## Product Integrity Standards – Drones Operating in the UK

The drone industry has the potential to contribute  $\pounds$ 45bn to the UK economy, save  $\pounds$ 22bn in costs across public services and be responsible for 650 000 jobs, all while reducing carbon emissions by up to 2.4 million tonnes<sup>1</sup>.

However, the future of UK drone operations and the benefits they can bring to the UK economy are at risk due to the requirement for Product Integrity Standards for certain types of drone not yet being implemented by the Government despite the requirement for such standards becoming law in 2019.

The potential implications of this are far-reaching. Drone-use in the public sector has significant benefits, but without adequate regulation could result in incidents causing reputational damage to operators including the emergency services. The current uncertainty also hampers the efforts of the UK drone industry to comply with international standards, meaning drone operators may be forced to acquire hardware from China, with potential national security implications when used for police operations, for example.

With market surveillance required to be in place by 1<sup>st</sup> January 2026, this issue has become time critical, and although the current CAA consultation 'UAS Policy Consultation - Recognised Assessment Entity (RAE) – Flightworthiness and SAIL Mark' is progressing, government intervention is required to address the specific requirements of the EASA 2019/945 directive which facilitates CE marking and hence Open Class UAS product integrity. The introduction of RAEs and the Specific Operational Risk Assessment (SORA) by the CAA does not meet these criteria.

We recommend that this issue be addressed in one of the following ways:

- Follow the European methodology and adopt a UK Scheme based upon CEN 4709 and relevant volumes. The advantage of adopting this approach is that it sets a common benchmark and will be fully equivalent with Europe, and can also be implemented rapidly.
- Create a UK Scheme, with the assistance of UK Accreditation Service and small drone manufacturers. The advantage of this is that it is less onerous than the European method and allows reduced cost to Original Equipment Manufacturers (OEMs). It also sets a bar for commercial operators and for the general market, supporting UK exports in this sector.

<sup>&</sup>lt;sup>1</sup> Skies without limits: The potential to take the UK's economy to new heights. V2. July 2022. PricewaterhouseCoopers LLC

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We would welcome an opportunity to discuss this matter in more detail.