

► This RA has been substantially re-written; for clarity no change marks are presented – please read RA in its entirety ◀

RA 1604 – Uncrewed Air Systems Specific S1 sub-category

Rationale

There is a requirement to determine and apply an appropriate regulatory framework to Uncrewed Air Systems (UAS) to ensure they are safe to operate and are being operated safely. Failure to appropriately address UAS specific Hazards could lead to an increased Risk to Life (RtL). This regulatory framework will be proportionate to the UAS Category and its physical attributes¹. This Regulatory Article (RA) defines the regulatory framework for those UAS operating in the Specific S1 sub-category. The regulatory framework is Structured to specifically permit appropriate operating freedom to 'non-traditional' aviation units (who are the prevalent users of UAS in the Specific S1 sub-category).

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Applicability

Applicability of this RA

1. Operations within the Specific S1 sub-category are those to be conducted with UAS² that:
 - a. Have the following mandatory requirements:
 - (1) Have a Maximum Take Off Weight of less than 25 kg,
 - (2) Are required to operate Beyond Visual Line Of Sight (BVLOS)³ up to a maximum of 2,000 m from the Remote Pilot (RP),
 - (3) Have any maximum speed,
 - (4) Are not operated over Areas of high population density,
 - (5) Are not flown at a Height greater than detailed within the manufacturers guidelines,
 - (6) Are registered on the UK Military Aircraft Register (MAR) by type⁴,

¹ For definitions of UAS Categories, UAS sub-categories, and UAS physical attributes (eg Sub 250 g, Sub 4 kg, etc), refer to RA 1600 – Uncrewed Air Systems Categorization.

² Unless operating under the derogations requested and conditions set out in an approved Special Purpose Clearance (SPC).

³ Refer to MAA02: Military Aviation Authority Master Glossary.

⁴ For UAS that will be operated within the Specific S1 sub-category, UK MAR registration is applied for within the Categorization Submission, and registration is inherent in the issuing of a Letter of Endorsed Categorization (LEC). Refer to RA 1600 – Uncrewed Air Systems Categorization; and RA 1161 – Military Registration of Air Systems Operating within the Defence Air Environment.

Applicability

- (7) Have a Military Aircraft Registration Number and unit identifier, or a local UAS serial number, displayed on the main fuselage,
 - (8) Are operated within Segregated Airspace,
 - (9) Operate under the Defence Air Environment (DAE) Operating Framework⁵ and be assigned to a DAE Operating Category⁶; and
 - (10) Carry a UK / EU conformity marking of C0 – C4⁷ or be designed to similar standards.
- b. Have the following optional requirements:
- (1) Are capable of Swarming;
 - (2) If conducting tethered operations; Adhere to noise limits, Height limits, and requirements for remote identification and geo-awareness Systems and additional requirements;
 - (3) Are capable of being armed (only where an SPC has been endorsed by the MAA),
 - (4) Are capable of carrying / transporting dangerous Cargo^{8, 9};
 - (5) Are capable of Dropping of materiel; and
 - (6) Are capable of autonomous operations, with procedures covering the activities the RP is not directly controlling (including unplanned emergency conditions such as Lost link profiles).
2. Unless detailed further in the LEC or Contractor Flying Approved Organization Scheme (Basic UAS) (CFAOS (BU))¹⁰ Approval, only those MAA Regulatory Publication (MRP) documents detailed in this RA, RA 1600¹¹, and applicable Regulatory Instructions and Regulatory Notices, are applicable to UAS operating in Specific S1 sub-category.
3. CFAOS (BU) organizations must also comply with RA 1031¹⁰.
4. Where the requirement for a UAS to be operated from one of His Majesty's (HM) / MOD Ship exists, the combination must be Authorized through an appropriate Ship Air-Release process¹².
5. UAS publications are likely to include:
- a. The RA 1600 Annex B Categorization Safety Checklist for the UAS (MOD organizations).
 - b. Manufacturer's User or Operating Manual.
 - c. Specific orders or Instructions from the UAS Responsible Officer (RO).
 - d. The CFAOS (BU) Operations Manual from the UAS Accountable Manager (AM).
 - e. Local orders such as those published by a Head of Establishment (HoE) or Head of Unit.
6. Specific S1 sub-category UAS operations are not required to be supported by a:
- a. Aviation Duty Holder;
 - b. Accountable Manager (Military Flying);
 - c. Type Airworthiness Authority;

⁵ Refer to RA 1160 – The Defence Air Environment Operating Framework.

