have active Remote ID. Responses were more balanced, with 33.7% providing positive responses and 46.1% submitting negative responses. Some respondents highlighted the importance of clear data access controls for data available to enforcement bodies (such as the police) and the public. However, other respondents pointed to potential data privacy and protection risks in the proposals.
- 5.4. Finally, the consultation also set out the proposed scope of Remote ID requirements. This included proposals to require C1-C3 UAS and C0 UAS with cameras to be manufactured with Remote ID, to require legacy UAS to be operated with Remote ID from 2028 onwards, and to exempt model aircraft operations if certain criteria were met. The proposed scope of Remote ID requirements received higher levels of support, with 52.5% in favour. There was conditional support for the approach to exemptions for model aircraft, and respondents viewed the implementation timelines as sensible. However, 35.3% of responses were negative, highlighting that it would be challenging to retrofit legacy devices with Remote ID add-on modules.
- 5.5. Following the consultation being published, the CAA, the DfT, Home Office and police maintain the view that the ability to identify UAS operators will be essential to enforcing UAS regulations and deterring unlawful UAS operations. Remote ID is

considered a proportionate measure, given the scale of potential risk UAS may present, and the low impact of Remote ID to lawful UAS operators.

- 5.6. We have considered different technical solutions to implement Remote ID in detail – including Direct only and Network only. Direct Remote ID by itself is not considered the optimal enduring solution in the long term as the functionality provides effective identification only within a relatively close range to the UAS. Network Remote ID by itself is also not considered to be suitable, due to challenges using Network Remote ID in areas with low connectivity, or when the network is not available. We therefore maintain the view that Hybrid Remote ID (i.e. Direct and Network Remote ID) is the optimal enduring solution for the UK in the long term.
- 5.7. However, implementing an end-to-end Hybrid Remote ID solution is likely to take some time. Consequently, we propose to progress with Direct Remote ID as an interim solution, whilst the Hybrid Remote ID solution is further developed. We will continue to work with government, industry and operators to develop a Hybrid Remote ID solution in parallel. The proposed requirements for the Direct Remote ID interim solution have been developed in partnership across government.
- 5.8. Product requirements: We propose to require UK0 weighing 100g or more with a camera, UK1, UK2, UK3, UK5 and UK6 class-marked UAS to have Direct Remote ID functionality when placed on the UK market. In practice, this widens the scope of retained EU regulation to also include UAS weighing 100g to 249g with a camera. The approach aims to mitigate the risks associated with these platforms that have significantly higher capability than when class marking regulation was initially defined, whilst ensuring the lowest risk UAS remain excluded.
- 5.9. Direct Remote ID functionality must be active and up to date, prior to the take-off of a class-marked UAS, unless otherwise exempt. This will mitigate against the risk of a remote pilot intentionally deactivating Remote ID functionality to undermine the benefits of Remote ID.
- 5.10. Operational requirements: We propose to require operations with UK0 weighing 100g or more with a camera, UK1, UK2, UK3, UK5 and UK6 UAS to have active and up to date Direct Remote ID functionality. In the Specific Category, we expect operators to have active and up to date Remote ID functionality, unless exempted under an Operational Authorisation (OA). Our policy intent is for Remote ID to be the default requirement for all UAS operating in UK airspace, unless there are clear grounds for an exemption that can be easily enforced. This will include legacy UAS (i.e. not UK class-marked) and privately built UAS.
- 5.11. Model Aircraft: We propose to exempt model aircraft (e.g. UK4 UAS) from Remote ID requirements in certain circumstances, recognising the safety record of the model aircraft community. We will grant exemptions where all 3 of the following criteria are met:

- The remote pilot has an active membership of an Article 16 authorised model aircraft flying club and is operating within the rules set out in that regulation;
- The UAS meets defined criteria for a low-risk Model Aircraft – i.e. excluding commercial UAS or highly sophisticated Model Aircraft platforms; and
- The flight takes place within the bounds of a model aircraft flying site, declared by a model aircraft club in their Article 16 Authorisation.

We will work with the model aircraft community over the coming months to finalise these exemptions.

