

Fundamental Demands of F2618 UAV DACH

DIS

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0.1		Initial phase derived from EU Strategy topics collection
0.2	03.06.2026	Executive Board retreat refined requirements – Working Document
0.3	16.06.2026	Membership Participation Version
0.4	24.07.2026	Advisory Committee Review Version after consolidating all comments
1.0	25.09.2026	UAV DACH fundamental demands – Ready for Distribution
1.1	01.10.2026	Confirmed for distribution by Advisory Committee
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UAV DACH Fundamental Demands

1 A Common Framework for a Strong and Competitive European UAS Industry

The **UAV DACH Fundamental Demands** translate the association's statutory objectives into concrete policy demands, priorities and measures, developed by and for its members.

The Fundamental Demands are the result of a structured, member-driven editing phase. Following consultation with the membership, all submitted comments were reviewed and discussed by the editorial team. The consolidated document was subsequently confirmed by the Advisory Committee and approved for publication by the Executive Board.

The Fundamental Demands establish a **common strategic framework for all UAV DACH Working Groups**, guiding their policy positions and regulatory proposals

2 Seven Strategic Areas:

The Fundamental Demands are organised into seven areas:

1. Industrial Policy & Industry at Large
2. Airspace Access
3. Airspace Awareness
4. Efficient Design Rules
5. Compliant Flight Operations
6. Market Access
7. Effective Law Enforcement

Each Fundamental Demand includes a specific explanation outlining its intended application and the regulatory, operational or strategic outcomes it seeks to achieve.

3 Structure and Application of the Fundamental Demands

The Fundamental Demands are presented in a structured table, divided into two sections according to the level of regulatory and political responsibility:

- **National Level:** Demands addressed primarily to German policymakers, regulatory authorities and national institutions.
- **European Level:** Demands requiring action at EU level, particularly by the European Commission, EASA and other European regulatory bodies, to establish a harmonised framework across Member States.

Each demand is described using three elements:

Goal	Identifies the strategic area to which the demand contributes.
Demand	Defines the specific policy objective, regulatory change or action requested by UAV DACH.
Explanation	Clarifies the rationale, intended application and expected outcome of the demand, providing guidance for its interpretation and implementation.

This structure ensures that each demand can be clearly assigned to a strategic objective, communicated consistently to stakeholders and translated into concrete policy proposals and activities by UAV DACH Working Groups.

4 National Fundamental Demands

#	Goal	Demand	Explanation
1	Industrial Policy, Industry at large	Greater involvement of the German government in international regulations and laws	Germany should take an active leadership role in shaping European aviation and UAS regulation. National interests of industry, authorities, and users should be incorporated early on into EASA, European Commission, ICAO, Eurocontrol, and JARUS... processes. The implementation of the aviation strategy must be supported financially and with available resources.
2	Compliant Flight Operations	Hobbyist's drone operations with camera drones are permitted only over private property with the permission of the property owner	Clear rules for hobbyist's camera drones operations to enable and scale commercial applications. Hobbyist's flights with cameras drones should generally be permitted only over private property with the property owner's prior consent (including own property), or model aircraft club airfields. Authorities should consider granting additional privileges to hobbyist's drone flights affiliated with a model aircraft club membership.
3	Airspace Access	Creation of the Unmanned Aircraft category in Section 1 of the German Air Traffic Act, equivalent to the other categories	Unmanned aircraft should be established as a separate and equivalent category of aircraft in the German Air Traffic Act. Legal equality with other aircraft is intended to prevent discrimination and lay the foundation for technology-neutral further development of aviation law.
4	Market Access	Incorporation of UAS infrastructure into municipal construction and development planning	Municipal, regional, and national planning procedures should systematically take the future use of UAS into account. This includes takeoff and landing sites, logistics locations, charging infrastructure, communication networks, and digital air traffic infrastructure. UAS should be recognized as an integral part of modern mobility, infrastructure, and supply concepts.

