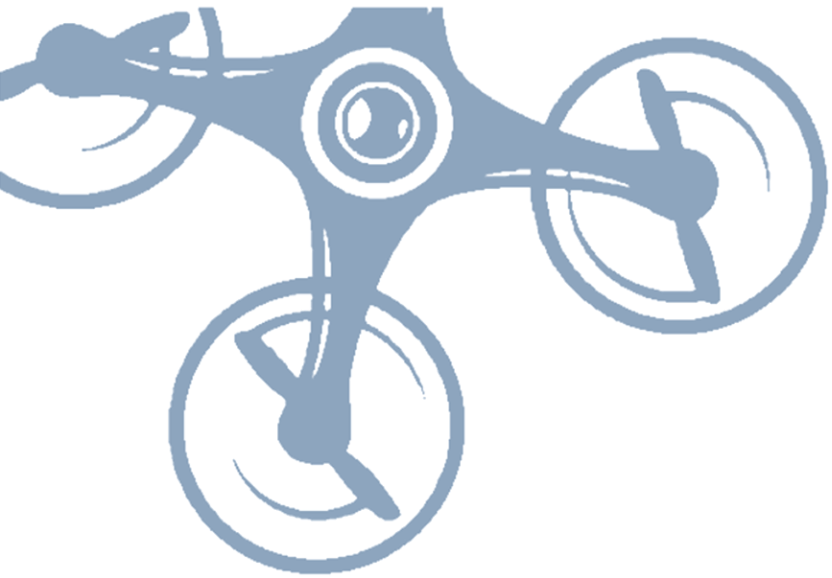
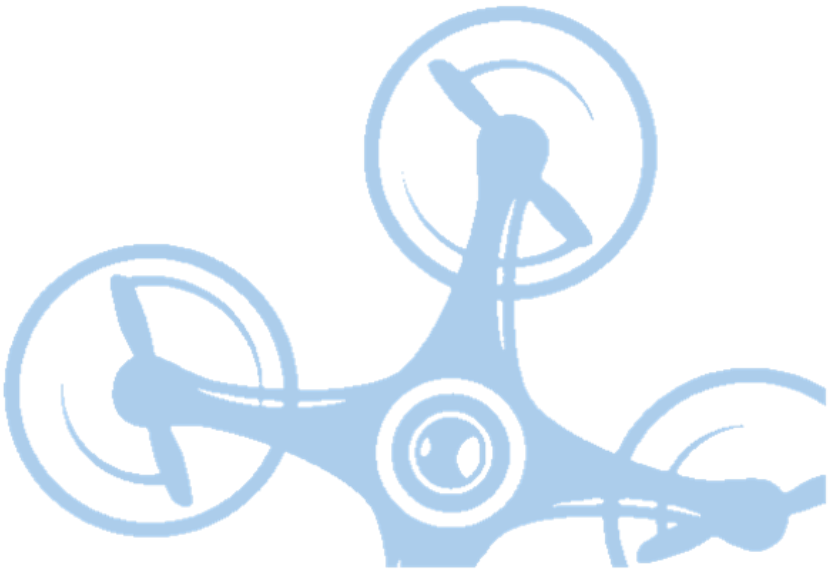


Comment Response Document

UAS Geographical Zones

Stakeholder Consultation



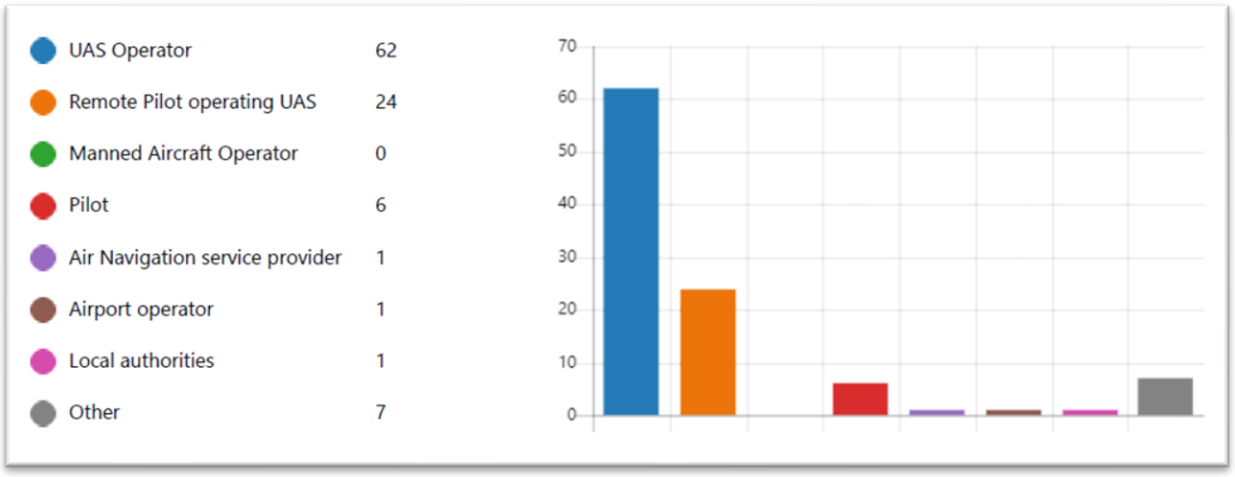
1. Summary of the outcome of the consultation.

1.1. General Summary.

One hundred & five (105) submissions were received in total. One hundred & four (104) through the online form, of which two (2) of included follow-up emails. An additional submission was received via email only.

1.2. Online Form Submissions Summary.

1.2.1. Primary Interest in Airspace.



1.2.2. Favoured Option.

1.2.3. Currently Operating an UAS within Controlled Airspace.

1.2.4. Height AGL Normally Operating within Controlled Airspace.

1.2.5. UAS Certificate Type.

Note: Legacy SOP & PCC not captured.

2. Outcome.

Given the divergent views, we took the more salient comments in developing the final version of the new UAS Geographical Zones for EIDW.

2.1. Updated UAS Geographical Zones for EIDW.

Remote pilots operating UAS may not operate in an UAS prohibited zone.

The current 4km no-fly zone around Dublin Airport is removed & a new UAS prohibited zone with a radius of 5km from the centre point of Dublin Airport is established.

From 5km to 12.1km from the centre point of Dublin Airport, remote pilots operating UAS can operate to the greater of 30m AGL or the height of the tallest obstacle within 50m. The maximum height may be increased up to 15m above the height of the obstacle at the request of the entity responsible for the obstacle.

From 12.1km, from the centre of Dublin Airport, to the EIDW CTR extents, remote pilots operating UAS can operate to a height of 90m (300ft), excluding UAS Geographical Zones with further restrictions.

The centre point of Dublin Airport, for the purpose of this consultation (options A & B) is defined as: 53° 25' 44.1249" N 006° 15' 56.7619" W.

Additional UAS prohibited zones around Ward Upper, Cloghran, & Dunsink are added due to high terrain in those areas.

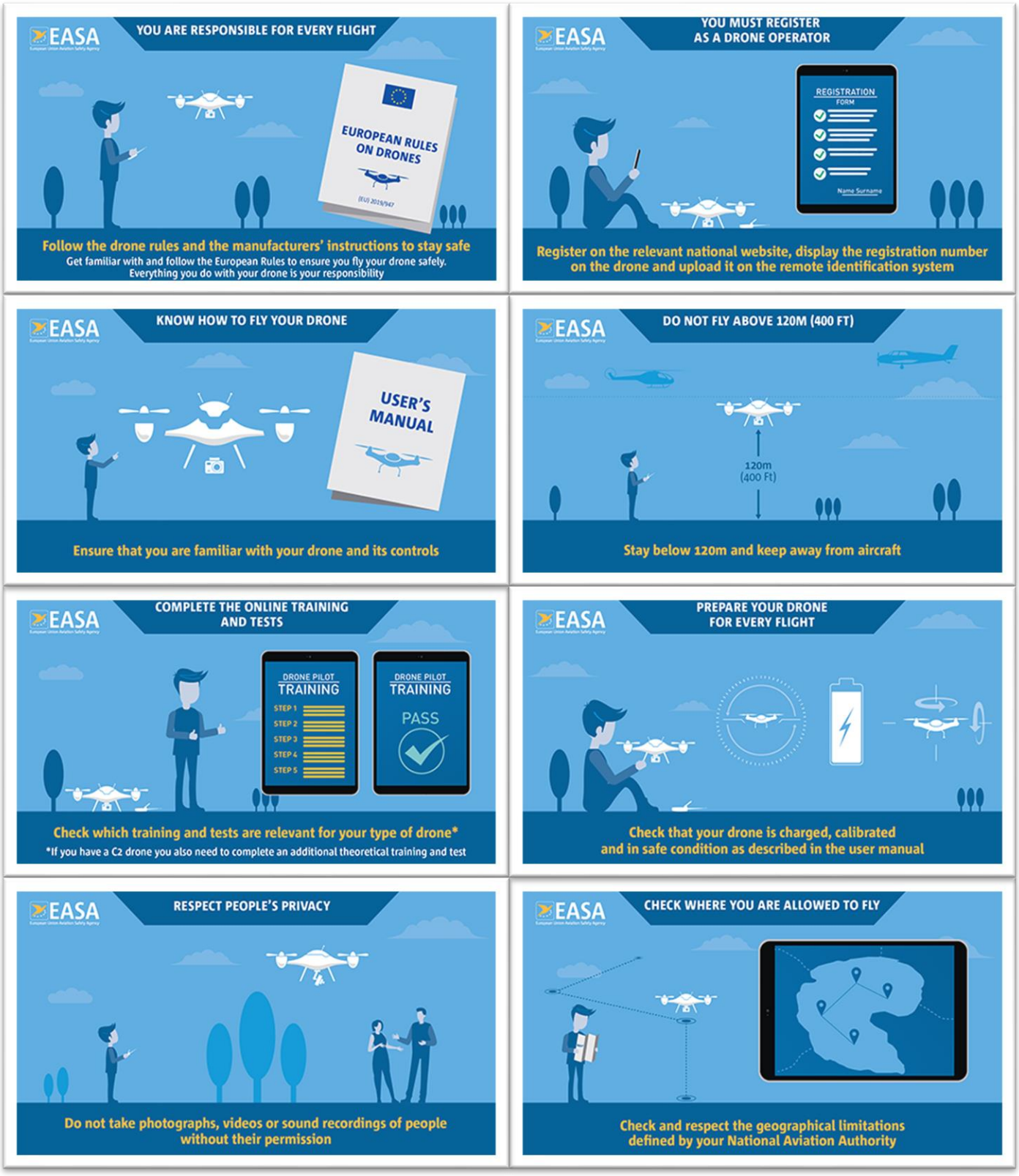
2.2. Rationale.

The updated UAS Geographical Zones for EIDW are based on a risk assessment. The ground risk was considered sufficiently mitigated through existing regulation.

The air risk to VFR aircraft is mitigated through the standard 5km prohibited zone around the airport & a restriction of 120m AGL beyond. The air risk to IFR aircraft is mitigated through the utilisation of ICAO Annex 15 terrain & obstacle dataset surfaces, specifically areas 1 & 2. An additional allowance was given in the amber zone, up to the height of the tallest obstacle, within 50m, or 15m above at the request of the entity responsible for the obstacle. This is regarded as still protecting IFR aircraft as all relevant obstacles are assessed, with a buffer, in the design & maintenance of IFR SIDs, STARs & approaches.

2.3. Existing Requirements.

UAS Operators are reminded that updated UAS Geographical Zones amend the height limitations only. Existing restrictions still apply, e.g. privacy, distance from structures, uninvolved persons, authorisations, etc. Check iaa.ie & dronerules.eu for further information.



2.4. Model Aircraft.

Exemptions for model aircraft within specific sites are added in line with Reg (EU) 2019/947:

"given the good safety level demonstrated by model aircraft operations in clubs & associations, there should be a seamless transition from the different national systems to the new Union regulatory framework, so that model aircraft clubs & associations can continue to operate as they do today".

2.5. Prisons.

On security ground, UAS prohibited areas are created for all prisons in the State.

2.6. Publication.

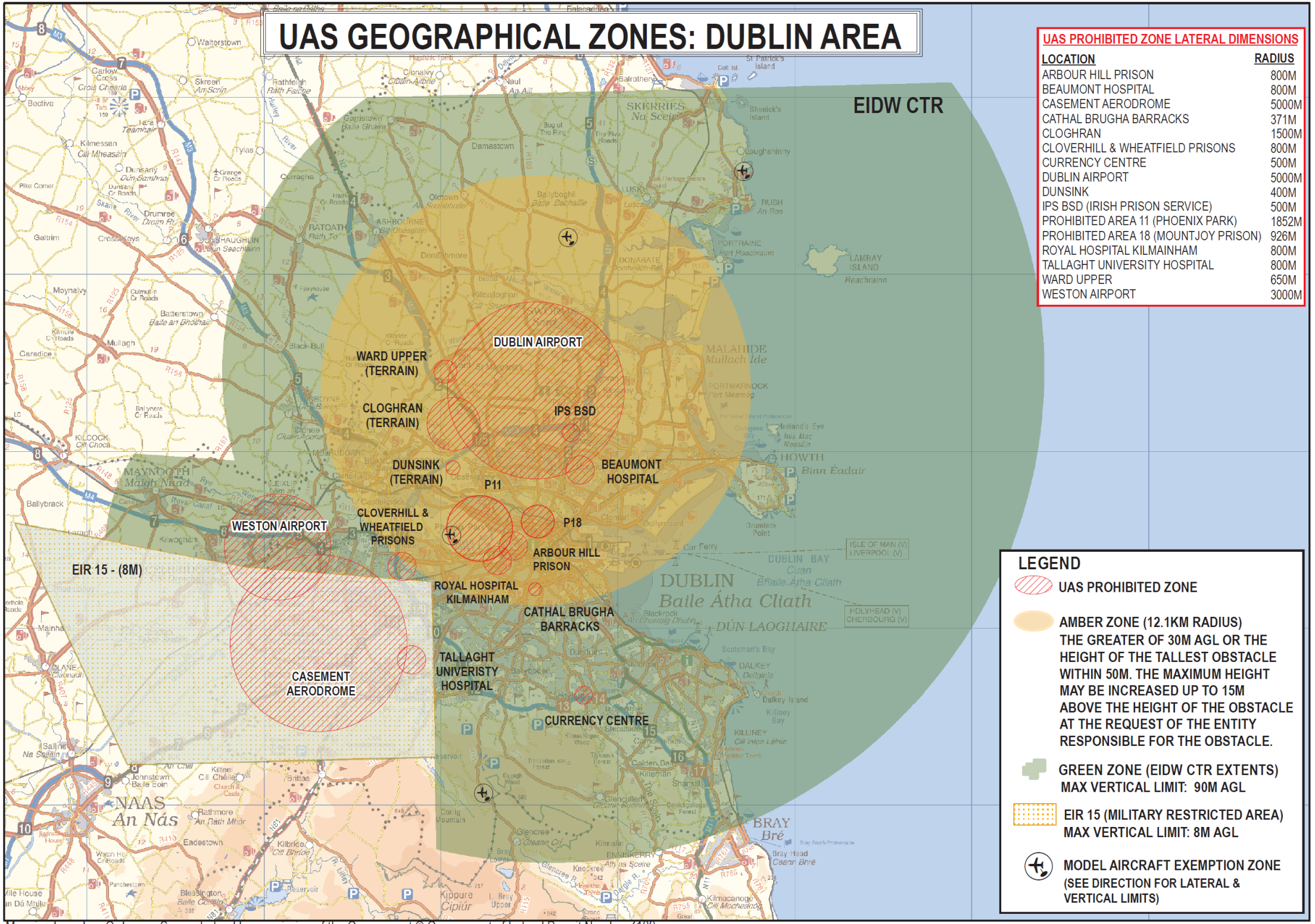
Updated UAS Geographical Zones information is available from the iaa.ie & the State Integrated Aeronautical Information Package[1]. The updated chart for the Dublin area & the new dataset for all UAS Geographical Zones in the State can be seen on following pages.

