

Comment	GCAA POSITION	GCAA additional explanation
CRD 2022-11/8		
<p style="text-align: center;">UAC.001 ABBREVIATIONS AND DEFINITIONS</p> <p>5) Commercial operations: operation of UA for the purpose of hire, remuneration, governmental purposes and provision of services.</p> <p style="color: red;">Not all governmental purposes come under commercial operations it can be for non-commercial purposes in case the governmental entity is conducting the operation itself.</p>	Accepted	definition for non commercial added
<p style="text-align: center;">UAC.001 ABBREVIATIONS AND DEFINITIONS</p> <p>6) GCAA Airspace Approval: An Authorisation issued by the GCAA to conduct an Unmanned Aircraft flight operation at specific time and on a specific route.</p> <p style="color: red;">What about LAA Airspace approval?</p>	Accepted	aispace approval definition ammended
<p style="text-align: center;">UAC.010 APPLICATION FOR UOA</p> <p>a) No organisation shall perform commercial UA operations without a valid UA Operator Authorisation (UOA) issued by GCAA or LAA, as the case.</p> <p style="color: red;">under which case the LAA can issue UOA?</p>	Noted	if the organisation based in specific Emirates, in this case the operator shall apply UOA through LAA (local civil aviation department), ;if the emirate doesn't have LAA then they have to apply through federal CAA (GCAA)
<p style="text-align: center;">UAC.010 APPLICATION FOR UOA</p> <p>f)Prior applying for UOA the applicant shall obtain Letter of Conformity (LoC) from Ministry of Industry Advanced Technology (MOIAT)</p> <p style="color: red;">how to communicate with (MOIAT) to obtain (LOC).</p>	Noted	through MOIAT e service
<p style="text-align: center;">AMC UAC.010 (C)</p> <p>b) A description of the proposed operation in company letterhead addressed to GCAA LAA, as the case,</p> <p style="color: red;">the proposal addressed to (GCAA and LAA) or (GCAA or LAA)</p>	Accepted	(GCAA or LAA)
<p style="text-align: center;">UAC.015 UA OPERATOR'S RESPONSIBILITIES</p> <p>g) vi-5) No Operation shall be conducted for Goods delivery;</p> <p style="color: red;">in the case of Goods delivery, the operator shall comply with CAR UAM or?</p>	Noted	good delivery meanwhile applicable under UA Demonstration flight regulation only

<p>UAC.025 OCCURRENCE REPORTING</p> <p>a) The operator shall report to the GCAA, any accident and serious incident, through the following hotline: +971506414667 and E-mail: aai@gcaa.gov.ae. Accidents shall be also reported to the local Emirate Police.</p> <p>add : The operator shall report to the GCAA and LAA</p>	Accepted	added
<p>UAC.030 AIRSPACE APPROVAL FOR UA OPERATIONS</p> <p>The UA operator shall obtain an UA Airspace Approval prior to any flight, the operator, unless the flight is intended to be conducted within:</p> <p>Remove :the operator</p>	Accepted	reworded
<p>GM to UAC.030</p> <p>a) Any UA Airspace Approval Application should be submitted through the GCAA or LAA E-Services, as the case.</p> <p>Does LAA have to establish an E- service?</p>	Noted	GCAA is handling and coordinating airspace approval for all emirates , the LAA can establish its own e-service in cordination with gcaa
<p>UAC.035 UA OPERATOR AUTHORISATION CONTINUED VALIDITY</p> <p>ii. The validity of GCAA or LAA Security Clearance</p> <p>Is there a requirement for the LAA Security Clearance</p>	Noted	refer to LAA of relevent emirates for registration requirement
<p>UAC.035 UA OPERATOR AUTHORISATION CONTINUED VALIDITY</p> <p>i. The GCAA is granted access, at any time, to the operator’s facility, equipment, document, records, data, procedures or any other material relevant to its activity.</p> <p>add : The GCAA and LAA</p>	Accepted	added
<p>UAD.001 ABBREVIATIONS AND DEFINITIONS</p> <p>5) GCAA Airspace Approval: An Authorisation issued by the GCAA to conduct an Unmanned Aircraft flight operation at specific time and on a specific route.</p> <p>What about LAA Airspace approval?</p>	Accepted	aispace approval definition ammended
<p>UAD.001 ABBREVIATIONS AND DEFINITIONS</p> <p>6) A demonstration flight: A special flight may be used when conducting customer demonstration flights of a new production aircraft and or other business related purposes. The purpose of Demonstration may include but not limited to: UA capability for marketing purposes, UA prototype testing including piloting for goods delivery service.</p> <p>testing should go under experimenting flights</p>	Noted	testing can fill under both categories depending on the purpose of testing

<p>UAD.015 UA OPERATORS RESPONSIBILITIES</p> <p>iii. Operation outside conditions stipulated in flying zone map in “My Drone Hub” smart phone application is not allowed. Operation outside conditions stipulated in flying zone map in “My Drone Hub” smart phone application is not allowed. repeated</p>	Accepted	reworded
<p>UAD.025 OCCURRENCE REPORTING</p> <p>The operator shall report to the GCAA, any accident and serious incident, through the following hotline: +971506414667 and E-mail: aai@gcaa.gov.ae. Accidents shall be also reported to the local Emirate Police. add : The operator shall report to the GCAA and LAA</p>	Accepted	added
<p>UAEV.010 APPLICATION FOR UOA</p> <p>5) GCAA Airspace Approval: An Authorisation issued by the GCAA to conduct an Unmanned Aircraft flight operation at specific time and on a specific route. What about LAA Airspace approval?</p>	Accepted	aispace approval definition ammended
<p>No organisation shall perform commercial UA operations without a valid UA Operator Authorisation (UOA) issued by GCAA or LAA, as the case. Replace: commercial with Drone Event</p>	Accepted	reworded
<p>UAEV.010 APPLICATION FOR UOA</p> <p>Prior applying for UOA the applicant shall obtain Letter of Conformity (LoC) from Ministry of Industry Advanced Technology (MOIAT) how to communicate with (MOIAT) to obtain (LOC).</p>	Noted	through MOIAT e service
<p>UAEV.025 OCCURRENCE REPORTING</p> <p>The operator shall report to the GCAA, any accident and serious incident, through the following hotline: +971506414667 and E-mail: aai@gcaa.gov.ae. Accidents shall be also reported to the local Emirate Police. add : The operator shall report to the GCAA and LAA</p>	Accepted	added
<p>AMC to UAEV.030</p> <p>Any UA Airspace Approval Application should be submitted through the GCAA E-Services add : GCAA or LAA</p>	Accepted	added

<p>UAEV.035 UA OPERATOR AUTHORISATION CONTINUED VALIDITY</p> <p>b) Upon revocation, the UOA shall be returned to the GCAA without delay. add : GCAA or LAA</p>	Accepted	reworded
<p>UAEX.005 ABBREVIATIONS AND DEFINITIONS</p> <p>6) GCAA Airspace Approval: An Authorisation issued by the GCAA to conduct an Unmanned Aircraft flight operation at specific time and on a specific route. What about LAA Airspace approval?</p>	Accepted	aispace approval definition ammended
<p>UAEX.010 APPLICATION FOR UOA</p> <p>Prior applying for UOA the applicant shall obtain Letter of Conformity (LoC) from Ministry of Industry Advanced Technology (MOIAT) how to communicant with (MOIAT) to obtain (LOC).</p>	Noted	through MOIAT e service
<p>UAEX.015 UA OPERATOR'S RESPONSIBILITIES</p> <p>vi.5) No Dangerous Goods shall be transported. It says that this car does not apply for goods why now it says only dangerous goods?</p>	Not Accepted	for expermentation purposes such approvals after GCAA risk assesment can be granted
<p>GM to UAEX.015 (f)</p> <p>GCAA Airspace Approval, if applicable add : GCAA or LAA</p>	Accepted	added
<p>UAEX.025 OCCURRENCE REPORTING</p> <p>The operator shall report to the GCAA, any accident and serious incident, through the following hotline: +971506414667 and E-mail: aai@gcaa.gov.ae. Accidents shall be also reported to the local Emirate Police. add : The operator shall report to the GCAA and LAA</p>	Accepted	added
<p>AMC to UAEX.025</p> <p>The following list while not exhaustive includes types of incidents involving UA Operations, which shall be reported to the GCAA (by email to aai@gcaa.gov.ae) add : GCAA or LAA</p>	Accepted	added
<p>AMC to UAEX.025</p> <p>Operation without appropriate GCAA approval; add : GCAA or LAA</p>	Accepted	added

