UK Civil Aviation Authority

Conformity Assessment Scheme for product certification of Unmanned Aircraft Systems (UAS) under UK Regulation (EU) 2019/945



Published by the Civil Aviation Authority, 2026

Civil Aviation Authority
Aviation House
Beehive Ring Road
Crawley
West Sussex
RH6 0YR

You can copy and use this text but please ensure you always use the most up to date version and use it in context so as not to be misleading, and credit the CAA.

First published 2026
First Edition

Enquiries regarding the content of this publication should be addressed to: MSAenquiries@caa.co.uk

The latest version of this document is available in electronic format at: www.caa.co.uk

Contents

Contents	**3**
CAA Conformity Assessment Scheme	**5**
Executive Summary	**5**
Preliminary Sections	**6**
Revision History	**6**
References	**6**
Abbreviations	**7**
Terminology	**7**
1.0 Introduction	**8**
2.0 Scheme Development and Governance	**8**
3.0 Scope	**9**
4.0 Product Requirements	**11**
5.0 Certification Activities	**14**
6.0 Client Operational Requirements	**16**
7.0 Requirements for CABs	**17**
8.0 Environmental Test Conditions	**19**
9.0 Internal Governance of CABs	**19**
10.0 Methods for Outcome Consistency	**20**
11.0 Information supplied by applicants	**21**
12.0 Certificate Information	**21**
13.0 Marks of Conformity	**23**
14.0 Resource requirements & competence of staff	**24**
15.0 Evaluation Reporting	**27**
16.0 Handling of non-Conformities	**27**
17.0 Surveillance procedures	**28**
18.0 Access to the Scheme	**28**
19.0 Certifications	**29**
20.0 Non-conforming products and fraudulent claim of certification	**30**

21.0 Complaints and appeals **32**

22.0 Scheme reference in publicity and marketing **33**

23.0 Retention of Records **33**

24.0 Sampling **33**

25.0 Acceptance of Conformity Assessment results **34**

26.0 Outsourcing **35**

27.0 Surveillance **35**

28.0 Reporting to the Scheme owner **36**

29.0 Subcontracting of Scheme Operation **37**

30.0 Changes to the Scheme **37**

CAA Conformity Assessment Scheme

Executive Summary

This document establishes the Conformity Assessment Scheme (CAS) for product certification of Unmanned Aircraft Systems (UAS) placed on the UK market. The CAS defines a structured and harmonised framework through which conformity with applicable technical and regulatory requirements is assessed and certified.

The scheme sets out the scope of certification, evaluation principles, assessment activities, and the respective responsibilities of manufacturers and Conformity Assessment Bodies (CABs). It is designed to ensure that certification activities are conducted consistently, impartially and transparently across all approved CABs.

The CAS has been developed in alignment with recognised European and international standards, including EA-1/22, BS EN ISO/IEC 17065, BS EN ISO/IEC 17067, BS EN ISO/IEC 17025 and the applicable technical requirements of the EN 4709 series, thereby providing a robust and credible basis for regulatory oversight and market confidence.

Preliminary Sections

Revision History

Version	Affected Pages	Change
Issue 01	all	N/C

References

Nr.	Code	Title
1	UK Reg. 2019/945	UK Regulation (EU) 2019/945
2	BS EN ISO/IEC 17067	Conformity assessment. Fundamentals of product certification and guidelines for product certification schemes
3	BS EN ISO/IEC 17065	Conformity assessment. Requirements for bodies certifying products, processes and services
4	EA-1/22 A-AB: 2023	EA procedure and criteria for the evaluation of conformity assessment schemes by EA accreditation body members
5	BS EN ISO/IEC 17025	General requirements for the competence of testing and calibration laboratories
6	EN 4709-001	Product requirements and verification for the Open Category
7	EN 4709-002	Direct Remote Identification
8	EN 4709-003	Geo-awareness requirements
9	EN 4709-004	Lighting requirements
10	EN 4709-005	Verification method for the Geocaging function
11	EN 4709-006	Means to terminate flight, requirements, and verification
12	EN 4709-007	General product requirements for UAS of classes C5 and C6
13	ISO/IEC Directives, Part 2	Principles and rules for the structure and drafting of ISO and IEC documents

Note: When referencing UK Regulation (EU) 2019/945, it will always reference the latest version of the regulation, including any future amendments.

Abbreviations

Acronym	Term
ANSI	American National Standards Institute
BS	British Standard
CAA	Civil Aviation Authority
CAB(s)	Conformity Assessment Body/Bodies
CAS	Conformity Assessment Scheme
CPTPP	Comprehensive and Progressive Agreement for Trans-Pacific Partnership
CTA	Consumer Technology Association
DfT	Department for Transport
DRI	Direct Remote Identification
EA	European co-operation for Accreditation
EN	European Norm
ISO	International Organization for Standardization
IEC	International Electrotechnical Commission
MSA	Market Surveillance Authority
NAB	National Accreditation Body
NDA	Non-Disclosure Agreement
SO	Scheme Owner
UA	Unmanned Aircraft
UAS	Unmanned Aircraft Systems
UK	United Kingdom
UKAS	United Kingdom Accreditation Service
UKCA	UK Conformity Assessed

Terminology

Across this document, specific verbal forms are used in accordance with ISO/IEC Directives, Part 2, to express provisions consistently:

- “shall” is used to express a requirement;
- “should” is used to express a recommendation;
- “may” is used to express a permission;
- “can” is used to express a possibility or a capability.

Statements not employing these verbal forms are to be considered informative and do not express requirements, recommendations, or permissions.

1.0 Introduction

This Conformity Assessment Scheme (CAS) has been developed by the Civil Aviation Authority (CAA) in its capacity as Market Surveillance Authority (MSA) for class-marked Unmanned Aircraft Systems (UAS) intended to be used in the Open Category. The MSA is identified as the scheme owner.

This CAS applies to all stakeholders involved in the conformity assessment of Unmanned Aircraft Systems that fall under the classes UK0, UK1, UK2, UK3, UK4, UK5, UK6 and Direct Remote Identification Add-Ons, as stated in UK Regulation (EU) 2019/945.

Stakeholders

- UK CAA as Market Surveillance Authority (MSA),
- Conformity Assessment Bodies (CABs) as those entities that will assess the conformity of the products and quality systems (when applicable), and,
- all end-users, such as Unmanned Aircraft Systems (UAS), direct remote identification system (DRI) manufacturers, authorised representatives, importers, and distributors.

All mentions of ‘Market Surveillance Authority’ or ‘MSA’ shall be considered as the UK CAA being appointed as the MSA for UAS in the UK.

For the purposes of this Conformity Assessment Scheme, references to the ‘manufacturer’ shall, where applicable, include ‘authorised representatives’, ‘importers’ and ‘distributors’ acting in accordance with their respective responsibilities as economic operators under UK Regulation (EU) 2019/945. Where an importer or distributor becomes subject to the obligations of a manufacturer, Article 10 of UK Regulation (EU) 2019/945 shall apply.

Where an economic operator modifies a compliant system without the manufacturer’s authorisation, they would be considered the manufacturer and would assume the related obligations, as set out in Recital 23 of the introduction to UK Regulation (EU) 2019/945.

2.0 Scheme Development and Governance

This Conformity Assessment Scheme (CAS) has been developed by the MSA in consultation with relevant stakeholders, including industry representatives, conformity assessment bodies, and technical experts in unmanned aircraft systems and product certification. The objective of this consultation was to ensure that the scheme reflects current regulatory requirements, applicable standards, and established conformity assessment practices.

