

Do your views represent those of an organisation?

No, these are my personal views

Chapter 1 - Personal details

What UAS do you own?

Drone

If you selected other, please describe::

How many UAS do you own?

1 to 2

Approximately, how frequently do you fly UAS?

Daily

What is your age?

61 – 70

Chapter 2: Operational Requirements

1 Do you agree with the challenges with operational requirements identified by stakeholders, and why?

Somewhat disagree

Please provide detail on why you have selected your answer::

When looked at in its entirety, all of the categories, sub-categories may look complicated, but in reality the only category that is likely to be confusing is the Open category, used typically by recreational and small business flyers needing some new UAS users to either feel there is nowhere they can legitimately fly, or else carry on regardless, possibly even being completely unaware of any regulation regarding the device they have just purchased. The Specific and Certified category are clearly for more risky uses, and as such will be typically where larger businesses and more specialist contractors (who need to take the time to understand the restrictions) will operate.

As long as the Open category can be summarised with a short sentence, or even a infographic (as shown on page 9 of the Call for input), I don't think there is an issue, however . I suggest you take a look at the Grey Arrows Drone Clubs web site. they have a tool they created called "Good 2 Go" (<https://dronescene.co.uk/good2go/start>) This allows a user to enter their 'situation' and where they want to fly, and it will tell them if that's all OK. It should not be down to hobbyists to create tools like this. I believe CAA should do much more on the education front, and should do all it can to provide tools and information to encourage compliance.

In relation to the transitional arrangements, I think that they should continue indefinitely as they are and let them continue operate under the conditions that applied at the time of their manufacture, in very much the same way that classic cars can be used, even though they are no where near to complying with modern safety standards, Surely a small UAS cannot pose a larger threat than an old car?. If a drone is safe and legal to fly today, how can it become unsafe and illegal on 1st Jan 2026? Many modern drones today (especially sub 250g) are extremely safe by design, and should be allowed to fly until the 'natural end of life' of the drone. If after 2026 additional benefits can be given to these drones, these should retrospectively be added/allowed.

You mention "evolving security and safety risks" but this is very vague and so it's hard to respond with any detail. It is clear that all technology can be used for good or bad, and no amount of regulation will mitigate against a bad actor intent on nefarious actions.

2 Should CAA adopt the following policy objectives for operational requirements and why?

Should CAA adopt the following policy objectives for operational requirements and why? - Mitigate safety and security risks:

Neither yes nor no

Should CAA adopt the following policy objectives for operational requirements and why? - User-centric:

Neither yes nor no

Should CAA adopt the following policy objectives for operational requirements and why? - Enforceable:

Neither yes nor no

Should CAA adopt the following policy objectives for operational requirements and why? - Growth enabling:

Neither yes nor no

Should CAA adopt the following policy objectives for operational requirements and why? - Scalable:

Neither yes nor no

Please provide detail on why you have selected your answer and any other objectives that should be considered::

In the policy objectives, you have linked safety and security into one point, and I think these are separate things. Safety is without doubt the primary concern, and this is clearly a key requirement, but security is not so straight forward. Many of the issues around security are nothing to do with safety, and so should not be linked and frankly I do not believe should be the remit of the CAA. Security (other than security of the airspace) should be dealt with as a separate issue and not bundled in, in this way.

Modern drones are clearly very safe, and even though there are 250,000 pilots, there have been very few incidents of note. Most incidents reported in public are clearly based on sensationalist press reports. I saw one about a drone at 30,000 feet being seen from an airliner! The description of the 'drone' sounded much more likely to be a balloon of some description, and incredibly, the pilot of the aircraft could identify tiny details of the device as they flew past it at 600mph!

It is important to recognise that some users may do stupid things with a drone, but that's no different to some drivers, motor cyclists, sky divers, cyclists, or skateboarders doing stupid things, but there is not a clamour to regulate them any more closely.

3 Do you value international alignment in operational requirements, and why?

Definitely yes

Please provide detail on why you have selected your answer::

The drone market globally is huge, but the UK market in comparison is almost insignificant. It is totally unrealistic to assume that any manufacturer of drones will develop, test, certify and market a different version of drone, specifically for the UK market and so the UK should stay as aligned as possible with the EASA / international regulations. In this way the UK market is not isolated, and will not miss out on the incredible developments in drone technology in the rest of the world.