<p>AMC to UAEX.030 All GCAA UOA holders has to comply with LAA rules and conditions, as the case. add : GCAA or LAA</p>	Accepted	added
<p>UAEX.035 UA OPERATOR AUTHORISATION CONTINUED VALIDITY iii. The GCAA is granted access, at any time, to the operator’s facility, equipment, document, records, data, procedures or any other material relevant to its activity; and add : GCAA or LAA</p>	Accepted	added
<p>UAEX.035 UA OPERATOR AUTHORISATION CONTINUED VALIDITY Upon revocation, the UOA shall be returned to the GCAA without delay. add : GCAA or LAA</p>	Accepted	Provision removed
<p>RUA.030 EMERGENCY In case of any accident or safety incident involving the UA, the UA pilot to inform the GCAA via 00971 506414667 immediately add : GCAA or LAA</p>	Accepted	added
CRD 2022-11/6		
<p>Local Appropriate Authority (LAA): Recommend removing ‘affairs’ before ‘of civil aviation...’ as affairs is repeated twice. Not required. Suggest changing to either: “The local authority having competence with regards to the affairs or civil aviation in the relevant Emirate.” or “The local authority having competence with regards to civil aviation affairs in the relevant Emirate.”</p>	Accepted	reworded
<p>UAC.010 Application for UOA a. The purpose of the language “, as the case.” is not clear and does not appear to add any value to the intent. Recommend removing or amend accordingly.</p>	Accepted	GM added for LAA definition
<p>f. Text at the start of the line requires minor editing. Suggest as follows: “Prior to applying for UOA</p>	Accepted	reworded
<p>AMC UAC.010 (c) - In previous sections “the GCAA or LAA” is used. In b. only “GCAA LAA” is used in the first line. Perhaps an “or” or an “and” is missing.</p>	Accepted	'or" added

<p>g. vi. 5) It is not clear what safety concern ‘Goods delivery’ presents above all other types of UAS operation to be singled out in this way.</p> <p>Firstly, in other jurisdictions, carriage of dangerous goods is the only limiting factor, which can be overcome by an approval from the regulator.</p> <p>Secondly, apart from very limited demonstrations or test flights, there is no use case for goods delivery limited to VLOS, so it seems a superfluous restriction.</p> <p>Thirdly, a ‘good’ and ‘delivery’ are not defined in the NPA.</p> <p>It could therefore be assumed that carriage of an article (non-dangerous) by US so long as it is not sent to a third party would still be permitted.</p> <p>We recommend more clarification is provided to better define the intent and how the UAS operator should apply, for example if wanting to operate BVLOS.</p>	<p>Noted</p>	
<p>GM UAC.040 Finding Classification and Definitions</p> <p>Regarding, column Title “Timeline for completion of actions*” by organisation, it is not clear what the ‘*’ is meant to indicate or highlight. Recommend either removing or clarifying.</p>	<p>Accepted</p>	
<p>UAD.001 Abbreviations and Definitions</p> <p>Definitions</p> <p>6) A demonstration flight: See our note above regarding the lack of a definition of ‘good’ and ‘delivery’ there seeming to be no restriction to carriage of an article during a VLOS operation (A to A) to show the capability of the UA to carry articles, even if they are not delivered over an A to B flight. Perhaps the GCAA is concerned about operations BVLOS (with or without visual observers), which would be needed for operate drone delivery of goods. We recommend the GCAA better explains and clarifies this point.</p>	<p>Noted</p>	<p>The GCAA acknowledges that the present CAR may appear restrictive regarding the transport of goods by UAS operations. While there is a provision for accepting such activities on a case-by-case basis. Future updates to the CAR will further describe more operations of this type</p>
<p>UAD.0005 Applicability</p> <p>‘purpose’ should be plural. Recommend amending to ‘purposes’</p>	<p>Accepted</p>	

<p style="text-align: center;">AMC to UAD.015 (f)</p> <p>It is not clear what proposed UAS operations would require ‘special operation approval’ as there is no definition provided to prospective applications. UAS.015 g. vi. uses the language ‘specific approval’ whereas this clause uses ‘special operation approval’, which, as drafted is therefore confusing. We recommend harmonising the language to use the same language ‘specific approval’ for consistency. The correct term for SORA is ‘Specific Operations Risk Assessment’.</p> <p style="text-align: center;">We recommend adding the ‘s’ to Operation.</p>	Accepted	operations of this type.	
<p style="text-align: center;">UAEV.001 Abbreviations and Definitions</p> <p style="text-align: center;">Definitions</p> <p>7) Local Appropriate Authority: Recommend removing ‘affairs’ before ‘of civil aviation...’ as affairs is repeated twice. Not required. Suggest changing to either: “The local authority having competence with regards to the affairs or civil aviation in the relevant Emirate.” or “The local authority having competence with regards to civil aviation affairs in the relevant Emirate.”</p>	Accepted		
<p style="text-align: center;">GM to UAEV.005 (a)</p> <p>See Skyports comments on UAC.015 UA Operators Responsibilities, g) iv) 5) above.</p>	Noted		
<p style="text-align: center;">UAEX.001 Applicability</p> <p style="text-align: center;">b) ii UA operation for Goods delivery; and</p> <p>See Skyports comments on UAC.015 UA Operators Responsibilities, g) iv) 5) above.</p>	Noted		
<p style="text-align: center;">UAEX.005 Abbreviations and Definitions</p> <p style="text-align: center;">Definitions</p> <p>7) Local Appropriate Authority: Recommend removing ‘affairs’ before ‘of civil aviation...’ as affairs is repeated twice. Not required. Suggest changing to either: “The local authority having competence with regards to the affairs or civil aviation in the relevant Emirate.” or “The local authority having competence with regards to civil aviation affairs in the relevant Emirate.”</p>	Accepted		reworded

<p>AMC to UAEX.015 (g) (v)</p> <p>It is not clear what proposed UAS operations would require ‘special operation approval’ as there is no definition provided to prospective applications. UAS.015 g. vi. uses the language ‘specific approval’ whereas this clause uses ‘special operation approval’, which, as drafted is therefore confusing. We recommend harmonising the language to use the same language ‘specific approval’ for consistency. The correct term for SORA is ‘Specific Operations Risk Assessment’.</p> <p>We recommend adding the ‘s’ to Operation.</p>	Accepted	reworded
<p>UA.012 Abbreviations and Definitions</p> <p>b) Definitions</p> <p>2) Local Appropriate Authority: Recommend removing ‘affairs’ before ‘of civil aviation...’ as affairs is repeated twice. Not required. Suggest changing to either: “The local authority having competence with regards to the affairs or civil aviation in the relevant Emirate.” or “The local authority having competence with regards to civil aviation affairs in the relevant Emirate.” 3) It is not clear what ‘the Infrastructure’ means or refers to. It is also not clear what is meant by ‘an Unmanned Aircraft Airport’. Skyports recommends some clarifications or the provision of some definitions/notes.</p>	Accepted	reworded
CRD 2022-11/02		
<p>UAC.005 APPLICABILITY</p> <p>a)This CAR prescribes the requirements to be met by organisations operating UA for commercial purposes</p> <p>b)This CAR does not apply to:</p> <p>i.UA operated by military or law enforcement agencies (state UA);</p> <p>Comments: Clarification required to capture Dubai Police law enforcement agency</p>	Not Accepted	Dubai Police is a law enforcement agency
<p>GM to UAC.005 (a)</p> <p>Commercial Operations may include but not limited to:</p> <p>Aerial Photography, Survey, Media, Agricultural, Advertisement, Inspection, Monitoring,</p> <p>provision of services</p> <p>comment: too generic</p>	Accepted	reworded