Stakeholder feedback was considered during the development of the scheme to ensure that the certification activities, governance arrangements, and technical requirements are practical, transparent, and aligned with international conformity assessment principles.

The MSA is responsible for the overall management and maintenance of this scheme. The CAS will be periodically reviewed to ensure its continued relevance and alignment with applicable regulations, standards, accreditation requirements, and industry practices. Reviews may be initiated because of regulatory changes, revisions to applicable standards, market surveillance findings, accreditation activities, operational experience, complaints or appeals, or stakeholder feedback.

Where a review identifies the need for changes, the MSA shall:

- Evaluate the impact on the operation of the scheme.
- Determine any necessary amendments.
- Consult relevant stakeholders to ensure updates remain technically valid and proportionate.
- Approve the changes and incorporate them into the CAS.
- Update the document control process.
- Communicate the changes to affected stakeholders before they take effect.

Where applicable, the MSA will define implementation dates or transition arrangements.

The MSA will review the CAS on a yearly basis to ensure its continued suitability, effectiveness and alignment with applicable legislation, accreditation requirements, relevant standards and industry practices.

3.0 Scope

This Conformity Assessment Scheme will apply to all stakeholders involved in the conformity assessment of Unmanned Aircraft Systems (UAS).

The object of conformity of this scheme is all Unmanned Aircraft Systems that fall under class UK0 to UK6 and Direct Remote Identification (DRI) add-ons, as described by the UK Regulation (EU) 2019/945, Annex Parts 1 to 6, 16 and 17, including the changes introduced by SI 2025/1106, against the conformity assessment modules A, B, C and H.

UK5 accessory kits are temporarily excluded from the scope of this Conformity Assessment Scheme. This exclusion will be reviewed by the MSA with a view to reinstating UK5 accessory kits in the future.

For the purposes of this CAS, the conformity assessment modules and their relationship with UK CAB activities are as follows:

- Module A – Internal Production Control: performed by the manufacturer. No UK CAB involvement or accredited conformity assessment activity is required.
- Module B – Type Examination: performed by an accredited and approved UK CAB, which assesses the product and issues the applicable Type Examination Certificate.
- Module C – Conformity to type based on Internal Production Control: performed by the manufacturer following Module B. The UK CAB has no role in Module C.
- Module H – Conformity based on full quality assurance: performed by an accredited and approved UK CAB and includes the applicable assessment and surveillance activities required under UK Regulation (EU) 2019/945.

The scheme sets out the accreditation activities and demonstration of capabilities to be used by applicants who are seeking accreditation as a Conformity Assessment Body (CAB) for products referred to above. Participation in this CAS constitutes acceptance of its requirements and any actions arising from its implementation by all participating manufacturers, CABs, economic operators, and any other parties operating under this scheme.

Manufacturers and Conformity Assessment Bodies (CABs) shall ensure that the applicable conformity assessment procedure and its resulting demonstration of conformity are clearly identified in the documentation required under UK Regulation (EU) 2019/945. This information shall enable manufacturers, economic operators, regulators and other interested parties to understand the level of assurance provided by the applicable conformity assessment procedure under this Conformity Assessment Scheme.

The assurance provided under this Conformity Assessment Scheme is that the applicable product or quality management system has been demonstrated to comply with the relevant requirements of UK Regulation (EU) 2019/945, as applicable to the selected conformity assessment module, using the conformity assessment activities defined in this CAS.

This assurance shall be made available to manufacturers, economic operators, regulators and other interested parties through the applicable conformity assessment documentation issued under UK Regulation (EU) 2019/945:

- Module A: through the manufacturer’s technical documentation, in accordance with UK Regulation (EU) 2019/945 Annex Parts 7 and 10, and the Declaration of Conformity, in accordance with UK Regulation (EU) 2019/945 Annex Parts 11 and 12.
- Modules B and C: through the Type Examination Certificate issued by the CAB together with the manufacturer’s Declaration of Conformity;
- Module H, through the certificate(s) issued by the CAB together with the manufacturer’s Declaration of Conformity.

The minimum content of certificates issued under this CAS is specified in Section 12.

Conformity Assessment Bodies shall comply with the requirements established in Article 22 of UK Regulation (EU) 2019/945 and in BS EN ISO/IEC 17065. Applicants shall hold accreditation to BS EN ISO/IEC 17065 to become Conformity Assessment Bodies under this scheme. Accreditation may be obtained either prior to initiating the application process or by applying for accreditation as part of the application.

The scheme covers product requirements, certification activities, requirements for CABs, governance of CABs, consistency considerations, evaluation reporting, certificate management, and surveillance requirements. The scheme is based on BS EN ISO/IEC 17065, expanding and adding specific information to particularize the assessment processes of those Unmanned Aircraft Systems that fall under the scope of this scheme.

In line with BS EN ISO/IEC 17067, this scheme will fall under the following scheme types, as defined in the standard:

Table 1. Scheme types.

Scheme types according to BS EN ISO/IEC 17067	
Conformity assessment Module B evaluations	Scheme type 1a
Conformity assessment Module H evaluations	Scheme type 6

4.0 Product Requirements

UK Regulation (EU) 2019/945 and the recent changes introduced by the Statutory Instrument 2025/1106, Annex Parts 1 to 6, Part 16, and Part 17, cover the main requirements for each UKX class (or DRI Add-On).

When assessing the compliance of a UAS, the additional sections below may also be applicable:

- UK Regulation (EU) 2019/945, Article 16 – marks of conformity (UK marking, UK class label, sound power label, etc.)
- UK Regulation (EU) 2019/945, Parts 11 and 12 of the Annex – declarations of conformity
- UK Regulation (EU) 2019/945, Parts 13, 14 and 15 – noise.

UK Regulation (EU) 2019/945 includes three conformity assessment modules for Unmanned Aircraft Systems (UAS):

- Conformity assessment Module A – Internal production control (Part 7) (No UK CAB required).

- Only valid for assessing the conformity of systems under UK0, UK4, UK5, UK6, and DRI Add-Ons.

- Conformity assessment Modules B and C – Type examination and conformity to type based on internal production control (Part 8) (UK CAB required).
- Conformity assessment Module H – Conformity based on full quality assurance (Part 9) (UK CAB required).

The scope of accreditation of a UK CAB may include Module B and/or Module H, as well as one or more individual UK Class Marks and/or DRI add-ons.

Table 2. Available conformity assessment routes.

Available conformity assessment routes				
UK Class Mark	UK Reg. 2019/945 Annex Part - Requirements	Module A (Part 7)	Module B + C (Part 8)	Module H (Part 9)
		No UK CAB Required	UK CAB Required	
UK0	Part 1	✓	✓	✓
UK1	Part 2		✓	✓
UK2	Part 3		✓	✓
UK3	Part 4		✓	✓
UK4	Part 5	✓	✓	✓
DRI Add-on	Part 6	✓	✓	✓
UK5	Part 16	✓	✓	✓
UK6	Part 17	✓	✓	✓

Note: Module A (Internal Production Control) is only available for products subject to UK Regulation (EU) 2019/945 Annex Part requirements 1, 5, 6, 16 and 17 (UK0, UK4, DRI Add-on, UK5 and UK6 respectively). UK1, UK2 and UK3 products (UK Regulation (EU) 2019/945 Annex Parts 2, 3 and 4 respectively) require either the Module B+C route or Module H, both of which involve a UK Conformity Assessment Body (UK CAB).

