



Comment Response Document
Irish Aviation Authority
UAS Geographical Review
Consultation 2022



1. Summary.

Twenty-three (23) submissions were received in total from the online form.

Comment Responses:

Accepted: 10

Partially Accepted: 11

Noted: 32

Not Accepted: 15

2. Individual Comments & Responses.

In responding to the comments, the following terminology was applied to attest the Irish Aviation Authority (IAA), Safety Regulation Division (SRD) position:

- **Accepted** – IAA, SRD agree with the comment & any proposal is wholly incorporated.
- **Partially Accepted** – IAA, SRD either partially agrees with the comment, or agrees with it but the proposed amendment is only partially incorporated.
- **Noted** – IAA, SRD acknowledges the comment, but no change to the existing proposals is considered necessary.
- **Not Accepted** – The comments or proposed amendments are not agreed by IAA, SRD

RESPONSE 1	
Role	UAS Operator (Specific Category);
UAS Geographical Zones	<p>The new Dublin model appears to work well, us that as a template. Keep them realistic. Ridiculous restrictions like the current Waterford and Cork ones are typical of what needs to change.</p> <p>Communicate them better. A hard-to-read crappy PDF written in a style only familiar to experienced aviation people hidden deep in a website is not the way to communicate vital safety information to the masses. Know your audience.</p>
Response	Accepted. Dublin model applied to other CTRs where appropriate. Interactive chart developed for publication.
Access Request Form UF101	<p>There needs to be a lot better responsiveness to drone authorizations for flight in the restricted airspace. At the moment drones are very much considered second class citizens for most airports and it appears that any excuse to ignore them or not service their needs is utilized. Large lead times on UF101 form processing, Completely ignoring them in other cases. Also recently had a UF101 approval but when I called on the day they said the weather was IMC (I believe that is the term, even though the volume I was operating in was 20 diameter and 70 meters AGL around a tall structure of same size and we had blue skies over head. This was clearly a safe operation but the controller couldn't be bother to look at the details. This would never happen in manned aviation.</p>
Response	Noted. Will continue to monitor response time.
Access to UAS Geographical Zones established for the protection of manned aviation shall requires operational authorisation. We invite alternative proposals to further facilitate access while main...	<p>Any system needs to have responsiveness. For example: "we cannot authorize your request because altitude too high, reduce your altitude to below 500 feet and re submit".</p> <p>Needs to be "frictionless". Needs to be the path of least resistance. Needs to be consumer orientated, not old school archaic manned aviation procedures. Remember 99% of drone operators have no clue how big boy aviation works.</p>
Response	Noted. We must balance the speed of approvals with ensuring safety.
Additional Comments	<p>The IAA is historically a B2B organisation. With drones it is having to pivot itself to be much more consumer orientated. Considering drones are the future I would suggest they take this pivot seriously. Implementing archaic manned aviation style procedures for consumer level drone operators is not a good way to keep the average drone person "in the fold". The safety levels of manned aviation can still be maintained while at the same time being much more consumer driven. Remember if you want people to do something then make it the path of least resistance. At the moment the IAA is failing at this. To operate a drone within the law in Ireland is not as they say a "frictionless experience".</p> <p>Talk directly to the UAAI and other bodies via a zoom call. They might be able to give you a thing or two worth</p>

	considering. The stakeholders most effected by this are the drone operators. Historically manned aviation and airports have all the say in such things. Start to bring the drone people in a lot more. We are the future remember.
Response	Not Accepted. The IAA regulates both general and commercial air traffic. We engage with all relevant representative bodies regularly.

RESPONSE 2	
Role	UAS Operator (Specific Category);
UAS Geographical Zones	Excellent. very clear and much more flexible
Response	Noted.
Access Request Form UF101	Still looking for too much detail required. in terms of background and equipment of the operator
Response	Not Accepted. All data sought is relevant to the zone authority in assessing the request.

RESPONSE 3	
Role	UAS Operator (Open Category);
UAS Geographical Zones	EIU34 EIKY Red Zone
Response	Noted.
Access to UAS Geographical Zones established for the protection of manned aviation shall requires operational authorisation. We invite alternative proposals to further facilitate access while main...	See below re size of EIU34 EIKY Red Zone, and associated zones of lesser restriction.
Response	Noted.
Additional Comments	In relation to the restricted airspace around Kerry Airport, I believe serious consideration should be given to reducing this in size. It is disproportionately large given the very low level of traffic to the airport (the largest in the country), with a bigger red zone than Shannon, Cork or Dublin (possibly bigger than all three put together!). This does not appear to make any sense and warrants review/adjustment.
Response	Not Accepted. The size of the restrictions around EIKY is primarily due to the high terrain in relation to the flight procedures. The large restriction is required to ensure the protection of those procedures.