<p style="text-align: center;">UAC.010 APPLICATION FOR UOA</p> <p>a)No organisation shall perform commercial UA operations without a valid UA Operator Authorisation (UOA) issued by GCAA or LAA, as the case. b)The application for UOA or an amendment to an UOA shall be made in a form and manner established by the GCAA or LAA, as the case.</p> <p style="color: red;">comment: Clarification needed to cover if GCAA and LAA rule contradict each other, which shall prevail. i.e, GCAA rule shall be adhered to in this instance</p>	Noted	GCAA & LAA rules are harmonized.
<p style="text-align: center;">UAC.010 APPLICATION FOR UOA</p> <p>e) In order to obtain UOA the operator shall apply through GCAA or LAA registration platform</p> <p style="color: red;">comment: This would imply that you can apply for UOA to the GCAA for an operation within Dubai and do NOT require LAA(DCAA) approval. This is not the case. This wording needs correction to ensure operators do not follow solely apply through GCAA and proceed with their operation without DCAA knowledge. Whilst GCAA may immediately refer to the DCAA for approval, this should be captured either at the beginning of the document or within this section.</p>	Accepted	GM added for LAA definition
<p>f) Prior applying for UOA the applicant shall obtain Letter of Conformity (LoC) from Ministry of Industry Advanced Technology (MOIAT)</p> <p style="color: red;">comment: Is there no longer a requirement to request NOC from MOI? If not then this should be stated within the change notification.</p>	Not Accepted	process for application is described in the gcaa platform or LAA platform.
<p style="text-align: center;">UAC.015 UA OPERATOR'S RESPONSIBILITIES</p> <p>i.The UA Pilot shall give way to a UA-piloted aircraft or any manned aircraft at all times and land the UA whenever hearing or sighting a UA-piloted aircraft or any manned aircraft.</p> <p style="color: red;">Comment: IF two UA are flying in the vicinity of each other they must both land? This is what this is stating. Suggest revision of wording. i.e. maintain safe distance from each other or similar. Given that this is the Commercial operations requirements, then they would be aware of other commercial operators that are in the same area or close-by. Then this is suggesting that commercial, approved UA operations should give way and land if they encounter a hobbyist drone?</p>	Partially Accepted	reworded
<p>iv.Assessment and Authorisation of UA Pilots shall be issued before they can operate their UOA.</p> <p style="color: red;">Comment: Should this read 'exercise the privileges of their UOA license'?</p>	Not Accepted	it is an authorisation not license

<p>vi.The following limitations shall apply to any operation, unless a specific approval is issued by the GCAA or LAA, as the case:</p> <p>1)Operations shall be limited to day time; 2)Operations shall be limited to VLOS operations; 3)Operations shall be limited to 400 ft. height AGL; 4)Operations shall be limited to UA with a maximum take-off mass of 25kg; and 5) No Operation shall be conducted for Goods delivery</p> <p>comment: There are no commercial UAS operations permitted to take place in the Emirate of Dubai 'without' prior approval from the DCAA. Are there instances where commercial UAS operations take place in Abu Dhabi where GCAA approval is not required? If not, then suggest this is either removed or clarified. It currently suggests that if you are an approved operator and you comply with these rules you can fly whenever you choose...? See comment above regarding GCAA/DCAA approvals. Suggest clarifying</p>	<p>Not Accepted</p>	<p>Refer to UAC.030 Airspace Approval For UA operations.</p>
<p>d) UA Pilots authorisation and assessment. Comment: License?</p>	<p>Not Accepted</p>	<p>it is an authorisation not license</p>
<p>AMC to UAC.015 (g) (vi)</p> <p>In order to obtain special operation approval, the operator should submit a Specific Operation Risk Assessment (SORA) for GCAA or LAA, as the case, to evaluate and authorise the operations. Through SORA the operator should demonstrate that the operation can be conducted with an acceptable level of safety</p> <p>comment: This is very vague, and also would require the construct within the organisation to manage it This is extremely subjective. There are no guidelines or requirements for compliance with any ICAO or UAE CAR Risk assessment methodology or risk classification tables. Whilst this is still a correct statement there is no further reference material or guidance with regards to SMS or risk management requirements for Commercial UAS operations.</p>	<p>Accepted</p>	<p>The operator may provide any risk type methodology.</p>
<p>b)The use of aerial photographic apparatus installed on the UA shall not be permitted without a prior authorisation from the Security Sector within the GCAA or LAA. Comment: MOI? MOIAT? Clarification needed</p>	<p>Noted</p>	<p>AVSEC sector within GCAA. Refer to LAA</p>

<p style="text-align: center;">UAC.025 OCCURRENCE REPORTING</p> <p>a)The operator shall report to the GCAA, any accident and serious incident, through the following hotline: +971506414667 and E-mail: aai@gcaa.gov.ae. Accidents shall be also reported to the local Emirate Police.</p> <p>b)The report shall contain all pertinent information, known to the operator, about the accident or serious incident. Reports shall be made within 48 hours from the accident/ serious incident takes place,</p> <p>c)Where relevant, the operator shall produce a follow-up report to provide details of actions it intends to take to prevent similar occurrences in the future.</p> <p style="color: red;">comment: Why is this different to manned? Why does it not align with 3 hours for accident?</p>	Accepted	aligned
<p style="text-align: center;">AMC to UAC.025</p> <p>The following list while not exhaustive includes types of incidents involving UA Operations, which should be reported to the GCAA (by email to aai@gcaa.gov.ae):</p> <p style="color: red;">comment: Reporting of incidents and accidents is not optional within existing aviation regulations. It 'should' be mandatory for all types of aircraft safety events. This wording is very weak. If a commercial UAS crashes as per point a), then filing a safety report has to be mandatory and the would 'should' changed to 'shall'.</p>	Noted	refer to UAC.025
<p style="text-align: center;">UAC.030 AIRSPACE APPROVAL FOR UA OPERATIONS</p> <p>The UA operator shall obtain an UA Airspace Approval prior to any flight, , unless the flight is intended to be conducted within:</p> <p style="color: red;">comment: As per UAC 015, g, vi, this is now contradictory as previously commented above. This is now stating that there is approval required for all flights as per the existing regulations.</p>	Noted	reworded
<p>b)Exterior Building Airspace: Airspace within 10 meters off the facade or 5 meters above the roof of a building provided the building is located outside any airport boundary/fence. If the building is associated with heliport then a prior approval from the heliport operator shall be obtained.</p> <p style="color: red;">comment: This is in contradiction of DCAA regulations and these flights would still need a DCAA approval to fly. Please add an LAA caveat or reword to include LAA regulations.</p>	Not Accepted	No contradiction between Federal & any Emirate Law. Kindly refer to (GM to UAC.001 (b) Definitions (7))
<p>c)Drone Fly Zone: Airspace coloured as indicated on the Drone Flying Zone Map on My Drone Hub Application.</p> <p style="color: red;">Comment: Is the word 'green' missing from this sentence? As there is no key on the my drone hub application indicating a drone fly zone. Additionally these flights would still need LAA approval within Dubai. Please add LAA caveat or similar.</p>	Partially Accepted	reworded

<p>c)All GCAA UOA holders has to comply with LAA rules and conditions, as the case. comment: This should be stated at the beginning of this document, not towards the end.</p>	Accepted	adjusted
<p>ii.The validity of GCAA or LAA Security Clearance. Comment: Security clearance is very vague, this could be interpreted as meaning a military or Police NOC and not, as is the assumption, the MOI/MOIAT(?) approval to fly?</p>	Not Accepted	process for application is described in the gcaa platform or LAA platform.
<p>ii.The UOA not being surrendered, suspended or revoked. Upon suspension or revocation, the UOA shall be returned to the GCAA without delay. Comment: The UAO is hard copy and not digital?</p>	Accepted	reworded
<p>GM UAC.040 Finding Classification & Definitions: comment: The numbers are missing from the Level categories. Final description box has a formatting error</p>	Accepted	typo fixed
<p>UAD.010 APPLICATION FOR UOA f) Prior to applying for UOA the applicant shall obtain Letter of Conformity LoC from Ministry of Industry Advanced Technology. Comment: See comment above re MOI clarification and not being applicable anymore(?)</p>	Not Accepted	process for application is described in the gcaa platform or LAA platform.
<p>UAD.015 UA OPERATORS RESPONSIBILITIES Following limitations shall apply to any operation unless a specific approval is issued by the GCAA or LAA, as the case: i.Operations shall be limited to day time; ii.Operations shall be limited to UA with a maximum take-off mass of 25kg; iii.Operation outside conditions stipulated in flying zone map in “My Drone Hub” smart phone application is not allowed. Operation outside conditions stipulated in flying zone map in “My Drone Hub” smart phone application is not allowed. iv.No Dangerous Good shall be transported by air unless permitted by the GCAA. comment: See comment above. This needs further clarification and restrictive wording to prevent flights being conducted without LAA approval</p>	Accepted	reworded