The specific requirements to determine compliance with the regulation are included in the series of standards 4709 from BSI (BS EN 4709-00X). Until the BS EN 4709-00X series is fully published by BSI, the European EN 4709-00X standards and versions identified in Table 3 shall apply for conformity assessment under this CAS. The following table presents a summary of the standards developed to address the requirements of UK Regulation (EU) 2019/945. Each standard referenced in the table below contains multiple sections covering

the regulatory requirements. Each section provides performance requirements, verification methods, pass criteria and potentially required equipment or test setups. Certification activities are detailed in this CAS and in the relevant section of the standards referred to in the following table.

Tables ZA.1 in the standards covered in the following table provide a correspondence between the regulatory requirements and applicable clauses in the standards for the different functions and features of each UAS class (UK0/C0 – UK6/C6).

Table 3: EN 4709-00X Series alignment to UK Regulation (EU) 2019/945 requirements.

Standard	Description	Requirements from UK Regulation (EU) 2019/945 Annex
EN 4709-001:2026	Product requirements and verification for the Open Category	Parts 1.1 to 1.9 Parts 2.1 to 2.7, 2.10, 2.15, and 2.17 to 2.19 Parts 3.1 to 3.9, 3.12, 3.17, and 3.19 to 3.20 Parts 4.1 to 4.5, 4.7, 4.12, 4.13, 4.15 and 4.16 Parts 5.1 to 5.5
EN 4709-002:2023	Direct Remote Identification	Parts 1.7A to 1.7C Parts 2.12, 2.12A and 2.20 Parts 3.14, 3.14A and 3.21 Parts 4.9, 4.9A and 4.17 Parts 5.3A and 5.3B Parts 6.1 to 6.5
EN 4709-003:2026	Geo-awareness requirements	Parts 1.7D Parts 2.13 and 2.14 Parts 3.15 and 3.16 Parts 4.10 and 4.11
EN 4709-004:2026	Lighting requirements	Part 2.16 Part 3.18 Part 4.14
EN 4709-005:2026	Verification method for the Geocaging function	Part 17.4
EN 4709-006:2026	Means to terminate flight, requirements, and verification	Part 16.5 Part 17.5
EN 4709-007:2026	General product requirements for UAS of classes C5 and C6	Parts 16.3, 16.4, 16.6 and 16.7 Parts 17.1, 17.3, and 17.6 to 17.8

This Conformity Assessment Scheme identifies the following additional standards to be used for specific technical aspects in addition to the standards referenced above:

- EN ISO 3744:2010 for noise testing and compliance demonstration in accordance with UK Regulation (EU) 2019/945 Annex Part 13.

- ANSI/CTA-2063-A-2019 for serial number definition and use for remote ID systems in accordance with UK Regulation (EU) 2019/945 Annex Parts 1 – 6, 16 and 17.

5.0 Certification Activities

Each CAB shall demonstrate correctness in evaluating every regulatory requirement and associated standard. For each requirement, CABs shall determine the activity to be used for assessment. The activity selection shall be accompanied by a rationale to justify it and shall be based on the standards referred to in Table 3. When testing is selected, the rationale can be omitted.

The table below summarises the principal certification activities applicable under this Conformity Assessment Scheme and provides references to the sections containing the detailed requirements for each stage of the conformity assessment process.

Table 4. Overview of the certification process and applicable sections of this Conformity Assessment Scheme.

Certification activity	Relevant CAS section(s)
Application	Section 6
Information supplied by applicants	Section 11
Selection	Section 5 (this section)
Determination	
Review	
Decision on certification	
Attestation (Certificate issuance)	Section 12
Surveillance (where applicable)	Section 17
Handling of non-conformities	Section 16
Certification management	Section 19

The table above provides an overview of the certification process and identifies the relevant sections of this Conformity Assessment Scheme where each activity is described. The certification activities below, in line with the functional approach defined in BS EN ISO/IEC 17067 Section 5.2, are required for CABs to assess the products and the quality management system.

Selection: CABs shall establish a selection process which includes planning and preparation of certification activities, sampling methods, specification of requirements and

all the associated references to them such as the applicable standards, applicable requirements from the regulation, additional methods, etc.

Determination of characteristics: Any of the following processes may be used to assess and determine the characteristics of the products, assessing the applicable requirements.

- **Testing activities:** The regulatory requirements are verified and assessed using requirements covered by the standards referred to in Table 3. For some specific scenarios, witness testing may be required. Testing includes demonstrations as verification methods where these are required by the relevant standards.
- **Inspections**: When assessing technical functionalities or configurations of a system prior to test or where otherwise required by the relevant standards, inspections shall be performed. The CAB shall define a procedure on how to perform inspections in line with the relevant standards.
- **Design appraisals:** If a design appraisal is needed to justify compliance, the personnel performing the appraisal shall be qualified, evidencing enough experience in systems similar to the one being reviewed.

> **Note:** Design appraisals shall be limited to specific cases where no other certification activity would be suitable to completely analyse the conformity of the system.

Analysis: When using analysis to justify any requirements from the UK Regulation (EU) 2019/945, the analysis shall be valid and sufficient to evidence compliance. All analyses shall be:

- Reproducible: Detailed enough for independent reviewers to reproduce the results.
- Traceable: Every requirement shall be traced to the analysis results.
- Valid (in terms of the methods used): Every method or technique shall be recognised (by a relevant standard), validated, and appropriate for the context.
- Accurate and precise: It shall quantify uncertainties, tolerances and/or margins.
- Consistent: Results shall not conflict with other possible test evidence, simulations and/or other analyses.
- Complete: Scope shall include and cover all relevant conditions, configurations or use cases tied to the requirement.

Where similarity argumentations are used by manufacturers and assessed by a CAB, the CAB shall have sufficient evidence that all relevant configuration items, except the item of interest, represent a similar product version to conclude that a repetition of tests is not required.

Documentation review: Certain requirements of the compliance assessment will include verifying technical documentation from the applicants. These reviews shall be documented in the CAB technical file and traceable to the system being assessed. Documentation review shall be based on the regulatory requirements and verification methods outlined in the standards referred to in Table 3.

Additionally, the review process shall ensure that the determination of characteristics activities covers the information required to ensure requirements have been met.

Review: Prior to the certification decision, the CAB shall review the outputs of the conformity assessment activities to confirm that the evaluation has been completed, the applicable requirements have been assessed, and sufficient objective evidence is available to support the certification decision.

Decision on certification: CABs shall establish the process to decide on the certification. This process shall be documented and include the review of the complete process

Attestation and licensing: Upon successful completion of the process, CABs shall issue a certificate(s) that covers the product evaluated. Further information on the certificate content can be found later in this CAS.

Surveillance and Audits (only applicable for Module H assessments): When assessing a manufacturer's quality system under Module H, CABs shall perform an initial assessment and periodic surveillance audits of the manufacturer’s quality management system and perform this in line with ISO 17021.

6.0 Client Operational Requirements

Manufacturers seeking certification under this Scheme shall submit an application to a CAB either electronically or physically, depending on the operational procedures defined by the CAB. Manufacturers, authorised representatives, importers, or distributors are eligible to apply for certification provided that the products fall within the scope of this CAS.

Upon receipt of an application, the CAB shall review the information provided by the applicant to determine eligibility and whether sufficient information has been submitted to proceed with the conformity assessment process.

Manufacturers shall agree in writing to the assessment process they will undergo, via a legally enforceable agreement with the CAB. After signing, manufacturers agree to comply with requirements set out in ISO 17065 section 4.1.2.2, including but not limited to the delivery of information, products, ancillary equipment, technical documentation, and any additional information the CAB needs to completely assess the UAS. The CAB shall inform the manufacturer of all relevant information regarding the processes to be carried out, including technical reviews, application process, surveillance mechanisms, findings identification and handling of non-conformities. The application and information requirements are detailed in Section 11 of this Conformity Assessment Scheme.