- 5.12. Timelines for implementation: We propose a phased approach to implementing Remote ID requirements for different UAS, to ensure that users have adequate time to adjust to these changes. The proposed timelines for the implementation of Direct Remote ID requirements are outlined below:
- From 1<sup>st</sup> January 2026, Direct Remote ID requirements will come into force for UK1, UK2, UK3, UK5 and UK6 UAS, unless exempted under a Specific Category OA.
  - From 1<sup>st</sup> January 2028, Direct Remote ID requirements will come into force for UK0 UAS weighing 100g or more with a camera, model aircraft (e.g. UK4 UAS) unless exempted through the conditions outlined in 5.11, privately built UAS weighing 100g or more with a camera, and legacy UAS (i.e. those not within the scope of UK class marking) weighing 100g or more with a camera.
- 5.13. Remote ID add-on modules: If in-scope privately built and legacy UAS do not have existing Direct Remote ID functionality, the operator will be required to install a Direct Remote ID add-on module on the device. We propose to include the weight of the Remote ID add-on module in the weight categorisation of these UAS, ensuring that the safety of the operation is not impacted by the add-on module. This approach ensures the requirement is implemented consistently across UK airspace.
- 5.14. Offences: To ensure compliance, it is necessary for the police to have the ability to enforce against operators who do not comply with these Remote ID requirements, or who attempt to tamper with or spoof a Remote ID transmission. Therefore, new offences may be created for non-compliance with these Remote ID requirements. The specific detail relating to these will be shared in due course.
- 5.15. Hybrid Remote ID: The long-term objective of the CAA, the DfT and our security stakeholders remains to progress towards Hybrid Remote ID (i.e. Network and Direct Remote ID). We will continue to work with government, industry and operators to develop a full Hybrid Remote ID solution over a longer time period. This will support the enforcement of UAS regulations, deter unlawful operations, and will have a low impact to lawful UAS operators. This phased approach provides the time needed to progress towards Hybrid Remote ID effectively.

## Geo-awareness and Geo-fencing

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- 5.16. In the consultation, we proposed geo-awareness and geo-fencing as technical mitigations to help prevent UAS entering restricted airspace. Of respondents who provided a view, 57.5% were in favour of the proposal to implement geo-awareness and 56.4% supported the implementation of geo-fencing. Many commentators agreed that geo-awareness and geo-fencing would be essential to ensure airspace safety, helping to prevent unauthorised access to restricted airspace.
- 5.17. However, 32.4% and 33.9% of respondents were against the proposals to implement geo-awareness and geo-fencing respectively. Some of these respondents suggested that implementing geo-awareness and geo-fencing would be impractical, as the maps would require frequent maintenance to remain up to date. In addition, some respondents highlighted that geo-fencing is not mandatory under EU regulations, and that diverging from the EU could create barriers for manufacturers placing products on the UK market.
- 5.18. Overall, we consider that geo-awareness and geo-fencing will both be critical in enabling UAS to operate safely and securely in UK airspace in the long-term. Together, we expect these requirements to provide an effective mitigation against the risk of unauthorised operators negligently or deliberately infringing airspace restrictions. However, our approach to implementing geo-fencing is still evolving as the technology matures. We are therefore proposing to implement geo-awareness before geo-fencing.
- 5.19. From 1<sup>st</sup> January 2026, we are proposing to implement geo-awareness only for UK1, UK2 and UK3 UAS, through product and operational requirements. From 1<sup>st</sup> January 2028, geo-awareness will also be required for UK0 UAS with cameras weighing 100g or more. 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.
- 5.20. The long-term aim remains to progress towards geo-fencing as an additional requirement to geo-awareness. Our view is that there are potential national security benefits associated with geo-fencing, especially in preventing unlawful UAS operations and enabling UAS regulations to be enforced. We will continue to work with government, industry and operators to consider a geo-fencing solution over a longer time period.
- 5.21. To support the implementation of geo-awareness, in-scope operators and remote pilots must be aware of the relevant airspace restrictions that could impact their operations. Therefore, we are proposing to amend product regulations to ensure UAS have the technical functionality needed to input data for any updated airspace restrictions. This will expand the scope of current regulations, which only reference airspace restrictions made under Article 15 of UK Regulation (EU) 2019/947.