2.7. Dublin Area UAS Geographical Zones Chart.

The chart on the next page is valid at time of publication only. Refer to iaa.ie or the State Integrated Aeronautical Information Package for the latest information.

[1] http://iaip.iaa.ie/iaip/index.htm

UAS GEOGRAPHICAL ZONES: DUBLIN AREA



UAS PROHIBITED ZONE LATERAL DIMENSIONS

LOCATION	RADIUS
ARBOUR HILL PRISON	800M
BEAUMONT HOSPITAL	800M
CASEMENT AERODROME	5000M
CATHAL BRUGHA BARRACKS	371M
CLOGHRAN	1500M
CLOVERHILL & WHEATFIELD PRISONS	800M
CURRENCY CENTRE	500M
DUBLIN AIRPORT	5000M
DUNSINK	400M
IPS BSD (IRISH PRISON SERVICE)	500M
PROHIBITED AREA 11 (PHOENIX PARK)	1852M
PROHIBITED AREA 18 (MOUNTJOY PRISON)	926M
ROYAL HOSPITAL KILMAINHAM	800M
TALLAGHT UNIVERSITY HOSPITAL	800M
WARD UPPER	650M
WESTON AIRPORT	3000M

LEGEND

- UAS PROHIBITED ZONE
- AMBER ZONE (12.1KM RADIUS) THE GREATER OF 30M AGL OR THE HEIGHT OF THE TALLEST OBSTACLE WITHIN 50M. THE MAXIMUM HEIGHT MAY BE INCREASED UP TO 15M ABOVE THE HEIGHT OF THE OBSTACLE AT THE REQUEST OF THE ENTITY RESPONSIBLE FOR THE OBSTACLE.
- GREEN ZONE (EIDW CTR EXTENTS) MAX VERTICAL LIMIT: 90M AGL
- EIR 15 (MILITARY RESTRICTED AREA) MAX VERTICAL LIMIT: 8M AGL
- MODEL AIRCRAFT EXEMPTION ZONE (SEE DIRECTION FOR LATERAL & VERTICAL LIMITS)

2.8. UAS Geographical Zones Dataset.

The information in the following dataset is valid at time of publication only. Refer to iaa.ie or the State Integrated Aeronautical Information Package[2] for the latest information.

UAS Geographical Zone Area Dataset Description: This dataset contains a listing of data defining the boundaries of the UAS geographical zone organisation components.

UAS Geographical Zone Area Dataset structure:

The dataset contains blocks of airspace. Each individual block is identified uniquely using the following column identifiers:

- UAS Geographical Zone Name;
- UAS Geographical Zone Location;
- UAS Geographical Zone ID;

Where the boundaries of each block are defined by a sequence of points, each one represents an apex, joined by a specific line type.

Where a line type Arc/Arc (A) or Circle is given, the data representing the centre and radius are included in the record.

Each record contains the geographic coordinate representing the sequence point together with the line type joining that point to the subsequent point contained in the following record.

The final sequence point for each block is joined to the first sequence point.

All geographic coordinates are those of the World Geodetic System 1984 (WGS-84).

[2] http://iaip.iaa.ie/iaip/index.htm

UAS Geographical Zone Area Dataset – Column Identifiers

ABBREVIATION	COLUMN IDENTIFIER
UGZ Name	UAS Geographical Zone Name
UGZ Location	UAS Geographical Zone Location
UGZ ID	UAS Geographical Zone Identifier
PT SEQ	Point Sequence
Radius (M)	Radius in meters
Max. UAS Height (FT AGL)	Maximum permissible height of UAS in feet above ground level
ASPC Class	Classification of Airspace

UAS Geographical Zone Area Dataset – Line Type Description

LINE TYPE ABBREVIATION	DESCRIPTION
Geodesic	A curve representing the shortest path between two points
Circle	Circle
Arc	Arc of small circle - clockwise
Arc (A)	Arc of small circle - anticlockwise

UGZ NAME	UGZ LOCATION	UGZ ID	PT SEQ	CENTRE LATITUDE	CENTRE LONGITUDE	LATITUDE	LONGITUDE	LINE TYPE	RADIUS (M)	BASE	TOP AMSL (FT)	MAX UAS HEIGHT (FT AGL)	PERIOD OF VALIDITY	CONDITION	ASPC CLASS	REMARKS
Currency Centre	Sandyford, Dublin	EI U2	N/A	53 16 24.8000N	006 13 54.4000W			Circle	500	Surface	5000	0	Permanent	UAS Prohibited	Class C	
Royal Hospital Kilmainham	Military Road, Dublin	EI U3	N/A	53 20 34.8000N	006 18 07.8000W			Circle	800	Surface	5000	0	Permanent	UAS Prohibited	Class C	
Tallaght University Hospital	Tallaght, Dublin	EI U4	N/A	53 17 26.5200N	006 22 41.5200W			Circle	800	Surface	5000	0	Permanent	UAS Prohibited	Class C	
Casement Aerodrome	Clondalkin, Dublin	EI U7	N/A	53 18 10.7710N	006 27 19.4621W			Circle	5000	Surface	5000	0	Permanent	UAS Prohibited	Class C	
Newcastle Aerodrome	Aerodrome Traffic Zone Newcastle, Wicklow	EI U12	N/A	53 04 22.0000N	006 02 11.0000W			Circle	2778	Surface	1500	0	Permanent	UAS Prohibited	Class G	
Custume Barracks	Athlone, Westmeath	EI U17	N/A	53 25 28.0000N	007 56 52.0000W			Circle	3704	Surface	2000	0	Permanent	UAS Prohibited	Class G	

Cathal Brugha Barracks	Rathmines, Dublin	EI U19	N/A	53 19 40.5800N	006 16 13.6900W			Circle	371	Surface	550	0	Permanent	UAS Prohibited	Class C	
Beaumont Hospital	Beaumont Road, Dublin	EI U20	N/A	53 23 25.4400N	006 13 23.8800N			Circle	800	Surface	5000	0	Permanent	UAS Prohibited	Class C	
Weston Airport	Leixlip, Kildare	EI U21	N/A	53 21 08.0000N	006 29 18.0000W			Circle	3000	Surface	5000	0	Permanent	UAS Prohibited	Class C	
Dublin Airport Terrain	Ward Upper, Dublin	EI U24	N/A	53 26 22.1213N	006 20 32.3017W			Circle	650	Surface	5000	0	Permanent	UAS Prohibited	Class C	
Dublin Airport Terrain	Cloghran, Dublin	EI U25	N/A	53 24 46.2276N	006 20 11.3403W			Circle	1500	Surface	5000	0	Permanent	UAS Prohibited	Class C	
Dublin Airport Terrain	Dunsink, Dublin	EI U26	N/A	53 23 25.9663N	006 20 16.2456W			Circle	400	Surface	5000	0	Permanent	UAS Prohibited	Class C	
Dublin Airport - Red Zone	County Dublin	EI U27	N/A	53 25 44.1249N	006 15 56.7619W			Circle	5000	Surface	5000	0	Permanent	UAS Prohibited	Class C	
Dublin Airport - Amber Zone	County Dublin	EI U28	N/A	53 25 44.1249N	006 15 56.7619W			Circle	12100	Surface	5000	98	Permanent	UAS Height Constraint	Class C	Excluding UAS Prohibited Zones. The greater of 30M AGL or the height of the tallest obstacle within 50M. The maximum height may be increased up to 15M above the height of the obstacle at the request of the entity responsible for the obstacle.
Waterford Control Zone (CTR)	County Waterford	EI U30	N/A	52 11 13.9199N	007 05 13.0659W			Circle	9500	Surface	5000	0	Permanent	UAS Prohibited	Class C	
Shannon Control Zone (CTR)	County Clare	EI U31	N/A	52 42 07.1151N	008 55 29.3364W			Circle	6000	Surface	5000	0	Permanent	UAS Prohibited	Class C	
Connaught Control Zone (CTR)	County Mayo	EI U32	N/A	53 54 37.0688N	008 49 06.5676W			Circle	4500	Surface	5000	0	Permanent	UAS Prohibited	Class C	
Cork Control Zone (CTR)	County Cork	EI U33	N/A	51 50 28.5672N	008 29 28.0049W			Circle	4500	Surface	5000	0	Permanent	UAS Prohibited	Class C	
Kerry Control Zone (CTR)	County Kerry	EI U34	1			52 06 05.6000N	009 45 42.3000W	Geodesic	N/A	Surface	5000	0	Permanent	UAS Prohibited	Class C	
		EI U34	2			52 05 56.7000N	009 44 45.1000W	Geodesic	N/A	Surface	5000	0	Permanent	UAS Prohibited	Class C	
		EI U34	3			52 06 06.4000N	009 43 31.0000W	Geodesic	N/A	Surface	5000	0	Permanent	UAS Prohibited	Class C	
		EI U34	4			52 06 02.9000N	009 42 43.0000W	Geodesic	N/A	Surface	5000	0	Permanent	UAS Prohibited	Class C	
		EI U34	5			52 04 30.3000N	009 38 47.4000W	Geodesic	N/A	Surface	5000	0	Permanent	UAS Prohibited	Class C	
		EI U34	6			52 04 03.7000N	009 31 22.4000W	Geodesic	N/A	Surface	5000	0	Permanent	UAS Prohibited	Class C	

		EI U34	7			52 04 11.9000N	009 30 37.0000W	Geodesic	N/A	Surface	5000	0	Permanent	UAS Prohibited	Class C	
		EI U34	8			52 04 06.8000N	009 30 01.0000W	Geodesic	N/A	Surface	5000	0	Permanent	UAS Prohibited	Class C	
		EI U34	9			52 03 47.3000N	009 29 11.9000W	Geodesic	N/A	Surface	5000	0	Permanent	UAS Prohibited	Class C	
		EI U34	10			52 03 02.6000N	009 25 52.8000W	Geodesic	N/A	Surface	5000	0	Permanent	UAS Prohibited	Class C	
		EI U34	11			52 03 35.9000N	009 20 17.2000W	Geodesic	N/A	Surface	5000	0	Permanent	UAS Prohibited	Class C	
		EI U34	12	52 10 51.1608N	009 31 25.6247W			Arc (A)	18520	Surface	5000	0	Permanent	UAS Prohibited	Class C	
		EI U34	13			52 19 57.2000N	009 38 04.4000W	Geodesic	N/A	Surface	5000	0	Permanent	UAS Prohibited	Class C	
		EI U34	14			52 14 35.8000N	009 38 37.8000W	Geodesic	N/A	Surface	5000	0	Permanent	UAS Prohibited	Class C	
		EI U34	15			52 14 39.6000N	009 46 28.1000W	Geodesic	N/A	Surface	5000	0	Permanent	UAS Prohibited	Class C	
		EI U34	16	52 10 51.1608N	009 31 25.6247W			Arc (A)	18520	Surface	5000	0	Permanent	UAS Prohibited	Class C	
		EI U34	17			52 06 05.6000N	009 45 42.3000W	Geodesic	N/A	Surface	5000	0	Permanent	UAS Prohibited	Class C	
Newcastle Aerodrome	Radio Mandatory Zone	EI U41	N/A	53 04 22.0000N	006 02 11.0000W			Circle	2778	Surface	1500	0	Permanent	UAS Prohibited	Class G	
Arbour Hill Prison	Arbour Hill, Dublin 7	EI U42	N/A	53 21 00.5700N	006 17 17.1700W			Circle	800	Surface	550	0	Permanent	UAS Prohibited	Class C	
Castlerea Prison	Harristown, Castlerea, Roscommon	EI U43	N/A	53 45 14.7900N	008 29 13.7470W			Circle	800	Surface	550	0	Permanent	UAS Prohibited	Class G	
Cloverhill & Wheatfield Prison	Cloverhill Road, Clondalkin, Dublin 22	EI U44	N/A	53 20 27.9300N	006 22 58.9200W			Circle	800	Surface	550	0	Permanent	UAS Prohibited	Class C	
Cork Prison	Rathmore Road, Cork City	EI U45	N/A	51 54 33.4000N	008 27 35.9700W			Circle	800	Surface	550	0	Permanent	UAS Prohibited	Class C	
Loughan House	Blacklion, Cavan	EI U46	N/A	54 17 19.3400N	007 54 56.3400W			Circle	800	Surface	550	0	Permanent	UAS Prohibited	Class G	
Shelton Abbey	Arklow, Wicklow	EI U47	N/A	52 48 56.6100N	006 11 25.5100W			Circle	800	Surface	550	0	Permanent	UAS Prohibited	Class G	
IPS BSD	Santry, Dublin	EI U48	N/A	53 24 24.8400N	006 14 12.5500W			Circle	500	Surface	550	0	Permanent	UAS Prohibited	Class C	
IPS HQ	Longford	EI U49	N/A	53 43 59.8300N	007 46 29.9200W			Circle	500	Surface	550	0	Permanent	UAS Prohibited	Class G	
Leinster Model Flying Club	Phoenix Park, Dublin 8	EI U50	N/A	53 21 23.0000N	006 20 26.0000W			Circle	300	Surface	400	400	Permanent	Exemption Zone	Class C	Model Aircraft are exempt from the restrictions of the UAS Geographical Zone within which the exemption zone resides.
Balheary Model Flying Club	Roscall, Balheary, County Dublin	EI U51	N/A	53 30 22.0000N	006 14 07.0000W			Circle	800	Surface	400	400	Permanent	Exemption Zone	Class C	Model Aircraft are exempt from the restrictions of the UAS Geographical Zone within which the exemption zone resides.