<p>AMC to UAD.015 (f)</p> <p>in order to obtain special operation approval, the operator shall submit a specific operation risk assessment (SORA) for GCAA or local LAA authority, as the case, to evaluate and authorise the operations. Through SORA the operator shall demonstrate that the operation can be conducted with an acceptable level of safety.</p> <p>comment: Should replaced with shall twice</p>	Accepted	reworded
<p>GM to UAD.030</p> <p>c)All GCAA UOA holders has to comply with LAA rules and conditions, as the case.</p> <p>comment: As above and with all CAR UA documents this should be stated at the beginning of the document and not the end</p>	Not Accepted	provision deleted
<p>UAD.040 UA OPERATOR AUTHORISATION (UOA) FOR DEMONSTRATION CONTINUED VALIDITY</p> <p>ii.The validity of GCAA or LAA Security Clearance.</p> <p>Comment: As above, this is too vague</p>	Not Accepted	repeated
<p>AMC to UAEV.025</p> <p>The following list while not exhaustive includes types of incidents involving UA Operations, which shall be reported to the GCAA (by email to aai@gcaa.gov.ae</p> <p>comment: This is contained in the other CAR UA documents as should and not shall. Suggest other documents are aligned with this one.</p>	Not Accepted	this CAR will be aligned with other UA CAR's
<p>AMC to UAEX.015 (g) (vi)</p> <p>in order to obtain special operation approval, the operator should submit a specific operation risk assessment (SORA) for GCAA or local competent authority, as the case, to evaluate and authorise the operations. Through SORA the operator should demonstrate that the operation can be conducted with an acceptable level of safety</p> <p>comment: Comment same as above in other CAR's. replace should with shall. This cannot be optional</p>	Not Accepted	Shall can't be used in AMC
<p>2.Direct radio control link shall be maintained</p> <p>3.between UA Pilot and the UA</p> <p>comment: This has been added as point 3, when it is the second part of the sentence from point 2</p>	Noted	amended
<p>General – applicable to all</p> <p>1.ANSP plays a significant role in ensuring the safety of the UAE airspace by providing ATS and IFP services. The proposed CAR does not cater/involve ANSP in any process; hence it might result in approving UA operations (by GCAA or LAA) without consultation with ANSP and lead to serious aviation incidents.</p>	Noted	ANSPs are already involved within internal local CAA process and communication

<p>2. According to the CAR, LAA can approve UOA applications and flights – when it's not identified who LAA is and whether LAA will have certification or audit from GCAA. Or how will it be ensured that LAA follows GCAA regulations? In case of a dispute with LAA, who should be contacted?</p>	<p>Not Accepted</p>	<p>The LAA is referred to in the definitions. The federal and Emirate levels have harmonized their rules and regulations. The appropriate escalation channel should be followed.</p>
<p>3. Proposed CARs do not provide clear guidance, will cause a misinterpretation and might lead to events. The proposal is to develop CAR further, involving ANSP and local CAA in consultations</p>	<p>Not Accepted</p>	<p>all stakeholders including the public were consulted through the NPA process.</p>
<p>4. CAR DEF defines RPAS and does not have the definition of UA when proposed CARs use UA and does not have the definition of RPA. Propose to use ICAO standard definitions.</p>	<p>Not Accepted</p>	<p>kindly refer to CAR DEF "how to read definitions"</p>
<p>5. Most of the text regulations in all CARs are repetitive. Suggest restructuring the CAR by introducing the general part, which will be applied to all types of UA activity, this will avoid repetition in each CAR.</p>	<p>Noted</p>	<p>The segmented CAR's for each activity is introduced after industry feedback.</p>
<p>6. Even though most of the regulations are repetitive, the editorial difference persists, for example: a) Only UAEV has Foreword b) All CARs named UA – C (Commercial), D (demonstration), EV (Event), EX Experimentation and only – Recreational (RUA) has different abbreviation if the pattern above is followed, it should be UA -R/RE (Recreational) c) Numbering and sequence are to be revised</p>	<p>Accepted</p>	<p>reworded</p>
<p>7. Roles, responsibilities of the below listed authorities are not clearly described: "GCAA" "LAA" "any other Agencies" "Security Sector"</p>	<p>Accepted</p>	<p>roles and responsibilities are clarified within the regulations in the CAR.</p>

<p>8.It is not clear what the difference is between: “Airspace Approval” (Ref: UAEV.30) “GCAA operation approval” “Appropriate GCAA approval” (Ref AMC to UAEV.025) “UA Operational Approval” (Ref: UAEV.30) (abbreviated but not defined) “UA Airspace Approval” (Ref: UAEV.30) “UA Operator Authorization” (Ref: UAEV.35) “GCAA or LAA Security Clearance” (Ref: UAEV.35) “GCAA Airspace Approval” (Ref: UAEX.005 b) 6) “Special Operational Approval” (Ref: AMC to UAEX015(g) (vi))</p>	Accepted	reworded
<p>9. According to the CAR LAA can approve UOA applications, flights – when its not clearly identified who are LAA and whether LAA will have certification or audit from GCAA. Or how will it be ensured that LAA follows GCAA regulations?</p>	Not Accepted	The LAA is referred to in the definitions. The federal and Emirate levels have harmonized their rules and regulations. The appropriate escalation channel should be followed.
<p>10. Proposed CARs do not provide clear guidance and will cause a misinterpretation and lead to events. Propose to develop further them involving ANSP, local CAA in consultations.</p>	Not Accepted	comment can be considered in the next revisions
<p>11. Below table represents the requirements imposed by CARs; these requirements could be revised to align them.</p>	Partially Accepted	refer to NPA 2022-11 CRD 4
<p>Specific comments 1.UAEX.010 CAR refers to GCAA or LAA Registration platform. Can the link to this platform be mentioned in CAR?</p>	Not Accepted	Links might change with updates.
<p>UAEX.015 UA Operators Responsibility Statement: g) i.) The UA Pilot shall give way to a UA-piloted aircraft or any manned aircraft at all times and land the UA whenever hearing or sighting a UA-piloted aircraft or any manned aircraft. Comment: The regulation above can be enhanced by adding the rule of how UA pilots shall give a way to another UAE pilot.</p>	Accepted	reworded

<p>AMC to UAEX.015 e (iv)</p> <p>Statement: b) The assessment should determine if a UA Pilot is competent to perform the intended operation and possess the skills and knowledge about law, regulations and procedures. Comment: The proposed regulation does not define who is responsible for conducting the assessment, the requirements for the assessment and how the results of the assessment will be presented to GCAA or LAA.</p>	Accepted	requirement added
<p>UAEX.030 AIRSPACE APPROVAL FOR UA OPERATIONS</p> <p>Statement: Prior to any flight, the operator shall obtain an UA Airspace Approval, unless the flight is intended to be conducted within:</p> <p>Comment: The regulation above does not define which organisation issues UA Airspace Approval and does not describe the process for obtaining it. ANSP plays a major role in ensuring the safety of the UAE airspace through the provision of ATS and IFP services. The proposed CAR do not cater/involve ANSP in any process; hence it might result in approving UA operation (by GCAA or LAA) without consultation with ANSP and lead to serious aviation incident.</p>	Noted	ANSPs are already involved within internal local CAA process and communication
<p>RUA.010 UA Registration</p> <p>Statement: Prior any Unmanned Aircraft (UA) activity or operation, the owner shall register the UA through the GCAA or local appropriate authority (LAA) registration platform, as the case, the owner shall provide the following : - a Letter of conformity from Ministry of Industry & Advanced Technology (MOIAT)</p> <p>Comment: Only RUA describes and requires UA registration</p>	Accepted	added
<p>RUA.015 Pilot License</p> <p>Only RUA describes and requires a Pilot license</p>	Accepted	added
CRD 2022-11/5		
<p>Concerns of Dubai Air Navigation Services</p> <p>1. ANSP plays a significant role in ensuring the safety of the UAE airspace by providing ATS and IFP services. The proposed CAR does not cater/involve ANSP in any process; hence it might result in approving UA operations (by GCAA or LAA) without consultation with ANSP and lead to serious aviation incidents.</p>	Not Accepted	ANSPs are already involved within internal local CAA process and communication