⁶ The DAE Operating Category relates to the ownership and Safety governance of the Air System, whereas the UAS Category relates to the regulatory framework which is set by the MAA according to the Risk posed by the UAS and the manner in which it is operated.

⁷ Refer to [Commission Delegated Regulation \(EU\) 2020/1058](#) and [UK Regulation \(EU\) 2019/945](#).

⁸ Refer to AAP-06 – The North Atlantic Treaty Organization (NATO) Glossary of Terms and Definitions (English and French).

⁹ For example (non-exhaustive list): Explosives, radioactive material, flammable liquids, dangerous or volatile chemicals, strong acids, compressed gases, biological agents, poisons.

¹⁰ Refer to RA 1031 – Contractor Flying Approved Organization Scheme (Basic Uncrewed Air Systems).

¹¹ Refer to RA 1600 – Uncrewed Air Systems Categorization.

¹² Refer to RA 1395 – Authorization to Permit Embarked Aviation in His Majesty's / MOD Ships.

Applicability

- d. Continuing Airworthiness Management Organization;
 - e. Chief Air Engineer;
 - f. Sponsor;
 - g. Senior Responsible Owner.
7. There is no requirement to have a Certificate of Design or meet Design Safety Targets.
8. There is no requirement to demonstrate and sustain Airworthiness via an Airworthiness / Air Safety Strategy.
9. If the UAS Service life is under 6-years, then there is no requirement to hold an Ageing Air System Audit (AAA). If the UAS Service life is 6-years or longer, then an AAA is required¹³.
10. This Regulation does not cover Test and Evaluation (T&E) activity. UAS applicants wishing to operate in a manner or Configuration not supported by RA 1600 and RA 1604 (ie T&E) will be subject to RA 2370¹⁴ and other MRP requirements. Discussion with the MAA¹⁵ will be required in order to confirm the applicable Regulations.
11. The endorsed RA 1600 Annex B Categorization Safety Checklist (MOD organizations) or the CFAOS (BU) Approval (non-MOD organizations) will satisfy the requirement for an Air System Safety Case (ASSC) (An ASSC provides an evidenced and coherent argument that a system is safe to operate and is being operated safely).

**Regulation
1604(1)****Responsibilities**

- 1604(1) Organizations operating UAS in the Specific S1 sub-category **shall** comply with the requirements of RA 1600 and RA 1604.

**Acceptable
Means of
Compliance
1604(1)****Responsibilities**

12. MOD organizations responsible for operating UAS **should** either:
- a. Nominate:
 - (1) A Capability Owner (minimum OF5 or equivalent), and
 - (2) A UAS RO (minimum OF4 or equivalent).
 - b. Or ensure that operations are carried out by an organization appropriately approved in accordance with (iaw) the CFAOS (BU).
13. Non-MOD organizations operating military registered UAS in the Specific S1 sub-category **should**:
- a. Be appropriately approved iaw the CFAOS (BU).
 - b. Nominate a UAS AM iaw RA 1031¹⁰.
14. UAS organizations considering operating from MOD establishments or aviation capable HM / MOD Ships **should** ensure the MOD establishments' or aviation capable HM / MOD Ships' HoE has complied with RA 1010 and RA 1026¹⁶.

**Guidance
Material
1604(1)****Responsibilities**

15. Nil.

¹³ Refer to RA 5723 – Ageing Air System Audit.

¹⁴ Refer to RA 2370 – Test and Evaluation.

¹⁵ Contact via DSA-MAA-MRPEquiries@mod.gov.uk.

