



DEFENCE AVIATION SAFETY AUTHORITY

## NOTICE OF PROPOSED DASR AMENDMENT NPA 2020-003 Revision 1

BP10257335

### AMENDMENT OF UAS REGISTRATION REGULATION WITHIN DASR.UAS

#### INTRODUCTION

##### Applicability

1. This proposal is applicable to Command and Groups that operate Certified, Specific Type A & B, and Open category UAS.

##### Purpose

2. The purpose of this NPA is to correct the IR, AMC and GM inconsistencies evident throughout DASR.UAS.

3. This NPA is an integral part of key stakeholder consultation to allow for comment and input to regulation development prior to its formal release.

4. The proposed amendments are expected to:

a. Resolve the inconsistent call-out of UAS registration through DASR.UAS by:

- (1) Introducing four instances of IR, and one instance of both AMC and GM.
- (2) Amending two instances of IR.
- (3) Deleting three instances of AMC.

5. The benefits flowing from the proposal are expected to:

- a. Align the UAS registration requirements for Certified UAS to those of manned aircraft.
- b. Simplify the UAS registration regulatory requirements structure in DASR.UAS for Specific Type A & B, and Open category UAS.
- c. Rectify inconsistencies that will improve clarity around organisational UAS registration responsibilities (Note that the extant regulations already mandate registration of Defence UAS).
- d. Clarify requirements for operators of UAS to provide DASA with Local UAS Registers.

##### Background

6. 2019 UAS AwBs Board members requested ACPA review DASR.UAS to correct the above identified problems within UAS registration IR, AMC and GM. ACPA raised DCP 2020-003 as a result with the aim of having the corrective amendments published in Sep 20.

##### Proposed Amendments

7. The proposed rewording for DASR.UAS is presented at Annex A.



8. The DCP is intended to be released in conjunction with the DASR update in Sep 20.
9. DASA assesses that this DCP will not introduce any additional training requirements in advance of publication.

### **Transition Timeline**

10. Compliance with the revised regulation will be required by 31 Dec 20.

### **HOW TO SUBMIT COMMENTS ON THIS NPA**

#### **Format**

11. Responses to this NPA are to be recorded on the NPA Response Sheet included at Annex B.
12. Responses are to be submitted by email to DASA, Hardcopies of the NPA Comment Sheet are not required.

#### **Timing**

13. Comments on NPA 2020-003 are to be forwarded to DASA by close of business 17 Aug 20.

#### **Additional Information**

14. Additional information concerning this NPA is available from ACPA-REGS2, MAJ Charles Rose contactable 0423 198 922 or [acpa.regs@defence.gov.au](mailto:acpa.regs@defence.gov.au).

### **DISPOSITION OF RESPONSES RECEIVED**

15. A Comment Response Document will be prepared and published on the [DASA Website](#). DASA will not individually acknowledge or respond to comments or submissions.

Original Signed  
16 July 2020

**D.R. SMITH**  
GPCAPT  
Director  
ACPA  
Defence Aviation Safety Authority  
02 6128 7301

#### **Annexes:**

- A. NPA 2020-003 Revision 1 - Proposed Changes to DASR.UAS
- B. NPA 2020-003 Revision 1 - Response Sheet - Amendment of UAS registration regulation within DASR.UAS



## NPA 2020-003 REVISION 1

### PROPOSED CHANGES TO DASR.UAS

#### AMC UAS.10.A(3)

**Current:**

All Defence UAS, other than those regulated under DASR NDR, should be registered prior to first operation, either on the Defence Register (when directed by the Authority) or on a local register. When requested by the Authority, the Command/Group should be able to readily provide the Authority with a list of each UAS, and the UAS categories under which they have been authorised to operate. For UAS that require only local registration, a centralised register for each Service/Group is recommended. Local registers need be no more complex than an asset list.

**Proposed:**

<To be deleted and transferred to new AMC - AMC UAS.10.D>

#### DASR.UAS.10(d)

**Current:**

<No Implementing Regulation exists>

**Proposed:**

Defence UAS must be either on the Defence Register when directed by the Authority, or on a local register.

#### AMC UAS.10.D

**Current:**

<No AMC exists due to new IR being proposed. AMC UAS.10.A to be incorporated into proposed AMC UAS.10.D, and amended>

**Proposed:**

With the exception of UAS operated under DASR NDR, all Defence UAS should be registered on the Defence Register (where directed by the Authority) or a local register prior to first operation. For UAS that require only local registration, a centralised register for each Service/Group is recommended. Local registers need be no more complex than an asset list.

#### GM UAS.10.D

**Current:**

<No GM exists due to new IR being proposed>

**Proposed:**

**Purpose:** The purpose of this regulation is to allow the Authority to best determine what type of registration is required for UAS.

#### DASR.UAS.10(e)

**Current:**

<No Implementing Regulation exists>

**Proposed:**

Local registers raised in accordance with DASR.UAS.10(d) must be made available to the Authority on request.