<p>2. According to the CAR, LAA can approve UOA applications and flights – when it's not identified who LAA is ?, and whether LAA will have certification or audit from GCAA ? Or how will it be ensured that LAA follows GCAA regulations? In case of a dispute with LAA, who should be contacted?</p>	<p>Not Accepted</p>	<p>The LAA is referred to in the definitions. The federal and Emirate levels have harmonized their rules and regulations. The appropriate escalation channel should be followed.</p>
<p>3. Proposed CARs do not provide clear guidance, will cause a misinterpretation and might lead to events. The proposal is to develop CAR further, involving ANSP and local CAA in consultations.</p>	<p>Not Accepted</p>	<p>all stakeholders including the public were consulted through the NPA process.</p>
<p>GENERAL COMMENTS 1) CAR DEF defines RPAS and does not have the definition of UA when proposed CARS uses UA and does not the definition of RPA. Propose to use ICAO standard definitions.</p>	<p>Not Accepted</p>	<p>kindly refer to CAR DEF "how to read definitions"</p>
<p>2) Most of the text regulations in all CARs are repetitive. Suggest restructuring the CAR by introducing the general part, which will be applied to all types of UA activity, this will avoid repetition in each CAR.</p>	<p>Not Accepted</p>	<p>The segmented CAR's for each activity is introduced after industry feedback.</p>
<p>3)Even though most of the regulations are repetitive, the editorial difference persists, for example: a)Only UAEV has Foreword b)All CARs named UA – C (Commercial), D (demonstration), EV (Event), EX Experimentation and only – Recreational (RUA) has different abbreviation if the pattern above is followed, it should be UA -R/RE (Recreational) c)Numbering and sequence are to be revised</p>	<p>Noted</p>	<p>reworded</p>
<p>4)Roles, responsibilities of the below listed authorities are not clearly described: - GCAA - LAA - any other Agencies - Security Sector</p>	<p>Accepted</p>	<p>Roles, responsibilities of the below listed authorities are not clearly describe</p>

<p>5)It is not clear what the difference is between: -“Airspace Approval” (Ref: UAEV.30) -“GCAA operation approval” -“Appropriate GCAA approval” (Ref AMC to UAEV.025) -“UA Operational Approval” (Ref: UAEV.30) (abbreviated but not defined) -“UA Airspace Approval” (Ref: UAEV.30) -“UA Operator Authorization” (Ref: UAEV.35) -“GCAA or LAA Security Clearance” (Ref: UAEV.35) -“GCAA Airspace Approval” (Ref: UAEX.005 b) 6) -“Special Operational Approval” (Ref: AMC to UAEX015(g) (vi))</p>	Accepted	reworded
<p>6)According to the CAR LAA can approve UOA applications, flights – when its not clearly identified who are LAA and whether LAA will have certification or audit from GCAA. Or how will it be ensured that LAA follows GCAA regulations?</p>	Not Accepted	<p>The LAA is referred to in the definitions. The federal and Emirate levels have harmonized their rules and regulations. The appropriate escalation channel should be followed.</p>
<p>7)Proposed CARs do not provide clear guidance and will cause a misinterpretation and lead to events. Propose to develop them further involving ANSP, local CAA in consultations.</p>	Not Accepted	comment can be considered in the next revisions
CRD 2022-11/03		
<p style="text-align: center;">SPECIFIC COMMENTS UAC.005 APPLICABILITY</p> <p>a)This CAR prescribes the requirements to be met by organisations operating UA for commercial purposes b)This CAR does not apply to: i.UA operated by military or law enforcement agencies (state UA); DANS Comments : Clarification required to capture Dubai Police law enforcement agency</p>	Not Accepted	Dubai Police is a law enforcement agency
<p style="text-align: center;">GM to UAC.005 (a)</p> <p>Commercial Operations may include but not limited to: Aerial Photography, Survey, Media, Agricultural, Advertisement, Inspection, Monitoring, provision of services DANS Comments : Too generic. Require further clarification !</p>	Accepted	reworded

<p style="text-align: center;">UAC.010 APPLICATION FOR UOA</p> <p>a) No organisation shall perform commercial UA operations without a valid UA Operator Authorisation (UOA) issued by GCAA or LAA, as the case.</p> <p>b) The application for UOA or an amendment to an UOA shall be made in a form and manner established by the GCAA or LAA, as the case.</p> <p style="color: red;">DANS Comments : Clarification needed to cover if GCAA and LAA rule contradict each other, which shall prevail. i.e, GCAA rule shall be adhered to in this instance</p>	<p style="text-align: center;">Not Accepted</p>	<p style="text-align: center;">GCAA & LAA rules are harmonized.</p>
<p style="text-align: center;">UAC.010 APPLICATION FOR UOA</p> <p>e) In order to obtain UOA the operator shall apply through GCAA or LAA registration platform</p> <p style="color: red;">DANS Comments : This would imply that you can apply for UOA to the GCAA for an operation within Dubai and do NOT require LAA(DCAA) approval. This is not the case. This wording needs correction to ensure operators do not follow solely apply through GCAA and proceed with their operation without DCAA knowledge. Whilst GCAA may immediately refer to the DCAA for approval, this should be captured either at the beginning of the document or within this section.</p>	<p style="text-align: center;">Accepted</p>	<p style="text-align: center;">GM added for LAA definition</p>
<p style="text-align: center;">UAC.010 APPLICATION FOR UOA</p> <p>f) Prior applying for UOA the applicant shall obtain Letter of Conformity (LoC) from Ministry of Industry Advanced Technology (MOIAT)</p> <p style="color: red; text-align: center;">DANS Comments :</p> <p style="color: red; text-align: center;">Is there no longer a requirement to request NOC from MOI? If not, then this should be stated within the change notification.</p>	<p style="text-align: center;">Not Accepted</p>	<p style="text-align: center;">process for application is described in the gcaa platform or LAA platform.</p>

<p style="text-align: center;">UAC.015 UA OPERATOR'S RESPONSIBILITIES</p> <p>g) In addition to the flying condition stipulated in My Drone Hub smart phone application and UOA certificate, the operator shall establish and implement procedures for the safe operation including the following:</p> <p>i The UA Pilot shall give way to a UA-piloted aircraft or any manned aircraft at all times and land the UA whenever hearing or sighting a UA-piloted aircraft or any manned aircraft.</p> <p>DANS Comments : If two UA are flying in the vicinity of each other they must both land? This is what this is stating. Suggest revision of wording. i.e. maintain safe distance from each other or similar. Given that this is the Commercial operations requirements, then they would be aware of other commercial operators that are in the same area or close-by. Then this is suggesting that commercial, approved UA operations should give way and land if they encounter a hobbyist drone?</p>	Partially Accepted	reworded
<p style="text-align: center;">UAC.015 UA OPERATOR'S RESPONSIBILITIES</p> <p>iv. Assessment and Authorisation of UA Pilots shall be issued before they can operate their UOA.</p> <p>DANS Comments : Should this read 'exercise the privileges of their UOA license'?</p>	Not Accepted	it is an authorisation not license