¹⁶ Refer to RA 1010 - Head of Establishment Aviation Responsibilities and Aviation Duty Holder / Accountable Manager (Military Flying) Establishment Responsibilities; and RA 1026 – Aerodrome Operator and Aerodrome Supervisor (Recreational Flying) Roles and Responsibilities.

Regulation 1604(2)

Uncrewed Air System Responsible Officer and Uncrewed Air System Accountable Manager Responsibilities

1604(2) UAS in the Specific S1 sub-category **shall** be operated under the authority of a UAS RO / UAS AM and supported by appropriate persons.

Acceptable Means of Compliance 1604(2)

Uncrewed Air System Responsible Officer and Uncrewed Air System Accountable Manager Responsibilities

16. UAS ROs / UAS AMs **should** ensure prior to operation of UAS in the Specific S1 sub-category:

- a. MOD organizations hold an appropriate MAA UAS LEC¹⁷.
- b. Non-MOD organizations hold an appropriate CFAOS (BU) Approval.

17. UAS ROs / UAS AMs **should**:

- a. Be responsible and Accountable for the operation of UAS within their Area of Responsibility (AoR).
- b. Ensure UAS Occurrences are reported, investigated, and recorded^{18, 19}.

Note:

Landings, or terminal phase manoeuvres, consistent with planned operations incurring damage or destruction, will not normally be considered as Air Safety reportable Occurrences unless the UAS RO / UAS AM determine that there may be a wider Safety interest. Notwithstanding this derogation, UAS ROs and UAS AMs has to ensure that any significant deviation from the intended UAS behaviour, response, or UA flight path is reported.

- c. Ensure there are local procedures detailing the process for the transfer of Air Safety arrangements and general conditions of transfer (explicitly handover requirements, and requiring both the dispatching and receiving organizations to be responsible for compliance with the directed conditions of transfer)²⁰.
- d. Detail in Orders:
 - (1) The operating limitations and regulatory requirements applicable to operations in their AoR.
 - (2) The relevant types of RP Instructor (RPI) (ie First Person View RPI) within their AoR;
 - (3) The experience level and course(s) required by personnel in their AoR to become an RPI.
 - (4) The required currencies and competencies required for an RPI qualification to remain valid.
 - (5) The applicable emergency procedures, including any requirements for pre-planned emergency recovery sites.
 - (6) The protocols required to manage control data-links.
- e. Ensure UAS operating in the Specific S1 sub-category are not:

¹⁷ Military Organizations (ie Military Operated) that have previously operated under an Open Category Sub 250 g UAS LEC will require to establish an appropriate UAS RO construct and undertake additional RP training beyond that required for Open Category operations, as defined within this RA. Civilian Organizations (ie Civilian Operated) that have previously operated under an Open Category UAS LEC will require to undertake additional RP training beyond that required for Open Category operations, as defined within this RA.

¹⁸ Refer to RA 1410 – Occurrence Reporting and Management.

¹⁹ Refer to the Manual of Aircraft Post Crash and Incident Management Chapter 1: The Aircraft Post Crash and Incident Management (APCOM) Task, paragraph 8: Applicability.

²⁰ Explicitly the transfer of Responsibility of Air Systems in line with the RA 1164 requirements.