- 5.22. The CAA, the DfT and our security stakeholders believe that the safety and security benefits from Hybrid Remote ID (i.e. Network and Direct Remote ID), geo-awareness and geo-fencing would be maximised if all technologies operate together effectively. Therefore, we will continue to explore the potential synergies between Hybrid Remote ID, geo-awareness and geo-fencing as we develop a longer term solution. Work is also ongoing to determine how UAS manufacturers can maintain accuracy of airspace restriction data. Further communications will be made available on this in due course.

## Flashing Light

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- 5.23. In the consultation, we identified safety and security concerns from UAS flying at night without a light. To alleviate this risk, we proposed to require remote pilots to have an active flashing light on their UAS for operations taking place at night. Feedback to this proposal was largely positive, with 87.2% of respondents in favour of a flashing light requirement placed on UAS remote pilots. Respondents agreed that this would increase the safety of the airspace by making UAS more visible to other aircraft and people.
- 5.24. We will take forward the proposal to require UAS remote pilots to have an active flashing light on their UAS for operations taking place at night. This requirement would apply to all UAS, irrespective of weight or class. For UAS without an in-built flashing light, remote pilots would be required to install an add-on flashing light to be permitted to fly at night. We propose to include the weight of the flashing light add-on in the weight categorisation of these UAS, ensuring that the safety of the operation is not impacted by the flashing light add-on.

## Chapter 6

## Supporting the UAS Sector

## Transition Period and Legacy UAS

- 6.1. The current regulations place some additional restrictions on how legacy (i.e. non-class marked) UAS could be used from 1<sup>st</sup> January 2026 onwards. For example, legacy UAS would no longer be able to fly in the A2 sub-category, and legacy UAS weighing between 250g and 499g would no longer be able to fly in the A1 sub-category. In the consultation, we suggested this would create challenges for the UAS sector and proposed to extend the timeline for these additional restrictions to come into force (i.e. the ‘transition period’) to 2 years after the introduction of class marking requirements on UAS manufacturers.
- 6.2. Of respondents who provided a view, 23.3% supported the proposal to extend the timeline for these new restrictions to come into effect. When asked about the length of the extension, 3.3% were in favour of the proposal to extend this timeline by 2 years from 1<sup>st</sup> January 2026 to 1<sup>st</sup> January 2028. A minority (11.0%) argued for a shorter transition period to accelerate the benefits of class-marked UAS. The majority (85.7%) argued for a longer or indefinite extension, to allow legacy UAS to be used for more time under existing restrictions.
- 6.3. We specifically proposed to maintain current regulations that, in effect, prevent legacy UAS operations in the A2 sub-category after the transition period. The feedback to this proposal was largely unsupportive, with 84.1% of respondents providing a negative view. Many commentators argued this restriction would impose a significant cost burden on operators having to replace legacy UAS for operations in the A2 sub-category. Some argued that the additional pilot competency requirements in the A2 sub-category provides sufficient safety mitigation for legacy UAS operations.
- 6.4. After reviewing emerging evidence, we consider that the current transitional regulations should apply indefinitely. Therefore, we are proposing to allow UAS operators and remote pilots to carry on using legacy UAS indefinitely under existing operational requirements, in most cases. This will remove costs to UAS users from the transitional regulations for legacy UAS ending in 2026. It will also make the regulations easier for UAS users to understand, which should, in turn, improve safety. Specifically:
  - (i) Considering the A2 sub-category, we do not believe the benefits outweigh the potential costs of preventing legacy UAS from being flown in the A2 sub-category after the transition period ends. We are now proposing to change regulatory requirements to allow the use of legacy UAS in the A2 sub-category indefinitely. As is the case today, this would only be allowed where the UAS weighs less than 2kg, the UAS is operated a minimum horizontal distance of 50m from people, and the remote pilot holds an A2 Certificate of Competency.