<p style="text-align: center;">UAC.015 UA OPERATOR'S RESPONSIBILITIES</p> <p>g) In addition to the flying condition stipulated in My Drone Hub smart phone application and UOA certificate, the operator shall establish and implement procedures for the safe operation including the following:</p> <p>vi. The following limitations shall apply to any operation, unless a specific approval is issued by the GCAA or LAA, as the case:</p> <ol style="list-style-type: none"> 1) Operations shall be limited to day time; 2) Operations shall be limited to VLOS operations; 3) Operations shall be limited to 400 ft. height AGL; 4) Operations shall be limited to UA with a maximum take-off mass of 25kg; and 5) No Operation shall be conducted for Goods delivery <p style="text-align: center;">DANS Comments :</p> <p>There are no commercial UAS operations permitted to take place in the Emirate of Dubai 'without' prior approval from the DCAA. Are there instances where commercial UAS operations take place in Abu Dhabi where GCAA approval is not required? If not, then suggest this is either removed or clarified. It currently suggests that if you are an approved operator and you comply with these rules you can fly whenever you choose...?</p> <p>Clarification needed to cover if GCAA and LAA rule contradict each other, which shall prevail. i.e, GCAA rule shall be adhered to in this instance?</p>	<p>Not Accepted</p>	<p>Refer to UAC.030 Airspace Approval For UA operations.</p>
<p style="text-align: center;">AMC to UA 015 (f)</p> <p>Records should be composed of but not limited to the following:</p> <p>b) GCAA or LAA Airspace Approval, if applicable</p> <p style="text-align: center;">DANS Comments :</p> <p>There are no commercial UAS operations permitted to take place in the Emirate of Dubai 'without' prior approval from the DCAA. Are there instances where commercial UAS operations take place in Abu Dhabi where GCAA approval is not required? If not, then suggest this is either removed or clarified. It currently suggests that if you are an approved operator and you comply with these rules you can fly whenever you choose...?</p> <p>Clarification needed to cover if GCAA and LAA rule contradict each other, which shall prevail. i.e, GCAA rule shall be adhered to in this instance?</p>	<p>Not Accepted</p>	<p>Refer to UAC.030 Airspace Approval For UA operations.</p>

<p>AMC to UA 015 (f) Records should be composed of but not limited to the following: d) UA Pilots authorisation and assessment. DANS Comments : Assessment - License?</p>	Accepted	license introduced
<p>AMC to UAC.015 (g) (vi) In order to obtain special operation approval, the operator should submit a Specific Operation Risk Assessment (SORA) for GCAA or LAA, as the case, to evaluate and authorise the operations. Through SORA the operator should demonstrate that the operation can be conducted with an acceptable level of safety DANS Comments : This is very vague, and also would require the construct within the organisation to manage it. Acceptable level of safety: This is extremely subjective. There are no guidelines or requirements for compliance with any ICAO or UAE CAR Risk assessment methodology or risk classification tables. Whilst this is still a correct statement there is no further reference material or guidance with regards to SMS or risk management requirements for Commercial UAS operations.</p>	Accepted	The operator may provide any risk type methodology.
<p>UAC.020 SECURITY RULES The operators shall ensure: a) Compliance with any security requirement mandated by the GCAA or LAA or any other agencies. b) The use of aerial photographic apparatus installed on the UA shall not be permitted without a prior authorization authorisation from the Security Sector within the GCAA or LAA. DANS Comments : Security Sector - MOI? MOIAT? Clarification needed</p>	Noted	Security Sector within the GCAA or LAA

<p style="text-align: center;">UAC.025 OCCURRENCE REPORTING</p> <p>a)The operator shall report to the GCAA, any accident and serious incident, through the following hotline: +971506414667 and E-mail: aai@gcaa.gov.ae. Accidents shall be also reported to the local Emirate Police.</p> <p>b) The report shall contain all pertinent information, known to the operator, about the accident or serious incident. Reports shall be made within 48 hours from the accident/ serious incident takes place,</p> <p>c) Where relevant, the operator shall produce a follow-up report to provide details of actions it intends to take to prevent similar occurrences in the future.</p> <p>DANS Comments : Why is this different to manned? Why does it not align with 3 hours for accident?</p>	Accepted	aligned
<p style="text-align: center;">AMC to UAC.025</p> <p>The following list while not exhaustive includes types of incidents involving UA Operations, which should be reported to the GCAA (by email to aai@gcaa.gov.ae):</p> <p>a)Crashes</p> <p>b)Interferences with signal or control of UA.</p> <p>c)Near miss with a manned aircraft or other UA;</p> <p>d)Collisions with other objects;</p> <p>e)Operation without appropriate GCAA approval;</p> <p>f)Operation which results in a public nuisance.</p> <p>DANS Comments : Reporting of incidents and accidents is not optional within existing aviation regulations. It 'should' be mandatory for all types of aircraft safety events. This wording is very weak. If a commercial UAS crashes as per point a), then filing a safety report has to be mandatory and the would 'should' changed to 'shall'.</p>	Noted	refer to UAC.025
<p style="text-align: center;">UAC.030 AIRSPACE APPROVAL FOR UA OPERATIONS</p> <p>The UA operator shall obtain an UA Airspace Approval prior to any flight, the operator, unless the flight is intended to be conducted within:</p> <p>DANS Comments : As per UAC 015, g, vi, this is now contradictory as previously commented above. This is now stating that there is approval required for all flights as per the existing regulations.</p>	Accepted	reworded

<p>UAC.030 AIRSPACE APPROVAL FOR UA OPERATIONS</p> <p>b)Exterior Building Airspace: Airspace within 10 meters off the facade or 5 meters above the roof of a building provided the building is located outside any airport boundary/fence. If the building is associated with heliport then a prior approval from the heliport operator shall be obtained.</p> <p>DANS Comments : This is in contradiction of DCAA regulations and these flights would still need a DCAA approval to fly. Please add an LAA caveat or reword to include LAA regulations.</p>	Accepted	No contradiction between Federal & any Emirate Law. Kindly refer to (GM to UAC.001 (b) Definitions (7))
<p>UAC.030 AIRSPACE APPROVAL FOR UA OPERATIONS</p> <p>c)Drone Fly Zone: Airspace coloured as indicated on the Drone Flying Zone Map on My Drone Hub Application.</p> <p>DANS Comments : Is the word 'green' missing from this sentence? As there is no key on the my drone hub application indicating a drone fly zone. Additionally these flights would still need LAA approval within Dubai. Please add LAA caveat or similar</p>	Partially Accepted	reworded
<p>GM to UAC.030</p> <p>d)All GCAA UOA holders has to comply with LAA rules and conditions, as the case.</p> <p>DANS Comments : This should be stated at the beginning of this document, not towards the end.</p>	Accepted	adjusted
<p>UAC.035 UA OPERATOR AUTHORISATION CONTINUED VALIDITY</p> <p>a)The UA Operator Authorisation (UOA) shall be valid for one year and its validity is subject to:</p> <p>ii.The validity of GCAA or LAA Security Clearance.</p> <p>DANS Comments : Security clearance is very vague, this could be interpreted as meaning a military or Police NOC and not, as is the assumption, the MOI/MOIAT(?) approval to fly?</p>	Not Accepted	process for application is described in the gcaa platform or LAA platform.
<p>UAC.035 UA OPERATOR AUTHORISATION CONTINUED VALIDITY</p> <p>a)The UA Operator Authorisation (UOA) shall be valid for one year and its validity is subject to:</p> <p>ii.The UOA not being surrendered, suspended or revoked.</p> <p>Upon suspension or revocation, the UOA shall be returned to the GCAA without delay.</p> <p>DANS Comments : The UAO is hard copy and not digital?</p>	Accepted	reworded

<p>GM UAC.040 Finding Classification & Definitions: (the table) DANS Comments : The numbers are missing from the Level categories. The final description box has a formatting error.</p>	Accepted	typo fixed
<p>UAD.001 ABBREVIATIONS For the purposes of this Chapter, the following abbreviations and definitions apply: Abbreviations 1)UA: Unmanned Aircraft 2)VLOS: Visual Line of Sight 3)UOA: UA Operator Authorisation 4)MOIAT: Ministry of Industry and Advanced Technology 5) LoC: Letter of Conformity 6) LAA: Local Appropriate Authority DANS Comments : Numbering formatting error</p>	Accepted	typo fixed
<p>UAD.010 APPLICATION FOR UOA f) Prior to applying for UOA the applicant shall obtain Letter of Conformity LoC from Ministry of Industry Advanced Technology. DANS Comments: See comment above re MOI clarification and not being applicable anymore(?). Is there no longer a requirement to request NOC from MOI? If not, then this should be stated within the change notification.</p>	Noted	process for application is described in the gcaa platform or LAA platform.