Fingal Model Flying Club	Drumanagh, Loughshinny, County Dublin	EI U52	N/A	53 32 15.0000N	006 05 03.0000W			Circle	800	Surface	400	400	Permanent	Exemption Zone	Class C	Model Aircraft are exempt from the restrictions of the UAS Geographical Zone within which the exemption zone resides.
Island Slope Rebels Club	Killakee, Glassamucky Mountain, Dublin	EI U53	N/A	53 13 30.0000N	006 19 06.0000W			Circle	800	Surface	400	400	Permanent	Exemption Zone	Class C	Model Aircraft are exempt from the restrictions of the UAS Geographical Zone within which the exemption zone resides.
Blacksod Refuelling Base	County Mayo	EI U54	N/A	54 05 54.0000N	010 03 48.0000W			Circle	1000	Surface	500	0	Permanent	UAS Prohibited	Class G	
Castletown Refuelling Base	County Cork	EI U55	N/A	51 39 06.0000N	009 53 45.0000W			Circle	1000	Surface	500	0	Permanent	UAS Prohibited	Class G	
Galway University Hospital	County Galway	EI U56	N/A	53 16 36.0000N	009 04 09.0000W			Circle	1000	Surface	500	0	Permanent	UAS Prohibited	Class G	
Kerry University Hospital	Tralee, County Kerry	EI U57	N/A	52 15 52.0000N	009 41 10.0000W			Circle	1000	Surface	500	0	Permanent	UAS Prohibited	Class C	
Letterkenny University Hospital	Letterkenny, County Donegal	EI U58	N/A	54 57 43.0000N	007 44 05.0000W			Circle	1000	Surface	500	0	Permanent	UAS Prohibited	Class G	
Limerick University Hospital	Dorradoyle, County Limerick	EI U59	N/A	52 37 58.0000N	008 39 05.0000W			Circle	1000	Surface	500	0	Permanent	UAS Prohibited	Class G	
Mayo University Hospital	Castlebar, County Mayo	EI U60	N/A	53 51 00.0000N	009 18 07.0000W			Circle	1000	Surface	500	0	Permanent	UAS Prohibited	Class G	

2.9. Existing Areas Dataset

UGZ NAME	UGZ DESCRIPTION	UGZ ID	MAX UAS HEIGHT (FT AGL)	PERIOD OF VALIDITY	CONDITION	LEGISLATION	REMARKS
EI D1	Danger Area 1, Gormanston, Meath	EI U1	0	Permanent	UAS Prohibited	Prohibited & Danger Area Amendment June 10th 2004	
EI D5	Danger Area 5, Glen of Imaal, Wicklow	EI U5	0	Permanent	UAS Prohibited	Prohibited & Danger Area Amendment June 10th 2004	
EI D6	Danger Area 6, Kilworth, Cork	EI U6	0	Permanent	UAS Prohibited	Prohibited & Danger Area Amendment June 10th 2004	
EI D13	Sea/Coastal Area SSW of Cork	EI U13	0	Permanent	UAS Prohibited	Prohibited & Danger Area Amendment June 10th 2004	Excluding High Seas (Waters greater than 12nm from coastline)
EI D14	Sea Area SW of Kerry	EI U14	0	Permanent	UAS Prohibited	Prohibited & Danger Area Amendment June 10th 2004	Excluding High Seas (Waters greater than 12nm from coastline)
EI P8	Prohibited Area 8, Portlaoise, Laoise	EI U8	0	Permanent	UAS Prohibited	Prohibited & Danger Area Amendment June 10th 2004	
EI P9	Prohibited Area 9, Limerick Prison	EI U9	0	Permanent	UAS Prohibited	Prohibited & Danger Area Amendment June 10th 2004	
EI P10	Prohibited Area 10, Curragh Military Camp, Kildare	EI U10	0	Permanent	UAS Prohibited	Prohibited & Danger Area Amendment June 10th 2004	
EI P11	Prohibited Area 11, Phoenix Park, Dublin	EI U11	0	Permanent	UAS Prohibited	Prohibited & Danger Area Amendment June 10th 2004	
EI P18	Prohibited Area 18, Mountjoy Prison, Dublin	EI U18	0	Permanent	UAS Prohibited	Prohibited & Danger Area Amendment June 10th 2004	
EI R15	Restricted Area 15	EI U15	0	Permanent	UAS Prohibited	S.I. 806 of 2007 - Designated Areas Order	When EIR 15 is active.
EI R16	Restricted Area 16 (B,C,D,E,F,G,H)	EI U16	0	Permanent	UAS Prohibited	S.I. 806 of 2007 - Designated Areas Order	
EI R22	Restricted Area 22	EI U22	0	Permanent	UAS Prohibited	S.I. 806 of 2007 - Designated Areas Order	
EI R23	Restricted Area 23	EI U23	0	Permanent	UAS Prohibited	S.I. 806 of 2007 - Designated Areas Order	
Dublin Airport - Green Zone	County Dublin	EI U29	300	Permanent	UAS Height Constraint	Shannon FIR Airspace Amendment 08th December 2016	Excluding Dublin Airport Amber Zone.
Donegal Control Zone (CTR)	County Donegal	EI U35	0	Permanent	UAS Prohibited	Shannon FIR Airspace Amendment 08th December 2016	
Sligo Control Zone (CTR)	County Sligo	EI U36	0	Permanent	UAS Prohibited	Shannon FIR Airspace Amendment 08th December 2016	
Waterford Airport	Radio Mandatory Zone (RMZ)	EI U37	0	Permanent	UAS Prohibited	Aeronautical Notice R.07 / Shannon FIR Airspace Amendment 08th December 2016	
Sligo Airport	Radio Mandatory Zone (RMZ)	EI U38	0	Permanent	UAS Prohibited	Aeronautical Notice R.07 / Shannon FIR Airspace Amendment 08th December 2016	
Waterford Airport	Transponder Mandatory Zone (TMZ)	EI U39	0	Permanent	UAS Prohibited	Aeronautical Notice R.04 / Shannon FIR Airspace Amendment 08th December 2016	
Sligo Airport	Transponder Mandatory Zone (TMZ)	EI U40	0	Permanent	UAS Prohibited	Aeronautical Notice R.04 / Shannon FIR Airspace Amendment 08th December 2016	

2.10. Specific Category & SOP Holders

UAS operations within UAS restricted airspace are permitted for Specific Category operations or SOP holders under the following conditions:

- Operational authorisation,
- ATC permission (UF101),
- Landowner / custodian permission,
- Special VFR minima (cloud ceiling of 500 ft),
- VLOS range of 800 m,
- Multi-rotor Hybrid UAS only,
- ATC may apply additional operational conditions.

An updated UF101 - UAS Flight in Controlled Airspace Application Form can be seen on the next page. It is also available from iaa.ie.

	Form No. U.F.101 Version No. 9 Issue Date 21/05/2021 Page 1 of 1	**UAS Flight in Controlled Airspace Application Form**

This Form is for the use of **UAS Specific Category & Specific Operations Permission (SOP)** holders when applying to the Irish Aviation Authority (Air Traffic Control Operations) to conduct UAS Operations within Controlled Airspace.

UAS Specific Category / SOP Flight Application Form CLASS C / CTR / TRA /Other	
Operator Name	
MySRS Registration No. (16 digit)	
UAS Model	
Remote Pilot(s) Name(s)	
Mobile Phone Numbers (Primary & Alternate)	
Controlled Airspace Location	
Latitude & Longitude (Degrees, Minutes & Seconds)	
Radius of Operation (m)	
Description of the Area (townland, landmark, etc.)	
Maximum Altitude (AMSL)	
Height Above Ground Level (AGL)	
Safety & integrity Level (SAIL)	
VHF Capability, Receiver only (Y/N)	
E-Identification (Y/N)	
Proposed Date(s) & Time(s) (Local)	
Duration (HH:MM)	

Caution: All survey & risk assessments shall be in consideration of Regulation (EU) 2019/947 Article 11 Operational Risk Assessment. VLOS operations only.

Map of Location, Area of Operation Aeronautical Chart, etc. (Insert Below)

Copy & Paste Here

For Dublin, Cork & Shannon completed forms must be sent to: suaairspace@iaa.ie

For Sligo Airport (EISG) completed forms must be sent to: safetymanager@sligoairport.com

For Kerry Airport (EIKY) completed forms must be sent to atc@kerryairport.ie

For Waterford Airport (EIWF) completed forms must be sent to sua@waterfordairport.net

For Donegal Airport (EIDL) completed forms must be sent to sua@donegalairport.ie

For Ireland West Airport (EIKN) Completed Form must be sent to michaelconnolly@irelandwestairport.com

3. The Way Forward

This should be regarded as the first step in an iterative process with respect to UAS Geographical Zones. A review of UAS Geographical Zones in other control zones is under way, along with a risk assessment of model aircraft sites.

UAS Geographical Zones will be continually reviewed in line with regulation & assessment of risk.

Guidance material for UAS Geographical Zones proposals is under development. In the interim the current Airspace Change Proposal process shall be applied.

4. Individual Comments & Responses.

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

- **Accepted** – IAA agree with the comment & any proposal is wholly incorporated.
- **Partially Accepted** – IAA either partially agrees with the comment, or agrees with it but the proposed amendment is only partially incorporated.
- **Noted** – IAA 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.

Primary Airspace Interest	Preferred Option	Comments Supporting Preferred Option	General Comments IRT UAS Ops & UAS Geographical Zones within Ireland	Currently Operating an UAS within Controlled Airspace	Height AGL Operating within Controlled Airspace	UAS Certificate Type	Response
Person who lives in the geographical zone	Neither	I note that the list of persons that are stakeholders does not include people who live in the area the drones would be flying. Drones are noisy & impinge on my enjoyment of public space & have on occasion intruded on my private space & sense of privacy, such as hovering over my garden. This should be taken into account when considering changes to the UAS Geographical Zone. The new regulation explicitly refers to the following matters to be considered as "risks pertaining to safety, privacy, protection of personal data, security or the environment, arising from UAS operations". My submission asks the IAA to consider the noise impact on the lived environment & the privacy & personal data implications of allowing greater drone use in the Dublin City area.	Privacy considerations & noise (environment) considerations should form part of this consultation process.	No		None	**Partially accepted** Noise restrictions already exist under the EU regulation.
Remote Pilot operating UAS	Option A		Member of Leinster RC club (fixed wing models) A great project would be a mobile app that would warn whether an aircraft flying below X height comes within Y distance from current user location.	Yes	30m	A1/A3 Remote Pilot Certificate	**Noted**

Airport operator	Neither		Can a 1000m prohibition zone be placed over Ballyboughal Airfield (EIBB)? Coordinates 53°30'N 006°14'W We have a lot of drone "pilots" drive out from Swords & fly from farm gateways adjoining the airfield. Having a marked zone on the IAA UAS operation map would be very helpful in highlighting the danger here. Michael Bergin, Ballyboughal Airfield, Ballyboughal, Co. Dublin michaelbergin@live.ie 0862544436				**Noted** Please submit an airspace change proposal for additional UAS Geographical Zones requests.
Remote Pilot operating UAS	Option A	As a UAS pilot I like clear rules where I can operate my drone without interrupting operations of other aircrafts but still enjoy flying drone when you have A2 certificate for some photo & video project at the really low level like 50 m AGL in some current NFZ Dublin area.	I am a drone operator & pilot registered/licensed & approved in many countries like USA, IE & Poland. As the sky is getting busier I really would like IAA to develop an app like DroneRadar or PANSA (PL) or B4UFLY (USA) when e.g. UAS pilot as to check in the drone prior the flight so all UAS can see the UAS operating next to so it is safe for all of UAS pilots. Additionally IE CostGuards or other helicopter pilots should check in as well so UAS drone see alerts that helicopter is approaching. Dalkey,Killiney beach sometimes helicopters are flying really low so if we increase in that are AGL from 15m to 100m we need inform Helicopter pilots do not go too low tp avoid incidents especially with less experienced UAS pilots.	Yes	10m	A2 Remote Pilot Certificate	**Noted**
UAS Operator	Option A	It is the better of the two options.	Please continue to make it easy for professional photographers to fly at low levels to photograph buildings. We seldom need to fly above 40m. & any aircraft flying that low outside of the airport is crashing. There is little need to restrict beyond that.	No		A1/A3 Remote Pilot Certificate	**Noted**

UAS Operator	Option A	It is not clear what the maximum height AGL is for the Amber Zone in option A. I wonder what is the reason for the differentiation of this zone? Given that Option B allows for maximum height AGL of 30m within the entire amber zone & Option A allows for a maximum vertical limit of the tallest obstacle within 100m within both the Amber & Yellow Zones, why not combine the two? This would mean within the Amber Zone of Option B there is a maximum of vertical limit of either 30m or the tallest obstacle within 100m.		Yes	above 30m	A2 Remote Pilot Certificate	**Partially Accepted** The proposal for a combined 30m & building height zone will be considered.
UAS Operator	Option A	Option A is more realistic & enforceable.	It would be great to have licence / insurance system in place like in US, when you can apply for & purchase a temporary licence for the duration of the flight from a mobile app.	Yes	30m	A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Neither	I think that is over complicating the matter.	I suggest a 5km exclusion zone, within the 5km zone flights must be approved by ATC & they must provide 24 hour notification of their intended flight via email. A colour map within the 5km zone is the easiest method of allowing staff to assess its threat to operations, Red zone would be airport boundary & extended runway center line, these would need watch manager approval out just banned out right. Yellow zone would surround the out edges of the red zone, this would need watch manager approval. The green zone would cause little or no threat if the drones are limited to not above 400ft agl, they would still require to call on the day & once complete. If Weston & Bal adopt the same approach, it would make the process a lot more clear & easier for drone	No	20m	None	**Not accepted**

			users. It is less restrictive but offers a safety net for operations at each airport. A similar map which is used across the uk can be seen here, it works really well & is easily managed. https://birminghamvfr.com/drone-safety/				
Remote Pilot operating UAS	Option A	I full respect the need for Geographical Zones, but the Geographical Zones should be no more than is needed, & option A give more freedom to UAS operation	I would like to ask that you consider removing the 'green zone' from that areas Kilmashogue Wood, Tibradden Forest Glenceee, Ticknock Forest, Glencullen, Kilmalin, The Scalp & Carrickgollogan Forest. Is there a real need to have then within the 'green zone'?	No		A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Option A	I am a researcher based in Trinity College Dublin. TCD is carrying out an increasing amount of experimental research which involves flying UAS devices (for example, research into UAS communication systems); however, the current UAS geographical zones severely restrict the ability of our students & staff to perform this research in Dublin city without involving professional UAS pilots. Under the proposed option A Dublin will have less stringent height restrictions than under option B, which will significantly benefit our ability to carry out experimental work in the north part of the city.	1. I agree with the proposal of allowing UAS to be flown at heights equivalent to nearby obstacles (buildings). However, I am somewhat skeptical that members of the public will be able to obtain these height values. To my knowledge, there is no free public resource that catalogues building heights in the Dublin city area that members of the public can use to calculate these height values. Estimating building heights visually from ground-level is very imprecise, will the IAA allow a degree of error for these estimates? Will the IAA consider providing height maps of the Dublin area to assist pilots? 2. Currently, the prohibited area around Weston airport is 5km in radius, which encapsulates the entirety of Leixlip town. As a result of this prohibited area Leixlip has stricter UAS restrictions than the military restricted zone. As a resident of Leixlip I	Yes	10m	A1/A3 Remote Pilot Certificate	**Partially Accepted** A reduction in 100m radius from the tallest obstacle will be considered to allow for better estimation of height. A review of EIWT & other aerodrome UAS prohibited zones will follow the EIDW proposal.

