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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.
13.03.2023	3	Updated to reflect preferred document format for submission is Microsoft Excel Format (.xlsx).
21.11.2023	4	Updated to incorporate Decision 2023/012/R of 20 th Oct 2023.

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 2⁴
- Annex II to Decision 2022/002/R, AMC and GM to the Annex to Regulation (EU) 2019/947, Issue 1, Amendment 2⁵
- Executive Director Decision 2023/012/R, AMC and GM to Part-UAS, Issue 1, Amendment 3⁶

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

https://www.easa.europa.eu/en/downloads/135911/en

⁶ https://www.easa.europa.eu/en/downloads/138680/en

3. Purpose

The purpose of this document is to provide guidance on the update of compliance tables for operational authorisation applications using PDRAs as updated in Decision 2023/012/R, AMC and GM to Part-UAS, Issue 1, Amendment 3.

The compliance tables for operational authorisation applications using PDRAs were originally introduced in Annex I to Decision 2022/002/R, AMC and GM to Regulation (EU) 2019/947, Issue 1, Amendment 2; Decision 2023/012/R, AMC and GM to Part-UAS, Issue 1, Amendment 3 and Corrigendum to the Decision of 14/09/22.

4. Definitions

For the purposes of this guidance document, the definitions in Regulation (EU) 2019/947 and the Irish Aviation Authority Act, 1993 apply.

5. Introduction

ED Decision 2023/012/R of 20th October 2023 issued Amendment 3 to Issue 1, AMC, and GM to Part-UAS, of the Acceptable Means of Compliance (AMC) and Guidance Material) GM) to Commission Implementing Regulation (EU) 2019/947.

This update includes changes to AMC and GM for Article 11, particularly the expansion of the applicability of PDRA S-01 to agricultural operations and changes to the PDRA characterisation tables for PDRA G-01, PDRA G-02 and PDRA G-03.

6. PDRA Revision status

PDRA#	Edition / Date	AMC# to Article 11
PDRA-S01	1.2 /October 2023	AMC4
PDRA-S02	1.1 / January 2022	AMC5
PDRA-G01	1.3 / October 2023	AMC2
PDRA-G02	1.2 /October 2023	AMC3
PCRA-G03	1.1 / October 2023	AMC6

6.1. Updates to AMC2 – AMC 5 Article 11

AMC2 – PDRA G-01 - Containment; MoC Light-UAS.2511; DVR demonstrating compliance.

AMC3 – PDRA G-02 - removal of 'ensure UA remains clear of cloud, perform unaided visual scan of airspace; Containment; MoC Light-UAS.2511; DVR demonstrating compliance.

AMC4 – PDRA S-01 - removal MTOM 25kg; applicable national or international regulations; adjacent volume; no persons should be overflown when spraying liquids or dropping substances; Infrastructure or facilities can be overflown on request of the entity responsible for the infrastructure or facility; addition of 10m height AGL; establishment of de-confliction scheme; dedicated training scheme; means to immediately stop spraying of liquids or dropping of substances in case of emergency.

AMC6 – PDRA G-03 - inclusion of power lines; change to vertical and horizontal distances; removal of 'ensure UA remains clear of cloud, perform unaided visual scan of airspace; containment; MoC Light-UAS.2511; DVR demonstrating compliance.

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 Microsoft Excel Format (.xlsx).

See UAM 007 A for a breakdown of all PDRA compliance tables.

8. Caution

UAM 007 and UAM 007 A (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 - some of which may not yet be reflected in the Easy Access Rules for UAS. Where errors or omissions exist in the attachment or associated UAM, the extant regulation applies.