Each agreement or contract shall constitute a Non-Disclosure Agreement (NDA) between the CAB and the manufacturer or consider non-disclosure aspects in any other kind of agreement for the services provided, and as such, the terms and conditions of such agreement shall be included in the agreement.

CABs shall ensure that they have arrangements in place to store information provided by manufacturers in line with confidentiality requirements from ISO 17065 section 4.5.

All parties involved in the operation of this Conformity Assessment Scheme shall ensure that confidential information obtained or generated during conformity assessment activities is protected and only disclosed where required by applicable legislation, regulatory obligations, or with the agreement of the information owner. Conformity Assessment Bodies shall ensure that confidentiality arrangements apply to all personnel and external parties involved in certification activities, including subcontractors and technical experts, in accordance with the applicable requirements of BS EN ISO/IEC 17065.

Manufacturers shall keep their information, assessments, and data generated under this CAS confidential, this includes all data related to conformity assessment processes, evaluations, records, technical information, and notifications.

When required, the MSA may make information public if the information is in the interest of the parties involved under this CAS or the public.

7.0 Requirements for CABs

Conformity Assessment Bodies for UAS are legal entities that the MSA has approved to become CABs, via previous accreditation by the United Kingdom Accreditation Service (UKAS).

Conformity Assessment Bodies for UAS shall be legal entities that ensure the results of conformity assessments performed on these products. CABs shall fully comply with BS EN ISO/IEC 17065, specifically the sections related to General, Structural, Resource, Process, and Management System Requirements.

CABs shall have legal personality and shall be established in the United Kingdom or the territory of a party to the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP), i.e. Australia, Brunei, Canada, Chile, Japan, Malaysia, Mexico, New Zealand, Peru, Singapore, and Vietnam.

CABs shall apply for accreditation to UKAS and meet the general requirements mentioned above, along with the specific requirements listed in this scheme for UAS. The applicant shall indicate which Module they will be applying for. Under this CAS, CABs may apply for accreditation for Module B or Module H, depending on the conformity assessment activities they intend to perform.

Conformity Assessment Bodies operating under this Conformity Assessment Scheme shall maintain professional liability insurance or equivalent financial coverage to address liabilities arising from their conformity assessment activities. CABs shall establish and maintain a documented process to identify and periodically review the risks and liabilities arising from their conformity assessment activities, including the adequacy of the associated insurance or equivalent financial coverage. Such insurance or financial coverage shall be maintained for the duration of the CAB's operation under this scheme.

Note: Liability considerations under this Conformity Assessment Scheme relate solely to the conformity assessment activities performed by the CAB and do not extend to the operational use of the UAS or the responsibilities of manufacturers, operators or other parties beyond the scope of the CAB's certification activities.

CABs shall maintain a documented methodology for determining the time and cost of certification activities. This methodology shall define the criteria used to prepare quotations, ensuring consistency, transparency, and alignment with the scope and complexity of the conformity assessment, without prescribing specific fees.

CABs remain solely responsible for the conformity assessment activities they perform, including certification decisions and associated technical evaluations.

The Market Surveillance Authority (MSA), acting as the Scheme Owner, does not assume liability for certification decisions issued by CABs or for the conformity of products assessed under this scheme.

Note: Pre-authorisation by the MSA is not required prior to applying to UKAS for accreditation. However, according to UK Regulation (EU) 2019/945, the UK CAA in its responsibility as the MSA will exclusively approve CABs that have successfully achieved accreditation.

Module B – Type examination.

The CAB accreditation applicant shall demonstrate an ability to perform an assessment of a specific product, validating all the requirements listed in UK Regulation (EU) 2019/945 – Annex Parts 1 to 6, 16 and 17. The CAB accreditation applicant shall create and present evidence for all requirements by making use of all available and necessary activities, while complying with Annex Part 8 of the regulation.

Requesting accreditations for all parts of the Annex (i.e., all UKX classes) is not mandatory, and CABs may choose to obtain accreditation for specific UKX classes.

Module H – Conformity based on full quality assurance.

The CAB accreditation applicant shall demonstrate that they can perform an assessment on the manufacturer, including their products, and quality system to ensure full compliance during all steps of the manufacturing process. The assessment shall ensure compliance of the products with the requirements listed in UK Regulation (EU) 2019/945 – Annex Parts 1

to 6, 16 and 17. The CAB accreditation applicant shall create and present evidence for all requirements by making use of all available and necessary activities, while complying with Annex Part 9 of the regulation.

Requesting accreditations for all parts of the Annex (i.e., all UKX classes) is not mandatory, and CABs may choose to obtain accreditation for specific UKX classes.

8.0 Environmental Test Conditions

Conformity Assessment Bodies (CABs) shall ensure that all indoor and/or outdoor testing activities conducted under this Conformity Assessment Scheme (CAS) are planned, executed and controlled in a manner that ensures the validity, reliability and technical equivalence of test results.

Testing shall be conducted using the verification methods specified in the standards referenced in Table 3 of this CAS. Where those standards do not define environmental conditions, test tolerances or performance criteria necessary to ensure the validity of the results, the CAB shall have a suitable process and apply appropriate controls consistent with recognised laboratory practice and the requirements in line with BS EN ISO/IEC 17025, in particular, clause 6.3.5.

The CAB shall identify, monitor and record environmental conditions that may influence test results. As applicable, this shall include wind speed, ambient temperature, humidity and any other environmental parameters relevant to the test method. Where environmental conditions have the potential to affect the validity or comparability of results, the CAB shall define acceptable operating limits and implement appropriate correction factors or mitigation measures as part of the test procedure.

The CAB shall ensure that test procedures sufficiently address repeatability, reproducibility and measurement uncertainty. These procedures shall be applied consistently to ensure that conformity assessment results produced under this CAS are technically equivalent and comparable across different CABs.

9.0 Internal Governance of CABs

All approved CABs shall establish and participate in a joint internal governance group (the CAB Governance Group*).*

The establishment, operation and maintenance of the CAB Governance Group shall be the responsibility of the approved CABs. The CABs shall collectively define and agree the terms of reference for the group, including its purpose, roles, functions, responsibilities, decision-making processes and any required technical arrangements. This shall include, where applicable, the use of shared resources to support the group’s activities (e.g. secretariat or administrative support).

The CAB Governance Group shall be formally established once at least two CABs for UAS have been approved by the MSA. The group shall operate as an open and collaborative forum for the discussion of matters relevant to the operation of the CAS, including but not limited to potential issues, conflicts, procedural discrepancies, and updates to applicable requirements or regulations. The forum shall provide a central mechanism through which views and concerns of all CABs may be raised and considered.

Membership of the CAB Governance Group shall be mandatory for all CABs approved by the MSA. All CABs shall participate in scheduled meetings. In addition, one representative from the MSA and one representative from the Department for Transport (DfT) may attend scheduled meetings of the group. The agenda for each meeting shall include a dedicated session restricted to CAB members only.

The CAB Governance Group shall meet no fewer than three times per calendar year. Meetings may be held either in person or by electronic means. Any proposal to increase the frequency of meetings shall be agreed by the group and recorded.

Upon establishment of the group, the CABs shall elect a President and a Deputy President. These officers shall be responsible for the management of the group's activities, including meeting organisation, documentation control, record-keeping and external representation, as applicable.