4 Should CAA re-name operational categories and sub-categories (Opportunity 1) and why?

Yes, to an extent

Please provide detail on why you have selected your answer::

I don't think that the names are the key cause of confusion, but it's more likely the additional conditions for each of the open category sub-categories that are often vaguely defined is a bigger issue.

Naming them according to risk level would make things more obvious in the first instance, but in reality I don't think it takes long to find out and understand the order of increasing risk of the current names?

5 Should CAA simplify how operational requirements are categorised (Opportunity 2) and why?

Neither yes nor no

Please provide detail on why you have selected your answer::

I think the basic categorisation that is already in use (low risk, medium risk and high risk) is correct, even if the naming is potentially confusing

6 Should CAA update how model aircraft operations are regulated (Opportunity 3) and why?

I do not know

Please provide detail on why you have selected your answer::

I do not fly model aircraft, and have no real knowledge, but would look at what evidence there is that there is a need to change the regulations. Model aircraft have been around for a very long time, and I see no reason to impose more stringent regulations unless there is clear evidence that this is needed, but interestingly, they potentially pose greater threats than drones, but seem to have less stringent restrictions in place.

7 Should CAA simplify exclusions from operational requirements (Opportunity 4) and why? Please describe any alternative exclusions that should be considered.

Definitely yes

Please provide detail on why you have selected your answer and any alternative exclusions that should be considered::

I agree that the classification of toy or not is very vague, but in reality, is that the differentiator? Most toy drones would struggle to operate more than 25m away from the remote pilot (RP). Maybe that is a better way to classify the regulations (so a child playing in the garden with a cheap toy, will not be hindered or criminalised for playing)!

I also do not think that the presence of a camera is relevant either. If it was, then why are mobile phone cameras (or even high quality SLR cameras) also not closely regulated. These cameras (and possibly high power lenses) can and have been used (by paparazzi) to collect sensitive and personal data, but there is no plans to impose draconian restrictions on their use (and there should not be). Just because a drone has a camera does not mean it will be mis-used, and if it is, then there are already adequate regulations around trespassing, photography and the invasion of privacy that do not need the CAA to get involved.

Simplifying the exclusions can have significant 'unintended consequences'. The variety of traditional drones (toys, sub 250g, larger consumer / pro drones), is further complicated by FPV drones that are typically flown in totally different situations and in different locations. Any simplification may well seriously impact one of these groups, with no real evidence that there is an issue.

While it may be desirable to simplify the categories, the sheer variety of situations that need to be addressed would seem to make this impractical.

Ultimately, where does the risk come from? It would seem to be more closely aligned with the environment being flown in and the weight of the UAS, not whether or not it is a toy, or has a camera. Perhaps if the objective of the requirement is purely risk oriented, then the exclusions should be based around that. Maybe something primarily based on operational height + weight, with provisos similar to those currently in place regarding proximity to people and buildings.

The CAA must have significant data about the safety record of small drones. Are any of the reported issues about the technical quality of the drone, or are they mainly about misuse of the drone (intentional or otherwise) by the RP?

Is 250g a realistic limit?

I have to say, that based on the very good safety record of consumer drones, I think that maybe the CAA should instead focus on the risks posed by other, much heavier objects in the sky. I am astonished that I could strap a petrol engine and big propeller on my back and take to the skies with no pilots licence or airworthiness checks. Surely that is several magnitudes more risky than a well engineered drone weighing a few hundred grams.

I also think there is some justification to assert that 'forcing' recreational users to keep below the 250g limit (so they can fly in the widest range of locations) means that they are less able to make use of a larger, more stable drone that can cope with stronger winds and has all around object avoidance. Allowing the new generation of larger drones (some with C1 class marks), with all the additional technical benefits, to fly in the A1 category is likely to improve the already excellent safety record.

