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## Opening the market for remotely piloted aircraft systems (RPAS or civil drones)

Fields marked with \* are mandatory.

Please provide information to help us build your profile as a respondent. In accordance with Regulation 45/2001, all personal data collected through this survey will be kept securely and will ultimately be destroyed.

Please note that the questionnaire will only use your full contribution if your name, organisation (if you answer on behalf of an organisation or institution) and contact details are provided. If you choose to not provide your name, organisation and contact details, you have the option of submitting a general comment only. If you do choose to provide us with your name, organisation and contact details, you can still opt for your answers to remain anonymous when results are published.\*

- ☒ Yes, I will provide my name and contact details
- ☐ No, I prefer to provide a general comment only (and questionnaire ends here)

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### A. Respondent details

1. Please specify your main field of activity or how you are mainly linked to the RPAS sector\*

- ☐ An individual
- ☐ Aviation professional (working in the aviation industry as a pilot, crew member, controller, etc.)
- ☐ RPAS operator
- ☐ Commercial Air Transport operator
- ☐ Business Aviation operator
- ☐ Recreational aviation operator
- ☐ Aerial work operator
- ☐ Aircraft design, manufacturing, or maintenance
- ☐ Air navigation service provider
- ☐ Aerodrome operator
- ☒ National regulator
- ☐ Qualified entity, or other organisation officially recognized by the national authority
- ☐ Training organisation for aviation professionals
- ☐ EU institution/body
- ☐ Stakeholder/industry association
- ☐ Research organisation/university/consultancy
- ☐ Other (please specify)

1a. Please specify\*

Ministry of Infrastructure and the Environment

2. If you work for a company, please give an indication of its size

- ☐ micro-enterprise (employs fewer than 10 persons and whose annual turnover and/or annual balance sheet total does not exceed EUR 2 million)
- ☐ small enterprise (employs fewer than 50 persons and whose annual turnover and/or annual balance sheet total does not exceed EUR 10 million)
- ☐ medium-sized enterprise (employs fewer than 250 persons and whose annual turnover does not exceed EUR 50 million or whose annual balance sheet total does not exceed EUR 43 million)
- ☐ large enterprise

3. If answering as an individual, please provide your place of residence.

If answering on behalf of an organisation/institution, please provide the place of establishment of the organisation/institution.\*

Netherlands

3a. Please specify "Other"\*

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4. First name\*

5. Last name\*

6. Organisation\*

7. Address\*

9. City\*

10. Email address\*

Please specify your main field of activity or how you are mainly linked to the RPAS sector\*

- ☐ An individual
- ☐ Aviation professional (working in the aviation industry as a pilot, crew member, controller, etc.)
- ☐ RPAS operator
- ☐ Commercial Air Transport operator
- ☐ Business Aviation operator
- ☐ Recreational aviation operator
- ☐ Aerial work operator
- ☐ Aircraft design, manufacturing, or maintenance
- ☐ Air navigation service provider
- ☐ Aerodrome operator
- ☒ National regulator
- ☐ Qualified entity, or other organisation officially recognized by the national authority
- ☐ Training organisation for aviation professionals
- ☐ EU institution/body
- ☐ Stakeholder/industry association
- ☐ Research organisation/university/consultancy
- ☐ Other (please specify)

11. Please indicate if your organisation is registered in the [Transparency Register](#) of the European Commission.\*

- ☐ Yes
- ☒ No

12. Contributions received from this survey may be published on the European Commission's website, with the identity of the contributor. Do you agree to your contribution being published under your name?\*

- ☒ My contribution may be published under the name indicated
- ☐ My contribution may be published but should be kept anonymous
- ☐ I do not wish any of my contributions to be published

## B. Expected market development

The aim of this section is to obtain stakeholders' views on the expected market developments, both in terms of development and production of RPAS and of the use of RPAS to deliver services. If you are active in the development or use of RPAS you are particularly encouraged to provide more details in the free text section below. This section should give an idea of the sense of urgency for possible public intervention, including the areas for government action.