5 European Fundamental Demands

#	Goal	Demand	Explanation
5	Compliant Flight Operations	No launch or operation of a drone unless a valid identification certificate is available	Introduction of a mandatory digital operator identity as a prerequisite for the operation of UAS. The operator ID should be uniquely assignable, electronically verifiable, and transmissible via ADS-L, similar to a vehicle license plate. Multiple UAS belonging to a single operator may be assigned to a single operator identity.
6	Compliant Flight Operations	Clear differentiation between legal and illegal drone operations	Regulation, communication, and enforcement measures must distinguish between legal, authorized UAS operations and unlawful activities. Legal operators must not be placed under general suspicion. Drone defense measures and safety legislation must be risk-based and protect commercial operations.
7	Airspace Access	Mandatory introduction of ADS-L for all aircraft in Europe that do not use ADS-B	Mandatory electronic visibility of all aircraft (all airspace users) in lower airspace via ADS-B or ADS-L. Either ADS-B and ADS-L constitutes the minimum interoperable standard, without excluding the complementary use of other compatible broadcast technologies and systems. The goal is a shared situational awareness picture, direct aircraft-to-aircraft detection, improved safety, efficient integration of UAS, and the use of a common European infrastructure.
8	Airspace Access	ADS-L is to be recognized throughout Europe as Network ID or Remote ID and replace these in the future	Recognition of ADS-L as a fully-fledged European solution for the electronic identification of aircraft. Avoidance of parallel systems for Remote ID, Network ID, and electronic visibility. Introduction of a uniform standard that fulfills both identification and situational awareness functions and is interoperable across Europe.
9	Compliant Flight Operations	Clear separation of drone operations into 4 categories	European regulation should distinguish between hobbyist's operations, commercial operations, governmental operations (public services/authorities), and military operations. Requirements, approval processes, and safety measures must be risk-based and tailored to the respective type of operation.
10	Compliant Flight Operations	Hobbyist's drone operations with camera drones are permitted only over private property with the permission of the property owner	Clear rules for hobbyist's camera drones operations to enable and scale commercial applications. Hobbyist's flights with cameras drones should generally be permitted only over private property with the property owner's prior consent (including own property), or model aircraft club airfields. Authorities should consider granting additional privileges to hobbyist's drone flights affiliated with a model aircraft club membership.
11	Airspace Access	Europe-wide adoption of the German approach to access authorization for Class D control zones (D-CTR).	Harmonization of the control zone structure for lower airspace. Application of German approach of D(CTR) access approval Europe-wide to approve operations within D(CTR) and pass-through/fly over airports.
12	Efficient Design Rules	Development of EU regulations for the certification of AI systems used in drone operations/aviation	Creation of a specific European certification framework for the use of machine learning and artificial intelligence in UAS. This includes automated flight control, detection, navigation, mission planning, DAA systems, situational awareness and risk-assessment and autonomous decision

#	Goal	Demand	Explanation
			support and similar. Europe should enable innovation while establishing transparent safety standards.
13	Airspace Access	U-space regulations must include a binding commitment to the use of ADS-L.	Any situational awareness for airspace coordination (UTM or U-Space) shall be based on ADS-L standards. The selection of identification and visibility systems must leave room for European developments and future standards.
14	Airspace Access	Introduction of an EU-wide "experimentation clause" for testing prototypes under real-world conditions	Creation of a simplified legal framework for research, development, and testing of innovative UAS technologies. Companies and research institutions should be able to test and mature new technologies under controlled real-world operating conditions without having to go through full certification procedures.
15	Industrial Policy, Industry at large	Introduction of a dedicated EU UAS funding program worth at least €5 billion.	Establishment of a milestone based European innovation and scaling fund for UAS, eConspicuity, and C-UAS technologies. The goal is to strengthen European technology providers, reduce strategic dependencies, and accelerate industrialization and market introduction with due consideration given to start-ups and SMEs. Comparable programs already exist in the U.S. and China.
16	Industrial Policy, Industry at large	The UAS sector must be recognized as a unique industry.	Recognition of the UAS industry as a key strategic industry in Europe with high significance for security, infrastructure, digitalization, logistics, agriculture, the environment, and defense. This should be reflected in funding programs, investment priorities, and regulatory decisions as well as in political agendas.
17	Industrial Policy, Industry at large	Introduction of accelerated and milestone-based procurement procedures for UAS technologies	Public procurement should take into account the technology's innovation cycles. Procurement must be faster, more modular, and results oriented. Pilot projects, incremental scaling, and technology-neutral tenders should be prioritized over long-term large-scale projects.
18	Market Access	For public procurement of UAS technologies within the EU, at least 75% of the components must originate from the EU or be manufactured within the EU	Introduction of resilience and security requirements for publicly procured UAS systems. The origin of critical components, vertical integration, ownership structure, and supply chain risks should be decisive factors. The requirements should become part of a Trusted EU Label and strengthen European value creation. That origination includes the beneficial ownership. Sensitive infrastructure and military technology must meet a 100% European-origin requirement.
19	Industrial Policy, Industry at large	More frequent use of <i>PCP</i> and <i>PPI</i> for UAS technologies	Increased use of Pre-Commercial Procurement (PCP) and Public Procurement of Innovative Solutions (PPI) to accelerate the transition of innovations from research and development to operational deployment. Public contracting authorities should be able to test and scale new European UAS technologies at an early stage as anchor customers.
20	Efficient Design Rules	Elimination of the EASA "Certified" Category efforts	The "Certified" category has not yet generated a relevant European market, yet it ties up considerable regulatory resources within authorities and industry. The focus of EASA and the limited resources should be on market-relevant operations, risk-based approval procedures, and the further development of the Specific Category.