8 Should CAA change transitional arrangements for users of UAS without class-marks (Opportunity 5) and why?

Definitely yes

Please provide detail on why you have selected your answer::

As mentioned earlier, if a drone is safe to use today (based on the carefully created regulations that are currently in place) why does it suddenly become unsafe at a certain point in time. Surely the regulations that are in place today are there to keep everyone safe. As long as they are actually doing that (and I see no evidence to suggest they are not) then let the legacy drones die of natural causes. Its better for the environment too, as otherwise there will be a lot of perfectly good drones being replaced unnecessarily

Chapter 3: Product Requirements

9 Do you agree with the issues identified by stakeholders relating to product requirements, and why?

Somewhat agree

Please provide detail on why you have selected your answer::

The planned class marking scheme (that the CAA dropped suddenly) seemed to be an entirely sensible, scalable, and easily understood scheme, and with the extra safety requirements of some of the classes would have been a great step forward, and opened up the market to innovative manufacturers who could get better adoption of their drones if, due to the class marks, allowed the RP to use a slightly heavier (and safer drone) in closer proximity to uninvolved people.

It is unclear what C4 is for ... big, heavy and no additional functions??

The point about the availability of point of sale material is valid, but we also need to consider second hand sales.

10 Should CAA adopt the following policy objectives for product requirements, and why?

Should CAA adopt policy objectives for product requirements, and why? Mitigates safety and security risks; User-centric; Growth enabling; Scalable; Internationally aligned. Please describe any other objectives we should consider. - Mitigates safety and security risks:

Neither yes nor no

Should CAA adopt policy objectives for product requirements, and why? Mitigates safety and security risks; User-centric; Growth enabling; Scalable; Internationally aligned. Please describe any other objectives we should consider. - User-centric:

Neither yes nor no

Should CAA adopt policy objectives for product requirements, and why? Mitigates safety and security risks; User-centric; Growth enabling; Scalable; Internationally aligned. Please describe any other objectives we should consider. - Growth enabling:

Neither yes nor no

Should CAA adopt policy objectives for product requirements, and why? Mitigates safety and security risks; User-centric; Growth enabling; Scalable; Internationally aligned. Please describe any other objectives we should consider. - Scalable:

Neither yes nor no

Should CAA adopt policy objectives for product requirements, and why? Mitigates safety and security risks; User-centric; Growth enabling; Scalable; Internationally aligned. Please describe any other objectives we should consider. - Internationally aligned:

Neither yes nor no

Please provide detail on other objectives CAA should consider and any other objectives that should be considered::

It is hard to criticise these objectives, but it's also hard to tell whether I would support them, until I see additional detailed information. Its possible that the objectives will address the issues you mention but my be abhorrent to a recreational flyer, that tries his best to fly safely, considerately, and cause the minimum disruption to those around.

I cant really comment until the details are clear.

11 Should CAA implement manufacturer standards (Opportunity 8) and why?

Yes, to an extent

Please provide detail on other objectives CAA should consider::

Staying aligned with the EU regulation seems like a no brainer as it allows access to a huge market for the manufacturers. I can't really see a difference between 5 classes, and 3 classes with multiple several sub classes??

What I would certainly oppose is too much interference with the current C0 class. This has proved itself to be safe, and easily understood. I would most definitely oppose this back door method of imposing Remote ID on this class. (See my rant about Remote ID later on)

12 Should CAA implement a product labelling scheme (Opportunity 9) and why?

No, to an extent

Please provide detail on other objectives CAA should consider::

To the cynic in me, this sounds more like like a political imperative (or a vanity project) to get UK based labelling on a drone ... to emphasise 'taking back control' in an area that makes absolutely no sense. If its safe to operate a drone, in a specific class, with a specific class mark in Germany, France, Spain, Italy etc, how can it not be safe (and need additional labels) in the UK?

13 Should CAA simplify exclusions from product requirements (Opportunity 10) and why?

Definitely no

Please provide detail on other objectives CAA should consider::

When you say simplify, you seem to be implying "remove some exclusions' and as the majority of sub 250g drones already have a fairly badly implemented geo-fencing facility, it is clear that this simplification is to enable Remote ID to be implemented on drones where it is totally unrealistic and obtrusive.

If you want to improve the sub 250g category, ensure that the implemented geo-fence features are properly implemented, and based on up to date 'maps' of the restricted area.