All governance documentation for the CAB Governance Group, including its terms of reference and internal procedures, shall be established at the time the group is formed and shall be maintained and kept up to date. Decisions of the group shall be taken in a fair, transparent and democratic manner and shall be appropriately recorded.

10.0 Methods for Outcome Consistency

Due to the nature of variability of certification activities for UAS under this scheme, to maintain consistency among CABs, they shall participate in interlaboratory comparisons, as stated in BS EN ISO 17025 section 7.2.2.1, or, when outsourcing or subcontracting the certification activities, among subcontractors.

Upon request, all CABs shall be accepted to participate in interlaboratory comparisons. They shall take place at least once every two years.

Note: Not all CABs (or subcontractors) shall participate in the same interlaboratory comparison.

11.0 Information supplied by applicants

Manufacturers seeking certification under this Conformity Assessment Scheme shall apply to an approved CAB using the CAB's documented application process. The application shall include, as a minimum, the information specified in this section and any additional information reasonably required by the CAB to determine whether the product falls within the scope of this CAS and whether sufficient information has been provided to proceed with the conformity assessment process.

Applicants shall provide the information necessary for the CAB to perform the conformity assessment activities as described in this CAS. The completeness and adequacy of the information supplied will form the basis for the technical evaluation carried out by the CAB.

This information shall include, as a minimum, the following:

- UK Regulation (EU) 2019/945 Annex Part 10, such as a complete product description, drawings, an overview of standards applied, or test reports.
- Labels, marks, signs, packaging (if applicable).
- The user manual of the system(s) under assessment.

For Module H applicants, the information to be submitted shall also include information regarding their quality management system.

When manufacturers are not required to use a CAB for their conformity assessment (e.g., module A), they shall still include all the above information in their technical documentation. The technical file developed shall be available for the Market Surveillance Authority upon request.

12.0 Certificate Information

The certificate(s) issued when an assessment is successfully completed shall include all the information listed in BS EN ISO/IEC 17065 sections 7.7.1.a to 7.7.1.d.

The expiration date for any certificate(s) issued cannot exceed **five years**.

Additionally, the certificate shall include the following information:

- Information on the certification being issued (under Module B, Module H, etc).

  Note: Module B and Module H attestations may be combined into a single certificate, provided that the applicable conformity assessment modules are clearly identified.

- Scope of the certification shall include:

- Regulation assessed (i.e. UK Regulation (EU) 2019/945).
- Standards used in the assessment, including the applicable version/date, and reference to this Conformity Assessment Scheme (CAS).

> **Note:** Where the standard(s) or other normative document(s) to which conformity is being certified include reference to other standards or normative documents, these may not be included in the formal certification documentation.

- Commercial name and model of the product(s), including remote controllers, ad-hoc software, etc.
- Product versions assessed (software, hardware, firmware).
- Signature of the CAB representative who makes the certification decision (BS EN ISO/IEC 17065 section 7.7.2).
- Notes and additional information relevant to the assessment (restrictions, assessment conditions, explicit exclusions, etc.).

This section only applies to conformity assessment processes under Module B or Module H.

> **Note:** The format, layout, and template of certificates issued under this CAS are outside the scope. CABs may use their own certificate templates, provided that the minimum information is included.

As per BS EN ISO/IEC 17065 section 7.7.3, formal certification documentation shall only be issued after, or concurrent with, the following:

a) the decision to grant or extend the scope of certification has been made;
b) certification requirements have been fulfilled;
c) the certification agreement has been completed/signed.

Statement of conformity Use

Following the conformity assessment process with the CAB, a manufacturer will be issued a certificate(s). This document shall not be made publicly available by the manufacturer without explicit agreement from the CAB.

Once the manufacturer has the certificate(s), they can draw up a Declaration of Conformity and make it publicly available.

13.0 Marks of Conformity

The marks of conformity associated with this CAS are as follows:

- UK Class i.e. UK0, UK1, UK2, UK3, UK4, UK5 and UK6 – UK Regulation (EU) 2019/945 Annex Parts 1 to 5, 16 and 17.
- Sound power label (if applicable) – UK Regulation (EU) 2019/945 Annex Part 14.

The manufacturer may affix the applicable UK Class Mark and, where applicable, the sound power label following successful completion of the applicable conformity assessment procedure. No separate permission or licence to use these marks or labels is issued by the MSA or the CAB.

- Module A: responsibility for demonstrating conformity and affixing the applicable marks remains with the manufacturer.
- Module B + C route: the applicable marks may be affixed following completion of Module B by the UK CAB and subsequent completion of Module C by the manufacturer.
- Module H: the applicable marks may be affixed following successful completion of the Module H conformity assessment and issuance of the applicable certification by the UK CAB.

The requirements for the format, affixing and use of the UK Class Marks and sound power label are defined in UK Regulation (EU) 2019/945 as follows:

- UK Class identification label – Article 16(2) and the applicable Annex Part 1 to 5, 16 or 17, which identifies the class label applicable to each UK Class.
- Sound power level indication – Article 16(3) and Annex Part 14, where applicable.
- Timing for affixing the applicable UK Class identification label and sound power level indication – Article 16(4).

Manufacturers shall apply the applicable UK Class Marks and sound power labels in accordance with these provisions. This CAS does not establish alternative graphical specifications, dimensions or conditions for their use.

UK Class Marks (i.e. UK3) are allowed while the certification and/or conformity assessment process remains valid. When the validity of the certificate expires (i.e., expiration date, withdrawal, suspension, etc.) or the conformity assessment is no longer valid (i.e., market inspection discoveries, oversight activities, etc.), manufacturers shall notify their customers of the corrective action to take regarding the marks of conformity for products whose assessment is no longer valid.

Additionally, the sound power label, if applicable, may be affixed after being assessed.

Where a UK CAB is involved in the conformity assessment under Module B or Module H, the CAB shall verify, as applicable to the product and conformity assessment module, that the UK Class identification label and, where applicable, the sound power label comply with the requirements identified above. The outcome of this verification shall be recorded as part of the conformity assessment documentation.

Note: UKCA marking is excluded from this CAS.

Licensing and control of the mark

No separate licence for use of the UK Class Marks or sound power labels is issued under this CAS. Manufacturers remain responsible for their correct use in accordance with the provisions identified above. Where a UK CAB is involved in the conformity assessment, the CAB shall verify compliance with the applicable UK Class Mark and sound power label requirements as part of its conformity assessment activities. Products placed on the UK market remain subject to market surveillance by the MSA, including verification of the continued correct use of the applicable marks and labels.

UKCA marking remains outside the scope of the conformity assessment activities defined by this CAS and is not subject to verification by the CAB under this scheme. Responsibility for affixing the UKCA marking rests with the manufacturer, and its use remains subject to the applicable regulatory requirements.

14.0 Resource requirements & competence of staff

CABs shall ensure all resources and personnel used during a conformity assessment process comply with BS EN ISO/IEC 17065 section 6, including subcontractors and personnel not part of the CAB but who will carry out outsourced activities.

In addition to the requirements set in the section mentioned above, the personnel used for testing, either part of the same entity as the CAB or part of a subcontractor, shall have the necessary licenses and permits to fly systems in the ‘Open’ category as per the UK Implementing Regulation (EU) 2019/947, Annex A, point UAS.OPEN.040, if testing and verification activities are applied in the UK, or the relevant equivalent certificates for operations performed outside of the UK (e.g., by subcontracted laboratories).