RESPONSE 4	
Role	UAS Operator (Open Category);UAS Operator (Specific Category);
UAS Geographical Zones	Information is very clearly presented. It's a huge improvement on all of the various unofficial ones and I really hope it is the shape of what we can expect. The link for 101 UAS should probably link to the equivalent of (https://www.iaa.ie/general-aviation/drones/docs-list/docs/default-source/publications/forms/unmanned-aircraft-application-forms/uas-flight-in-controlled-airspace-application-form--v-9).
Response	Accepted. Will review link.
Access Request Form UF101	If there is a version other than the one that is currently in use, I cannot find it.
Response	Noted. See Annex A of consultation document.
Access to UAS Geographical Zones established for the protection of manned aviation shall requires operational authorisation. We invite alternative proposals to further facilitate access while main...	I'm not sure that there is an alternative. I think, rather, that we need a way to make the access more streamlined. UF101 being printed out, filled out and emailed in is a haphazard system. An online system, signed by our MySRS identities, with a form input seems a bit more straight forward.
Response	Accepted. Digitisation of the access request process is under review.

RESPONSE 5	
Role	UAS Operator (Open Category);
UAS Geographical Zones	Waterford county
Response	Noted.
Access to UAS Geographical Zones established for the protection of manned aviation shall requires operational authorisation. We invite alternative proposals to further facilitate access while main...	I use a DJI mini SE 249g drone
Response	Noted.
Additional Comments	The area around Waterford and Cork airport seems to be too wide an area for safety concerns DJI always stop Infraction been caused Bigger Drones are normally more dangerous but they have more Professional pilots
Response	Not accepted. The reduced restrictions around Cork and Waterford allow for greater flexibility while maintaining the safety of the Instrument Flight Procedures around the airports.

RESPONSE 6	
Role	UAS Operator (Open Category);
UAS Geographical Zones	The NFZ around the airport is draconic. 9 of our car dealerships fall into the one zone meaning we can't fly a drone around our own premises, not even at a measly 10m altitude. Needless to say that even at 120m altitude we wouldn't pose a danger to air traffic (even though we never fly this high). The safety precautions are way beyond requirements and make our investment in drones obsolete as it simply won't take off anywhere around our dealerships. A limit to 30m altitude in the msot restrictive NFZ would still ensure safety while allowing local businesses to video their own premises.
Response	Not Accepted. These dealerships all reside with the 5km 'no fly zone' around the airport. This restriction is required to ensure the safety of manned aircraft in the vicinity of the airport and is in line with current best practice. Access to this zone is possible in the specific category and with approval of the zone authority. The specific category requirement is to ensure the appropriate level of training to operate is close proximity to the airport.
Access to UAS Geographical Zones established for the protection of manned aviation shall requires operational authorisation. We invite alternative proposals to further facilitate access while main...	Limit the altitude in Red NFZ's to allow close to ground level activity. 30m is safe everywhere outside the bounds of the airport.
Response	Not Accepted. See above.
Additional Comments	Right now our entire drone equipment is useless to us due to the overly restrictive NFZ
Response	Not Accepted. See above.

RESPONSE 7	
Role	UAS Operator (Open Category);
UAS Geographical Zones	The expanse of the Dublin airport terrain zones have made it impossible for us to use our drone for commercial work related to the company. We fly low, shooting cars in a number of dealerships in North Dublin. The updated zones have stopped this entirely and we are no longer able to use our drone for it's purpose, to film vehicles on our property.
Response	Not Accepted. The terrain restrictions within CRTs are required to ensure the safety of manned aircraft in the vicinity of the airport, in particular the safety of instrument flight procedures.
Access Request Form UF101	Access Request Form UF101 is irrelevant to our business and the cost of the license prices us out of the market for requests
Response	Not Accepted. See above.
Access to UAS Geographical Zones established for the protection of manned aviation shall requires operational authorisation. We invite alternative proposals to further facilitate access while main...	the NFZ makes sense in principle, but at 30m altitude we pose no threat to any aircraft ever and believe this needs to be revisited for low flying drones.
Response	Not Accepted. See above.
Additional Comments	This really needs to be revisited. The blanket ban and restrictions on airspace have made our use of the drone impossible. Can exceptions or modifications be made to the existing regulations? We are happy to discuss further.
Response	Not Accepted. See above.

RESPONSE 8	
Role	Property Owner;
UAS Geographical Zones	All
Response	Noted.
Access Request Form UF101	Yes
Response	Noted.
Additional Comments	I would like to understand who owns the air space?
Response	Noted. The State is responsible for sovereign airspace.

RESPONSE 9	
Role	UAS Operator (Open Category);UAS Operator (Specific Category);
UAS Geographical Zones	Red rectangle in Atlantic Ocean to the south of Skellig Rocks. I am seeking clarification on whether this is intended to restrict access to flying drone near the Skellig Rocks.
Response	Noted. This is a Navel Service Firing Range.
Access to UAS Geographical Zones established for the protection of manned aviation shall requires operational authorisation. We invite alternative proposals to further facilitate access while main...	In relation the red rectangle in Atlantic Ocean to the south of Skellig Rocks. I am seeking clarification on whether this is intended to restrict access to flying drone near the Skellig Rocks and if access would need to be sought when flying around (not over) the Skellig Rocks.
Response	Noted. This is a Navel Service Firing Range. Access requests should go to the zone authority, the Dept. of Defence.