			believe this is wholly excessive, given the amount of air traffic around Weston & the fact that much of Leixlip is located in a river valley below the level of the airport. I suggest the IAA reconsider the Weston restricted area.				
UAS Operator	Option A	option A provides much more use of drones for work in dublin city center area - roof inspections etc.	thanks for the good work. note for question 6 below, dublin sky line (higest building) is actually very low - averaging here - so the hight we need is aroun 50m to geet decent footage o roofs. you migt want to update th options to consider this :)	Yes	above 30m	A1/A3 Remote Pilot Certificate	**Not Accepted**
UAS Operator	Neither	I don't fly in that Area, nor intend to	You could consider allowing UAS operators to fly higher than 15m, suggest 45m & 200m laterally in Waterford outside 9500m from the centre of the runway until we reach Class G airspace.	Yes	above 30m	A2 Remote Pilot Certificate	**Noted** A review of EIWF & other aerodrome UAS prohibited zones will follow the EIDW proposal.
UAS Operator	Option A	A clear no fly zone around the airport that has the takeoff & landing approach routes makes more sense to me. Altitude limit of highest structure within 100m makes more sense than a set limit.	If possible it would make more sense to have the greenzone set to the max altitude in the open category at 120m. This would make 8t easier to determine your max altitude. Red - no fly zone Amber - max as tallest obstacle within 100m Yellow - 30m or tallest obstacle within 100m Green - 120m (same as open category max alt) Eir15 - 8m hight, different story as its a certain area that we just need to know.	Yes	30m	None	**Not Accepted**
Remote Pilot operating UAS	Neither	I don't use thuis space	No	Yes	above 30m	A1/A3 Remote	**Noted**

						Pilot Certificate	
UAS Operator	Option B	The current height limits are too restrictive to allow low level flights without being anywhere near the operating heights of aircraft.		No		None	**Noted**
UAS Operator	Neither	i think with all due respect it should remain as it is, from a safety perspective this will basically say to all who own drones that they are welcome to push the limits, as a commercial operator it provides those who have insurance & the correct permits to operate in this area safely & without hinderance.	i wish to see more action taken against those who illegally operate drones in dublin airspace at this present time.	No		A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Neither	I live close to Dublin Airports runway 16 outer marker. The altitude restrictions being suggested are too low. I suggest 50-60Mts as anything lower means you loose sight of the UAV to quickly dur to trees & hedgerow restricting visibility. Even when active no traffic come close to an altitude of less than 400 mtrs in the area. People who fly UAVs in my category do so for fun & aerial photography. This would be adversely & unfairly impacted if such high restrictions are introduced. By all means make key areas strict no fly zones, but please use some fairness in the process. A UAV at 50-60 mtrs is zero risk to aircraft beyond 4km of the airports centre point. As an ex light aircraft pilot, I state this from a position of knowledge. As a pilot flying from Weston, I never re-joined the pattern at less that 1500 ft	All contained my comment above	Yes	above 30m	A1/A3 Remote Pilot Certificate	**Not Accepted**

UAS Operator	Option A	Option B will put many local parks/open spaces into prohibited zone - I am based in Swords, not going anywhere close to DA.	whatever the limits will be set, I would like DJI to comply with them.	Yes	10m	A2 Remote Pilot Certificate	**Noted**
UAS Operator	Option B	Looks easier & clearer	None for now	Yes	10m	A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Option B	It would give me a lot more freedom to fly my Drones in my local area. With out having to travel outside of Dublin airspace		Yes	10m	A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Option B	The 5km no fly zone is either to assess & provides more security for the airport.	Appreciate the ease of restrictions in south Dublin.	Yes	above 30m	A1/A3 Remote Pilot Certificate	**Noted**
Remote Pilot operating UAS	Option B	Simpler, less restricting.		Yes	30m	A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Option B	It seems a more simpler approach to me	Just anything better than the 15m is good, as long it's clear to understand where to fly	Yes	10m	A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Option A	I think we can shoot more if the Dublin city & have fantastic seeings of the city from top		Yes	20m	A1/A3 Remote Pilot Certificate	**Noted**

Remote Pilot operating UAS	Neither	Remote pilots operating UAS in the open category may not operate in an UAS prohibited zone. 3.1.2.The current 4km no-fly zone around Dublin Airport is removed & a new UAS prohibited zone with dimensions varying between 0.8km & 1.9km is established. 3.1.3.Outside of this UAS prohibited zone, up to a distance of 6.5km from the centre point of the airport, remote pilots operating UAS in the 'open' category can operate to a height equivalent to the highest structure within 100m of their UAS. Division by distance. The further from 2km prohibited zone, the higher. Roughly: 20m AGL >=2km <=4km 40m AGL >4km <6.5km 120m AGL >= 6.5km Obviously respective of any other prohibited zones like prisons etc & other rules. In my humble opinion I don't see that there's any manned aircraft operation happening (which this change is about, as I understand) at that height (excluding emergencies). It still leaves a buffer zone for manned aircraft flying around 400m AGL just in case.	Nope.	No		A1/A3 Remote Pilot Certificate	**Not Accepted**

		3.1.4.From 6.5 km to 12.1 km from the centre point of Dublin Airport, remote pilots operating UAS in the open category can operate to a height of 30m (98ft) or a height equivalent to the highest structure within 100m of their UAS. 120m AGL. 3.1.5.From 12.1 km from the centre point of Dublin Airport to the boundary of the Dublin Control Zone, remote pilots operating UAS in the open category can operate their UAS up to a maximum height of 100m (328ft). 120m AGL.					
Remote Pilot operating UAS	Neither		Restrictions are Very strict at the moment! do some better tests or something & let us enjoy bit more freedom & chance to snap nice pictures.	No	above 30m	A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Option A	this choise will allow me to fly the UAS in previously restricted areas, but respects Airtrafic. I would even go further & request the operator to enter his operation of the UAS in an controlled app like AIRMAP, so that it is clear where & when UAS can be used in what max Hight	I would even go further & request the operator to enter his operation of the UAS in an controlled app like AIRMAP, so that it is clear where & when UAS can be used in what max Hight	Yes	30m	A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Option A			Yes	10m	A1/A3 Remote	**Noted**

						Pilot Certificate	
Remote Pilot operating UAS	Option B	Guidelines are more likely to be obeyed if they are less punitive , & allow for trust on behalf of UAS operators		No	10m	None	**Noted**
Remote Pilot operating UAS	Option A			No		A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Neither			Yes	above 30m	A2 Remote Pilot Certificate	**Noted**
UAS Operator	Neither	Both options introduce additional restrictions without justifying their need. "HEIGHT OF THE TALLEST OBSTACLE WITHIN 100M RADIUS" is ambiguous & unenforceble	For Dublin area, I suggest 1) Maintain existing prohibited zones. 2) Maintain existing 15m limit out to 6.5Km 3) 30m limit out to 12Km 4) 100m limit for rest of EIDW CTR.	No		A1/A3 Remote Pilot Certificate	**Partially Accepted** A reduction in 100m radius from the tallest obstacle will be considered to allow for better estimation of height.
UAS Operator	Option B	Having a max fix height will make it easier for people to remain under the rules also safer.	No	No		A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Option A	3.1.3 especially brings the rules in line with other districts & unlocks a lot of flights that are safe but previously would have been blocked such as roof inspection.		No		None	**Noted**
UAS Operator	Option A			No	30m	None	**Noted**

UAS Operator	Neither	Status quo seems reasonable.	Please publicize the right to operate UAVs so that the general public is aware of the rules we have to follow. For example, when we are operating in a national park, we still get hassled.	Yes	20m	A2 Remote Pilot Certificate	**Partially Accepted** The proposal to publicise UAS rules is noted.
UAS Operator	Option A	Easier to judge altitude based on nearby structures without reading sensors.		No		None	**Noted**
	Neither	The information in the document is very detailed & there is little in the way of context for the general reader i.e. the public who may be concerned about drones hovering over their back gardens (our road yesterday). Only the 'main changes' are listed — why not the full details or a simpler, clearer exposition?	See above	No			**Noted**
UAS Operator	Option A			Yes	above 30m	A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Option A	As a drone pilot, who regularly flies with a friend who lives in Swords, the current restrictions around the Airport means we always have to travel well away from Swords before we can safely fly. We would welcome changes which might allow us to fly closer to Swords & surrounding areas. Current restrictions do not allow too many options for coastal flying, around Portmarnock, Malahide, Howth etc.	It would be great if Regional Airports had similar criteria applied, & also contact person phone number available for smaller airports & also ballooning & kite, windsurfer clubs etc. should all have contact numbers easily available.	No		A2 Remote Pilot Certificate	**Noted**
UAS Operator	Option A	IAA can take advantage of the GeoFencing capabilities of modern	As part of the final statement, it would help if the IAA stated clearly that it was the sole legal regulator of Ireland's airspace.	No		A2 Remote	**Noted**

		drones to help regulate the varying distances.	This would circumscribe attempts by organizations such as the OPW, GAA etc from placing further limits to those regulated by the IAA.			Pilot Certificate	
UAS Operator	Option A	Protects the Operational Airport Corridors & provides the greatest scope of the area where UAS can legally fly. Proportionally allows the greatest volume of operations & reduces the impact on Operators.	It would be very useful if this was rolled out to other area's in the country as the response time & procedures involved are not a level playing field nationwide. Two notable examples Waterford & Shannon are both very very good at responding & following procedures, however, Cork refuses to respond to reasonable flight requests via UF-101.	Yes	30m	A2 Remote Pilot Certificate	**Noted**
Remote Pilot operating UAS	Option A	Looks better suited	N/a	Yes	20m	A2 Remote Pilot Certificate	**Noted**
UAS Operator	Option A	The restrictions outlined in Option A seem very reasonable & should provide ample headroom for the Dublin Airport area while allowing greater flexibility for UAS operators, It also clears up any AGL confusion issues when operating around Howth area.		Yes	10m	A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Option A			No	10m	A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Option A	Option A gives more freedom for the use of drone in Dublin, 30m or to the height of the closest obstacle within a 100 m radius. The options should only be available to A2 pilots within the open	You can now buy a drone for under €500, it might be time to included an IAA/ESAS leaflet with all new drones, explaining the rules/registration. We all want o enjoying flying drone within Ireland in a safe manner.	No		A2 Remote Pilot Certificate	**Noted**

		category (A1 light drones, should also complete the A2 level of training) I believe this is the minimum training required to be able to conduct a risk assessment & mitigate the risks of an accident occurring.	It would be a great shame if one or two bad apples would ruin this for everyone else.				
UAS Operator	Option A	I think this makes sense given the lack of risk to aviation up to 100m limit.	I fly a small consumer drone in my area D18. I fly it responsibly & find crushing regulations will not be helpful.	Yes	above 30m	None	**Noted**
Remote Pilot operating UAS	Option A	A modified a would be my preference... RED Zone & AMBER Zone as is... YELLOW Zone Increase to 60 metres GREEN Zone as is	I see for both of your Options you are sticking rigidly to 'obstacle rules' that are standard for airspace designers to follow. But these are mainly for instrument flying. Recreational Open category A2 UAS pilots are always "Line of Sight" so you can give a little more freedom in the YELLOW Zones. In answer to question 6 ..... I fly at 15 metres in controlled air space around the Fingal coast, but your choices are only 10 & 20 metres	Yes	10m	A2 Remote Pilot Certificate	**Not Accepted**
UAS Operator	Option A	As long as everyone observes proper safety & follow the basic protocols, Option A would suit best. I suggest that the IAA provide & app for us to check if we are able to fly at the spot we are in & up to what height. Whatever the IAA decides, I will follow all rules & regulations. I am just happy that the IAA is trying to make this consultation.	I wish that you could protect the Dublin airport more since this is a very dangerous place to fly our UAS. Some people just don't understand & they would just fly whenever & wherever they want. Anything around option A suits for me except for putting more restrictions near Dublin airport. Thank you for giving us a chance to share our thoughts. Whatever the decision that you come up with, I will follow.	No		A1/A3 Remote Pilot Certificate	**Noted**
Remote Pilot operating UAS	Option A	more logical		No		A1/A3 Remote	**Noted**

						Pilot Certificate	
Remote Pilot operating UAS	Option A	Restrictions in Dublin are quite severe, understandably as there is a large airport however for the majority of UAS pilots Option A will open up many opportunities to fly in areas in Dublin which have before been restricted. The no fly zone was far too large. Most operators fly within the IAA regulations, of course, some don't.	Mo	Yes	20m	A1/A3 Remote Pilot Certificate	**Noted**
Pilot	Option A	Sensible protection afforded to airport environs & aircraft arriving/departing. Current restrictions are overkill.	It would be good to look at something similar for Shannon & Cork too as current restrictions are ridiculous especially towards outer edges of the zones in rural areas.	No		A2 Remote Pilot Certificate	**Noted**
UAS Operator	Neither	Too complex to operate effectively & see point 4) below. Current system (UF101/SOP) works	Dublin airspace is awash with toy UAS & unlicensed 'commercial' operators who simply don't know or bother to know the regs & comply. These changes will further complicate the situation. Total absence of policing /enforcement powers is deeply frustrating for legitimate operators.	Yes	above 30m		**Noted**
UAS Operator	Option A	We at Joe Duffy Group own a number of car dealerships within 5km of the Airport. We also own 2 drones that we use to promote our dealerships. Option B would effectively ban us from filming our own dealerships, despite never coming anywhere near the Airport & never flying anywhere near the maximum height limit. We would urge you not to implement a complete ban in a radius of 5km around the Airport as it would be detrimental to our commercial drone use.	We still think Option A is more restrictive than necessary (with Phoenix Park being more than half banned) but could arrange ourselves with it. Option B would be unacceptable.	Yes	20m	A1/A3 Remote Pilot Certificate	**Noted**

UAS Operator	Option A	I think the no-fly zone around the airport must be reduced to facilitate the safe use of sua in the area. A new tier system will be a welcome change.	I think it's important to have different rules for licensed & insured competent operator vs recreational users. I personally think that licensed SUA Operator should be able to fly up to 100m in most parts of the city without prior approval from the iaa while recreational users should be restricted. In terms of restricting the max altitude, nobody flies below 100m except emergency rescue aircrafts which is a very rare occurrence in the airspace. A height restriction of 30m & 8m is no use for commercial operators. Experienced & qualified operators should have the permission to exceed those limits without approval from the iaa. The nature of our work is photography & filmmaking. We are extremely weather dependent. There is no time to plan ahead in this country when the weather changes multiple times in a day	Yes	above 30m	A1/A3 Remote Pilot Certificate	**Not Accepted**
UAS Operator	Option A	More realistic for the Commercial needs, in particular videography		No		A1/A3 Remote Pilot Certificate	**Noted**
Local authorities	Neither	The current air risk is minimal, my primary concern is ground risk; are the IAA responsible for this & if so what are you doing about it?	People on our streets & especially in our public spaces are increasingly at risk from drones, it is only a matter of time before someone is seriously injured. Small drones which are freely available at low cost are very unlikely to cause any damage to an aircraft in flight but they could easily kill or seriously injure someone on the ground, forget about adjusting the heights, & address the real risk!	No		None	**Noted** Ground risk is already considered with the existing regulation. Please contact IAA to discuss concerns further.