**Acceptable
Means of
Compliance
1604(2)**

- (1) Operated within 50 m of any vessel, vehicle or Structure not under the control of the RP or Uninvolved Person except during take-off or landing²¹.
 - (2) Operated over or within a horizontal distance of 50 m of any Congested Area³.
 - (3) Operated in a restricted area²² (eg flight restriction zone of a protected Aerodrome²³) unless in receipt of appropriate permission from the Airspace Controlling Authority.
- f. Ensure the requirement for a UAS SPC is identified when a UAS operating in the Specific S1 sub-category requires to be operated outside the bounds of its LEC.
 - g. Ensure UAS SPCs (which are authorized by the MAA and issued to the UAS RO / UAS AM) are invoked when the RtL associated with its usage is greater than the Risk identified within the Specific S1 LEC²⁴.
 - h. Supplement the original Categorization Submission, when applying for a UAS SPC, for the UAS with relevant details including a record of their judgement that the benefits of operating the UAS with a UAS SPC outweigh any increased RtL and submit it to the MAA iaw the RA 1600 Categorization submission process¹¹.
 - i. Ensure suitable Lost link, and Command and Control, procedures are implemented to maintain safe flight (or safe termination), safe separation from other Aircraft, and to enable Aircraft recovery. In the event of an emergency in the Command Unit that requires abandonment, or the loss of Return feed data link that precludes safe control, Lost link procedures **should** be followed.
 - j. Produce orders or instructions detailing actions in the event that verbal communication becomes impossible (eg intercom failure or suspected incapacitation).
 - k. Ensure that Risks to RPs, operating personnel, other organization / MOD personnel, and the general public through the operation of UAS are As Low As Reasonably Practicable and Tolerable, and cease operations if not.
 - l. Hold appropriate Terms of Reference (ToR).
 - m. Follow the intent of RA 2335²⁵, for UAS operators working up for, or conducting, UAS flying at a Flying Display, Display Flying, Display Parachuting, Role Demonstration or Flypast event.
 - n. Ensure that, where training provided does not include flying under MRP rules, the UAS SO / UAS Flight Operations Post Holder (FOPH) / RP receives additional local training on MRP UAS flying either by an RPI or an appropriately Suitably Qualified and Experienced Person (SQEP) individual²⁶ as approved by the UAS RO / UAS AM.
 - o. Ensure that RP training is provided by a Defence Systems Approach to Training (DSAT) compliant organization providing an MAA approved UAS course, or an equivalent UK CAA approved Recognized Assessment Entity (RAE).
 - p. Ensure that if RP training does not include a period of BVLOS flight, the RP completes BVLOS practical flying training either under the supervision of an RPI / UAS SO / UAS FOPH until deemed qualified as Competent to operate BVLOS, or iaw their CFAOS (BU) Approval (for CFAOS (BU) organizations).

²¹ This requirement does not mean that the RP is 'at the controls' of the vessel or vehicle. Rather, it means that the RP is in control of the positioning, speed, location, etc and has direct influence of the person at the controls to ensure the safe operation of the UAS.

²² Defined as: "Airspace of defined dimensions over the land areas or territorial waters of a State within which the flight of Aircraft is restricted in accordance with certain specified conditions". Sourced from: UK Civil Aviation Authority (CAA) Publication (CAP) 722D.

²³ Details of UK Aerodromes that fall into the 'protected' Category can be found within the [NATS eAIS Package](#). For Government Aerodromes see the [UK Mil AIP](#).

²⁴ Refer to RA 1600 – Uncrewed Air Systems Categorization.

²⁵ Refer to RA 2335 – Flying Displays, Display Flying, Display Parachuting, Role Demonstrations and Flypasts.

²⁶ Attendance at either the UAS RO Briefing Day or UAS AM Briefing day will satisfy this requirement.

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Compliance
1604(2)**

- q. Ensure a level of Safety is provided in respect of collision avoidance, equivalent to that provided by the pilot of a crewed Aircraft^{27, 28} (for operations either inside or outside UK airspace).
- r. Ensure operations inside the UK Flight Information Region are flown in Segregated Airspace³.
18. UAS ROs **should**:
- Be answerable to a designated Capability Owner within the chain of command.
 - Ensure that the UAS is operated and maintained in line with the RA 1600 Annex B Categorization Safety Checklist, Manufacturer's User or Operating Manual, RA 1604(8), and LEC.
 - Attend an MAA UAS RO briefing day²⁹ prior to commencement of UAS operations if required to do so by the MAA³⁰.
 - Nominate a Senior Operator (SO).
 - Issue a Letter of Delegation when delegating supervisory day-to-day operating Responsibilities to a SQEP (minimum OF3 (or equivalent)) within their AoR. The appointed UAS RO and delegated individual will attend the MAA UAS RO briefing day prior to commencement of UAS operations if required to do so by the MAA. Whilst day-to-day supervisory Responsibility may be delegated by the UAS RO, accountability will remain with the UAS RO.
 - Ensure that UAS operations within another sovereign nation's territorial Airspace are conducted either:
 - For operations conducted with the nation's consent, iaw the relevant local, national, and international legal requirements, and satisfy diplomatic clearance requirements^{31, 32}, or
 - For operations conducted without the nation's consent (ie conducted lawfully under the Law of Armed Conflict, UN Security Council resolution or other legal mandate), under 'Due Regard'³³ and outside Controlled Airspace; unless the Controlled Airspace³ has been created or assigned for the purposes of the Operation.
19. UAS AMs **should**:
- Ensure that UAS are operated and maintained in line with the CFAOS (BU) Operations Manual, Manufacturer's User or Operating Manual, RA 1604(8), and CFAOS (BU) Approval.
 - Attend an MAA UAS AM briefing day prior to commencement of UAS operations if required to do so by the MAA³⁴.
 - Nominate a FOPH in order to provide the UAS AM with appropriate specialist support³⁵.
 - Ensure that UAS operations within another sovereign nation's territorial Airspace and with that nation's consent are conducted iaw the relevant local, national, and international legal requirements and satisfy diplomatic clearance requirements^{31, 32}.