RESPONSE 10	
Role	UAS Operator (Specific Category);UAS Operator (Open Category);Local Authority;
Access Request Form UF101	On the section about open category sun category it should read A1, A2, or A3. not A1, A3,A3. In the Lat Long section it should say WGS-84 not WGS-64. Maybe ITM should be added. Should there be a mention in the heading of limited to holders of an operational authorisation in the Specific Category?
Response	Partially Accepted.
Access to UAS Geographical Zones established for the protection of manned aviation shall requires operational authorisation. We invite alternative proposals to further facilitate access while main...	Does this mean that you cannot fly within controlled airspace if you have only open category qualifications?
Response	Noted. No. The restriction is limited to the restricted areas. Open category may operate within the limits provided.
Additional Comments	This update to geographical zones is very welcome and I have no doubt will be well received by UAS operators.
Response	Noted.

RESPONSE 11	
Role	UAS Operator (Open Category);
UAS Geographical Zones	The geographical zones are clearly marked and good
Response	Noted.
Access Request Form UF101	Very informative and relevant
Response	Noted.

RESPONSE 12	
Role	UAS Operator (Open Category);UAS Operator (Specific Category);Remote Pilot;
UAS Geographical Zones	Donegal and Sligo
Response	Noted.
Access Request Form UF101	<p>I believe the use of UF101 forms is a bit dated in this day and age, although works well. I live near Donegal airport and have used the UF101 form many times.</p> <p>Although Donegal Airport has started to use Altitude Angel recently instead of the UF101.</p> <p>I did try this a couple of months ago but couldn't complete the application using Altitude Angel at the time and had to use a UF101 to get permission.</p>
Response	Accepted. Digitisation of access requests in under review.
Access to UAS Geographical Zones established for the protection of manned aviation shall requires operational authorisation. We invite alternative proposals to further facilitate access while main...	<p>If a UAV pilot is using a drone less than 250g, where it is not possible to get an FTS/Parachute system making it not possible to apply for Operational Authorisation.</p> <p>Then why not let this pilot fly in these zones if they have a Specific category remote pilot certificate within the rules and regulations?</p>
Response	Partially Accepted. We will review the requirement for submitting access requests with CTRs.

RESPONSE 13	
Role	UAS Operator (Open Category);UAS Operator (Specific Category);Remote Pilot;
UAS Geographical Zones	The 30m limit for Open Category operators is very welcome but will be of more practical use if set at 50m (ideally 75m). Open Category operators will be very aware of the importance of staying within such a limit and as such this will not increase the risk to manned aircraft. In addition to being of practical use to operators, it will free up ATC's time in going through the full UF101 process.
Response	Not Accepted. The limit is based on the obstacle capture surfaces around the airport. An increase from 30m would penetrate this surface and impact on instrument flight procedures. Please provide evidence for your statement that an increase in the height would <i>"not increase the risk to manned aircraft"</i> .

RESPONSE 14	
Role	Drone;
UAS Geographical Zones	EIU27 EIDW Red Zone
Response	Noted.
Access Request Form UF101	EIU27 EIDW Red Zone
Response	Noted.
Access to UAS Geographical Zones established for the protection of manned aviation shall requires operational authorisation. We invite alternative proposals to further facilitate access while main...	We can't fly the drone for our dealership due to the restricted area. looking to amend the height restriction/ zone as its difficult for our business.
Response	Noted.

RESPONSE 15	
Role	Remote Pilot;UAS Operator (Open Category);
UAS Geographical Zones	Swords area specifically Airside Retail Park
Response	Noted.
Access to UAS Geographical Zones established for the protection of manned aviation shall requires operational authorisation. We invite alternative proposals to further facilitate access while main...	Narrow the restricted zones to areas directly beside the airport or introduce a height restriction to those areas like Airside in Swords which are busy retail areas where we have a need to collect drone footage and are far enough away from the airport so as to pose no danger to airplanes especially if a height restriction is implemented. Implement a no-fly zone around the airport itself and then a staggered height restricted zone for areas close to the airport.
Response	Not Accepted. This area resides within the 5km 'no fly zone' around the airport. This restriction is required to ensure the safety of manned aircraft in the vicinity of the airport and is in line with current best practice. Access to this zone is possible in the specific category and with approval of the zone authority. The specific category requirement is to ensure the appropriate level of training to operate is close proximity to the airport.

RESPONSE 16	
Role	UAS Operator (Specific Category);UAS Operator (Open Category);Remote Pilot;
UAS Geographical Zones	In favour. Proposed zones are a step forward from the current geographical zones
Response	Noted.
Access Request Form UF101	Is UAS serial number necessary? It can be necessary to swap out UAS on the day of an operation for multiple reasons.
Response	Partially Accepted. Yes the serial number is necessary to assist in identifying legitimate UAS operator from those operating within approval. The necessity to at time "swap out" the UAS is understood and accepted. Please inform the zone authority at the time if this is necessary.

Additional Comments	The IAA should seek to engage with local authorities on ground signage to indicate the boundaries of geographic zones. Many of those who fly illegally do not consider their activities to be a form of aviation and are unlikely to engage with current forms of outreach. A standard format of signage placed around geographical zones, especially in urban areas, would help to inform and educate. One example I am very familiar with is the current exclusion zone around the helicopter landing pad at Galway University Hospital. This is violated on a weekly basis by operators filming or photographing Galway Cathedral, University College Galway and the Salmon Weir on the River Corrib. Many of those involved are visitors to the city and/or country and signage in the area would greatly assist in informing/educating many of these operators.
Response	Partially Accepted. We have engaged with a number of the zone authorities on signage and some plan on implements a limited amount. However, the size of the zones make full coverage highly impractical. The new interactive chart will assist in operators clearly identifying zone. Responsibility ultimately rests with the operator in understanding the restrictions. The zone around Galway University Hospital is now removed.