- (ii) Legacy UAS weighing between 250g and 499g can currently be operated in the A1 sub-category up to 1<sup>st</sup> January 2026. Unlike other UAS in this sub-category, remote pilots must have an A2 Certificate of Competency and reasonably expect that no uninvolved person will be overflown during the UAS operation. As is set out in Chapter 2, we are also proposing to harmonise requirements in the A1 sub-category for flying over uninvolved people, to provide a simpler and consistent approach for different types of UAS. However, we are concerned that allowing legacy UAS weighing up to 500g to fly over uninvolved people would deliver an increased safety risk.

We are therefore proposing for UAS operations with legacy UAS weighing between 250g and 499g to only be allowed in the A2 or A3 sub-category. To fly in the A2 sub-category, legacy UAS must be flown a minimum horizontal distance of 50m from uninvolved people. On balance, we consider this to be a minor change in operational privileges that would enable significant simplification of the A1 sub-category, whilst preventing an unacceptable increase in safety risk.

- 6.5. In addition, several consultation responses raised questions regarding the use of EU class-marked UAS in the Open Category. Some respondents argued that UAS class-marked in the EU, but not in the UK, should have similar operational privileges to UK class-marked UAS. This would benefit users who want to do more complex operations in the Open Category, in advance of UK class-marked UAS becoming widely available.
- 6.6. We agree that there are benefits in allowing EU class-marked UAS to operate in the UK, and that the EU class marking framework provides confidence in the safety of these UAS. However, we also consider that allowing EU class-marked UAS to operate in the UK indefinitely could limit the uptake of UK class-marked UAS, undermining our ability to regulate and oversee the UK market. We are therefore proposing for EU class-marked UAS to be able to operate in the Open Category, in the same sub-categories as their UK equivalents. In practice, this would enable C1 UAS weighing up to 900g to operate in the Over People (A1) sub-category, and for C2 UAS weighing up to 4kg to operate in the Near People (A2) sub-category. We propose for these arrangements to expire on 1<sup>st</sup> January 2028, 2 years after the introduction of class marking, when we would expect UK class-marked UAS to be widely available.

## Conformity Assessment

- 6.7. In the consultation, we described options to introduce more flexibility into conformity assessment requirements for C1, C2 and C3 class-marked UAS. The options we considered in the consultation included:
  - (i) Allowing C1, C2 and C3 UAS to meet conformity assessment requirements using internal production control, for a temporary period – subject to the UAS undergoing type examination or full quality assurance in the future.



- (ii) Allowing C1, C2 and C3 UAS to meet conformity assessment requirements using internal production control, for requirements that have undergone type examination by conformity assessment bodies under other jurisdictions.
- 6.8. In response to our question on what changes we should make to the approach to conformity assessment of class-marked UAS, 40.3% of respondents answered, 'I do not know'. These respondents mentioned that as they only operated UAS, they did not have a view on the conformity assessment requirements facing manufacturers.
- 6.9. Of respondents who provided a view, 19.5% supported the option to allow internal production control for a temporary period, subject to the UAS undergoing type examination of full quality assurance in the future. Many of these commentators mentioned that accepting internal production control would support manufacturers to place products on the market with less disruption.
- 6.10. A further 23.6% of respondents agreed with the option to allow internal production control for products that have undergone type examination by conformity assessment bodies under other jurisdictions. Several respondents provided the view that the UK should accept type examination by EU conformity assessment bodies, as the safety requirements and technical standards tested in these jurisdictions are the same.
- 6.11. The remaining 56.9% of respondents believed the CAA should make other changes to the approach to conformity assessment of class-marked UAS. Some commentators suggested that manufacturers should be given greater flexibility to use self-declaration to demonstrate conformity of their products. In doing so, manufacturers could be permitted to use either internal production control for a temporary period, or certificates of type examination from other jurisdictions.
- 6.12. Our view is that it is appropriate to provide manufacturers flexibility in how they approach conformity assessment in the period before conformity assessment bodies are fully established in the UK. We propose to allow self-declaration, through internal production control, for products with a type-examination certificate from an EU-approved conformity assessment body for C1, C2 and C3 class-marked UAS until 31<sup>st</sup> December 2027. From 1<sup>st</sup> 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. Internal production control will continue to be possible for C0/UK0, C4/UK4, C5/UK5 and C6/UK6 UAS irrespective of whether the product has a type-examination certificate from an EU-approved conformity assessment body.
- 6.13. The proposed interim measures should enable manufacturers to place products on the market with less disruption, while maintaining an acceptable level of confidence that products meet regulatory requirements. The requirement for manufacturers to obtain a type-examination certificate from a UK conformity assessment body from 2028 aims to provide assurance that products meet UK requirements in the long term.