²⁷ Refer to RA 2320 – Flight Procedures: Role Specific S2 and Certified Uncrewed Air Systems.

²⁸ For definition refer to MAA02: Military Aviation Authority Master Glossary.

²⁹ Refer to RA 1440 – Air Safety Training.

³⁰ This requirement will be reviewed by the MAA during the categorization process; and any requirement / dispensation articulated in the LEC.

³¹ Refer to AP1158 – Approval and Diplomatic Clearance for Flights to Destinations Abroad.

³² Refer to RA 2305 – Supervision of Flying.

³³ Refer to RA 2307 – Rules of the Air.

³⁴ This requirement will be reviewed by the MAA during the CFAOS (BU) Approval process; and any requirement / dispensation articulated via the Approval.

³⁵ To include T&E when in the organization's CFAOS (BU) Approval and the UAS AM is not appropriately T&E qualified.

**Guidance
Material
1604(2)**

Uncrewed Air System Responsible Officer and Uncrewed Air System Accountable Manager Responsibilities

20. UAS ROs / UAS AMs may waive the requirement for an Occurrence Safety Investigation (OSI) down to a Local Occurrence Investigation (LOI) for an Accident where the loss is consistent with the intended concept of operating use of the UAS. Ultimately it is for the UAS RO / UAS AM to decide that there is nothing to be gained from a formal OSI. As a minimum the subsequent LOI still requires codification by the Incident Manager prior to being closed.

21. It is anticipated that, in many instances, UAS will be operated by organizations with either limited or no prior aviation experience. In such cases, the Unit Commander or civilian middle manager (who may have limited or no previous aviation experience) may be appointed as the UAS RO / UAS AM. Therefore, the MAA will provide appropriate UAS RO / UAS AM briefings to those assessed as requiring further training in order that they may be considered Competent to manage the RtL associated with operation of the UAS.

22. When operating with reduced visibility (eg at Night, sandstorm, etc) over or in proximity to uninvolved people, the UAS RO / UAS AM will need to ensure the ability to operate safely (eg Night Vision Devices, etc).

23. The requirement to Authorize operations in the Specific S1 sub-category is not mandated; however, UAS ROs / UAS AMs may elect to implement an Authorization process to formalize and account for any tasking conducted³⁶.

24. When Segregated Airspace is used as a mitigation for mid-air collision. UAS ROs / UAS AMs will detail the procedures to be followed to ensure that the UAS remains within the Segregated Airspace (this might include restrictions on approaching the boundaries of allocated airspace or use of independent flight termination Systems)³⁷.

25. A UAS RO may be required to employ Specific S1 sub-category UAS outside limitations contained within their LEC, when there is an unplanned or unexpected operational imperative to do so³⁸. When such situations arise, the UAS RO (or their representative when the UAS RO is not deployed) needs to inform the operational commander³⁹ of the increased Risk associated with operating outside of the LEC. Although the urgency of a given situation may preclude formal process, a UAS RO needs to demonstrate in retrospect a Risk analysis suitable to the context. There needs to be an assessment of the impact on third-parties (for example crewed aviation or civilian population in the area)⁴⁰. The operational commander needs to agree to accept the Risk and record the decision to do so. Operations outside of the LEC have to cease immediately once the operational requirement has been met.