Remote Pilot operating UAS	Neither	I believe a combination of Option A & Option B will be the safest way to operate. For instance Option A permitting drones to fly with such a reduced Prohibited lateral distance is not safe. It will see aircraft landing & taking off at Dublin reporting drones in close proximity to the airfield. From the drone operators point of view this is impractical & should only be permitted if the prohibited area has active geo-fencing on the drone. Option B with a clear 5km Prohibited zone is a safer idea & though though I feel that could be reduced to 4 km.	Very pleased the Authority is now considering permitting the OPEN category to operate in Controlled Airspace with the correct safe EASA approved SIZE of drone. The SPECIFIC category requirements should be for advanced operators who need permission to fly their drones outside the permitted OPEN category permissions. Simple operations for basic users should remain in the OPEN category.	Yes	above 30m	A2 Remote Pilot Certificate	**Noted**
UAS Operator	Option A	I believe that option A provides the best balance between protecting manned aircraft & providing the most flexibility for UAS operators. I believe this is important as UAS usage for various reasons will increase & can potentially provide important services, this will make it as important to facilitate safe UAS operations as it is to facilitate commercial air traffic in the future.	In general relating the maximum altitude for a UAS to the height of surround fixed objects (buildings, tress, etc) in areas around aerodromes provides a very clear & reference for UAS operators & others.	No	10m	A1/A3 Remote Pilot Certificate	**Noted**
Remote Pilot operating UAS	Neither	Open category is for hobby pilots or recreational use & therefore should be restricted		Yes	above 30m	A2 Remote Pilot Certificate	**Not Accepted**
Remote Pilot operating UAS	Option B	I believe there should be some option to fly at 15m if there is no high structure around in the closest zone. The 100m zone should be as far-reaching as possible. Unlicensed operators will	I think it would be safer to allow SUAs to fly 15m ABOVE the highest tree, building or structure within 100m in order to reduce the risk of collision. At the moment 15m AGL increases chances of flying into trees, etc. & being able to fly a short distance above	Yes	above 30m	A2 Remote Pilot Certificate	**Partially Accepted** The proposal for 15m above obstacle will be considered.

		continue to ignore all these limits anyway.	these would be really helpful. I would also welcome a 200m limit in the final few kilometres at the edge of the CTR as a more graduated approach would be more reasonable. However, I welcome this proposed relaxation of the current restrictions.				
UAS Operator	Option B	Ye need to make it as clear as possible as most people with drones are first time owners & don't know airlaw etc	Yes I want to be able to log on to the iaa website & click a map & find update info on we're I can't fly & what altitude I can fly to.colour coded with clear info.especially around national monuments & the likes of Sligo,Kerry & smaller airfields.	Yes	10m	A1/A3 Remote Pilot Certificate	**Accepted** Clear online charts will be published along with updated UAS Geographical Zones.
Remote Pilot operating UAS	Neither	Born in Ireland live in the USA. I have taken a full college semester on drone flying. It's unrecognized in Ireland. I use my drone mainly for photography. The vertical & horizontal limits are too limiting. What's going to happen is people will ignore them.	I have been trying to get permission to fly vertically at around 200 feet & horizontally 1500 feet for lake & sea photos. I've been referred to local courses that are expensive, & infrequent, & usually do not correspond to the time I am in Ireland.I am currently training for my private pilot license as there seems to be more leeway to licensed pilots. Think about your rules in that it's easier for me to become a private pilot than take the required courses to take over head photos of lakes & seas. I've hiked Glendalough & been buzzed by a drone. Just courtesy alone should tell the operator not to do that. So, you have folks (like myself) that want to operate safely, courteously, & not interfere in any way with aircraft, manned or otherwise. Then you have yahoo's that ignore the rules & do what the want.	No		A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Neither	The height is to restrictive when outside the prohibited zone		Yes	above 30m	A2 Remote	**Noted**

						Pilot Certificate	
UAS Operator	Option A	It's about time that common sense is used by All within this business.		Yes	above 30m	A2 Remote Pilot Certificate	**Noted**
UAS Operator	Option B	5km limit (up from 4km) & graduated restrictions outside of that seem very sensible		Yes	10m	A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Option A	Smaller exclusion zones make flying a little more enjoyable to get the great sights around Dublin City. If there were an issue with complexity around navigating the hard lines in Option A vs the simple radius in Option B it should be negated by the fact that almost all consumer level UAV's will have built in restrictions & Do Not Fly zones. For UAV's missing this feature there are many, many apps that show restricted airspace		Yes	above 30m	A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Option A	A seems to make sense of the two, as long as maps & guidelines set out are accurate & available to see easily online & access from mobile devices.	is this going to apply to just Dublin or with it eventually branch out to other restricted airport space?	No		A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Option B	Option B is safer for both drone operators & other airspace users, in the open category. Should more flexibility be required then a PCC & SOP should be obtained so that drone operators understand the key issues.		Yes	above 30m	A1/A3 Remote Pilot Certificate	**Noted**

Hobby model airplane pilot	Option B	While I agree with option B, there is no distinction made between quadcopter drones with GPS or FPV cameras that enable them to be flown beyond visual line of sight, & hobby model airplane that can only be flown while visible to the naked eye. The latter lends itself to natural sight & distance limits. The lack of this clear distinction is lazy by the IAA. It is also inherently unfair to responsible hobbyists who have years of experience & skill. Instead a specific reference should be to restrict those UAS that are GPS or camera enabled, to restrict people who can operate these vehicles out of the box without any training, experience or knowledge of aircraft aerodynamics.	While I agree with option B, there is no distinction made between quadcopter drones with GPS or FPV cameras that enable them to be flown beyond visual line of sight, & hobby model airplane that can only be flown while visible to the naked eye. The latter lends itself to natural sight & distance limits. The lack of this clear distinction is lazy by the IAA. It is also inherently unfair to responsible hobbyists who have years of experience & skill. Instead a specific reference should be to restrict those UAS that are GPS or camera enabled, to restrict people who can operate these vehicles out of the box without any training, experience or knowledge of aircraft aerodynamics.	No		None	**Not Accepted**
UAS Operator	Option B	Option A reduced restricted area is way too close to airport.		No		None	**Noted**
UAS Operator	Option B	Stupid idiotic Regulation . Buildings , pylons , phone masts even trees all exceed 15m height . should we raze all these to the ground in a 25km radius of our airports . Set realistic heights for drone operators to fly legally but safely in class C areas . Failure to do so will only encourage illegal flights. These can be posted online using untraceable anonymous accounts anyways. Most people want to stay within the rules so make the rules realistic.	If this is approved please apply to Cork airport also. I live 20 km from Cork airport near sea level but the Class C extends 5 km beyond my home. I can only legally fly up to 15m , which is lower than the height of some trees near by , & all this despite the fact that cork airport is over 300m above sea level !	Yes	20m	A2 Remote Pilot Certificate	**Not Accepted**
Remote Pilot operating UAS	Option A	Option A gives more scope for drone operations in Dublin, with the small price of increased complexity (which could be		Yes	10m	A2 Remote	**Noted**

		over come with good maps, ideally zoomable down to street level)				Pilot Certificate	
UAS Operator	Option B	The proposal does, I believe, strike a good balance between aerial safety & facilitating responsible drone use at higher flight levels for recreational photography/videography. In relation to the prohibited area around Dublin Airport, I believe option B provides more clarity for drone users, & that a simpler regime is less likely to lead to confusion. Option A could, I suspect, lead to concern among the general public who may be unfamiliar with drone regulations.	With the advent of the new EASA regulations, & technological advancements, use & prevalence of drones is going to become more common. I suspect that with this increasing public drone use, misuse of the technology is also likely to increase, such as users exceeding height limits or flying in prohibited areas. While this behaviour may constitute a public nuisance, some of it will potentially interfere with manned aircraft safety or aerodrome operations. REDACTED I believe that most Gardaí are ill equipped to respond to suspected incidents where EASA regulations have been breached, be that as a result of responding to complaints from the public or simply happening upon them while in the course of their duty. There are two main reasons for this, in my view; (i) Lack of knowledge of regulations: There are members of the Gardaí who are themselves registered operators or otherwise interested in drones & are, as a result, familiar with regulations in place. Members stationed near aerodromes may also have gained an understanding of regulations given they are more likely than Gardaí elsewhere to receive complaints regarding drone use. However, in my experience, most members of AGS are no more informed than the average member of the public. (ii) Lack of / unfamiliarity with enforcement legislation: Despite my personal interest in drones, I personally am unable to point to	Yes	10m	A1/A3 Remote Pilot Certificate	**Accepted**

			specific laws which grant Gardaí authority to take enforcement actions where suspected breaches of regulation occur, for example demanding name & address of persons suspected of flying drones in proximity to aerodromes. Such specific powers may indeed exist, but if Gardaí are unaware of them, they will not be in a position to avail of them should the need arise. I believe that, given members of the Gardaí already receive complaints regarding drone use, & they represent a significant body of personnel on the ground across the country, AGS could be a useful asset to the IAA. This is because they would can act as additional eyes & ears for the IAA, with the ability to gather necessary information to assist the IAA, where necessary, to take enforcement action against rogue drone operators. To fully realise the potential of empowering the Gardaí, I believe the following would be required: (i) Information / Education for Gardaí: Knowledge of what constitutes safe, legal drone flying, & what constitutes a breach of regulations would be required if Gardaí were to assist the IAA in enforcing regulations. Vehicles for delivering such knowledge to Garda members could include the Gardaí's online learning system. Engagement between senior management in the IAA & the Gardaí would be a pre-requisite to such an initiative, but it potentially could be of benefit in promoting & monitoring safe drone use. (ii) Following on from this would be education on enforcement powers available to members (if any). Where none exist, then				

			there could be said to be a case for seeking implementation of laws which strengthen the enforcement powers of the IAA & also AGS. It is appreciated that this is a governments purview, but public clamour for such powers might arise if increased drone misuse materialises. On this note, it should be pointed out that there is precedence for legislation granting Gardaí similar enforcement powers to statutory bodies in areas for which AGS are not the primary responsible agency, e.g. littering. Local authority litter wardens are the first port of call when it comes to investigating & prosecuting breaches. However, power to demand name & address from suspected offenders, & other enforcement powers, are also extended to Gardaí. The rationale is that given their role & presence in our communities, Gardaí are in an ideal position to assist the lead agency. Such an arrangement could, I believe, be of benefit to the IAA & society broadly, in tackling rogue drone use.				
UAS Operator	Option A	Less paperwork for minor jobs	I feel there should be stronger controls on non insured & untrained (qualified) drone pilots.	Yes	30m	A1/A3 Remote Pilot Certificate	**Noted**
Remote Pilot operating UAS	Option A	Less paperwork for routine jobs	Stricter controls for non registered users	Yes	30m	A1/A3 Remote Pilot Certificate	**Noted**

UAS Operator	Option A	It appears that the variable zone option would allow for exceptional circumstances & mitigation factors to be taken into account when presenting an application to work closer to Dublin Airport	Planning & on-going coordination with the controllers in CTA's will help to improve overall safety	Yes	30m	A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Option A	As a UAS Operator & Remote Pilot, greater flexibility for me to be able to fly aerial mapping or surveys is a real asset. Option A would offer some scope to be able to fly in the open category without the need for a UF101 for some flight ops.	I would like clarity on the operation of legacy drones under the new EASA regulations. Is it possible that some legacy drones will be able to receive a CE classification retrospectively? I would like to purchase an Enterprise quality drone but do not what to be shouldered with something which the regulations will make near impossible to fly in an urban setting or within controlled airspace	Yes	above 30m	A2 Remote Pilot Certificate	**Noted** Please contact the Airworthiness Department of the IAA with respect to your legacy UAS query.
Remote Pilot operating UAS	Neither	Safety	UAS activity in Geographical Zones should be more strictly controlled.	No		A2 Remote Pilot Certificate	**Not Accepted**
Remote Pilot operating UAS	Option A	My choice for option A gives me more options for flights, while following all the security measures. Most of people I know respect the rules & not only use drone for personal, but for professional purposes, & giving this flexibility, enables people to show even more the beauty of Dublin.		Yes	10m	A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Option A	Being able to fly at the same height as nearby buildings is sensible, since large aircraft are not going to fly anywhere near said buildings.	The EASA should consider working with drone manufacturers to allow retrospective classification of “legacy” drones to the new classes, probably by firmware update. From an environmental perspective, it would be a tremendous waste of resources to force UAS operators to purchase new drones, if current	Yes	10m	A1/A3 Remote Pilot Certificate	**Noted**

			units could be made compliant through software.				
Pilot	Option B	Option B appears to provide for more restrictive UAS no-fly-zone limits.	UAS drones need to be fitted with some form of Electronic Conspicuity (EC), both Tx & Rx, similar to FLARM, which is already widely used in Europe (>50,000 GA & UAS aircraft). https://flarm.com/ https://www.flarmnet.org/flarmnet/ https://www.flarmnet.org/faq UAS drones should automatically take avoiding action in the event that they or another FLARM equipped GA aircraft come into close proximity. Drones are difficult to see from the air, so the drone needs to take the avoiding action to prevent a collision. FLARM traffic data is available to ATC service providers, but critically, does not require any oversight by them or place any burden on ATC service providers. The technology already exists to prevent drones operating within geo-fenced areas or to respect the limits of any UAS Geographical Zones that come in to effect. Drones without this technology should not receive a license. Commercial UAS drone operations outside urban limits need to be restricted to defined highways in the sky & must be fitted with some form of EC that is accessible to all GA & sport aviation communities. Consider this: how long before we start seeing commercial UAS operators offering click-and-deliver services bringing fresh	No		None	**Noted**

			coffee & sandwiches to hill walkers out for a day's hike. How long before there is a serious air-prox or mid-air collision with a manned aircraft?				
UAS Operator	Option A	It gives me more choices for operating as the zones open up as you move away from the airport	Would it be possible to look at the operating radius in relation to Mountjoy prison, it is nearly 1km & so covers quite a large area, is it possible to reduce this as it requires an extra couple of agencies to be involved when seeking permission to fly & sometimes with weather etc you need to get a quick response	Yes	above 30m	A1/A3 Remote Pilot Certificate	**Noted** Please contact Dept. of Justice with respect to the dimensions of EIP18.
UAS Operator	Option A	Option A gives the best compromise between the operational needs of manned aircraft & UAS operations. I believe that this option would reduce the workload on both the ANSP & UAS operators speaking as both a UAS pilot & an operational ATCO	In Sligo there has been an effort I believe to reduce the no fly zone area which currently encompasses the entirety of the Sligo CTR. It would be beneficial to both ANSP & operators if such UAS airspace changes proposed for the Dublin area are replicated across other areas of controlled airspace. This would again reduce the burden on both sides whist maintaining safety. In regard to any insurance requirements, It seems that €6.5 million is the standard for commercial operators. For hobby flyers, the current policies available only cover up to €1.3 million. If such high levels of public	Yes	10m	A2 Remote Pilot Certificate	**Noted**