## Model Aircraft

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- 6.14. In the consultation, we provided the view that the costs of significantly changing the regulatory framework for model aircraft would outweigh the benefits for the government, the CAA, and the model aircraft community. Consequently, we proposed to maintain the foundations of the current regulatory framework and continue to collaborate with the model aircraft community to improve how regulations are applied.
- 6.15. Of respondents who provided a view, 88.4% were in favour of the proposal to maintain the existing regulatory approach for model aircraft. Respondents largely agreed that the current Article 16 authorisation process for model aircraft associations works effectively and should not be significantly changed. Many commentators requested stability in the regulatory approach, as the model aircraft community is well accustomed to current requirements.
- 6.16. Our view is that, on balance, it is sensible to continue with the proposal to maintain the existing regulatory approach for model aircraft. Although Remote ID requirements will cover model aircraft, in practice, many model aircraft will be exempt (i.e. those operating within an Article 16 authorised model aircraft flying club within the rules set out in that regulation).

## Chapter 7

## Next steps

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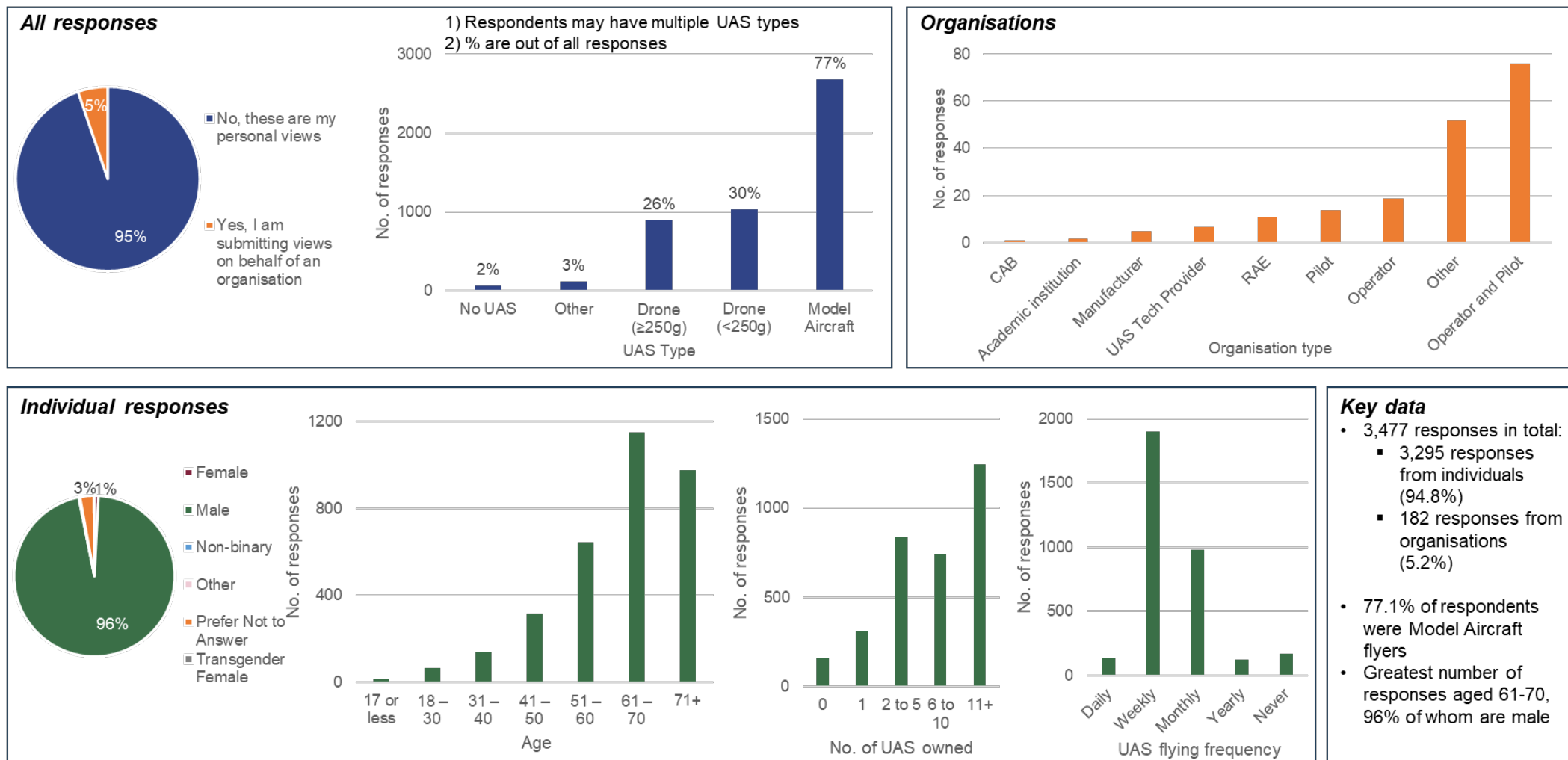
### What happens after the consultation response?