<p style="text-align: center;">UAD.015 UA OPERATORS RESPONSIBILITIES</p> <p>Following limitations shall apply to any operation unless a specific approval is issued by the GCAA or LAA, as the case:</p> <ul style="list-style-type: none"> i. Operations shall be limited to day time; ii. Operations shall be limited to UA with a maximum take-off mass of 25kg; iii. Operation outside conditions stipulated in flying zone map in “My Drone Hub” smart phone application is not allowed. Operation outside conditions stipulated in flying zone map in “My Drone Hub” smart phone application is not allowed. iv. No Dangerous Goods shall be transported by air unless permitted by the GCAA. <p>DANS Comments: There are no commercial UAS operations permitted to take place in the Emirate of Dubai 'without' prior approval from the DCAA. Are there instances where commercial UAS operations take place in Abu Dhabi where GCAA approval is not required? If not, then suggest this is either removed or clarified. It currently suggests that if you are an approved operator and you comply with these rules you can fly whenever you choose...?</p> <p>Clarification needed to cover if GCAA and LAA rule contradict each other, which shall prevail. i.e, GCAA rule shall be adhered to in this instance?</p> <p>This needs further clarification and restrictive wording to prevent flights being conducted without LAA approval.</p>	<p style="text-align: center;">Not Accepted</p>	<p style="text-align: center;">Refer to UAC.030 Airspace Approval For UA operations.</p>
<p style="text-align: center;">AMC to UAD.015 (f)</p> <p>In order to obtain special operation approval, the operator should submit a specific operation risk assessment (SORA) for GCAA or local LAA authority, as the case, to evaluate and authorise the operations. Through SORA the operator should demonstrate that the operation can be conducted with an acceptable level of safety.</p> <p>DANS Comments : Should be replaced with shall twice</p>	<p style="text-align: center;">Accepted</p>	<p style="text-align: center;">reworded</p>

<p style="text-align: center;">UAD.025 OCCURRENCE REPORTING</p> <p>a)The operator shall report to the GCAA, any accident and serious incident, through the following hotline: +971506414667 and E-mail: aai@gcaa.gov.ae. Accidents shall be also reported to the local Emirate Police.</p> <p>b)The report shall contain all pertinent information, known to the operator, about the accident or serious incident. Reports shall be made within 48 hours from the accident/ serious incident takes place,</p> <p>c)Where relevant, the organisation shall produce a follow-up report to provide details of actions it intends to take to prevent similar occurrences in the future.</p> <p>DANS Comments :Why is this different to manned? Why does it not align with 3 hours for accident?</p>	Accepted	aligned
<p style="text-align: center;">UAD.030 AIRSPACE APPROVAL FOR UA OPERATIONS</p> <p>The UA operator shall obtain an UA Airspace Approval prior to any flight, the operator, unless the flight is intended to be conducted within:</p> <p>b)Exterior Building Airspace: Airspace within 10 meters off the facade or 5 meters above the roof of a building provided the building is located outside any airport boundary/fence. If the building is associated with heliport then a prior approval from the heliport operator shall be obtained.</p> <p>DANS Comments : This is in contradiction of DCAA regulations and these flights would still need a DCAA approval to fly. Please add an LAA caveat or reword to include LAA regulations.</p>	Not Accepted	No contradiction between Federal & any Emirate Law. Kindly refer to (GM to UAC.001 (b) Definitions (7))
<p style="text-align: center;">GM to UAD.030</p> <p>a)Any UA Airspace Approval Application should be submitted through the GCAA or LAA E-Services, as the case.</p> <p>c)All GCAA UOA holders has to comply with LAA rules and conditions, as the case.</p> <p>DANS Comments : As above and with all CAR UA documents this should be stated at the beginning of the document and not the end</p>	Accepted	provision deleted

<p>UAD.040 UA OPERATOR AUTHORISATION (UOA) FOR DEMONSTRATION CONTINUED VALIDITY</p> <p>a)The UA Operator Authorisation (UOA) for demonstration shall be based on one off basis or as accepted by the GCAA. ii.The validity of GCAA or LAA Security Clearance.</p> <p>DANS Comments : As above, Security clearance is too vague</p>	<p>Not Accepted</p>	<p>repeated</p>
<p>UAEV.001 ABBREVIATIONS AND DEFINITIONS</p> <p>For the purposes of this Chapter, the following abbreviations and definitions apply</p> <p>Abbreviations</p> <p>1)UA: Unmanned Aircraft. 2)VLOS: Visual Line of Sight. 3)UOA: UA Operator Authorisation. 4)MOIAT: Ministry of Industry and Advanced Technology 5) LoC: Letter of Conformity 6)LAA: Local Appropriate Authority</p> <p>DANS Comments : Numbering formatting error</p>	<p>Accepted</p>	<p>numberring fixed</p>
<p>UAEV.020 SECURITY RULES</p> <p>The Event Organiser shall ensure:</p> <p>b)The use of aerial photographic apparatus installed on the UA shall not be permitted without a prior authorization from the Security Sector within the GCAA or LAA</p> <p>DANS Comments : Security Sector - MOI? MOIAT? Clarification needed</p>	<p>Not Accepted</p>	<p>Security Sector within the GCAA or LAA</p>

<p style="text-align: center;">UAEV.025 OCCURRENCE REPORTING</p> <p>a)The operator shall report to the GCAA, any accident and serious incident, through the following hotline: +971506414667 and E-mail: aai@gcaa.gov.ae. Accidents shall be also reported to the local Emirate Police.</p> <p>b)The report shall contain all pertinent information, known to the operator, about the accident or serious incident. Reports shall be made within 48 hours from the accident/ serious incident takes place,</p> <p>c)Where relevant, the organisation shall produce a follow-up report to provide details of actions it intends to take to prevent similar occurrences in the future.</p> <p>DANS Comments : Why is this different to manned? Why does it not align with 3 hours for accident? especially as these are related to events with potentially more risk to life.</p>	Accepted	aligned
<p style="text-align: center;">AMC to UAEV.025</p> <p>The following list while not exhaustive includes types of incidents involving UA Operations, which shall be reported to the GCAA (by email to aai@gcaa.gov.ae):</p> <p>a)Crashes</p> <p>b)Interferences in signal or control of UA.</p> <p>c)near miss with a manned aircraft or other UA;</p> <p>d)Collisions with other objects;</p> <p>e)Operation without appropriate GCAA approval;</p> <p>f)Operation which results in a public nuisance.</p> <p>DANS Comments: This is contained in the other CAR UA documents as should and not shall. Suggest other documents are aligned with this one</p>	Not Accepted	this CAR will be aligned with other UA CAR's

<p style="text-align: center;">UAEV.030 AIRSPACE APPROVAL FOR UA OPERATIONS</p> <p>A UA operator intending to operate in Emirate FIR shall obtain an UA Operational Approval prior to any flight, unless the intended flight will be conducted within:</p> <p>b)Drone Fly Zone: Airspace coloured as indicated on the Drone Flying Zone Map on My Drone Hub Application. Operation outside conditions stipulated in flying zone map in “My Drone Hub” smart phone application is not allowed.</p> <p>DANS Comments : Is the word 'green' missing from this sentence? As there is no key on the my drone hub application indicating a drone fly zone. Additionally these flights would still need LAA approval within Dubai. Please add LAA caveat or similar.</p>	Accepted	reworded
<p style="text-align: center;">UAEX.005 ABBREVIATIONS AND DEFINITIONS</p> <p>a)Abbreviations</p> <p>6)UA: Unmanned Aircraft</p> <p>7)VLOS: Visual Line of Sight</p> <p>8)UOA: UA Operator Authorisation</p> <p>9)MOIAT: Ministry of Industry and Advanced Technology 10) LoC: Letter of Conformity</p> <p>11) LAA: Local Appropriate Authority</p> <p>DANS Comments : Is there no longer a requirement to request NOC from MOI? If not, then this should be stated within the change notification.</p>	Noted	process for application is described in the gcaa platform or LAA platform.
<p style="text-align: center;">UAEX.010 APPLICATION FOR UOA</p> <p>b)The application for UOA or an amendment to an UOA shall be made in a form and manner established by the GCAA or LAA.</p> <p>DANS Comments : CAR refers to GCAA or LAA Registration platform. Can the link to this platform be mentioned in CAR?</p>	Noted	Links might change with updates.
<p style="text-align: center;">UAEX.010 APPLICATION FOR UOA</p> <p>e)Prior applying for UOA the applicant shall obtain Letter of Conformity (LoC) from Ministry of Industry Advanced Technology (MOIAT)</p> <p>DANS Comments : Is there no longer a requirement to request NOC from MOI? If not, then this should be stated within the change notification.</p>	Noted	process for application is described in the gcaa platform or LAA platform.