RESPONSE 17	
Role	UAS Operator (Open Category);UAS Operator (Specific Category);Remote Pilot;
UAS Geographical Zones	The new zones are much clearer for other state airports, similar to what was applied to EIDW.
Response	Noted.
Access Request Form UF101	I previously held (in 2021) a SOP and PCC and operated many times in controlled airspace both military and commercial through the UF101 form. I am currently not a holder of an Operational Authorization in the Specific Category (through cost and time etc) but hope to be in the future. I have however completed A2 Open Category, and Specific Category training. I operate drones for commercial use and it is a significant constraint (in some locations) not being able to complete a UF101 under the A2 Open Category, where risk is very low to uninvolved persons etc., e.g. farmland. Can applications be opened to all and reviewed on merits etc. I assume "Open Category Sub-Category (A1, A3, or A3) on the Sample UF101 form should be A2
Response	Partially Accepted. The level of training in the open category (particularly the lack of a practical assessment) is not considered sufficient for operating close to the airport. We are however, reviewing the requirement in the specific category.

Access to UAS Geographical Zones established for the protection of manned aviation shall requires operational authorisation. We invite alternative proposals to further facilitate access while main...	Similar comment as above.
Response	Partially Accepted. See above.
Additional Comments	Will IAA hold and maintain the interactive map, similar to the one on the website for consultation? There are multiple maps with somewhat confusing information. e.g. the Altitude Angel map which for example has an Area of Increased Risk at Dublin Docks and a Construction Progress Flight at Dublin 13 - I assume both are advisory. What is the status of these areas / restrictions / information - some clarity would be useful and a single source of information would also be useful. The DJI FlySafe Map also has a different arrangement, alignment with a definitive source would be useful.
Response	Accepted. Implemented.

RESPONSE 18	
Role	Air Navigation Service Provider; Airport Operator;
UAS Geographical Zones	I welcome this Review. Once the Review is complete and prior to the proposed UAS Geographical Zones being implemented, a national educational campaign is required to clearly illustrate to users, in particular the non-professional UAS Operators, the Airspace Red, Green and Amber Zones, their lateral and vertical extent, height limitations within, who is permitted to operate where, etc. Greater emphasis is needed on Operational Authorisation Holders in the Specific Category, ONLY, having access to the Red Zone and above the vertical limits of the Amber and Green Zones following the submission of a UF101 Form.
Response	Partially Accepted. The responsibility for operating with the limits of airspace restrictions rests with the operator. We will however produce an interactive chart to facilitate this.
Access Request Form UF101	Suggest removal of reference to " Open Category Sub-Category" from UF101 as the use of this Form is only for Operational Authorisation holders in Specific Category. I currently receive the UF101 Forms, how do we ascertain the bona-fides of applicants? Change "Allow at least 3 days", "Allow at least 7 days". Please replace

	safetymanager@sligoairport.com, with atc@sligoairport.
Response	Partially Accepted. Holders of an operational authorisation may operate with an open category drone.
Additional Comments	Are State Emergency Services, Gardai, Ambulance, Fire Service, Defence Forces, Mountain Rescue, Civil Defence, Coast Guard Units, RNLI, and the HSE mandated to obtain Operational Authorisation for operations in the Specific Category?
Response	Noted.

RESPONSE 19	
Role	UAS Operator (Open Category);UAS Operator (Specific Category);Remote Pilot;Manned Pilot;
UAS Geographical Zones	Nil
Response	N/A