14 Should CAA implement Remote ID (Opportunity 11) and why?

Definitely no

Please provide detail on why you have selected your answer::

It is invasive, impractical and not fit for purpose.

It would make far more sense to ensure effective conspicuity of all manned aircraft (enforce the use of ADS-B maybe), and then leave it to the RP to avoid them. This could provide a clear safety benefit, is easy to implement (due to the size of manned aircraft), is scalable, and is already well understood Even with Remote ID, bad actors will just circumvent the system, or will use hand made UAS to accomplish their illegal activities.

RID will expose law abiding UAS pilots to local busy bodies and will highlight their location to anyone in the area. This opens the RP up to confrontation and possible harassment and theft. I don't really have any objection to the encrypted collection of flight details (accessible historically to authorised agencies) but I think it is an unwarranted invasion of privacy for virtually no real time benefit.

To put this into some sort of context, how do you think the public would react if all dog walkers and dogs were tracked, and their location was broadcast locally. I am not saying I would want or support this idea, but based purely on the number of casualties and injuries (and fatalities) caused by dangerous dogs, this would seem a better place to use RID, but that is not being proposed. It feels like drone pilots are being unfairly penalised for doing something that is totally legal, and is already very safe.

Remote ID as implemented in the US is a disaster waiting to happen. Why is it necessary to inform every local busy-body within a couple of miles, the location of a remote pilot who is carefully, safely and conscientiously flying their drone? This can only harm the hobby, and the market, but will do nothing to prevent criminal activity. Why not automatically inform the police when a driver (in a huge, heavy and dangerous lump of metal) travels at 71mph on the motorway?

15 Should CAA to implement geo-awareness (Opportunity 12) and why?

Neither yes nor no

Please provide detail on why you have selected your answer::

Many UAS already have this feature, but it is typically based on an inaccurate map, that bear only a passing resemblance to the actual FRZs etc. I would urge caution about requiring this 'map' to be available in real time, as it's often preferable and safer to operate a small drone (with a mobile phone as the only display) with no connection to the internet i.e. in Aircraft Mode, to avoid any interruptions while flying. It would also be unfair to effectively 'ground' a RP / UAS just because they are unable to access the internet from their current location.

16 Should CAA introduce requirements for manufacturers to provide user guidance during product set-up or pre-flight, via the controller or other interface (Opportunity 13) and why?

Yes, to an extent

Please provide detail on why you have selected your answer::

This will depend on whether the UK market is big enough to justify the effort required to implement it. As long as the requirements are the same or very similar to those for our European partners, then this should not be too much of an issue. If however we have implemented too many UK specific requirements, then the benefit to the manufacturer of carrying out the work, may not be financially attractive enough to warrant the work.

17 Should CAA introduce user validation requirements on manufacturers (Opportunity 14) and why?

Yes, to an extent

Please provide detail on why you have selected your answer::

As long as this does not require real time access to a back end system (unintended consequence of being in a no signal area) then I think this is a reasonable requirement. I suggest that the RP has a window of time (days) to complete the validation before any restrictions become active.

Chapter 4: Other Opportunities

18 Should CAA simplify policy and guidance document structure (Opportunity 15) and why?

Definitely yes

Please provide detail on why you have selected your answer::

Frankly, why are you even asking this question?

Documents should always be easy to follow and understand. Why would anyone NOT agree to a simplification??

19 What other opportunities to improve UAS regulation, beyond those described in this Call for Input, would you like to see progressed?

What other opportunities to improve UAS regulation, beyond those described in this Call for Input, would you like to see progressed?:

I am sorry to say that this all seems to be a smoke screen to allow CAA to make changes and to implement additional restrictions in an area that has an incredible good safety record. The focus should be on increasing the conspicuity of manned aviation, rather than inflicting additional requirements and regulations on hobby drone pilots.

Why is a drone camera such an issue? There has admittedly been a spate of 'auditors' who are hell bent on annoying members of the public, but they are just using a drone as a tool. If the drone was not available, they would just use video cameras and large lenses to achieve the same levels of response from their "victims".

The majority of camera drones are basically flying tripods, and give photographers a different viewpoint. 99% of drone pilots have no interest in invading anyone's privacy, and are no more intrusive than the millions of cameras being carried all the time in everyone's pockets.