26. UAS SPCs are situation dependant and bound by time (length of Approval period) and airspace in which the operation will be conducted. They are not an alternative to long-term compliance.

27. A UAS SPC is comparable to a Specific S2 sub-category and Certified Category Operational Emergency Clearance (OEC) and will only be used for flight under the following circumstances:

- a. In conditions of actual or potential hostile enemy action, or;
- b. In other conditions of operational imperative, to include training for actual or planned operations, when enabled by the UAS RO.

28. The UAS RO will ensure that a clear explanation of the Risks involved, and related operating instructions to support a UAS SPC are incorporated into the Categorization Submission.

³⁶ If UAS ROs choose to implement the Authorization process, they are advised to use the principles of RA 2306 – Authorization of Flights.

³⁷ If operating on a Defence Training Estate it is the RP's Responsibility to check Range Standing Orders for the area to be utilized to ensure compliance with the Airspace Controlling Authority.

³⁸ Where Safety, Environmental Protection or operational imperatives demand, the Regulations may be deviated from provided that a convincing case can be offered in retrospect.

³⁹ The empowered individual at the time with tactical awareness of the current operation or task.

⁴⁰ Bounded by the Laws of Armed Conflict, superior command direction, Rules of Engagement and RtL to own forces.

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Material
1604(2)**

29. The UAS RO will ensure that the authority required for a UAS SPC to be enabled, guidance on the Risk involved, and related operating instructions are specified in appropriate orders.
30. UAS ROs and UAS AMs must ensure compliance with UK Civil Aviation Authority Safety Notice Number: SN-2025/004⁴¹.

**Regulation
1604(3)**
Remote Pilot Competence

- 1604(3) Withdrawn – Incorporated into RA 1604(1), (2), (7), (8) and (9).

**Acceptable
Means of
Compliance
1604(3)**
Remote Pilot Competence

31. Withdrawn – Incorporated into RA 1604(1), (2), (7), (8) and (9).

**Guidance
Material
1604(3)**
Remote Pilot Competence

32. Withdrawn – Incorporated into RA 1604(1), (2), (7), (8) and (9).

**Regulation
1604(4)**
Safe Operation and Limitations

- 1604(4) Withdrawn – Incorporated into RA 1604(1), (2), (7), (8) and (9).

**Acceptable
Means of
Compliance
1604(4)**
Safe Operation and Limitations

33. Withdrawn – Incorporated into RA 1604(1), (2), (7), (8) and (9).

**Guidance
Material
1604(4)**
Safe Operation and Limitations

34. Withdrawn – Incorporated into RA 1604(1), (2), (7), (8) and (9).

**Regulation
1604(5)**
Special Purpose Clearances

- 1604(5) Withdrawn – Incorporated into RA 1604(1), (2), (7), (8) and (9).

**Acceptable
Means of
Compliance
1604(5)**
Special Purpose Clearances

35. Withdrawn – Incorporated into RA 1604(1), (2), (7), (8) and (9).

**Guidance
Material
1604(5)**
Special Purpose Clearances

36. Withdrawn – Incorporated into RA 1604(1), (2), (7), (8) and (9).

⁴¹ Refer to SN-2025/004 – UAS Software and Firmware Updates.

**Regulation
1604(6)**

Handing over Control of Remotely Piloted Aircraft

1604(6) Withdrawn – Incorporated into RA 1604(1), (2), (7), (8) and (9).

**Acceptable
Means of
Compliance
1604(6)**

Handing over Control of Remotely Piloted Aircraft

37. Withdrawn – Incorporated into RA 1604(1), (2), (7), (8) and (9).

**Guidance
Material
1604(6)**

Handing over Control of Remotely Piloted Aircraft

38. Withdrawn – Incorporated into RA 1604(1), (2), (7), (8) and (9).

**Regulation
1604(7)**

Uncrewed Air System Senior Operator and Uncrewed Air System Flight Operations Post Holder Responsibilities

1604(7) Operations of UAS in the Specific S1 sub-category **shall** be supported by UAS SOs / UAS FOPHs.