Access Request Form UF101	<p>"UF101 Request Form</p> <p>The UF101 process is effective but needs refinement. Currently, the UF101 process itself is not robust. Non-authorized applicants are using the process unchecked. The integrity and assurance of the process is compromised if ATC cannot verify the applicant is legitimate and authorised to use the process. It clearly states on the form who can avail of the form, yet ATC seems to have no way of verifying the bona-fides of the applicant. This undermines the risk mitigation merits of the process and indeed the IAA's policy on Open and Specific category operations.</p> <p>As a matter of urgency, the UF101 process should be reviewed with a view to making ATC capable of checking an applicant's legitimate right to avail of the service.</p> <p>With regards to the form itself, an Unmanned Advisory Memorandum (UAM) should be published with information on how to use the form, who can use it, and where/when it is required. Some worked examples should be included.</p> <p>The following data is suggested as sufficient.</p> <ol style="list-style-type: none"> 1. UAS Operator Name. 2. UAS Operator Registration Number & Expiry Date. 3. Operational Authorization Number/LUC No. & Expiry Date. (Specific category operators only). 4. Remote Pilot Certificate Number & Expiry Date (Note: 30m Height Restriction Rule) (sub 250g, C0 and C1 UAS only) *. 5. UAS Model. 6. Remote Pilot Name(s). 7. Mobile Phone Number (Primary). 8. Mobile Phone Number (Secondary). 9. UAS Geographic Zone Name or Townland. 10. Latitude & Longitude. 11. Radius of Operation. 12. Maximum Height (Note: Max 30m Height Rule for non-Specific category operators) 13. Proposed Date & Times. 14. Duration. <p>Remove the Caution information.</p> <p>*Depending on the outcome of the UAS Geographical Zone access alternative proposals.</p> <p>Can the form be online and operate similarly to the manned aircraft 'File a Flight Plan Form'. https://www.iaa.ie/general-aviation/flight-planning/flight-planning-log-in/file-a-flight-plan-form</p> <p>72hours notice should be reduced to 24hrs. 72hours is too long for commercial UAS Operators and hinders the</p>
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	<p>unmanned industry here by not allowing operators to react to demand. 24hrs should still permit ATC to verify the request. The UF101 process and access rights to controlled airspace discriminates against unmanned aviation when compared to manned aviation's 30-minute flight plan process. Ref: AIP Ireland, ENR 1.10-13 Para 3.</p> <p>One of the major concerns with the current UF101 application system is it appears to only function as described in Dublin's Controlled Airspace. UF101 applications to other Controlled Airspace locations often go unanswered or are not acted upon without intervention by the UAS Operator through other means. This is very frustrating for commercial operators who are doing their best to work within the system.</p> <p>The IAA should therefore engage with other state airports and non-state-controlled ANSP's and develop an agreed protocol in the form of a Memorandum of Understanding (MOU) on the operation of UF101. This MOU should be published for all to see, reference, and comply with.</p> <p>"</p>
Response	<p>Partially Accepted. We will investigate if approvals are given to operators without a specific category authorisation within CTRs and delays in processing UF101s. We are also looking to digitise the access request process. 72hrs is currently required to safely risk access and process requests.</p>

<p>Access to UAS Geographical Zones established for the protection of manned aviation shall requires operational authorisation. We invite alternative proposals to further facilitate access while main...</p>	<p>"Access to UAS Geo Zones (Alternative Procedures). The current access policy to Prohibited airspace Geographic Zones being limited to Specific Category operational authorisation holders only is mostly sufficient except that it prohibits the use of very light unmanned aircraft (<250g) as they cannot meet the Specific Category technical mitigation requirement. As an alternative procedure for access to Red Geographic Zones for these aircraft, two options are suggested for UAS Operators and remote pilots who need to use very small unmanned aircraft that cannot meet the requirements of PDRA or SORA.</p> <p>Option 1: <250g UAS A remote pilot may operate a <250g UAS in ATC controlled Red Geographic Zones where the following criteria are met.</p> <ul style="list-style-type: none"> • UAS Operator is registered. • Remote Pilot holds a valid Certificate of Theoretical Knowledge (STS/PDRA pilot theory certificate) or an equivalent competency meeting the requirements of Attachment A to Chapter I of Appendix 1 to the Annex of Regulation 2019/947. • Operates on the basis of an approved UF101 submission to the relevant ATC unit. • Operates to a Height Restriction of 30m or the height of the tallest obstacle within 50m of the obstacle where the maximum height may be increased up to 15M above the height of the obstacle. • Adheres to an agreed Emergency Response Plan. UF101 permissions should include an Emergency Response Plan for a remote pilot to follow that includes instructions on how to contact ATC and what information to provide ATC if they lose control of their unmanned aircraft and there is a risk of it encroaching into the protected airports environment. <p>Rational: These ultra-light aircraft are considered by EU Regulations and EASA guidance as a very low risk aircraft type. However, they are currently unable to meet the requirements for Specific Category technical mitigations for STS/PDRA and SORA (adjacent airspace requirements) and so are excluded from operating in IAA Red Geographic Zones. As pilot competency is a major risk mitigator, the additional training requirement meets this competency requirements and so enhances the overall risk mitigation.</p> <p>.....alternatively.</p> <p>Option 2: <250g, C0 & C1 UAS A remote pilot may operate a <250g UAS or a C0 and C1 labelled aircraft in ATC controlled Red Geographic Zones where the following criteria are met.</p> <ul style="list-style-type: none"> • UAS Operator is registered. • Remote Pilot holds a valid Certificate of Theoretical Knowledge (STS/PDRA pilot theory certificate) or an equivalent
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	<p>competency meeting the requirements of Attachment A to Chapter I of Appendix 1 to the Annex of Regulation 2019/947.</p> <ul style="list-style-type: none"> • Operates on the basis of an approved UF101 submission to the relevant ATC unit. • Operates to a Height Restriction of 30m or the height of the tallest obstacle within 50m of the obstacle where the maximum height may be increased up to 15M above the height of the obstacle. • Adheres to an agreed Emergency Response Plan. UF101 permissions should include an Emergency Response Plan for a remote pilot to follow that includes instructions on how to contact ATC and what information to provide ATC if they lose control of their unmanned aircraft and there is a risk of it encroaching into the protected airports environment. <p>Rational: These light aircraft are considered by EU Regulations and EASA guidance as low risk aircraft type. C1 unmanned aircraft also have Remote ID capabilities and geo-awareness functionality. However, they are currently unable to meet the requirements for Specific Category technical mitigations for STS/PDRA and SORA (adjacent airspace requirements) and so are excluded from operating in IAA Red Geographic Zones. As pilot competency is a major risk mitigator, the additional training requirement meets this competency requirements and so enhances the overall risk mitigation.</p> <p>"</p>
Response	See below.