<p style="text-align: center;">UAEX.015 UA OPERATOR'S RESPONSIBILITIES</p> <p>g) In addition to the flying condition stipulated in My Drone Hub smart phone application and the UOA certificate, the operator shall establish and implement procedures for the safe operation including the following:</p> <p>i. The UA Pilot shall give way to a UA-piloted aircraft or any manned aircraft at all times and land the UA whenever hearing or sighting a UA-piloted aircraft or any manned aircraft.</p> <p style="color: red;">DANS Comments : The regulation above can be enhanced by adding the rule of how UA pilots shall give a way to another UAE pilot.</p>	Accepted	a UA that is obliged to give way to another UA should avoid passing over, under or in front of the other, unless it passes well clear
<p style="text-align: center;">UAEX.015 UA OPERATOR'S RESPONSIBILITIES</p> <p>vi. The following limitations shall apply to any operation, unless a specific approval is issued by the GCAA or LAA, as the case:</p> <ol style="list-style-type: none"> 1) Operations shall be limited to day time; 2) Operations shall be limited to VLOS operations; 3) Operations shall be limited to 400 ft. height AGL; 4) Operations shall be limited to UA with a maximum take-off mass of 25kg; and 5) No Dangerous Goods shall be transported. <p style="color: red;">DANS Comments : There are no commercial UAS operations permitted to take place in the Emirate of Dubai 'without' prior approval from the DCAA. Are there instances where commercial UAS operations take place in Abu Dhabi where GCAA approval is not required? If not, then suggest this is either removed or clarified. It currently suggests that if you are an approved operator and you comply with these rules you can fly whenever you choose...?</p> <p style="color: red;">Clarification needed to cover if GCAA and LAA rule contradict each other, which shall prevail. i.e, GCAA rule shall be adhered to in this instance?</p>	Accepted	Refer to UAC.030 Airspace Approval For UA operations.

<p>AMC to UAEX.015 e (iv)</p> <p>The assessment should determine if a UA Pilot is competent to perform the intended operation and possess the skills and knowledge about law, regulations and procedures.</p> <p>DANS Comments : The proposed regulation does not define who is responsible for conducting the assessment, the requirements for the assessment and how the results of the assessment will be presented to GCAA or LAA.</p>	Accepted	requirement added
<p>AMC to UAEX.015 (g) (vi)</p> <p>in order to obtain special operation approval, the operator should submit a specific operation risk assessment (SORA) for GCAA or local competent authority, as the case, to evaluate and authorise the operations. Through SORA the operator should demonstrate that the operation can be conducted with an acceptable level of safety</p> <p>DANS Comments: Comment same as above in other CAR's. replace should with shall. This cannot be optional</p>	Not Accepted	Shall can't be used in AMC
<p>UAEX.030 AIRSPACE APPROVAL FOR UA OPERATIONS</p> <p>Prior to any flight, the operator shall obtain an UA Airspace Approval, unless the flight is intended to be conducted within:</p> <p>DANS Comments: The regulation above does not define which organisation issues UA Airspace Approval and does not describe the process for obtaining it. ANSP plays a major role in ensuring the safety of the UAE airspace through the provision of ATS and IFP services. The proposed CAR do not cater/involve ANSP in any process; hence it might result in approving UA operation (by GCAA or LAA) without consultation with ANSP and lead to serious aviation incident.</p>	Noted	ANSPs are already involved within internal local CAA process and communication

<p>UAEX.030 AIRSPACE APPROVAL FOR UA OPERATIONS</p> <p>c)Exterior Building Airspace: Airspace within 10 meters off the facade or 5 meters above the roof of a building provided the building is located outside any airport boundary/fence. If the building is associated with heliport then a prior approval from the heliport operator shall be obtained.</p> <p style="text-align: center;">DANS Comments :</p> <p>d)This is in contradiction of DCAA regulations and these flights would still need a DCAA approval to fly. Please add an LAA caveat or reword to include LAA regulations.</p>	Accepted	No contradiction between Federal & any Emirate Law. Kindly refer to (GM to UAC.001 (b) Definitions (7))
<p style="text-align: center;">AMC to UAEX.030</p> <p>e)All GCAA UOA holders has to comply with LAA rules and conditions, as the case.</p> <p style="text-align: center;">DANS Comments : Formatting error.</p>	Accepted	reworded
<p>UAEX.035 UA OPERATOR AUTHORISATION CONTINUED VALIDITY</p> <p>a) The UA Operator Authorisation (UOA) shall be valid for one year and its validity is subject to the following: i. The Operator remains in compliance with the applicable requirements and conditions stipulated in the authorisation and in this CAR;</p> <p style="padding-left: 40px;">ii.The validity of GCAA or LAA Security Clearance.</p> <p>DANS Comments : Security clearance is very vague, this could be interpreted as meaning a military or Police NOC and not, as is the assumption, the MOI/MOIAT(?) approval to fly?</p>	Not Accepted	process for application is described in the gcaa platform or LAA platform.
<p style="text-align: center;">RUA. 001 ABBREVIATIONS AND DEFINITIONS</p> <p>For the purposes of this regulation, the following abbreviations and definitions apply:</p> <p style="padding-left: 40px;">a)Abbreviations</p> <p style="padding-left: 80px;">1)UA: Unmanned Aircraft</p> <p style="padding-left: 80px;">2)VLOS: Visual Line of Sight</p> <p style="padding-left: 80px;">3)MOIAT: Ministry of Industry & Advanced Technology 4) LoC: Letter of Conformity</p> <p style="padding-left: 80px;">5)LAA: Local Appropriate Authority</p> <p style="text-align: center;">DANS Comments : Numbering formatting error</p>	Accepted	typo fixed

<p style="text-align: center;">RUA.010 UA Registration</p> <p>Prior any Unmanned Aircraft (UA) activity or operation, the owner shall register the UA through the GCAA or local appropriate authority (LAA) registration platform, as the case, the owner shall provide the following : - a Letter of conformity from Ministry of Industry & Advanced Technology (MOIAT)</p> <p>DANS Comments: Only RUA describes and requires UA registration</p>	Accepted	clarified
<p style="text-align: center;">RUA.015 Pilot License</p> <p>In order to fly the UA in the UAE the operator shall apply and obtain UA pilot licence from GCAA or LAA platform, the applicant shall provide the following: -a Certificate of completion from approved UA training organisation by GCAA or LAA.</p> <p style="text-align: center;">Note: the applicant should be aged at least 18 years.</p> <p>DANS Comments: Only RUA describes and requires a Pilot license</p>	Accepted	requirement added
<p style="text-align: center;">RUA.025 FLYING CONDITIONS</p> <p>The UA operator shall comply with following flying conditions:</p> <ol style="list-style-type: none"> 2. Direct radio control link shall be maintained 3. between UA Pilot and the UA <p>DANS Comments: This has been added as point 3, when it is the second part of the sentence from point 2.</p>	Accepted	amended