In addition, tests can be performed in the ‘Specific’ category based on operational authorisations granted by the UK CAA, in which case the requirements, limitations and conditions related to the specific authorisation shall be met in accordance with UK Implementing Regulation (EU) 2019/947, Articles 11 and 12.

Testing personnel assessing the safe controllability of the UAS shall demonstrate a minimum of 10 total flight hours of experience with three or more equivalent systems, such as a multirotor.

In addition to the above, the following table provides further recommendations on the competence requirements for personnel that may assess Conformity Assessment Bodies under this scheme.

If the CAB holds accreditation for the competence of the personnel as outlined in BS EN ISO/IEC 17025 section 6.2, it can be assumed that the CAB meets the competence requirements for personnel involved in the relevant verification activities.

Table 5. Competence requirements for personnel.

	Essential criteria	Desirable criteria	Rationale
Education	Degree in Mechanical or Telecommunications Engineering.	Degree in Aerospace or Aeronautical Engineering.	The activities will be related to aerospace regulations, products, jargon.
General experience	Minimum of 5 years industry experience (preferably within UAV, aerospace, or related sectors).	More than 10 years industry experience (preferably within UAV, aerospace, or related sectors).	Extensive industry experience provides strong technical understanding of systems and processes, which is beneficial for conducting conformity assessments and audits.
Specific experience	Experience conducting audits, inspections, or testing of mechanical systems or products.	Experience auditing, designing, or testing UAV systems or similar technologies.	Familiarity with audit and inspection processes enhances the ability to identify non-conformities. Experience in design and testing helps in understanding system behaviour and evaluating compliance effectively.
Work experience	Experience working within aerospace sector organisations or the military.	Previous experience with Civil Aviation Authorities, Accredited Laboratories, Conformity Assessment Bodies, or other	Exposure to these environments supports understanding stakeholder expectations, regulatory behaviour, handling technical

		regulatory organisations.	discussions, and communicating clear compliance-driven messages.
Technical skills	Strong mathematical skills Experience with calibration and testing tools Understanding of simulation and digital testing tools Ability to interpret technical drawings and schematics Competence in developing or reviewing detailed technical documentation Knowledge of relevant technical standards (e.g., ISO 17025, ISO 17065, EN 4709-00X).	Experience applying these skills within certification, inspection, or conformity assessment environments.	These technical capabilities support effective evaluation of product compliance, measurement accuracy, and the technical integrity required for conformity assessment processes.
Soft skills	Ability to make consistent, evidence-based decisions. Strong adherence to procedures, standards, and regulatory requirements. Creative and analytical problem-solving capabilities. High level of attention to detail.	Experience navigating complex assessment processes or managing competing priorities.	These competencies are critical when conducting regulated assessments, ensuring accuracy, impartiality, clear communication, and the timely completion of conformity evaluations.

CABs shall maintain records demonstrating that personnel performing testing activities meet the applicable licensing, qualification and competence requirements for the activities they undertake. Such records shall be available as part of the CAB's conformity assessment records and shall identify the personnel involved in the testing activities, together with the basis on which they were considered competent to perform those activities.

15.0 Evaluation Reporting

While evaluating a product, CABs shall keep a proactive approach with manufacturers during the assessment process. All evaluations performed shall be notified to the manufacturer and, if not available, the current status of the assessment may be facilitated upon request.

If the process is successful, the CAB shall issue a certificate(s) based on which manufacturers can issue a declaration of conformity. When non-conformities or non-compliances are found and the process of issuing a type examination certificate or an approval to quality management systems is completed and unsuccessful, CABs shall issue an official report with their findings, deviations, and conclusions. If the manufacturer disagrees with the result, they can file a complaint or appeal with the CAB.

16.0 Handling of non-Conformities

When detecting a non-conformity on a product or on a quality management system with effects on the product, CABs shall record the non-conformity found and the process followed. This process shall include, at a minimum:

- Identification of the non-conformity. This shall include information on how it was detected via testing, design appraisal, etc.
- Notification of the non-conformity to the applicant.
- Response from the applicant.
- Decision taken. Suppose the applicant proposes a modification to the system. In that case, it shall be analysed to determine if it may affect other previously evaluated requirements, require additional activities to be considered, or reinitiate the assessment process.
- All the corrective actions shall be logged, and all changes shall be included in the technical file maintained by the CAB.
- Timeline. When a non-conformity is detected during audits or surveillance activities and is applicable to products with a current and valid certificate(s), the CAB shall notify the certificate holder of the maximum time allowed to close the non-conformity, before appropriate action is taken regarding the certification, including restriction, suspension or withdrawal, as applicable.

All non-conformities shall be closed before certification is granted under Module B or Module H.

For non-conformities identified during Module H surveillance, the CAB shall define a timeframe for their closure. Continued certification shall be subject to satisfactory closure of

the non-conformity within the timeframe established by the CAB. Where the non-conformity is not satisfactorily closed within that timeframe, the CAB shall take appropriate action regarding the certification, including withdrawal, suspension or restriction, as applicable.

17.0 Surveillance procedures

CABs shall implement surveillance activities in a consistent and structured manner to ensure continued confidence in certified products. As a minimum, CABs shall define and apply the scope, methodology, frequency and criteria of surveillance activities based on the applicable conformity assessment module and associated risks.

The requirements for surveillance activities are covered in UK Regulation (EU) 2019/945 Annex Part 9 (Conformity assessment Module H - Conformity based on full-quality assurance), section 4. The requirements for general surveillance procedures are covered by BS EN ISO/IEC 17065, section 7.9. CABs to which surveillance procedures are applicable shall comply with the requirements mentioned. Surveillance activities may include documentation review, product assessment, audits or testing, as applicable. When surveillance is required, audits shall be conducted annually, with a tolerance of one month before or after the scheduled annual surveillance date.

CABs may conduct additional surveillance activities where considered necessary based on the risk profile of the certification, including previous assessment results, identified non-conformities, complaints or significant changes affecting the certified system.

Conformity Assessment Bodies for UAS are not required to perform surveillance activities unless the process follows Module H and the CAB is approved to use it.

CABs shall establish, document, implement and maintain a certification programme for Module H assessments in accordance with Section 9 of BS EN ISO/IEC 17021-1. The certification programme shall define the initial certification activities, surveillance audit programme, recertification activities, and the associated audit intervals and planning arrangements to ensure the continued validity of the certification. Recertification activities may commence up to three months before the certificate expiry date and shall be completed before expiry to maintain continuity of certification.

18.0 Access to the Scheme

Conformity Assessment Scheme for UAS is a public document that can be accessed by any interested party at https://www.caa.co.uk/drones/drone-regulations/policy-programmes/market-surveillance/.

19.0 Certifications

Publication of Certifications

Certificates issued by CABs shall not be made public unless the CAB issuing the certification and the manufacturer, whose product has been assessed, have agreed to do so in writing.

CABs shall maintain a database of all certificates issued in a single source, using the internal governance body. This source shall be accessible to all CABs, UKAS and the MSA for referencing. The database shall include, as a minimum, the following information:

- Commercial name of the manufacturer.
- Commercial name and model number of the product.
- UK Class assessed.
- Issuance date of the certification.
- CAB issuing the certification.
- Status of the certificate: Valid, Suspended, Withdrawn or Restricted.

Certification management and withdrawal

Manufacturers are responsible for maintaining compliance with their certified products. When compliance cannot be maintained, they shall implement all corrective actions to restore compliance, in line with Module A or Module C requirements from UK Regulation (EU) 2019/945. If needed, CABs are approached to confirm the activities performed to maintain compliance or to reassess the product.