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- 7.1. Following the publication of this document, we will publish our formal opinion submitted to the DfT. The DfT will in turn consider whether to implement our proposed changes.
- 7.2. If the DfT chooses to take forward our proposals, changes to the relevant regulations will be progressed through a statutory instrument. The timetable for this statutory instrument will be determined by the DfT. The CAA will work with the DfT to communicate this timetable to the UAS sector at the earliest opportunity.
- 7.3. In addition, we will continue to work closely with the police, Home Office and the DfT to ensure any changes are implemented effectively across the public sector.

## APPENDIX A

# Demographic Characteristics<sup>7</sup>



<sup>7</sup> Quantitative analysis of the demographic characteristics of those who submitted responses via the online feedback form

Question	Yes, I am submitting views on behalf of an organisation	No, these are my personal views	Total
Do your views represent those of an organisation? - Do your views represent those of an organisation?	182 (5.2%)	3295 (94.8%)	3477 (100%)

Question	Academic or research institution	Conformity Assessment Body	Recognised Assessment Entity	UAS Manufacturer or Distributor	UAS Operator	UAS Pilot	UAS Operator and Pilot	UAS Technology Provider	Other	Total
Which of the following best describes your organisation?	2 (1.1%)	1 (0.5%)	11 (6.0%)	5 (2.7%)	19 (10.4%)	13 (7.1%)	73 (40.1%)	7 (3.8%)	51 (28.0%)	182 (100%)

Question	Male	Female	Non-binary	Transgender male	Transgender female	Prefer not to answer	Other	Total
What gender do you identify with?	3164 (96.0%)	27 (0.8%)	3 (0.1%)	0 (0%)	3 (0.1%)	92 (2.8%)	6 (0.2%)	3295 (100%)

Question	17 or less	18 - 30	31 - 40	41 - 50	51 - 60	61 - 70	71+	Total
What is your age?	15 (0.5%)	64 (1.9%)	136 (4.1%)	315 (9.6%)	641 (19.5%)	1149 (34.9%)	975 (29.6%)	3295 (100%)

Question	0	1	2 to 5	6 to 10	11+	Total
How many UAS do you own?	159 (4.8%)	311 (9.4%)	837 (25.4%)	745 (22.6%)	1243 (37.7%)	3295 (100%)

Question	Never	Yearly	Monthly	Weekly	Daily	Total
How frequently do you approximately fly UAS?	170 (5.2%)	121 (3.7%)	974 (29.6%)	1896 (57.5%)	134 (4.1%)	3295 (100%)

Question	No UAS	Drone (<250g)	Drone (≥250g)	Model Aircraft	Other	Total
What UAS do you own?	64 (18.4%)	1030 (29.6%)	889 (25.6%)	2681 (77.1%)	111 (3.2%)	3477

Note: Respondents may have multiple UAS types and (%) are out of all responses (3477)