#	Goal	Demand	Explanation
			(Certified EASA part 21 aircraft also include aircraft with electrical propulsion/single pilot/remote piloting)
21	Airspace Access	Harmonization of authorization requirements and procedures within the EU analogous to commercial aviation	Operating permits, procedures, certifications, and oversight processes must be harmonized within the European Union. An operation approved in one Member State should, in principle, be recognized in all Member States to enable a European single market for UAS services. This also fundamentally includes access to airspace.
22	Airspace Access	1:1 Adoption of the "Robustness Levels" from the JARUS guidelines	The Robustness Levels developed by JARUS should be adopted unchanged and without additional national or European requirements. Additional evidence and assessment procedures increase costs, prolong approval processes, and jeopardize international harmonization. In accordance with the JARUS proposal, the EASA's DVRs should not yet apply to SAIL IV.
23	Airspace Access	Definition of a European Competence Framework (ECF) for the UAS industry	Development of a Europe-wide harmonized competence framework for professions and activities in the UAS industry. The framework should define qualifications, training pathways, role profiles, and competency requirements and enable mutual recognition within Europe.
24	Efficient Design Rules	Drone systems shall be subject to standardized maintenance programs covering ground infrastructure, UAS, and auxiliary equipment.	A drone should only be placed on the market if it is accompanied by maintenance manual (MM) provided by the OEM. It should be structured in a way that enables implementation by an independent organization through a CAMO-comparable system via a Maintenance Program, ensuring that operators are not exclusively dependent on the original manufacturer for safe and compliant operation throughout the lifecycle of the aircraft. The MM typically delivers maintenance instructions, maintenance tasks, and maintenance levels besides component limits, software, and configuration control as well as documentation requirements.
25	Market Access	Establish Europe-wide noise limits and standardized testing procedures for low-altitude aviation and droneports.	A harmonised noise framework including noise limits and standardized testing procedures for droneports is necessary to provide a predictable basis for approval decisions. It should define acceptable noise limits and testing procedures adapted to local environments, while providing incentives for quieter UAS operations. Dedicated research funding should support common measurement methods and noise-reduction technologies, enabling consistent approval practices across Europe.
26	Effective Law Enforcement	Ensure consistent enforcement of UAS regulations.	Rules are ineffective without credible enforcement. Authorities should systematically detect, investigate and penalize violations by all operators, including individuals. Drone-detection units should support the protection of sensitive sites and the identification of illegal operations. Law enforcement personnel shall be adequately trained.
27	Airspace Access	Equitable Access to Airspace and Aviation infrastructure for commercial UAS operators	Commercial UAS operators should have fair and non-discriminatory access to airspace alongside crewed aviation and not be limited to 500 ft AGL. Transparent,

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			harmonized and risk-based procedures should replace blanket restrictions and enable safe access to controlled airspace and aviation infrastructure.
28	Airspace Awareness	Establishment of a European research and development program for ADS-L and interoperable technologies for comprehensive lower-airspace situational awareness and secure aircraft-to-aircraft communication	Implementation of a research project aimed at the comprehensive evaluation and further development of ADS-L and other relevant technologies for a complete air situation picture (cooperative and non-cooperative aircraft/drones) as well as for secure aircraft-to-aircraft communication in lower airspace. Active monitoring and support for this research project by EASA and the European Commission.

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