Additional Comments	<p>"continued from above.....</p> <p>Non-Airspace Risk Geographic Zones. Due to the security or other legitimate concern for a zone, red non-airspace Geographic Zones should remain restricted to those with Specific Category operational authorisations but also include Remote Pilot who holds a valid Certificate of Theoretical Knowledge (STS/PDRA pilot theory certificate) or an equivalent competency meeting the requirements of Attachment A to Chapter I of Appendix 1 to the Annex of Regulation 2019/947. An updated UF101 process should be used as the means to request access.</p> <p>Other non-airspace restricted Geographic Zones could be opened to Open and Specific category operators. The application to request permission should be different from UF101. The controlling authority can then assess the applicant's right to access the zone. The colouring of these Geographic Zones should be yellow, indicating the restricted nature of the Geographic Zone.</p> <p>The Zone Authority and contact method should be clearly indicated on a digital map.</p> <p>Licensed Aerodromes. SI563/2015 states that unmanned aircraft shall not be flown in 'Air Traffic Services airspace, other than controlled airspace, within 5km of an aerodrome during periods of aircraft operations, unless the aerodrome operator has given permission' (SI562/2109 Para 7.5.b).</p> <p>Can we get clarity on this requirement? Is this enforced today? Does it include only those aerodromes listed in the AIP or all aerodromes? Should these aerodromes be referenced in U4 as Geographic Zones and an access process established? "</p>
Response	<p>Partially Accepted. We are currently reviewing the requirements for access requests to restricted UAS Geographical Zones around airports. The Drones S.I. is under review. Where a discrepancy between national and EU regulations exist EU takes precedent.</p>

RESPONSE 20	
Role	UAS Operator (Specific Category);
UAS Geographical Zones	<p>"Wing welcomes the IAA's intention to apply the principles used in the vicinity of the Dublin Control Zone to all control zones in Ireland. Wing would like to bring to the attention of the IAA some elements regarding the structure of the UAS geographical zones that would be of benefit to all categories of operations. Wing believes that considering the points below would make UAS geographical zones in Ireland more accessible to uncrewed operations, clearer for airspace users, and in line with the approach taken by regulators in Europe and overseas.</p> <p>+Wing advises taking into consideration the probability of conflict with a crewed aircraft when defining geographical zones. It therefore encourages the IAA to consider designing UAS geographical zones in Ireland based on items such as approach and departure paths, SIDs and STARs, to avoid that no-fly zones are established where uncrewed aircraft are unlikely to fly.</p> <p>+Wing encourages harmonisation with EASA countries and other regulators worldwide regarding the structure of the restrictions. In the EU, most restrictions are designed based on proximity to the runway and take into consideration the distance from the approach / departure glide slopes rather than designing the restriction based on a point and radius from the airport reference point[1]. An example of this is the approach by Australia's Civil Aviation Safety Authority (CASA) that defines the restrictions via performance rules based on the runway thresholds and that enables lower restrictions away from the approach / departure paths [2]. The Federal Aviation Administration's (FAA) Low Altitude Authorization and Notification Capability (LAANC) Concept of Operations [3] in the US are mostly focused on a 5NM radius restricted airspace area around aerodromes. With that said, the LAANC geographical zones define a maximum allowable altitude for UAS operations inside the 5NM volume based on a reduced risk factor for conflict with crewed aircraft, thus allowing UAS operations much closer to the sides of the airfield than the radius would otherwise allow.</p> <p>+Wing encourages the IAA to provide information on UAS geographical zones in digital formats such as GeoJSON Wing would like to know if microlight areas, helicopter landing sites (HLS), and glider areas would also have restrictions designed in the same way.</p> <p>Resources: [1]https://www.eurocontrol.int/tool/uas-no-fly-areas-directory-information-resources. [2]https://www.casa.gov.au/sites/default/files/2022-06/rpas-platform-operating-rules.pdf See attachment C. [3]https://www.faa.gov/sites/faa.gov/files/uas/programs_partnerships/data_exchange/laanc_for_industry/FAA_LAANC_CONOPS.pdf Please see "Figure 9: ESN gridded map system with altitude restrictions" on p.28."</p>
Response	Partially Accepted. As outlined in the consultation document, the UAS Geographical Zones around airports are

	<p>designed using the obstacle capture surfaces thereby protecting instrument flight procedures. We are working towards publishing the UAS Geographical Zones in line with ED-269 as per Reg (EU) 2019/947 Art. 15.</p>
<p>Access Request Form UF101</p>	<p>"Wing would like to inquire about a number of fields currently contained in the UAS Flight in Controlled Airspace Application Form" (UF101). Regarding the "VHF Capability, Receiver only" and the "E-Identification" fields, Wing would like to know what is the use for this information and whether these are mandatory fields, given that drones are not required to equip these capabilities. Similarly, Wing would be interested to know the added value brought by the field "UAS Model(s)", given that the category of the operation Specific) is already known, and whether the IAA is referring instead to the "Type of UAS", as per AMC1 UAS.SPEC.030(2,) of the vehicle. Wing would like to flag that the UAS model used in real-life operations can change at short notice, as the operation can be contracted from the requester to an operator with access to multiple aircraft. The access request form should consider this and make sure that a last-minute change in the UAS model (which does not change the operation's category) does not require the submission of a new request. Furthermore, the Form assumes that the requester is always the pilot. However, this is often not the case (Wing has experienced this in countries like France).</p> <p>With reference to the EU General Data Protection Regulation (GDPR), Wing would like to know how the information provided would be processed and stored, as well as if it would be communicated to third parties and under what conditions."</p>
<p>Response</p>	<p>Noted. All fields are used and developed in consultation with the zone authorities. Not all are mandatory but assist in providing access approvals and developing mitigations where required. The UAS model assists in deconflicting approved and unapproved UAS. We acknowledge the need to change a short notice. In this event the change should be notified to the zone authority as soon as practicable. The information in the UF101 is exempt from GDPR under public interest. However, it is not communicated to third parties, other than the IAA on request, and used solely by the zone authority for accessing the safety of the access request.</p>

