


Irish Aviation Authority The Times Building 11-12 D'Olier Street Dublin 2, Ireland www.iaa.ie Safety Regulation Division	Údarás Eitlíochta na hÉireann Foirgneamh na hAmana 11-12 Sráid D'Olier Baile Átha Cliath 2, Éire Rannán na Rialachán Sábháilteachta	UAS ADVISORY MEMORANDUM (UAM) NO. UAM 003 ISSUE 2 DATE 26.11.2021	
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Guidance on UAS Operator Registration for Complex Organisations

1. Change Record

Date	Issue	Revision Description
03.09.2021	1	Initial publication.
26.11.2021	2	Clarification regarding operations manual.

2. References¹

- Regulation (EU) 2018/1139
- Regulation (EU) 2019/947

3. Purpose

The purpose of this guidance document is to provide guidance for UAS Operator registration for organisations whose size & complexity necessitates the registration of multiple sub-entities.

4. Definitions

For the purposes of this guidance document, the definitions in Regulation (EU) 2018/1139 & Regulation (EU) 2019/947 apply.

The following definitions also apply:

‘My Safety Regulatory System’ (‘mySRS’) means the Irish Aviation Authority’s (IAA) online portal.

‘Organisation’ means the legal entity wishing to register as an Unmanned Aircraft Systems Operator.

¹ https://www.easa.europa.eu/sites/default/files/dfu/Easy_Access_Rules_for_the_Basic_Regulation.pdf

5. Regulation

5.1. Registration.²

“2. ... UAS operators shall provide ...

(a) ... the name and their identification number for legal persons;

(b) the address of UAS operators;

(c) their email address and telephone number;

(d) an insurance policy number for UAS if required by Union or national law;

(e) the confirmation by legal persons of the following statement: ‘All personnel directly involved in the operations are competent to perform their tasks, and the UAS will be operated only by remote pilots with the appropriate level of competency’; ...

... 6. UAS operators shall register themselves in the Member State where they have their residence for natural persons or where they have their principal place of business for legal persons and ensure that their registration information is accurate. A UAS operator cannot be registered in more than one Member State at a time ...

... 9. In addition to the data defined in point (2) Member States may collect additional identity information from the UAS operators.”

² Reg (EU) 2019/947 Article 14 - Registration of UAS operators and certified UAS

6. Process

Organisations that are NOT listed on the Companies Registration Office (CRO)³ OR whose size & complexity necessitates the registration of multiple sub-entities CANNOT be registered by the organisation through mySRS. The organisation must contact mysrssupport@iaa.ie to arrange manual registration.

In the case of complex organisations, the IAA will determine if it is appropriate to register with sub-entities or as a single operator.

6.1. Requirements

6.1.1. Roles

Accountable Manager. By default, the parent entity should have the CEO as the Accountable Manager. An alternative may be appointed by a director of the company, by letter, on headed paper.

Administrator. An Administrator should be nominated for the parent & each sub-entity.

UAS Responsible Person. An UAS Responsible Person should be nominated for each sub-entity.

All nominated individuals must be registered & verified as an individual on mySRS. Multiple roles may be held by the same individual.

6.1.2. Parent Entity Operations Manual

An Operations Manual for the parent entity should be provided detailing:

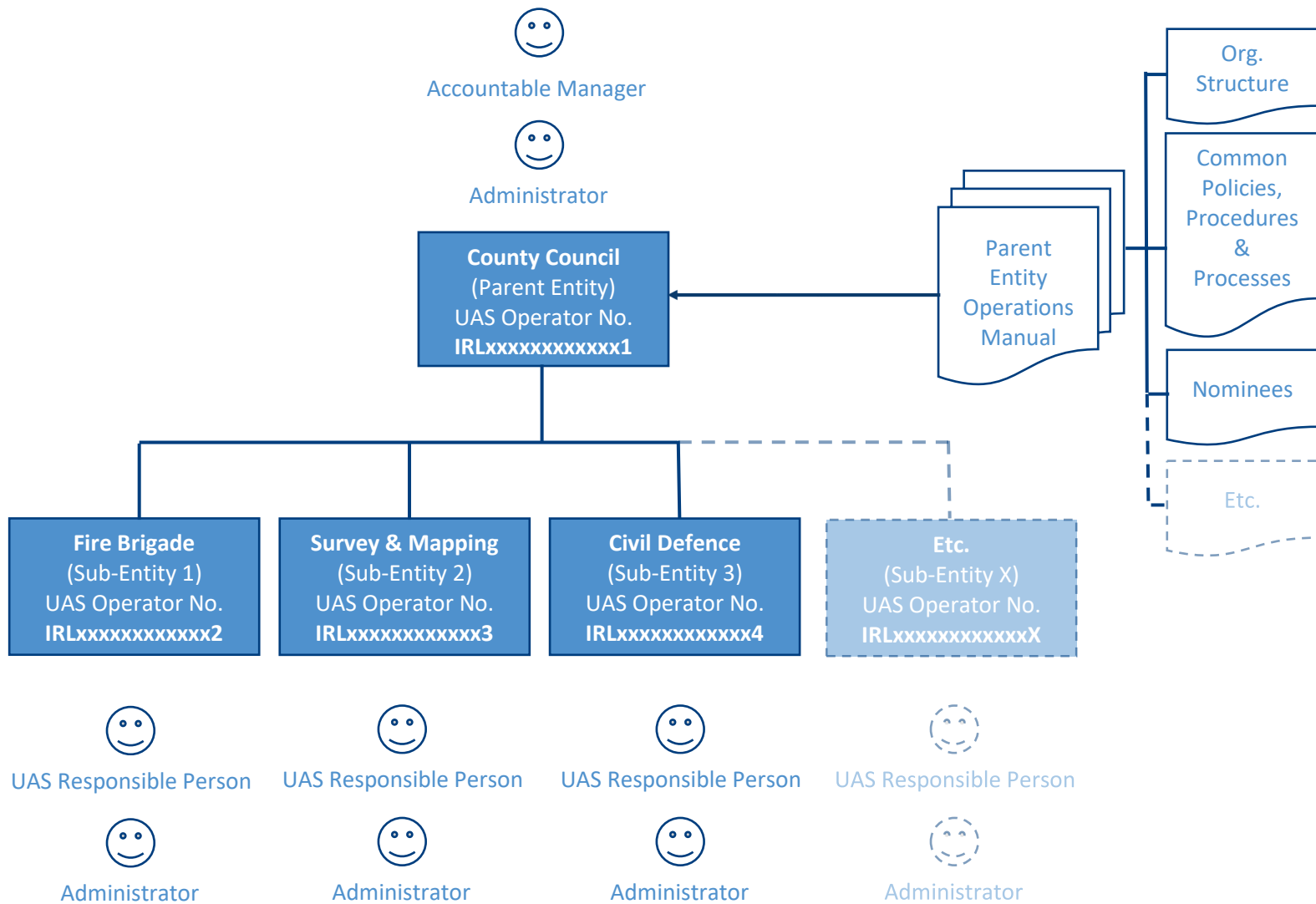
- The parent & sub-entities plus the relationship structure.
- Nominees (Accountable Manager, Entity administrators & UAS Responsible Persons)
- Where deemed appropriate by the organisation, policies, procedures or processes common to parent & all sub-entities, e.g. data protection.

6.1.3. *Legal Entity Status.* A proof or declaration of status as a legal entity shall be provided.

6.2. *UAS Operator Registration.* Once the required entity accounts are created on mySRS the parent entity Accountable Manager & relevant sub-entity Administrators shall log onto mySRS & register the various entities as UAS Operators.

³ <https://www.cro.ie/>

6.3. Example



6.4. Flowchart