The MSA will inform CABs about non-conformities detected in the market. If the non-conformity arises from a non-conforming product that has been previously certified, the CAB that had issued the certification, upon notification from MSA, shall withdraw, suspend or restrict the certificate or portions of the covered scope of the certificate, at the same time that the MSA will be suspending, restricting or withdrawing the product.

The manufacturer shall be notified, and until the issue is resolved and the CAB can assure the compliance of the product again, the certificate shall remain suspended or withdrawn if deemed necessary.

After the expiration of a certificate(s), if the manufacturer does not engage with a CAB to reassess the system, the certification will expire and not be valid. The manufacturer shall be in charge of removing all products from the market.

CABs are not required to maintain active surveillance on the certifications issued, but they shall notify MSA when detecting a possible compliance violation.

Note: Certification issued by CABs under this Conformity Assessment Scheme does not transfer responsibility for product compliance from the manufacturer to the CAB or the Market Surveillance Authority.

Manufacturers remain fully responsible for ensuring that products placed on the market comply with the applicable regulatory requirements.

20.0 Non-conforming products and fraudulent claim of certification

The MSA shall perform market surveillance activities to ensure that products placed on the UK market and subject to this CAS, comply with UK Regulation (EU) 2019/945. Where the MSA identifies potential non-compliance through activities such as documentation review, testing, assessment of technical information, or verification of markings and labels, it may determine that a product does not meet the requirements of the regulation and therefore constitutes a non-conforming product.

By operating under this Conformity Assessment Scheme, all parties acknowledge and accept that the MSA may exercise its statutory powers under the applicable legislation, including requiring the suspension, restriction or withdrawal of certificates issued under this scheme, and taking the necessary measures to restrict, withdraw or remove non-compliant products from the UK market.

If during a market surveillance activity, a non-conforming product is detected, the MSA shall determine which of the following scenarios applies:

- UAS product that has undergone a conformity assessment under Modules B + C or Module H through an accredited and approved CAB.
- UAS product that has undergone a conformity assessment under Module A.
- UAS product that has not undergone any conformity assessment.

UAS product under Module B + C or Module H

When assessing a product that has undergone a Module B + C or Module H assessment, the MSA shall verify the claim of certification by engaging with the CAB and confirming the listed information.

If the product has undergone a Module H assessment, the MSA shall not take further action, as the responsibility will be with the CAB. Where certification under Module H has been restricted, suspended or withdrawn by the CAB as a result of non-conformities identified through its certification or surveillance activities, the CAB may reinstate the certification, as applicable, once the manufacturer has satisfactorily addressed the non-conformities and the

CAB has verified that conformity has been restored in accordance with Sections 16 and 17 of this CAS.

Where a product has undergone a Module B + C assessment, the MSA may assess the manufacturer's application of Module C. If deemed necessary, while assessing a manufacturer's application of Module C, the MSA may engage with the CAB issuing the type examination certification to align with the non-conformities detected, including those related to the Module B performed by the CAB. Following notification by the MSA, the CAB shall handle the non-conformity in accordance with the requirements of Section 16 of this Conformity Assessment Scheme.

Upon detection of a non-conformity, the MSA will notify the CAB responsible for the issuance of the type examination certificate and the distributor of the product for which the non-conformity was detected, of the finding. The CAB shall act in accordance with the MSA decision by withdrawing or suspending the type examination certificate and its validity. The manufacturer shall re-engage with the CAB to reinitiate the assessment and ensure the system is compliant with UK Regulation (EU) 2019/945 and its requirements. Once the CAB has verified that the non-conformity has been satisfactorily addressed in accordance with Section 16, the certification may be reinstated subject to confirmation from the MSA that the conditions giving rise to its decision have been resolved.

UAS product under Module A

Where a product has undergone a Module A assessment, the MSA shall verify the claim of the certification. The MSA shall analyse the technical file developed by the manufacturer. If required, additional testing shall be executed at accredited laboratories to ensure the validity of the results. The MSA shall ensure the testing is performed according to the required standards. If the assessment of specific requirements depends on the interpretation of the standards, the MSA shall raise the issue in the governance forum of CABs to agree on the interpretation.

After an investigation of a UAS product under Module A is completed, if the result is negative, it shall be treated as a fraudulent claim of certification by the manufacturer.

UAS product that has not undergone any conformity assessment

When the MSA detects a product in the market without any conformity assessment, it shall be treated like a fraudulent certification claim.

If a manufacturer's certification claim is found fraudulent during market surveillance activities, the MSA shall thoroughly investigate responsibilities and liabilities. Upon completion, MSA shall issue a report for the manufacturer clearly stating the following information (more information can be added if deemed necessary by the MSA):

- Data of the manufacturer or the responsible entity for the product.
- Identification of the product analysed or investigated. The identification shall include the place of acquisition or the channel through which it was acquired.

- Results of the analysis, including all possible testing performed, and rationale - determining the claim of certification is fraudulent.
- Statement to remove all affected products from the market and timeframe.
- Liabilities and/or fines.

The MSA will follow up on any issued report related to the non-conforming product or fraudulent claim of certification to ensure the required actions have been completed.

21.0 Complaints and appeals

Complaints from applicants

CABs shall establish and maintain a documented process to receive, evaluate, and respond to complaints from applicants related to the conformity assessment activities carried out under this CAS. The complaints process shall comply with the requirements listed in BS EN ISO/IEC 17065 section 7.13. CABs shall ensure that complaints are handled in a fair, impartial and timely manner.

CABs shall maintain records of complaints received, the evaluation performed, and the actions taken to resolve them. Applicants shall be informed of the outcome of the complaint at a suitable time.

Where the applicant considers the complaint has not been satisfactorily addressed by the CAB, the matter may be escalated to the MSA.

Appeals from applicants

When an applicant disagrees with a decision taken by a CAB under this CAS, it may appeal against such a decision (e.g., refusal, suspension or withdrawal of certification). CABs shall establish and maintain a documented process for handling appeals from applicants against decisions. This process shall comply with the requirements of BS EN ISO/IEC 17065 section 7.13 and shall ensure that appeals are reviewed impartially by personnel not involved in the original decision.

CABs shall review the appeal, evaluate the relevant information, and communicate the outcome to the applicant at a suitable time. Records of appeals and the decisions taken shall be maintained.

Where the applicant considers the appeal has not been adequately addressed, the matter may be escalated to the MSA.

Complaints and appeals to the scheme owner

Any complaints and appeals regarding this CAS shall be directed to: msaenquiries@caa.co.uk and shall include, as a minimum:

- Name and address of the person making the complaint or appeal.

- Role under this CAS.
- Clear statement on the complaint/appeal.
- Documentation that supports the claim or any other justification to be submitted.

All complaints and appeals will be treated equally and answered by the MSA if they have been correctly submitted. All available information shall be submitted and traceable to specific requirements from regulations, standards, and/or this CAS.

22.0 Scheme reference in publicity and marketing

Any interested party may use this Conformity Assessment Scheme in publicity and/or marketing material. When directly mentioning specific manufacturers, CABs, or UKAS, an explicit agreement between the parties shall be in place.

The MSA has authority over any information shared in publicity and marketing and may request modifications and/or additions to any shared material linked to this CAS, especially when confidential information outside the scope of this CAS is used.

CABs shall establish and maintain a documented policy and process governing the identification, review and publication of publicly available information related to their certification activities, ensuring that such information remains accurate and up to date. The policy and process shall comply with the requirements defined in BS EN ISO/IEC 17065 Section 4.6.