#### DASR.UAS.20.a.1

**Current:**

are Defence registered

**Proposed:**

are Defence registered in accordance with DASR.ARO.60

#### DASR.UAS.30(b).1

**Current:**

be registered as directed by the Authority

**Proposed:**

be registered in accordance with DASR.UAS.10.d

#### AMC UAS.30.B(1)

**Current:**



1. All Defence UAS should be registered prior to first operation, either on the Defence Register (when directed by the Authority) or on a local register.
2. At all times, the Command / Group must be able to readily provide the Authority with a list of all UAS, which they have been authorised to operate. For UAS that require only local registration, a centralised register for each Service is recommended.
3. Defence Registration would normally only be considered by the Authority for UAS with a MTOW of at least 25 kg.

**Proposed:**

&lt;To be deleted&gt;

**DASR.UAS.30(c)****Current:**

1. be operated only under Standard Scenarios in DASR UAS.35
2. be notified to the Authority prior to commencement of UAS operations.

**Proposed:**

1. be registered in accordance with DASR.UAS.10.d
2. be operated only under Standard Scenarios in DASR.UAS.35
3. be notified to the Authority via submission of Form 150 prior to commencement of UAS operations.

**AMC UAS.40.A(2)****Current:**

UAS operated under Open category will not be included on the Defence Register unless specifically directed by the Authority. They must, however, be included on a local register. A centralised register for each Service is recommended. When requested by the Authority, the Command/Group must be able to readily provide the Authority with a list of all UAS they have authorised to operate under Open category.

**Proposed:**

&lt;To be deleted&gt;

**DASR.UAS.40.A(1)****Current:**

- i. be operated within visual line of sight
- ii. be operated no higher than 400 ft Above Ground Level (AGL)
- iii. be operated during daytime and not in cloud
- iv. not operate in a way that creates a hazard to another aircraft, person or critical infrastructure
- v. not operate in a Prohibited Area, or a Restricted Area unless approved by the authority controlling the area
- vi. not operate in the movement area or the approach or departure path of a runway of an aerodrome / ship without approval from the relevant authority
- vii. not operate in such a manner as to create an obstruction to an aircraft
- viii. be controlled by a RP who meets training, qualification and experience requirements defined by the relevant Command / Group AMC
- ix. allow RP intervention during all stages of the flight.

**Proposed:**

- i. be registered in accordance with DASR.UAS.10.d
- ii. be operated within visual line of sight
- iii. be operated no higher than 400 ft Above Ground Level (AGL)
- iv. be operated during daytime and not in cloud
- v. not operate in a way that creates a hazard to another aircraft, person or critical infrastructure
- vi. not operate in a Prohibited Area, or a Restricted Area unless approved by the authority controlling the area
- vii. not operate in the movement area or the approach or departure path of a runway of an aerodrome / ship without approval from the relevant authority
- viii. not operate in such a manner as to create an obstruction to an aircraft
- ix. be controlled by a RP who meets training, qualification and experience requirements defined by the relevant Command / Group AMC
- x. allow RP intervention during all stages of the flight.



## NPA 2020-003 Revision 1 Response Sheet

### AMENDMENT OF UAS REGISTRATION REGULATION WITHIN DASR.UAS

Please forward this sheet as an email attachment to [DASA](#) by 17 Aug 20. A word version of this response sheet can be found via obj no: [BO3960659](#) or alternatively contact [DASA](#).

Please indicate your acceptance or otherwise of this proposal by ticking the appropriate box below. Additional comments, suggested amendments or alternative action are welcome and may be provided on this response sheet or by separate correspondence.

- The proposal is **acceptable without change**.
- The proposal is **acceptable but would be improved if the following changes were made:**
- The proposal is **not acceptable but would be acceptable if the following changes were made:**

LSN	NPA Reference: (i.e Regulation number, NPA paragraph etc)	Comment or suggested change	Explanation
1			
2			
3			
4			
5			

#### RESOURCE IMPLICATIONS

Please provide specific comment on any significant resource implications that this proposal may have for your organisation, for both its implementation and ongoing compliance. Your comments should address both financial and human resource considerations.

Resource implications – Proposal implementation	
Resource implications – Proposal sustainment	



## RESPONDENT DETAILS

<b>Your name:</b>	
<b>Submission date:</b>	
<b>Your organisation:</b>	
<b>Email address:</b>	
<b>Postal address:</b>	
<b>Phone:</b>	
<p><b>Whose views are represented in your response?</b></p> <p><b>i.e. Is your response the authoritative response from your organisation?</b></p>	<p>Responding on behalf of :</p> <p>Individual [ <input type="checkbox"/> ]</p> <p>Regulated Military entity [ <input type="checkbox"/> ]</p> <p>Regulated Commercial entity [ <input type="checkbox"/> ]</p> <p>Wing HQ [ <input type="checkbox"/> ]</p> <p>Group HQ [ <input type="checkbox"/> ]</p> <p>ADF Regulatory, Technical or Logistics policy agency [ <input type="checkbox"/> ]</p> <p>Other commercial entity [ <input type="checkbox"/> ],</p> <p>Other [ <input type="checkbox"/> ] Please describe:</p>
<p><b>Do you consent to your name being published as an NPA respondent within the NPA Summary of Responses:</b></p>	<p>YES [ <input type="checkbox"/> ]</p> <p>NO [ <input type="checkbox"/> ]</p>

