


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 015 ISSUE 2 DATE 05.11.2024	
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Guidance on Applications for Light UAS Operator Certificate (LUC)

1. Change Record

Date	Issue	Revision Description
25.07.2024	1	Initial publication.
11.05.2024	2	Amendment to Section 6. Review process Step 0 and Step 1 Amendment to Section 7. Applicant`s responsibilities

2. References

- Regulation (EU) 2019/947, on the rules and procedures for the operation of unmanned aircraft.¹
- Irish Aviation Authority Act, 1993.²
- S.I. No. 24 of 2023, Irish Aviation Authority UAS (Drones) Order³
- Management System Assessment Tool of EASA⁴
- Schedule of Fees 6. Unmanned Aircraft Systems⁵

3. Purpose

The purpose of this guidance document is to outline the review timelines and conditions of Light UAS Operator Certificate (LUC) applications.

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

² <https://www.irishstatutebook.ie/eli/1993/act/29/enacted/en/html>

³ <https://www.irishstatutebook.ie/eli/2023/si/24/made/en/print>

⁴ <https://www.easa.europa.eu/en/document-library/general-publications/management-system-assessment-tool>

⁵ https://www.iaa.ie/docs/default-source/publications/corporate-publications/schedule-of-charges/iaa-schedule-of-charges---schedule-6---uas-operations---final.pdf?sfvrsn=1ae4eff3_6

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. 24 of 2023 apply.

5. LUC Application Review

The processing time of an LUC application varies depending on the application type, scope, complexity, and quality of the documents submitted. Allow up to 90 days from submission to commencement of review.

6. Review Process

Step 0 – Please note that only legal persons holding valid operational authorisation are eligible to apply for LUC.

Step 1 – Pre-application meeting

Applicants should meet with the IAA before submitting an application. At this meeting IAA policy will be discussed as well as the requirements of Regulation (EU) 2019/947 Annex PART C — LIGHT UAS OPERATOR CERTIFICATE (LUC).

Please note that all LUC holders are considered to be a UAS operator; therefore, they must register according to Regulation (EU) 2019/947 Article 14. This can be done in parallel to the LUC application. The pre-application meeting helps the applicant better understand the requirements and to specify the content of the application and scope of the operation intended to be conducted under the effect of LUC.

When considering the scope of the operations the applicant shall also consider, what privileges under UAS.LUC.060 of Regulation (EU) 2019/947 it wishes to apply for.

According to AMC1 to UAS.LUC.060

“Within the terms of its approval, the LUC holder should be able:

- (a) without prior declaration to the competent authority, to authorise its own operations based on an STS; and
- (b) without prior approval of the competent authority, to authorise one or more of the following types of own operations:
 - (1) one based on a PDRA that requires an authorisation;
 - (2) one based on one or more modifications of an STS (variants), which does not involve changes in the ConOps, the category of UAS used or the competencies of the remote pilots;
 - or
 - (3) one that does not correspond to a PDRA, but falls within a type of activity already performed by the UAS operator.”

The applicant shall demonstrate their present⁶ safety management system (SMS) during the review process. The SMS shall cover – in particular – the organisational structure, a log of hazards entailed by the activities of the applicant and their assessment and a description of the applicant’s compliance monitoring system.

The review process will investigate the suitability⁷ of the applicant’s SMS and whether it is operating⁸.

Step 2 – Application

The application is checked for compliance with authorisation sought, in accordance with UAS.LUC.010 of Regulation (EU) 2019/947.

Accordingly, the application must contain the following information:

- “(a) a description of the UAS operator’s management system, including its organisational structure and safety management system;
- (b) the name(s) of the responsible UAS operator’s personnel, including the person responsible for authorising operations with UASs;
- (c) a statement that all the documentation submitted to the competent authority has been verified by the applicant and found to comply with the applicable requirements.”

This means in practice, that applicant UAS operator shall provide in the application:

- Name and address of the applicant’s principal place of business.
- Statement that the application serves as a formal application for a LUC.
- Statement that all the documentation submitted to the competent authority has been verified by the applicant and found to comply with the applicable requirements.
- Desired date for the operation to commence.
- Signature of the applicant’s accountable manager.
- List of attachments that accompany the formal application (*please note that the list of required documents might be longer based on the content of the application*):
 - name(s) of the responsible UAS operator’s personnel, including the accountable manager, operations, maintenance and training managers, the safety manager and security manager, compliance monitoring manager, the person responsible for authorising operations with UASs;
 - list of UASs to be operated;
 - LUC Manual (UAS.LUC.040 of Regulation (EU) 2019/947) that should consist of:
 - Operations Manual (OM) including identification of the operation specifications sought and details of the method of control and supervision of operations to be used;
 - safety management manual (SMM) including description of the safety management system and compliance monitoring management of the UAS operator in compliance with UAS.LUC.030 of Regulation (EU) 2019/947);

⁶ SMS shall be deemed present if there is evidence that the relevant item is documented within the organisation’s Management System Documentation.

⁷ The SMS shall deem suitable if the applicant may demonstrate during the CRD process that so is the SMS based on the size, nature, complexity of the applicant’s organisation and the inherent risk in their activity.

⁸ The SMS shall deem operating if it can be proven during the review process that the SMS is in use and an output is being produced. (i.e. There is available evidence that the SMS procedures are properly used and documented by the applicant.)

- schedule of events in the process to gain the LUC certificate with appropriate events addressed and target dates;
- documents of purchase, leases, contracts or letters of intent;
- certificate of insurance cover under Reg. 785/2004/EC;
- arrangements for the facilities and equipment required and available; and
- arrangements for crew and ground personnel training and qualification.
- Privileges sought (for details please see Step 1).

Step 3 - A Common Response Document (CRD) is generated containing remarks outlining further requirements of the applicant. Remarks are classified according to the following categories: Major, Minor, Query, Edit. The CRD is a formal process (sometimes iterative) to communicate deficiencies and to provide regulatory guidance to the applicant.

An application will be returned via the CRD process when there are:

- a significant number of Major remarks identified
- fundamental errors and/or omissions
- flawed assumptions
- material data missing – lack of evidence.

Three (3) CRD returns will result in application rejection. Applicants are liable for the cost of a re-application. For re-applications allow up to 90 days from submission to commencement of review.

Step 4 – Once an application is refined to a standard acceptable to the authority, the applicant will receive an LUC specific to their operation.

7. Applicant`s Responsibility

1. Before submission, applicants must ensure identification of the UAS operation and relevant mitigations and/or privileges (where applicable).
2. All relevant application documentation must be sent to drones@iaa.ie. This includes supporting evidence referenced in the application. In the subject, please add “Operator`s name_LUC application” only.
3. Applicant shall pay the application fee according to IAA`s Schedule of Fees 6. Unmanned Aircraft Systems. Non-payment of applicable fees will result in the rejection of the application.
4. Applications must meet specific relevant compliance with the authorisation sought, in accordance with the requirements of Regulation (EU) 2019/947.
5. Applicant must provide access to its facilities and documents for a preliminary meeting.
6. Specific Operational Risk Assessment (SORA) in support of LUC application – the applicant must meet the requirements of AMC1 Article 11 Rules for conducting an operational risk assessment unless conducting an operation for which an operational declaration is sufficient according to point UAS.SPEC.020. Failure to demonstrate compliance will result in an application review being stopped at the relevant SORA Step, when requirements are not met.
7. Applicants must sufficiently address remarks in the CRD. Failure to do so will result in a returned CRD.