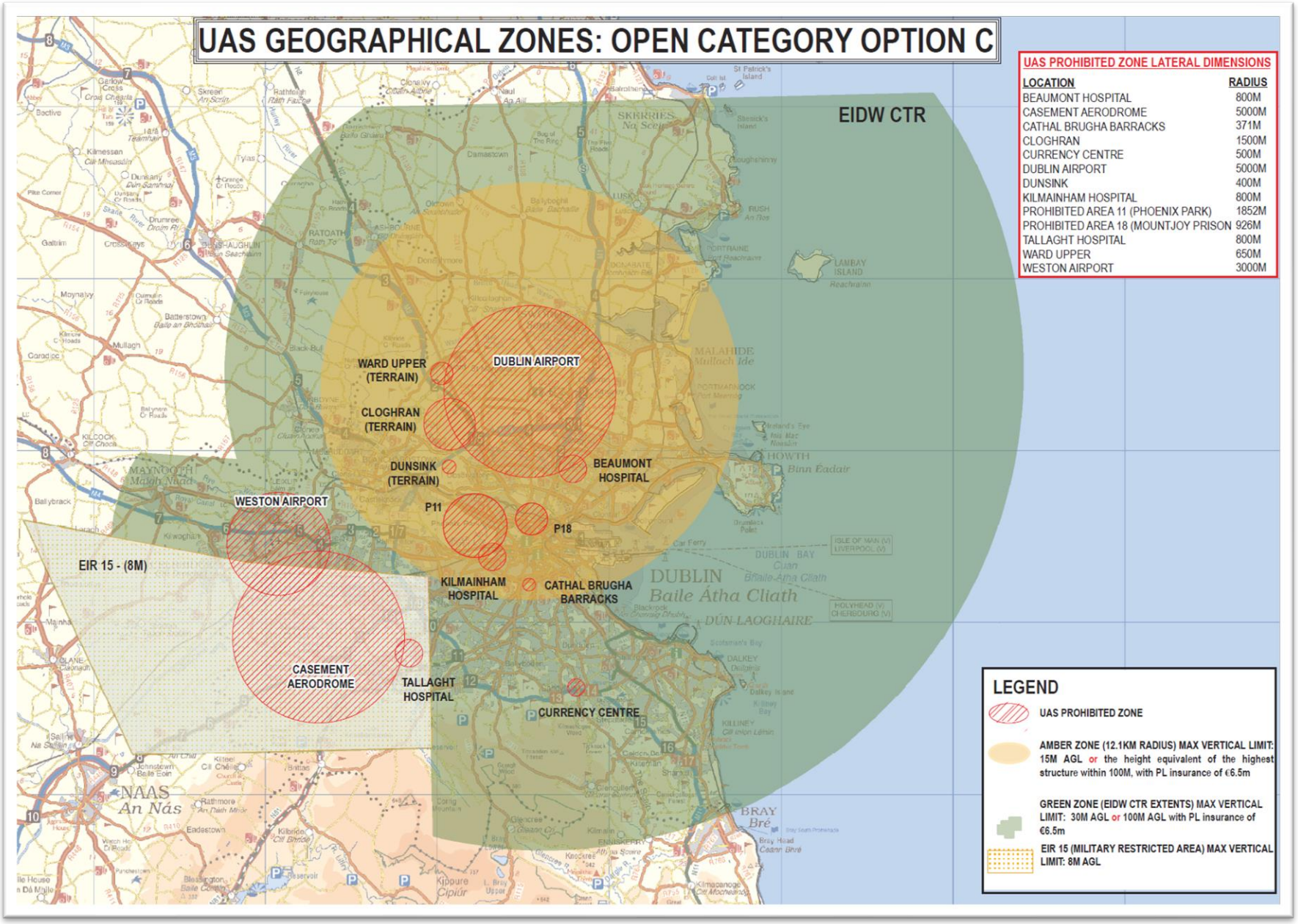
			liability insurance are mandated there will be a number of operators that will either give up on UAS altogether, stifling future growth or that operators of UAS will forgo the insurance. In this situation, the reporting of any occurrences or accidents involving the use of UAS will be hampered as pilots will not be encouraged to engage in a just safety culture.				
Pilot	Option B	Until UAS aircraft are equipped with anti-collision systems as standard the mixing of UAS & Commercial, General & Emergency aviation will always present a risk of collision.	The extension of the UAS operational areas will produce some anomalies: e.g. at present GA & sport aviation (such as paragliders/hang-gliders at some locations within ATC control zones is permitted subject to ATC confirmation on a case-by-case basis, however UAS operators will be able to fly in these zones without any collision avoidance & without calling ATC. Additionally, all AirLaw at present is based upon the principle that powered flight gives way to unpowered since the powered aircraft have greater manouverability. However, permitting UAS aircraft to operate without any anti-collision or eletronic conspicuity systems means that unpowered aircraft such as sailplanes, balloons, paragliders & hanggliders are now obliged to carry out the avoidance themselves, thus overturning exisiting principles of airlaw. All commercial UAS (and UAS aircraft above the 250g current limit) should be equipped with a system such as FLARM (https://flarm.com) which provides an automated collision avoidance system & electronic conspicuity to allow aircraft such	No			**Noted**

			as Air Ambulances, Light GA aircraft & rotorcraft & sport aviation to 'see & avoid' or be seen by these UAS aircraft. Given the commercial function of the UAS services they will by definition not follow standard routing (already the operators speak of coffee deliveries to households for example, see the current Galway trials) so the only safe way forwards is that UAS carry a standardised & cheap collision avoidance system which both provides other pilots with the ability to see & avoid, & enables the UAS itself to 'see' & take avoidance action when necessary. This technology already exists & is cheap, & is in regular use in most European countries & elsewhere worldwide, so it should be made mandatory prior to opening up airspace (both controlled & uncontrolled Class G) to large-scale commercial UAS activity.				
Pilot	Neither	In an emergency saving life has a priority over all laws & regulations..having drones without a 100% fail safe collision avoidance system endangers life.		No		None	**Not Accepted**
Pilot	Neither	No input into either option	As a free flyer, hang glider flying regularly in irish airspace concerned by lack of regulation of unmanned automated drones(missiles) flying in same airspace. Would like to see requirements for collision avoidance capability & flarm alerting added incorporated	Yes	above 30m	None	**Noted**

REDACTED national representative body	Option A	Both options allow for greater flexibility in Mountain Rescue use of drones in the Dublin Region. Either of the proposed options would raise the height limit above the section of the Dublin Wicklow Mountain Rescue teams primary response area (around Ticknock & Tibradden) within the control zone to 100m. Option A has a slight advantage as it allows greater flexibility to the north & the east of the city in the event teams were supporting a lowland missing persons search.	We look forward to similar consultations for the regional airports which impact our other member teams primary response areas	No		None	**Noted**
UAS Operator	Option B	It's easier to understand & enforce	Better enforcement is required	Yes	above 30m	A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Option A	I have already seen a similar approach around Warsaw Chopin International airport (Option A) & for me it is a logical solution to the problem. If I was designing this, I would indeed create a no-fly zone (around the closest vicinity of the airport) & gradually ease the restrictions the further from the airport.	I am not a fan of "relative" height criteria only, as in Option A point 3.1.3: "UAS in the 'open' category can operate to a height equivalent to the highest structure within 100m of their UAS." Instead, I would introduce criteria similar to point 3.1.4 which provides relative & absolute height criteria. For example, I would define 3.1.3 like this: "3.1.3.Outside of this UAS prohibited zone, up to a distance of 6.5km from the centre point of the airport, remote pilots operating UAS in the 'open' category can operate to a height of 15m (49ft) or a height equivalent to the highest structure within 100m of their UAS equivalent to the highest structure within 100m of their UAS."	Yes	above 30m	A1/A3 Remote Pilot Certificate	**Noted**

			Also, I would recommend creating a UAS Android/iPhone app for Drone operators & pilots. This app would: - Display No fly/Restricted/Controlled zones around the pilot along with height restrictions & other important information. (DJI app does not provide precise information about the zones & is very poor in this regard), - Allow the pilot/drone operator to "check in" their flight. Checking in would allow IAA to have a visibility of all flights around Irish airspace. There might also be a possibility for pilot to request a flight in regulated fly zones above certain restrictions, like height etc. IAA or a team could immediately see that & accept/reject. UAS operator/s ID and/or drone information (weight, make etc) would be visible. If you would like to explore possibility for such an app with me, please contact REDACTED				
Remote Pilot operating UAS	Option B	I believe an exclusion zone of 5km around the airport is reasonable and, I would never be operating a drone inside this area anyway.		Yes	20m	None	**Noted**
Pilot	Option A	Given the burgeoning development of UAS commercial capabilities I feel that it would be unrealistic to confine them unnecessarily. Plan A offers sufficient protection for the main runways & busy military & sensitive areas. I would suggest that the old R.19/20 in Gormanston should also be protected as per the circuit	No.	No		None	**Noted** Please note that the existing EID1 around Gormanstown is already defined as a UAS Geographical Zones prohibiting UAS activity when active.

		area at Casement as this area encompasses the air firing circuit dimensions for the Air Corps & a UAS would be unwelcome aloft amongst armed aircraft, be they helicopter or fixed-wing!!! Even though this area falls outside of the scope of this proposal I feel it an opportunity to consider it for future inclusion..					
UAS Operator	Option A	A move in the right direction but I'll always need 120m permission for my UAS operations.	I think pilots holing & operating an SOP for more that 3 years plus should be given the privilege to operate at 120m AGL outside a 5000m radius of Dublin airport & other UAS prohibited zones.	Yes	above 30m	A1/A3 Remote Pilot Certificate	**Not Accepted**
Remote Pilot operating UAS	Neither		No thanks	No	above 30m	A1/A3 Remote Pilot Certificate	**Noted**
UAS Operator	Neither	Hey, I am representing REDACTED. We have been SOP holders since 2014. We believe that Option B is the closest to what we would prefer, but we believe that everyone operating a drone in a built up area should have public liability insurance, to a minimum of €6.5m. We have drawn up an 'Option C', which can be found here.. REDACTED – ADDED BELOW This would be our preference.	Our main concern, like other commercial operators, is always around the enforcement side of things. This needs to be addressed & taken seriously, going forward.	Yes	above 30m	A2 Remote Pilot Certificate	**Partially Accepted**.


UAS GEOGRAPHICAL ZONES: OPEN CATEGORY OPTION C
EIDW CTR
WARD UPPER (TERRAIN)
DUBLIN AIRPORT
CLOGHRAN (TERRAIN)
DUNSINK (TERRAIN)
BEAUMONT HOSPITAL
WESTON AIRPORT
P11
P18
EIR 15 - (8M)
KILMAINHAM HOSPITAL
CATHAL BRUGHA BARRACKS
CASEMENT AERODROME
TALLAGHT HOSPITAL
CURRENCY CENTRE
DUBLIN
Baile Átha Cliath
DÚN LAOGHAIRE
NAAS
An Nás
BRAY
Bré
UAS PROHIBITED ZONE LATERAL DIMENSIONS
LOCATION RADIUS
BEAUMONT HOSPITAL 800M
CASEMENT AERODROME 5000M
CATHAL BRUGHA BARRACKS 371M
CLOGHRAN 1500M
CURRENCY CENTRE 500M
DUBLIN AIRPORT 5000M
DUNSINK 400M
KILMAINHAM HOSPITAL 800M
PROHIBITED AREA 11 (PHOENIX PARK) 1852M
PROHIBITED AREA 18 (MOUNTJOY PRISON 926M
TALLAGHT HOSPITAL 800M
WARD UPPER 650M
WESTON AIRPORT 3000M
LEGEND
UAS PROHIBITED ZONE
AMBER ZONE (12.1KM RADIUS) MAX VERTICAL LIMIT: 15M AGL or the height equivalent of the highest structure within 100M, with PL insurance of €6.5m
GREEN ZONE (EIDW CTR EXTENTS) MAX VERTICAL LIMIT: 30M AGL or 100M AGL with PL insurance of €6.5m
EIR 15 (MILITARY RESTRICTED AREA) MAX VERTICAL LIMIT: 8M AGL

Air Navigation service provider	Option B	The (re-) definition of the no fly zone around Dublin Airport is closer to the ANSP concept of drone operations within the Dublin CTR.	Based on my previous comment, I suggest that rather than using a radius/circle methodology, that squares/grids are used, i.e. set a rectangular no fly zone around the airport(s) as c. 3NM from the airfield boundary & the create square grids of U-Space airspace with graduated altitudes. This would align in my view with the navigation capability of drone operators who it would appear find radii difficult to navigate/assess. This would also align with my understanding of the Grid model used by UTM Platforms.	No		None	**Noted**

REDACTED Commercial Operator	Neither	Hi, From the document, 1.6: This should equally apply to the Specific category. An operator in the Specific category should not have to submit an ATC permission (UF101) to operate in the same airspace Open category can freely operate in. The changes should reflect the air risk of unmanned operations in general & not just to one category. Option A is too complex with too many variables & does not meet the 'keep it simple stupid' criteria!! Option B seems to be an easier solution to work with but is maybe overly restrictive. A hybrid example with more definition of the UAS Prohibited Zone around the airport & UAS Restricted Zones might make more sense & permit some additional scope in terms of operations. For 'UAS Prohibited Zones' around international & regional airports, could the following approach work on a national level. UAS Prohibited Zone based on 1. An cylindrical 'airport protection zone' (ATZ!!) centred around the aerodrome ARP point with a normal radius of 2.5km; and,		Yes	above 30m	A2 Remote Pilot Certificate	**Noted**

		2. A rectangular 'runway protection zone' extending longitudinally 5km along the extended centerline from the departure end of each runway & extending laterally to 1km on either side of the extended centre line; and as required, 3. Additional 'safety zone' where local needs apply (unique terrain etc) based on an Arc or Rectangle extending from the ARP point. 4. UAS Prohibited Zones around military airports could stick with the more simple method as described in Option B due to the VFR nature of a lot of their operations. 5. Likewise smaller airports like Weston where the predominance is VFR activity, the simple approach described in Option B remains to cater for Omni-directional arrivals. 6. Operations inside these areas require an ATC approval & an operational authorisation. A UAS Restricted Zone around international & regional airports based on. 1. From the ARP point & aligned longitudinally in the general direction of all runways, a rectangular area extending to 10km in each runway direction & laterally extending to 5km on either side of the centerline. (for example in Dublin airport, centred on the ARP & catering for runways 10/28 a					

		rectangle extending longitudinally 10km on bearing 280 & 10km on bearing 090 & laterally extending 5km from the centerline. Additionally, for run 16/34 a rectangle extending longitudinally 10km on bearing 160 & 10km on bearing 340 & laterally extending 5km from the centerline) 2. UAS height is restricted to 50m agl or when flying an unmanned aircraft within a horizontal distance of 50 metres from an artificial obstacle taller than 35 metres, the maximum height of the UAS operation may be increased up to 15 metres above the height of the obstacle at the request of the entity responsible for the obstacle. (This wording keeps commonality with that used for height restrictions in the Open category found in regulation 947). 3. Operations above 50m agl require an ATC approval & an operational authorisation. Outside these areas, the maximum height can be 120m from the surface of the earth or when flying an unmanned aircraft within a horizontal distance of 50 metres from an artificial obstacle taller than 105 metres, the maximum height of the UAS operation may be increased up to 15 metres above the height of the obstacle at the request of the entity responsible for the obstacle.				

