


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 hAmanna 11-12 Sráid D'Olier Baile Átha Cliath 2, Éire Rannán na Rialachán Sábháilteachta	UAS ADVISORY MEMORANDUM (UAM) NO. UAM 007 ISSUE 2 DATE 15.09.2022	
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Guidance on Operational Authorisation Applications using Pre-Defined Risk Assessments (PDRA)

1. Change Record

Date	Issue	Revision Description
14.09.2022	1	Initial publication.
15.09.2022	2	Updated to incorporate Corrigendum to Decision 2021/002/R of 14 th Sep 2022.

2. References

- Regulation (EU) 2019/947, on the rules and procedures for the operation of unmanned aircraft.¹
- Executive Director Decision 2022/002/R.²
- Corrigendum to Decision 2022/002/R³
- Annex I to Decision 2022/002/R, AMC and GM to Regulation (EU) 2019/947, Issue 1, Amendment 2.⁴
- Annex II to Decision 2022/002/R, AMC and GM to the Annex to Regulation (EU) 2019/947 — Issue 1, Amendment 2⁵

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0947&from=EN>

² <https://www.easa.europa.eu/en/downloads/135909/en>

³ <https://www.easa.europa.eu/en/downloads/137042/en>

⁴ <https://www.easa.europa.eu/en/downloads/135910/en>

⁵ <https://www.easa.europa.eu/en/downloads/135911/en>

3. Purpose

The purpose of this guidance document is to provide guidance on introduction of compliance tables for operational authorisation applications using PDRA as updated in Annex I to Decision 2022/002/R, AMC and GM to Regulation (EU) 2019/947, Issue 1, Amendment 2.

Amendments arising from Corrigendum to the Decision of 14/09/22 are included.

4. Definitions

For the purposes of this guidance document, the definitions in Regulation (EU) 2019/947, Irish Aviation Authority Act, 1993 and S.I. No. 523 of 2015 apply.

5. Introduction

ED Decision 2022/002/R of 07th February 2022 issued Amendment 2 to Issue 1 of the Acceptable Means of Compliance and Guidance Material to Commission Implementing Regulation (EU) 2019/947 and to its Annex. These updates included the addition of a new PDRA-G03 and changes to the PDRA characterisation tables, requiring UAS operators to fill in integrity and proof columns.

The corrigendum, of 14/09/22, to the Decision included updates which are captured in this issue.

6. PDRA Updates

6.1. GM1 AMC1 to Article 11

GM1 AMC1 to Article 11 is updated as follows:

“GENERAL

[...]

When UAS operators intend to conduct an operation covered by a PDRA, they should fill in the last two columns of the table related to the selected PDRA, named ‘integrity’ and ‘proof’. In the column ‘integrity’ they should explain how the level of integrity is met, and in the column ‘proof’ how the level of integrity is demonstrated. To support UAS operators, the two columns are already prefilled; however, the UAS operator may adapt the text to their needs.

If the UAS operation does not fit completely within the limits of the PDRA, the UAS operator is required to conduct a full risk assessment and submit it to the competent authority. Changes to the PDRA should not be done, unless the competent authority accepts that minor changes should be made.

PDRA#	Edition / Date	UAS characteristics	BVLOS / VLOS	Overflowed area	Maximum range from remote pilot	Maximum height	Airspace	AMC# to Article 11	Notes
PDRA-S01	1.1 / January 2022	Maximum characteristic dimension of up to 3 m and take-off mass of up to 25 kg	VLOS	Controlled ground area that might be located in a populated area	VLOS	150m	Controlled or uncontrolled, with low risk of encounter with manned aircraft	AMC4	
PDRA-S02	1.1 / January 2022	Maximum characteristic dimension of up to 3 m and take-off mass of up to 25 kg	BVLOS	Controlled ground area that is entirely located in a sparsely populated area	2 km with AO or with AO(s) 1 km, if no AO	150m	Controlled or uncontrolled, with low risk of encounter with manned aircraft	AMC5	

PDRA-G01	1.1 / January 2022	Maximum characteristic dimension of up to 3 m and typical kinetic energy of up to 34 kJ	BVLOS	Sparsely populated areas	If no AO, up to 1 km	150 m (operational volume)	Uncontrolled, with low risk of encounter with manned aircraft	AMC2
PDRA-G02	1.1 / January 2022	Maximum characteristic dimension of up to 3 m and typical kinetic energy of up to 34 kJ	BVLOS	Sparsely populated areas	n/a (direct C2 link)	As established for the reserved or segregated airspace	Reserved or segregated for the UAS operation	AMC3
PCRA-G03	1.1 / January 2022	Maximum characteristic dimension of up to 3 m and typical kinetic energy of up to 34 kJ	BVLOS	Sparsely populated areas	n/a (direct C2 link)	50 m from ground unless in reserved or segregated airspace	Controlled or uncontrolled airspace if height is below 50 m, otherwise reserved or segregated airspace	AMC6

Table 2 — List of PDRAs published as AMC to Article 11 of the UAS Regulation

For the purposes of the SORA, the following definitions should apply:

— ‘populated area’ should be understood as ‘congested area’, as defined in Regulation (EU) No 965/2012 (the ‘Air Operations Regulation’): ‘in relation to a city, town or settlement, any area which is substantially used for residential, commercial or recreational purposes’; and

— ‘rural area’ is used in the context of the air risk and it means the volume outside a populated area and not within the aerodrome traffic zone (ATZ) of an aerodrome.”

6.2. AMC2 – AMC 6 Article 11

Updates to AMC2 – AMC 5 to Article 11 include two additional columns to the PDRA characterisation and provision tables, 'Integrity' and 'Proof', which shall be completed by the UAS operator. See '*Attachment A - Compliance Tables*' for a breakdown of all updated PDRA characterisation and provision tables.

AMC 6 to Article 11 was added for the new PDRA-G03.

7. Compliance Tables

When submitting an operational authorisation application utilising a PDRA, a separate document containing the completed compliance table for the appropriate PDRA shall be uploaded to MySRS along with the Operations Manual. The preferred document format for submission is Portable Document Format (.pdf).

See '*Attachment A - Compliance Tables*' for a breakdown of all PDRA compliance tables.

8. Caution

This UAM and the attachment are to assist in the submission of operational authorisation applications utilising a Pre-Defined Risk Assessment (PDRA). All applications should be checked against extant regulation. Where errors or omissions exist in the attachment or associated UAM, the extant regulation applies.