**Acceptable
Means of
Compliance
1604(7)**

Uncrewed Air System Senior Operator and Uncrewed Air System Flight Operations Post Holder Responsibilities

39. UAS SOs and UAS FOPHs **should**:
- a. Support and be answerable to the respective UAS RO / UAS AM.
 - b. Have completed an approved UAS training package provided by a DSAT compliant UAS course, or an equivalent UK CAA approved RAE⁴² that includes a flying assessment. If the training does not include a period of BVLOS flight, the UAS SO and UAS FOPH **should** complete BVLOS practical flying training either under the supervision of an RPI until deemed qualified as Competent to operate BVLOS, or iaw their CFAOS (BU) Approval (for non-MOD organizations).
 - c. Ensure that all RPs within their AoR have successfully completed a DSAT compliant UAS course, or an equivalent approved UAS training package provided by a RAE that includes a flying assessment.
 - d. Be qualified on similar type UAS to be operated.
 - e. Ensure that RPs are medically fit to operate the Categorized UAS⁴³.
 - f. Ensure any RPI complies with RA 1604(5).
 - g. Specify SQEP individuals (eg RPIs) to award UAS flying privileges.

**Guidance
Material
1604(7)**

Uncrewed Air System Senior Operator and Uncrewed Air System Flight Operations Post Holder Responsibilities

40. Training provided by a CAA approved RAE that includes a flying assessment or an equivalent DSAT compliant UAS course has been assessed as appropriate by the MAA to provide suitable training and assessment for UAS SOs and UAS FOPHs.
41. The UAS SO / UAS FOPH may also hold a dual role as an RPI.
42. UAS SOs / UAS FOPHs will ensure that all RPs receive Conversion To Type (CTT) training from an RPI.

⁴² The list of CAA approved RAEs is found in the Unmanned Aircraft section of the CAA website.

⁴³ The baseline minimum Joint Medical Employment Standard for Military RPs of Specific S1 Category UAS is A-4. There is no baseline minimum Medical Employment Standard for Civilian RPs of Specific S1 Category UAS. There are no Initial or Periodic Medical Examination requirements (both Military and Civilian) to operate UAS in the Open Category and S1 sub-category. However, these baseline requirements may be further restricted via the LEC and / or the endorsed RA 1600 Annex B Categorization Safety Checklist.

**Regulation
1604(8)**
Remote Pilot Responsibilities

1604(8) RPs operating UAS in the Specific S1 sub-category **shall** be qualified and Competent.

**Acceptable
Means of
Compliance
1604(8)**
Remote Pilot Responsibilities

43. RPs **should**:
- a. Complete a UAS training package, designed for RPs flying UAS under MRP rules, that includes a flying assessment.
 - b. Maintain a level of Competence appropriate to the tasks being conducted.
 - c. Maintain an Auditable record of UAS training and flying activity.
 - d. Be familiar with all publications and processes required to safely operate the UAS.
 - e. Be fully conversant with either the RA 1600 Annex B Categorization Safety Checklist (MOD organizations) or CFAOS (BU) Operations Manual (non-MOD organizations), and local Orders.
 - f. Maintain a log of the inspections and Maintenance carried out on their UAS.
 - g. Be responsible for the safe operation of the UAS and not present undue Risk or Hazard to other airspace users or any person, vessel, vehicle or Structure.
 - h. Record UAS operations via:
 - (1) The Centralised Aviation Data Service flight planning service (provided by BAE Systems Information) to help reduce the Risk of collision with other Aircraft and physical Hazards (eg overhead wires), and
 - (2) Notice to Aviation (NOTAMs).
 - i. Adhere to:
 - (1) Orders promulgated by the UAS RO / UAS AM.
 - (2) The UAS Manufacturer's User or Operating Manual.
 - (3) The operating parameters and procedures detailed in
 - (a) The RA 1600 Annex B Categorization Safety Checklist and LEC (MOD organizations) or;
 - (b) The CFAOS (BU) Operations Manual and Contractor Flying Organization Exposition (Basic UAS) (non-MOD organizations).
 - j. Conduct flight planning and Risk Assessments iaw the most restrictive of Orders and adhere to the following operating limitations:
 - (1) Operations are conducted in Segregated Airspace³.
 - (2) Operated, BVLOS³, up to a maximum range of 2,000 m⁴⁴ from the RP.
 - (3) Any conditions stipulated in the LEC (MOD organizations) or CFAOS (BU) Approval (non-MOD organizations).
 - k. Ensure that when it is necessary to hand over control of a UAS, a formal instruction to take control and to accept control is made. In some cases (eg during instruction) it is necessary to take control in the first instance - this has to also be formally declared and accepted. Formal statements of 'I have control' and 'You have control' has to be made and acknowledged as appropriate.