## APPENDIX B

Quantitative Breakdown of Consultation Responses<sup>8</sup>

Question	Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree	Total (excl. I don't know)	I don't know	Total (incl. I don't know)
1. Allow C1 UAS to fly over uninvolved people in the A1 sub-category, aligning to regulations for C0 and <250g UAS	2429 (72.5%)	522 (15.6%)	187 (5.6%)	67 (2.0%)	144 (4.3%)	3349 (100%)	128	3477
2. Allow C0 and C1 UAS to fly in the A3 sub-category	2339 (72.8%)	467 (14.5%)	273 (8.5%)	43 (1.3%)	93 (2.9%)	3215 (100%)	262	3477
3. Align regulatory requirements in the A3 sub-category to current guidance to fly UAS a minimum of 50m from uninvolved persons	484 (14.7%)	1733 (52.7%)	545 (16.6%)	315 (9.6%)	214 (6.5%)	3291 (100%)	186	3477
4. Align regulatory requirements in the A3 sub-category to current guidance to fly a minimum of 150m from residential, commercial, industrial, recreational areas or buildings	311 (9.3%)	202 (6.1%)	195 (5.8%)	282 (8.5%)	2346 (70.3%)	3336 (100%)	141	3477
5. Re-name the A1, A2, A3 operational subcategories to 'Over', 'Near' and 'Far'	2308 (69.3%)	555 (16.7%)	279 (8.4%)	64 (1.9%)	126 (3.8%)	3332 (100%)	145	3477
6. Maintain existing names for Open, Specific and Certified operational categories	2398 (72.4%)	497 (15.0%)	309 (9.3%)	49 (1.5%)	59 (1.8%)	3312 (100%)	165	3477
7. Remove exclusions for 'toy' UAS from registration and pilot competency requirements	457 (13.5%)	218 (6.4%)	173 (5.1%)	195 (5.8%)	2340 (69.2%)	3383 (100%)	94	3477
9. Require flyers of <250g UAS to take the online Flyer ID test	671 (19.5%)	229 (6.7%)	126 (3.7%)	205 (6.0%)	2202 (64.1%)	3433 (100%)	44	3477
10. Introduce a minimum weight threshold, in the region of 50g – 100g, that aims to exclude miniature UAS from Flyer ID requirements	325 (9.7%)	221 (6.6%)	162 (4.8%)	170 (5.1%)	2476 (73.8%)	3354 (100%)	123	3477
11. Require manufacturers to present important regulatory information on the user interface or controller app to C0-C3 UAS users at product set-up	467 (14.1%)	295 (8.9%)	182 (5.5%)	198 (6.0%)	2173 (65.6%)	3315 (100%)	162	3477
12. Phase out the CAP 722 series and introduce new, user-friendly guidance	2545 (77.0%)	416 (12.6%)	209 (6.3%)	38 (1.1%)	97 (2.9%)	3305 (100%)	172	3477

<sup>8</sup> Quantitative analysis of responses submitted via the online feedback form