<p>Access to UAS Geographical Zones established for the protection of manned aviation shall requires operational authorisation. We invite alternative proposals to further facilitate access while main...</p>	<p>"Wing supports the IAA's proposal to limit the access to restricted UAS geographical zones to holders of an operational authorisation in the Specific category. This is a possible means to guarantee an acceptable level of competence. That being said, and as per the IAA's request to share alternative proposals, Wing would like to point out a number of technologies that are successfully deployed to facilitate access while maintaining an equivalent level of safety for the equivalent of both Open and Specific categories in various other countries:</p> <p>+Australia's Civil Aviation Safety Authority (CASA) digital platform, RPAS, [1] offers rapid access to low risk airspace and allows regulators to easily share the airspace makeup with airspace users. It is based on standard industry technologies and leverages digital data sharing and digital approval requests and management, which are performed automatically in low risk areas. The digital platform concept also supports the creation of more dynamic advisories or notifications to all UAS operators which complements the static geographical zone definitions for UAS restrictions.</p> <p>+The Federal Aviation Administration's (FAA) Low Altitude Authorization and Notification Capability (LAANC) [2] allows airspace data sharing and automated access to low-risk airspace for both 44809 (recreational) and Part 107 licence holders, with additional features to facilitate access requests to more restricted areas. This approach has successfully handled over a million flights to date.</p> <p>+The UK's Connected Places Catapult (CPC) open access UTM trials [3] featured standards-based industry solutions to manage and share digital airspace data, access to the airspace and auditing functionality.</p> <p>All solutions are based on identifying the portions of the airspace with lower risk, using standard industry methods to share digital information about the airspace makeup and establishing clear and simple rules for how the geographical zone data should be used. Wing encourages the IAA to explore whether this approach could be used in Ireland so as to allow operators to easily assess what they are required to do and to easily and quickly request access through a system that is cheap, safe, secure and scalable for regulators.</p> <p>Resources: [1]https://www.casa.gov.au/drones/industry-initiatives/digital-platform. [2]https://www.faa.gov/uas/getting_started/laanc#:~:text=What%20is%20LAANC%20%3F,at%20or%20below%20400%20feet. [3]https://cp.catapult.org.uk/wp-content/uploads/2021/06/Implementing-an-Open-Access-UTM-Framework.pdf."</p>
<p>Response</p>	<p>Noted. We are exploring the digitisation of access requests.</p>
<p>Additional Comments</p>	<p>Wing is happy to provide more information and insights from our experience in drone deliveries and uncrewed traffic management across three continents.</p>

Response	Noted. Thank you.
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RESPONSE 22	
Role	UAS Operator (Specific Category);Remote Pilot;Manned Aircraft Operator;Manned Pilot;UAS Operator (Open Category);Recognised Entity;
UAS Geographical Zones	<p>"Why is the amber zone in Donegal only up to 15m rather than 30m? Can the EIR15 8m limit be reviewed up to a higher limit? The zone around Kerry CTR is very prohibitive – can this be reviewed – it does not appear to correspond with the obstacle clearance paramaters at 2.3, 2.4 and 2.5? Why is the amber zone in Sligo only up to 15m rather than 30m? What is the planned response time for geozone managers? Can the filing of UF101 timelines be brought in line with the filing of flight plans for manned aviation? Can it be increased to 7 days a week? Can geozone managers be required to have redundancy in place for when they take time off/leave so access requests will always be dealt with? Also not personal email addresses but generic ones? Why are danger areas always prohibited to drone operations? Surely they should just be restricted to the active times as per NOTAMS? Can a procedure for operations near an airport environment that does not have a geographical area be published to give clarity to both drone operators and to manned aviation and to airport operators? "</p>
Response	<p>Noted. The EIDL and EISL zones are 15m due to terrain elevation. The EIR15 limit is set by the Dept of Defence. Please contact DoD to your request and justification for change. 72hrs is the requested response time, however, this is not always possible depending on the volume and complexity of requests. UF101 timelines cannot be brought in line with manned flight plans (i.e. instantaneous) until U-space is established. Zone Authority redundancy is not a regulatory requirement, however, we have asked for this in practice. Emails are supplied by zone authorities. Danger areas are permanent as experience has shown that large numbers of open category operators do no effectively check NOTAMS. Access requests to danger areas may be sent to the zone authority. Please elaborate on your request for procedures near to airports.</p>