⁴⁴ Operations beyond 2,000 m may be approved but the range, justification, and ability to support this range needs to be covered and approved in either the Categorization Submission or CFAOS (BU) application.

**Acceptable
Means of
Compliance
1604(8)**

44. When a planned UA sortie necessitates the handing over of control of the UA, the associated RPs **should** plan the timings and other requirements in advance of the sortie.

**Guidance
Material
1604(8)**

Remote Pilot Responsibilities

45. RPs will be appropriately trained and Competent. RPs are required to understand and be fully conversant with all appropriate publications and RA 1604(8), to ensure that their UAS are safe to operate and are being operated safely.

**Regulation
1604(9)**

Remote Pilot Instructor Responsibilities

1604(9) RPIs **shall** be trained and Competent.

**Acceptable
Means of
Compliance
1604(9)**

Remote Pilot Instructor Responsibilities

46. RPIs are required to possess skills that enable the effective transfer of knowledge to their students, and **should** be trained to achieve the following baseline Competences:

- a. Plan, prepare and deliver appropriately structured theoretical and practical teaching events.
- b. Manage trainees, students and instructional resources.
- c. Deliver specialist instruction to incorporate a range of differing learning styles.
- d. Integrate Human Factors training⁴⁵.
- e. Confirm / check learning has taken place, using appropriate practical techniques on the ground and in the air.
- f. Monitor and review trainee or student progress across the full range of RP training events.
- g. Produce comprehensive written reports on individual training outcomes.

47. RPIs **should**:

- a. Have qualified as a UAS operator following successful completion of a DSAT compliant course or a National Qualified Entity / RAE civilian course that includes a flying assessment.
- b. If operating under a UAS RO:
 - (1) Be qualified as a Defence Trainer⁴⁵.
 - (2) Achieve Practitioner Level prior to awarding qualification / Competency for a RP to fly UAS in this sub-category.
- c. If operating under a UAS AM:
 - (1) Hold an appropriate trainer qualification, approved as an equivalent to a Defence Trainer by the UAS AM responsible for the UAS they will operate.
 - (2) Achieve suitable level of training Competence, approved as an equivalent to Practitioner level of the Defence Trainer, by the UAS AM prior to awarding qualification / Competency for a RP to fly UAS in this sub-category.
- d. Maintain an Auditable record of UAS training, instructional training / assessment, and flying activity.
- e. Assess Competence at least annually. UAS ROs / UAS AMs have to stipulate in orders how and by whom the assessment may be conducted.

⁴⁵ Refer to JSP 822 – Defence Direction and Guidance for Training and Education.

**Acceptable
Means of
Compliance
1604(9)**

- f. Ensure Competence checks include the following baseline Competencies:
- (1) Ability to impart skill and knowledge, utilizing effective analysis and debriefing.
 - (2) Proficiency in flying or airborne operating skills, and knowledge of the Air System on which tested.
 - (3) Standardization of current training practice.
 - (4) Knowledge of subjects allied to flying / Air System operation.
- g. Document evidence of assessments of Competence in the RPI's training record.
- h. Provide RPs with CTT training.

**Guidance
Material
1604(9)****Remote Pilot Instructor Responsibilities**

48. Nil.