23.0 Retention of Records

All users of this CAS, regardless of their role, shall maintain records of all activities, documentation, processes, and any other tasks derived from it for a period of at least ten years. Specifically, technical files and/or conformity assessments, certifications and type examination certifications shall be securely stored.

CABs shall comply with BS EN ISO/IEC 17065 sections 7.12 and 8.4 in relation to retention of records. They shall have these records available for a period of at least ten years from when the CAS is used officially at the beginning of the accreditation process with UKAS.

24.0 Sampling

CABs shall determine a process for selecting the samples that will undergo the certification process according to BS EN ISO/IEC 17025 section 7.3. If the testing activities are outsourced or subcontracted, the CAB shall verify that the subcontractor's sampling process is aligned with its own.

Manufacturers that apply for a conformity assessment process to a CAB shall agree to follow their sampling rules and commit to delivering the specified sample(s) for testing.

For conformity assessments under Module H, CABs shall establish and maintain a documented sampling methodology defining the criteria used to select representative samples for assessment. The sampling methodology shall ensure that the selected samples are representative of the products covered by the manufacturer's quality management system and sufficient to provide confidence that conformity is consistently achieved across production. When establishing the sampling methodology, CABs shall take into account, where applicable, product variants, manufacturing processes, production sites, production volumes, critical product characteristics and previous assessment results. The sampling methodology shall be documented, justified and consistently applied.

Where prototypes are used as the sample analysed instead of production units, CABs shall ensure that the subsequent manufacturing of additional systems conforms to the prototype assessed. If Module B + C is used, the manufacturer shall ensure the conformity of subsequent units rather than the sample, which aligns with the internal production control requirements under Module C.

The MSA will follow defined policy procedures while performing sampling activities and shall have access to production units sold in the UK market when monitoring the market. Samples may be obtained from a retailer or directly from the manufacturer. Market inspection activities shall avoid destructive testing unless deemed necessary by the inspector. After inspection, the sample may be returned to the retailer, manufacturer, or owner.

25.0 Acceptance of Conformity Assessment results

When applying for a type examination certification under this CAS, a manufacturer may submit test results, analyses, calculations or other technical justifications that were generated prior to the initiation of the conformity assessment activities by a Conformity Assessment Body (CAB).

Where such pre-existing evidence is submitted, the CAB shall evaluate the relevance and adequacy of the information for the purposes of the conformity assessment. The CAB may accept the submitted results where they are deemed appropriate or may require partial or full re-assessment. In all cases, the CAB shall ensure that any accepted results are sufficient, technically valid and reproducible in relation to the conformity assessment activities being performed.

Note: Metrological traceability is not required for evidence provided by the manufacturer, provided that the requirements above are satisfied.

Manufacturers may also make use of external laboratories accredited to BS EN ISO/IEC 17025, operating under the required standards to generate test evidence in support of conformity with applicable requirements. Where such evidence is submitted to a CAB, the

CAB shall assess its suitability and completeness as part of the conformity assessment process.

Where the CAB considers the provided evidence to be insufficient to demonstrate compliance, or where uncertainties remain regarding conformity with the applicable requirements, the CAB shall require additional testing, repeat testing or further analysis, as necessary, to reach a justified conformity assessment decision.

26.0 Outsourcing

CABs may outsource or subcontract part of the assessment activities to different parties or entities, including laboratories. The CAB shall remain responsible for the outsourced activities and for the overall conformity assessment decision. CABs shall ensure appropriate supplier control arrangements are in place and that outsourced activities are performed in accordance with the applicable requirements of this CAS.

When outsourcing testing activities, CABs shall ensure the activities are performed according to specific standards, outsourced laboratories are accredited for the specific standards (e.g., EN 4709-001) being tested under BS EN ISO/IEC 17025. When accreditation for the applicable test standard is not available, the CAB may witness the testing activities to obtain sufficient confidence that the tests have been performed in accordance with the applicable test methods and that the results are valid for the purposes of the conformity assessment. The CAB shall document the witnessing activities performed, the evidence reviewed, and the rationale for accepting the test results.

Similarly, the MSA shall follow its internal procedures when outsourcing activities and conduct analysis or testing when monitoring the market.

27.0 Surveillance

All products placed on the UK market are subject to surveillance by the MSA. The surveillance shall be a recurrent activity led by the MSA, which will actively analyse and determine potential non-conformities. The MSA will follow all its internal product evaluation, market surveillance processes, and related policy procedures. The methods and procedures cover all relevant market surveillance activities, including:

- Reactive and proactive market surveillance.
- Preparation and performance of market surveillance campaigns.
- Product evaluations, risk assessments and investigations.
- Withdrawing, suspending or restricting products presenting a risk from the market.
- Notifying the public and the Secretary of State about any withdrawal activities.

- Management and oversight of corrective actions.

28.0 Reporting to the Scheme owner

CABs and UKAS shall report to the Scheme Owner to support the effective operation, maintenance and continuous improvement of this Conformity Assessment Scheme. Reporting shall include information relevant to the operation of the scheme, accreditation and certification activities, and any significant issues that may affect the consistent application of this CAS or require updates to the scheme. All data and information reported to the Scheme Owner shall be treated as confidential unless the MSA determines that disclosure is necessary in the public interest.

Besides the obligations imposed in Article 32 of UK Regulation (EU) 2019/945, the following information will be required to be shared:

- New certificates issued (from CABs), or accreditations issued to new CABs (from UKAS).
- Refusal, restriction, suspension or withdrawal of accreditations to CABs.
- Issues detected in standards, regulations, or conformity assessment activities that may affect the operation or consistent application of this scheme.

If any CAB needs to report to the scheme owner, and that information shall remain confidential, it may contact the MSA directly. UKAS may need to report to the scheme owner when detecting any information that may contradict sections included in this CAS.

Additionally, when updates to standards, regulations, or any other information used within this Conformity Assessment Scheme are introduced or foreseen, they shall be considered to update the CAS and align with the updates.

CABs, UKAS and other interested parties may submit information relevant to the operation of this Conformity Assessment Scheme to the MSA through the communication channels specified by the MSA (via email to msaenquiries@caa.co.uk). Submissions should clearly identify the matter being reported, provide sufficient supporting information to enable its assessment and, where applicable, identify the relevant certification, accreditation or scheme requirement.

Upon receipt, the MSA shall acknowledge and review the information provided, validate it as appropriate, and determine whether any action or amendment to the CAS is required. Where a change to the CAS is considered necessary, the MSA shall implement the appropriate amendment in accordance with the scheme review and maintenance process defined in Section 2.

29.0 Subcontracting of Scheme Operation

This Conformity Assessment Scheme for UAS shall not be subcontracted. The responsibility will remain in the MSA.

30.0 Changes to the Scheme

The MSA, as the scheme owner, will monitor the development of standards, regulations and other normative documents which define the specified requirements referred to in sections above. Where changes to these documents, market surveillance findings, accreditation activities, or operational experience indicate that the scheme requires updating, the MSA will assess the impact on the scheme and determine whether a revision is necessary.

Where a revision is proposed, the MSA will consult the CAB Governance Group and, where appropriate, other relevant stakeholders to obtain technical input on the proposed changes and any implementation considerations. Following this consultation, the MSA will determine the final content of the revision, any applicable transition arrangements, and the implementation date before issuing the updated version of the CAS.

In addition, the MSA will inform UKAS of any revisions to the CAS and provide an overview of the relevant changes together with an assessment of their impact on the operation of the scheme. Where applicable, this information will include any transition arrangements associated with the revised requirements.