Access Request Form UF101	<p>"Will the MySRS operator registration Number be verified by ATC? Open Category should be A1/A3 or A2 and this section could be clearer as to what information is required. Will the Pilots RPC be checked against the approval sought? Why do we need Lat and Long Information if we have The Geographical zone ID, Name and description of area and a pin point on a map. Is all of this information necessary? Do we need AMSL and Height? Would height not suffice? Why are we asking drone pilots to listen to VHF or demonstrate capability to listen out to VHF? Increasing workload on pilots unnecessarily and to no real gain unless the RPC is a manned pilot and working in the immediate proximity of an airport. Why do we have e-identification when it is not yet required or monitored? What form will be used for BVLOS flights?"</p>
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Response	Noted. Registrations, authorisations and RPC can be checked by ATC through the IAA. All location information is necessary to ensure it is accurate. Both AMSL and height is requested to identify the capability of the operator to understand both and as manned aviation uses AMSL and unmanned uses height. We are not asking operators to listen to VHF, it is not a requirement, however a number of operators have used this as an additional mitigation. E-ID is not currently a requirement however some operators are using this as an additional mitigation. BVLOS flights are addressed at operational authorisation approval stage as specific locations are included. We are not yet issuing generic BVLOS approvals.
Access to UAS Geographical Zones established for the protection of manned aviation shall requires operational authorisation. We invite alternative proposals to further facilitate access while main...	For geographical zones that are not air risk based then an Open A1/A3 or A2 with an additional module could be sufficient for access, depending on the area in question - however managing this may be difficult and do we need additional "ratings" on licences other than those already published by EASA?
Response	Not accepted. The restriction on open category is only for air risk based UAS Geographical Zones.
Additional Comments	Great to see this consultation going ahead - this should be an iterative ongoing process which should be more dynamic rather than only occurring after an 18 month period since the last review. Also further parameters/guidance on what is required where state agencies publish a "no drone zone" that is not listed as a geographical area - is drone flight allowed?
Response	Accepted. Guidance to other State Agencies is currently under draft to educate them on the correct mechanisms for restricting airspace.

RESPONSE 23	
Role	National Drone Association;
UAS Geographical Zones	<p>"Why is the amber zone in Donegal only up to 15m rather than 30m? Can the EIR15 8m limit be reviewed up to a higher limit? The zone around Kerry CTR is very prohibitive – can this be reviewed – it does not appear to correspond with the obstacle clearance parameters at 2.3, 2.4 and 2.5? Why is the amber zone in Sligo only up to 15m rather than 30m? What is the planned response time for geozone managers? Can the filing of UF101 timelines be brought in line with the filing of flight plans for manned aviation? Can it be increased to 7 days a week? Can geozone managers be required to have redundancy in place for when they take time off/leave so access requests will always be dealt with? Also not personal email addresses but generic ones? Why are danger areas always prohibited to drone operations? Surely they should just be restricted to the active times as per NOTAMS? Can a procedure for operations near an airport environment that does not have a geographical area be published to give clarity to both drone operators and to manned aviation and to airport operators?"</p>
Response	<p>Noted. The EIDL and EISL zones are 15m due to terrain elevation. The EIR15 limit is set by the Dept of Defence. Please contact DoD to your request and justification for change. 72hrs is the requested response time, however, this is not always possible depending on the volume and complexity of requests. UF101 timelines cannot be brought in line with manned flight plans (i.e. instantaneous) until U-space is established. Zone Authority redundancy is not a regulatory requirement, however, we have asked for this in practice. Emails are supplied by zone authorities. Danger areas are permanent as experience has shown that large numbers of open category operators do not effectively check NOTAMS. Access requests to danger areas may be sent to the zone authority. Please elaborate on your request for procedures near to airports.</p>
Access Request Form UF101	<p>"Will the MySRS operator registration Number be verified by ATC? Will the Pilots RPC be checked against the approval sought? Why do we need Lat and Long Information if we have The Geographical zone ID, Name and description of area and a pin point on a map. Is all of this information necessary? Do we need AMSL and Height? Would height not suffice? Why do we have e-identification when it is not yet required or monitored? What form will be used for BVLOS flights?"</p>
Response	<p>Noted. Registrations, authorisations and RPC can be checked by ATC through the IAA. All location information is necessary to ensure it is accurate. Both AMSL and height is requested to identify the capability of the operator to understand both and as manned aviation uses AMSL and unmanned uses height. We are not asking operators to</p>

	listen to VHF, it is not a requirement, however a number of operators have used this as an additional mitigation. E-ID is not currently a requirement however some operators are using this as an additional mitigation. BVLOS flights are addressed at operational authorisation approval stage as specific locations are included. We are not yet issuing generic BVLOS approvals.
Access to UAS Geographical Zones established for the protection of manned aviation shall requires operational authorisation. We invite alternative proposals to further facilitate access while main...	Where the geographical zone is not air risk based then access should be permitted on a case by case basis rather than just based on the qualification of the pilot.
Response	Not accepted. The restriction on open category is only for air risk based UAS Geographical Zones.
Additional Comments	Further parameters/guidance on what is required where state agencies publish a "no drone zone" that is not listed as a geographical area - is drone flight allowed?
Response	Accepted. Guidance to other State Agencies is currently under draft to educate them on the correct mechanisms for restricting airspace.