IAA DUTO holder / ATPL holder	Neither	The general idea of allowing less restrictive UAS operations in the Dublin CTR is a good idea however a number of concerns with the proposed options would be as follows: Re Option A: i) It is unclear what the 0.8km & 1.9km dimensions are relative to. Obviously not the reference point & am unsure if from the airfield boundary or from the runways? Whatever is decided, clear maps such as those in AN U04 would be required. ii) Assuming the 1.9km extends from runway threshold along the approach path; aircraft on approach will typically be at 350ft +/- (perhaps lower if managing an engine failure) at this point. It seems uncomfortably close to allow a UAS to operate up to 100ft (30m) in this area & this could be a source of distraction to manned aircraft pilots. iii) Open category (A3) allows use of UAS up to 25kg (ie large UAS), so it is possible a large UAS could be flying in an open area (150m from commercial, industrial, recreational & residential areas - eg in a field), to the height of a pylon, near the approach path. iv) adding to the above, the risk of a flyaway (eg due to compass failure, gps failure etc) - could lead to a large UAS flying uncontrolled close to manned aircraft on approach or in the takeoff segment. v) Flight close to the airport may cause more nuisance 'Drone Detection' alarms.	General comment - in my experience most drone operators will want to fly above the height of structures to capture the wider aerial view. It is dificult to include in the options above but consideration could be given to say 30m or height of the structure + 15m, in a similar way to what is permitted in EU2019/947 ANNEX Part A UAS.OPEN.010 General Provisions (3)	Yes	above 30m	A2 Remote Pilot Certificate	**Partially Accepted** The points are noted including 15m above obstacles.

		vi) Not withstanding the above the general principle of being able to fly to 30m or the ht of structure within 100m seems reasonable. vii) Is there a risk that the broader 100m height approval beyond 12.1km could cause issues for the GASU, EAS or Coast Guard helicopters? Re Option B: i) The suggested 5km, whilst perhaps sensible close to approach & takeoff flight paths, is overly restrictive for other less critical areas such as north or south of the airport. Suggestions: i) Consider increasing the prohibited area range from the airport along approach & departure path as discussed above. ii) Consider limiting the weight / size of UAS which can be flown close to the airport prohibited area, to say Class C2 Drones (max 4kg) / or legacy drones up to 4kg. This would cover most drones in common use & larger drones would need permission. ii) Clearly define the areas to allow simple / unambiguous interpretation by operators & Remote Pilots, of the prohibited area boundaries. iii) Consider if the 100m height approval beyond the 12.1km could impact emergency heli operations.					

Recognised Entity & drone operator	Option A	I support the most flexible possible use of airspace & this option provides this. I do think it could go even further though & I hope this will be an ongoing process with further alleviations in the short term.	This consultation focuses on the Dublin CTR but Cork & Shannon must also be considered asap along with the regional airports. Clarification is needed regarding the reversion to Class G at regional airports & if drones are then allowed to operate without a UF101. Most drone pilots do not have a pilots licence so do not understand terms such as TMZ or even controlled & uncontrolled airspace if they are in the Open category so the language used must be in layman's terms not aviation speak. The "Temporary" TRAs need points of contact or an ACP to have them correctly defined & accessible to drones who obtain permission. Information must be published by the IAA & easily accessible to all drone pilots (and manufacturers) - including those who have only registered & have not carried out any formal training. Engagement with the community is critical & this is a great start. The REDACTED is happy to host a Q&A session & we have over 500 members including hobby & professional pilots.	Yes	above 30m	A2 Remote Pilot Certificate	**Partially Accepted** The UAS Geographical Zones around regional airports remains active 24/7 irrespective of the class of airspace. The remaining points are noted.
REDACTED Representative Organisation	Neither	We are responding as REDACTED as a whole instead of as an individual. Please disregard our answers for 5, 6 & 7. After surveying our 518 members with a total of 105 responses there was no clear winner. Professional respondents favoured neither option, it's important to remember that for these pilots drone operations is their livelihood. You can see within the comments provided by our members that lack of enforcement is a concern, this was also raised at our	We request that future consultations with the drone community be conducted in plain english that all our members can understand easily.	Yes	above 30m	None	**Partially Accepted** Individual comments addressed below.

		townhall meeting. These documents are emailed to REDACTED – SENT TO IAA. One suggestion by our member REDACTED was for there to be a public liability insurance requirement for all those operating in populated areas over a certain height. This is called option C. This is included in the email to REDACTED – SENT TO IAA, with our findings. It is clear that many of our members are insured, with all full time operators insured. Only three part time operators are not insured. 32% of hobby operators are insured with 63% uninsured. The REDACTED requested that the IAA communicate in a a way that is clear to those not versed in aviation speak. We also request that the IAA hold Q&A for the community hosted by REDACTED				

Additional data, proposal & comments provided via email from above submission:	
1. Unless the laws are enforced & people breaking the laws are pursued for breaking the laws it wont matter what the new regulations are.	1. **Noted**
2. Better than present.	2. **Noted**
3. Living next to the airport does not give much options. I wish Fingal CC allowed the flying in the parks (remote parts of them).	3. **Noted:** Please liaise with Fingal CC.
4. These changes are great. We should be pushing to make drone flying easier for those who do things properly. There is often an argument from commercial operators about the need to have strict rules to prevent cowboys but we know cowboys couldn't care less & these rules end up restricting the activity of legit people	4. **Noted** 5. **Noted**

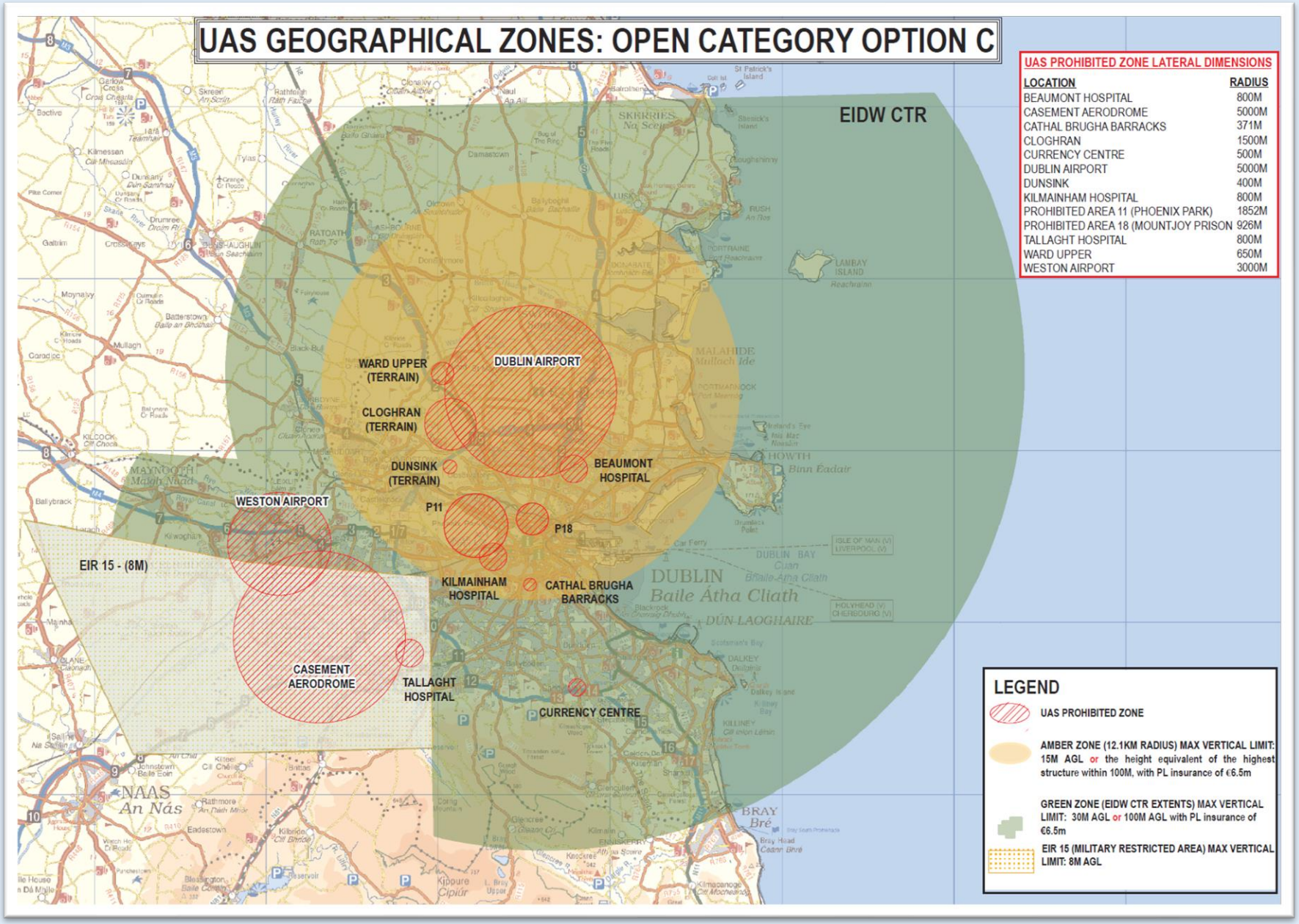
5. As long as relevant apps people use reflect the changes, I feel it a good proposal	
6. The IAA should declare that they are the sole regulator of Ireland's airspace not OPW, GAA etc.	6. **Not Accepted**: Already outlined in legislation.
7. More flexibility for Open Category to fly makes sense & would be great for Hobbyist near Airports	7. **Noted**
8. I agree	8. **Noted**
9. A positive move for flying safely in Dublin Airspace, looking forward to seeing changes in option A implemented	9. **Noted**
10. The proposals to relax current restrictions will suit commercial flyers but I fear there are too many unregistered drone operators out there that currently do not follow the current rules & restrictions. With the increase in manufacture & sales of drones I feel the focus should be directed to the requirements to purchase drones in the first place. When this is done, then you can focus on relaxing the limits.	10. **Not Accepted**: All airspace users shall be accommodated to the maximum extent possible.
11. Option A has the best airspace allowance, but rules difficult to enforce or comply with. Option B is simpler to understand, but extends zones/removes freedom. What about other airports in Ireland?	11. **Noted**: A review of other aerodromes UAS Geographical Zones will follow the EIDW proposal.
12. Seems too restrictive, given that it takes Dublin City centre out of the equation, which is a shame. I dont believe commercial flights will go 100m above ground from Dublin	12. **Noted**
13. It's a positive step but needs to keep momentum. While I appreciate DUB airspace is priority there are a lot of other locations which need attention too.	13. **Noted**: A review of other aerodromes UAS Geographical Zones will follow the EIDW proposal.
14. There should be a provision subject qualification to operate outside these limits by application to the appropriate authority & still not be limited to the Specific Category	14. **Not accepted.**
15. I think that if there is a tree, building or structure within 100m then it would be safer to be able to fly 15m above that structure rather than at the same height in order to avoid any potential collision. However, I welcome the changes. Living in the outskirts of the CTR I would welcome a 200m limit once past Killiney. Consideration should also be given to legacy SUAs that may fall outside the open category. Unlicensed pilots will continue to ignore all these rules anyway...	15. **Partially Accepted:** The proposal for 15m above obstacle will be considered. 200m proposal not accepted as it impinges on separation from other aircraft.
16. I think Option A is quite convoluted - option B while more restrictive should be simpler to interpret & allow enough leeway for those operating under Open Category.	16. **Noted**
17. Far too complicated and, anyway they don't even police the existing rules so what's the point. Its all technocratic bs.	17. **Not accepted.**

18. I don't believe there's enough in place to have these enforced safely, giving untrained & unlicensed operators more freedom to act illegally & in their own interest!	18. **Noted**
19. Seems a sensible solution for the open category	19. **Noted**
20. I think a slight easing of restrictions is a good thing, but only for those who are insured & licensed obviously. Perhaps some kind of ID card would be a benefit to members to quickly establish authority with concerned forces like An Garda & also curious members of the public.	20. **Partially Accepted.** All airspace users shall be accommodated to the maximum extent possible.
21. Can the 300ft be put in place in other parts of the country -- Kerry & Cork Airspace	21. **Noted**: A review of other aerodromes UAS Geographical Zones will follow the EIDW proposal.
22. I am more aligned with Option A, but it is not a perfect solution.	22. **Noted**
23. Existing regulations need to be enforced. A or B will result in a free for all in my opinion. Not a good idea from an air traffic perspective, risky flying in urban areas & privacy issues in urban areas.	23. **Partially Accepted.** The proposed UAS Geographical Zones do not remove the existing restrictions on UAS including those relating to privacy.
24. I think updating the limits alone will not improve safety for the public or manned aviation.It needs to be accompanied by an information campaign on safe & legal flying with more visible enforcement	24. **Partially Accepted.**
25. The following need to be addressed before forming a conclusion.	25. **Partially Accepted**
25.1. Given the EASA regulations are risk based, what risk assessment has been done of this proposal?	25.1. The proposals are based on an assessment of the risk, see rationale above.
25.2. What information/evidence are the changes based on? Has there been a trial of these proposed changes?	25.2. The proposals are based on an assessment of the risk, see rationale above.
25.3. Who is going to deconflict traffic between hobbyists & professionals operating in same area, especially if Professionals have ATC & DCC clearance ?	25.3. No ATC clearance is needed within the proposed UAS Geographical Zones. It is the responsibility of the UAS

	operator to "manage a situation of incursion of a person into the area of operation, & take appropriate measures to maintain safety;"
25.4. Why are professionals not considered as part of this proposal? this has a significant impact on their businesses	25.4. Please note para 1.8 of the consultation document which states "The purpose of this Notice is to inform all airspace users & interested parties of this review, & to invite & welcome submissions for consideration." & the option of 'other' in question 1 (what is your primary interest in the airspace?) of the submission form.
25.5. Given this is for Open category only, will there be a separate controlled airspace model for Specific Category/OA	25.5. Please elaborate on 'controlled airspace model'.
25.6. Why are Specific category being burdened with paperwork & approvals when Open Category can just turn up & fly	25.6. This is due to the nature of the operation & the UAS.
25.7. How is this going to be enforceable? Its making is exceptionally difficult for Gardai to police with multiple limits	25.7. **Noted.**
25.8. Has the legislation to allow for Garda enforcement been passed by the Dail?	25.8. Specificity required.
25.9. The SUA trial has been running for over 3 years & still requires SOP holders to submit UF101 for the areas that Open Category can now just fly up to 100m in parts of Dublin	25.9. **Noted**.
25.10. These proposals give Open Category a significant commercial advantage over SOP holders. No 24hr ATC approvals, lead time waiting on approvals, missed windows due to delays,no insurance requirement	25.10. **Noted**.
25.11. Why are the main stakeholders not involved in the process. DCC were completely unaware of this proposal.	25.11. See 25.4 above.