Question	Definitely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Definitely disagree	Total (excl. I don't know)	I don't know	Total (incl. I don't know)
material								
14. Implement product safety and security standards	2237 (66.7%)	659 (19.6%)	228 (6.8%)	78 (2.3%)	153 (4.6%)	3355 (100%)	122	3477
16. Changes to product requirements, as set out in paragraph 4.4 of the consultation	191 (6.2%)	231 (7.5%)	316 (10.3%)	204 (6.6%)	2138 (69.4%)	3080 (100%)	397	3477
17. Use UK-specific class identification labels on class-marked UAS, to differentiate between UAS compliant under UK and EU legislation	293 (8.9%)	240 (7.3%)	245 (7.4%)	214 (6.5%)	2305 (69.9%)	3297 (100%)	180	3477
18. Approach to enable the implementation of the MSA	1845 (61.5%)	569 (19.0%)	298 (9.9%)	69 (2.3%)	220 (7.3%)	3001 (100%)	476	3477
20. Technical approach to implementing Remote ID	184 (5.4%)	159 (4.7%)	135 (4.0%)	148 (4.4%)	2766 (81.5%)	3392 (100%)	85	3477
21. Policy approach to Remote ID	273 (8.3%)	840 (25.5%)	666 (20.2%)	396 (12.0%)	1124 (34.1%)	3299 (100%)	178	3477
22. Scope of Remote ID requirements	249 (7.6%)	1483 (45.0%)	400 (12.1%)	265 (8.0%)	900 (27.3%)	3297 (100%)	180	3477
23. Implement geo-awareness for UAS	733 (21.9%)	1194 (35.6%)	337 (10.1%)	442 (13.2%)	644 (19.2%)	3350 (100%)	127	3477
24. Implement geo-fencing for UAS	711 (21.2%)	1176 (35.1%)	327 (9.8%)	437 (13.1%)	696 (20.8%)	3347 (100%)	130	3477
25. Require Remote Pilots to have an active flashing light on their UAS for operations at night	2437 (71.7%)	526 (15.5%)	192 (5.7%)	60 (1.8%)	182 (5.4%)	3397 (100%)	80	3477
27. Extend the transition period for adoption of class-marked UAS by UAS operators	513 (16.1%)	229 (7.2%)	284 (8.9%)	174 (5.5%)	1983 (62.3%)	3183 (100%)	294	3477
29. Maintain current regulation that, in effect, prevents the use of legacy UAS in the A2 sub-category after the transition period has completed	154 (5.1%)	91 (3.0%)	239 (7.9%)	150 (4.9%)	2401 (79.1%)	3035 (100%)	442	3477
31. Maintain the existing regulatory approach for Model Aircraft	2440 (74.7%)	446 (13.7%)	168 (5.1%)	68 (2.1%)	144 (4.4%)	3266 (100%)	211	3477

Question	Yes	No	I do not know	Total
8. Are there other opportunities to simplify operational regulation that we should be considering	729 (21.0%)	1588 (45.7%)	1160 (33.4%)	3477 (100%)
13. Are there other opportunities to improve education and understanding that we should be considering	2719 (78.2%)	146 (4.2%)	612 (17.6%)	3477 (100%)
19. Are there other opportunities to improve UAS product safety and security that we should be considering	345 (9.9%)	1795 (51.6%)	1337 (38.5%)	3477 (100%)
26. Are there other opportunities to promote safe and secure airspace that we should be considering	2167 (62.3%)	332 (9.5%)	978 (28.1%)	3477 (100%)
32. Are there other opportunities to support the UAS sector that we should be considering	2343 (67.4%)	185 (5.3%)	949 (27.3%)	3477 (100%)

Question	Full EU alignment	Align to EU regulations, unless there is a safety, security, or user benefit that requires divergence	Full divergence	Total (excl. I don't know)	I don't know	Total (incl. I don't know)
15. To what extent should the UK align to the EU regulatory framework for product requirements	1787 (55.6%)	1206 (37.5%)	223 (6.9%)	3216 (100%)	261	3477

Question	No change (1 <sup>st</sup> January 2026)	1 year	2 years	3 years	4 years	5+ years	Total (excl. I don't know)	I don't know	Total (incl. I don't know)
28. How many years should CAA extend the transition period for operation of class-marked UAS by	269 (9.8%)	34 (1.2%)	90 (3.3%)	72 (2.6%)	49 (1.8%)	2233 (81.3%)	2747 (100%)	730	3477

Question	Allow C1 to C3 UAS to be certified using internal production control, for a temporary period	Allow internal production control for products with EU certificate for C1 to C3	Other changes to the approach to conformity assessment of class-marked UAS.	I don't know	Total
30. What changes should we make to the approach to conformity assessment of class-marked UAS	420 (11.6%)	510 (14.1%)	1228 (34.0%)	1454 (40.3%)	3612 (100%)



## APPENDIX C

# Abbreviations

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AMC	Acceptable Means of Compliance
BSI	British Standards Institute
BVLOS	Beyond Visual Line of Sight
CAA	Civil Aviation Authority
DfT	Department for Transport
EU	European Union
GM	Guidance Material
MSA	Market Surveillance Authority
OA	Operational Authorisation
RID	Remote ID
UAS	Unmanned Aircraft System