25.12. Have the Gardai, OPW, NPWS etc been formally engaged or is it just down to Twitter & some low level media coverage?	25.12. Yes.
25.13. What state bodies have been formally engaged ?	25.13. All relevant stakeholders.
25.14. Given the significance of the change, why has there been no webinar / Q&A with the IAA ? If drones are so important to IAA, why is it being done in this manner.	25.14. The purpose of the consultation is to gather comments, opinions & views, including questions. Once we have this, we will consider the feedback & address any issues that have been highlighted, if required. This may include an online Q&A and/or & FAQs.
25.15. Will the IAA formally engage the manufacturers & ensure the proposed changes are correctly enforced & drones will be limited to 30m in those areas with immediate effect ?	25.15. It is the role of the market surveillance authority to engage with relevant manufactures where necessary.
25.16. Given the significant increase in drone violations & lack of enforcement, why do the IAA feel that increasing the limits will help the situation? > 1km altitude a couple of weeks ago, wind turbine strike	25.16. Please provide more specific information.
25.17. Do they IAA actually expect, when they put in 2 limits, that the lower level with be adhered to?	25.17. **Noted**.
25.18. IAA Open Category training is inadequate, the same basic questions being repeately asked, many don't even know they have to regisuter A2 self certification flight test, how do pilots know they are not doing thigs wrong the whole time.	25.18. It is the responsibility of all UAS operators to ensure

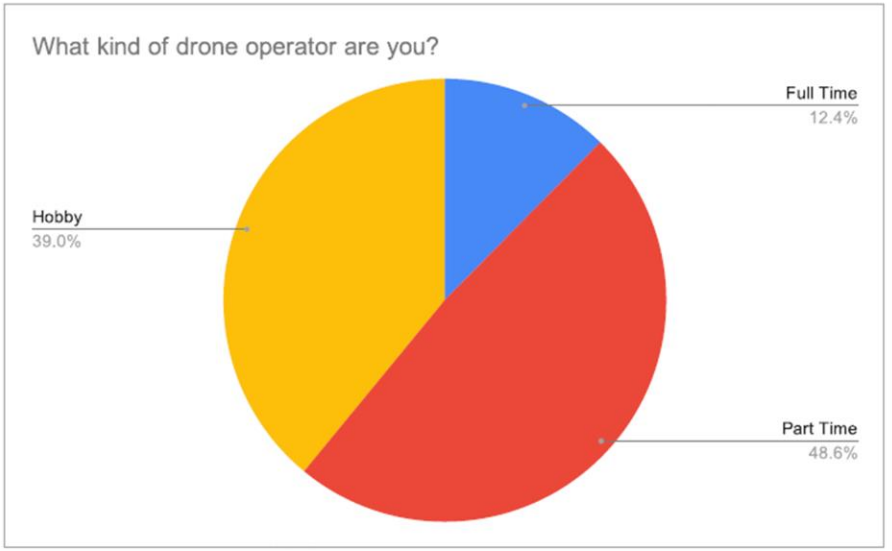
	compliance with the regulations.
25.19. Mavic Mini 2 is classed as low risk, yet has no collission avoidance to stop it being flown into someones face. Can be flown in A1 up Grafton Street	25.19. The proposed UAS Geographical Zones do not provide exemptions for existing restrictions including distances from building, uninvolved persons, etc.
25.20. Do you need permission from the owner of the structure under OC the way you do in Specific (crane owner or highest point < 100m)	25.20. See 25.19 above.
25.21. How to you legally operate above 30m in Dublin City in Open Category	25.21. See 25.19 above.


UAS GEOGRAPHICAL ZONES: OPEN CATEGORY OPTION C
EIDW CTR
WARD UPPER (TERRAIN)
DUBLIN AIRPORT
CLOGHRAN (TERRAIN)
DUNSINK (TERRAIN)
BEAUMONT HOSPITAL
WESTON AIRPORT
P11
P18
EIR 15 - (8M)
KILMAINHAM HOSPITAL
CATHAL BRUGHA BARRACKS
CASEMENT AERODROME
TALLAGHT HOSPITAL
CURRENCY CENTRE
DUBLIN
Baile Átha Cliath
DÚN LAOGHAIRE
NAAS
An Nás
BRAY
Bré
UAS PROHIBITED ZONE LATERAL DIMENSIONS
LOCATION RADIUS
BEAUMONT HOSPITAL 800M
CASEMENT AERODROME 5000M
CATHAL BRUGHA BARRACKS 371M
CLOGHRAN 1500M
CURRENCY CENTRE 500M
DUBLIN AIRPORT 5000M
DUNSINK 400M
KILMAINHAM HOSPITAL 800M
PROHIBITED AREA 11 (PHOENIX PARK) 1852M
PROHIBITED AREA 18 (MOUNTJOY PRISON 926M
TALLAGHT HOSPITAL 800M
WARD UPPER 650M
WESTON AIRPORT 3000M
LEGEND
UAS PROHIBITED ZONE
AMBER ZONE (12.1KM RADIUS) MAX VERTICAL LIMIT: 15M AGL or the height equivalent of the highest structure within 100M, with PL insurance of €6.5m
GREEN ZONE (EIDW CTR EXTENTS) MAX VERTICAL LIMIT: 30M AGL or 100M AGL with PL insurance of €6.5m
EIR 15 (MILITARY RESTRICTED AREA) MAX VERTICAL LIMIT: 8M AGL

Total Submissions: 105

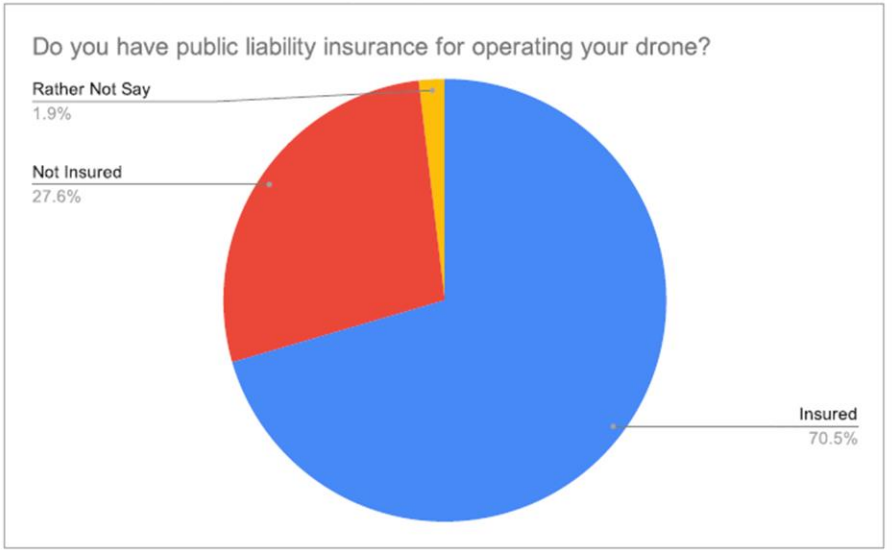
What kind of drone operator are you?

Full Time	13
Part Time	51
Hobby	41



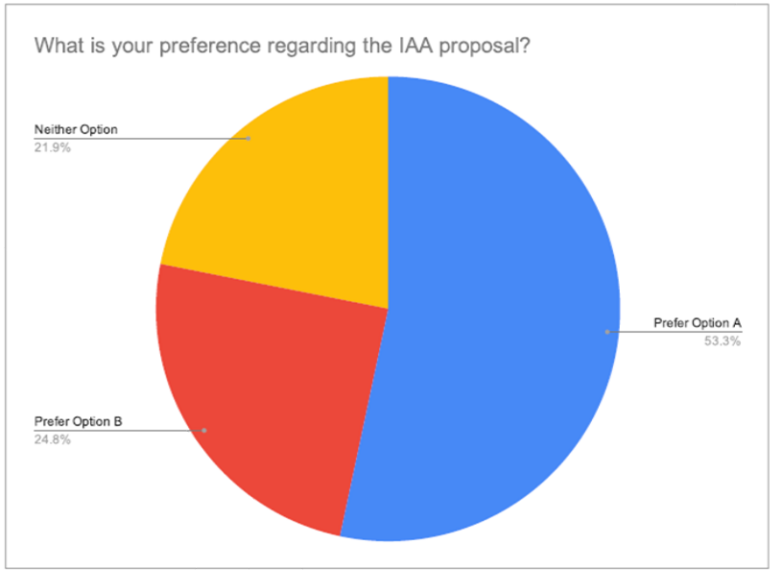
Do you have public liability insurance for operating your drone?

Insured	74
Not Insured	29
Rather Not Say	2



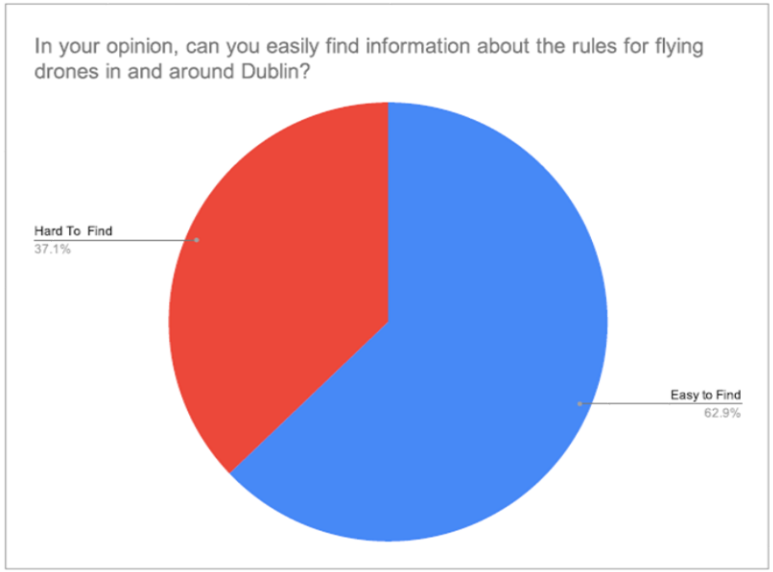
What is your preference regarding the proposal?

Prefer Option A	56
Prefer Option B	26
Neither Option	23



In your opinion, can you easily find information about the rules for flying drones in and around Dublin?

Easy to Find	66
Hard To Find	39



UAS Operator	Neither	Current SOP holder, renewed December 2021.My business REDACTED operate within the REDACTED area's. We completed over REDACTED flights last year, on track for REDACTED this year. We employed REDACTED drone operators throughout the year land are committed to the same this year. We are looking at significant growth over the next 2 years.	I support any initiative that enhances or promotes the drone industry, its been my full time job for the past 2 years. While I do support the relaxing of height restrictions & geo zones, particularly for hobby fliers, I do think that the proposed changes are a step in the right direction, I feel its too much too soon. I don't think there is enough awareness is there yet amongst the hobby community, its certainly positive to see the chatter on social media discussing the current regulations, there is still a level of ignorance & naivety that I'm not particularly comfortable with. I do worry about public perception of drones in this regard. Also the very small number of illegal flyers continue to fly & promote themselves on social media, its a small handful of people involved, & continue to have a negative influence on hobbyist's, but I certainly think there is an appetite for some kind of enforcement measures from all groups I really feel a national awareness campaign should be instigated across all media to help promote any proposed changes, in much the same vein as the Electrical industry, who have been amazingly successful with their RECI safety campaign over the past 30 years. As regards part time & professional drone operators, there is a lot of frustration & I guess anxiety regarding the EASSA changeover, in particular very poor direction on the specific category for those of us operating the larger Uavs, the comms from the IAA on this are unclear as are the timelines surrounding it. Most of the current SOP extensions run as far as August 2021, which is now 10 weeks away. Insurance	Yes	above 30m	None	**Noted**

			certification, commercial & governmental tenders all insist on compliance, which, after August we will not be. Some communications on this issue is most important. I also feel a quarterly newsletter to SOP or Specific Category holders is essential to keep them up to date, in much the same way as any other industry regulatory body does in Ireland.				
UAS Operator	Option A	I work for REDACTED who operates SUA REDACTED. Option A will allow us to inspect infrastructure to fulfil our Statutory Responsibility without putting employees at risk due to terrain & water hazards.	Our organisation will be approaching IAA with a proposal for BVLOS flight in the near future.	Yes	above 30m	A2 Remote Pilot Certificate	**Noted**
Remote Pilot operating UAS	Option B	It appears more practical.	The zone around Casement does not make sense. Building up to 22 m are permitted within this zone under the South County Dublin Development Plan. A UAS limit of 8 m is excessively restrictive in this area	Yes	20m	A1/A3 Remote Pilot Certificate	**Noted**
Representative Organisation		We, the REDACTED wish to make a submission within the newly published "Stakeholder Consultation" for the Dublin UAS area. Unfortunately the long established category of "Recreational Model Aircraft" which has now been acknowledged extensively within the current EASA regulations has not been mentioned in this proposal document. There may be valid reasons for this & you are exempting us from these proposals at this time but for clarity we wish to advise					**Noted** The current proposals are aimed primarily at open category UAS. It is our intention to address Recreational Model Aircraft separately & uniquely. We intend to do this through the creation of UAS Geographical Zones specifically for Recreational Model Aircraft within which certain exemption will be given in order to facilitate activities within. This will be subject to an airspace risk assessment & will bring the current sites under the new drone regulations.

		you of the flying sites we operate within this Zone. It should be noted that all of these sites are currently registered flying sites as advised to the IAA within an annual update process using ENR 5.5. We have no preference regarding option A or B once our current permissions remain unchanged In all cases these sites are working within the EASA guidelines of 400 ft. above the terrain, your new proposals suggest only 328 ft. within the "Green Zone" EIDW CTR. We have listed only the five individual sites of concern which are covered by the proposal which we understand to be within the largest area defined as EIDW CTR & EIR 15. All of these sites are annually affiliated to REDACTED, have a management structure, Insurance policy & operate within the rules of our association. REDACTED					