## 1. How do you see the civil RPAS market developing?

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	Strongly disagree	Disagree	Agree	Strongly agree	No opinion
RPAS technologies are already mature enough to allow for various civil applications in the next years	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
There are substantial business opportunities and commercial benefits for the EU business from the development and use of RPAS	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The EU market for RPAS applications is developing slower than in other parts of the world	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The EU RPAS manufacturing industry is not very competitive at the moment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
A strong, integrated EU market is an effective means to make the EU RPAS industry globally competitive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
I see a potential in RPAS for professional activities in the next five years	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
I see a potential in RPAS for daily life activities in the next five years	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The potential for RPAS applications in the EU is lower than in other parts of the world	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Demand for small RPAS with light weight and short flight distance will increase rapidly in the near future	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Demand for large RPAS with heavy weight and long flight distance will increase rapidly in the near future	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## 1a. Please elaborate on your answers to the above statements

@1.3 and 1.4 Because there is no good information on developments in the rest of the world and there is no single EU-market yet., it is not possible to make a valid evaluation.

@1.7 If daily professional life is meant.

@1.10 Could be, but also requires a phased development of rules.

## C. What problems would need to be addressed?

RPAS are a new technology for which little specific regulation exists. While there is already aviation legislation in place that could be applied to RPAS as well, it may not necessarily cover all aspects and specificities of the civil RPAS market. Thus, the aim of this section is to obtain stakeholders' views on the potential regulatory and market failures affecting RPAS application.

## 1. Overall, what is your opinion on the main problems affecting the development of the RPAS market?

	Strongly disagree	Disagree	Agree	Strongly agree	No opinion
The fragmentation of the RPAS market in the EU create entry barriers and negatively affect the competitiveness of EU companies*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Uncertainty about the future rules governing the development and use of RPAS hinders investment decisions*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The use of RPAS poses a threat to safety and could lead to fatal accidents*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The use of RPAS poses a threat to security because they could be used for unlawful actions*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The use of RPAS poses a threat to privacy or protection of personal data*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The current legislation does not provide effective protection against the safety, security and privacy risks linked to RPAS operations*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The current insurance regime does not sufficiently cover liability issues in case of accidents with RPAS*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## 1a. Please elaborate on your answers to the above statements

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## 2. What is your opinion on the following concerns related to RPAS operations?

	Strongly disagree	Disagree	Agree	Strongly agree	No opinion
RPAS are dangerous and should not be allowed in the EU airspace	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
RPAS should only fly if remotely piloted by a certified operator	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
RPAS should not be allowed to fly over city centres at low altitude	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The potential benefits of the RPAS applications outweigh the risks and threats they might pose	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The widespread use of RPAS will create a threat to safety of EU citizens on the ground	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The widespread use of RPAS will facilitate anonymous surveillance	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The widespread use of RPAS will make it difficult to ensure effective protection of privacy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
In order to ensure security the development of RPAS operations should be prohibited	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
RPAS will become an additional source of emissions and noise	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
There is a substantial risk that RPAS operators are not (sufficiently) insured	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## 2a. Please elaborate on your answers to the above statements

@2.3 At this moment safety is not enough guaranteed. Flying with all kinds of RPAS over city centres should not be generally allowed. The light ones (~0,1 kg) should be possible at the time, a phased approach is needed.

@2.4, 2.5, 2.9 2.10 When there will be a sufficient regulation this will not be a real problem.

## D. What are the causes of the problems?

Currently, the European Aviation Safety Agency (EASA) can draft safety rules for unmanned aircraft with an operating mass above 150 kg. The lighter unmanned aircraft are under Member State competence. Some Member States have already adopted rules to guarantee the safety of simple operations for light RPAS, while other Member States are preparing rules. There has not been a consistent approach how to regulate them and rules differ between Member States.

Concerning aspects related to RPAS applications, the existing European or national laws on data protection, privacy, environment (noise) and insurance are also applicable to all operations carried out by RPAS, irrespective of their weight. There is, however, some uncertainty if the existing rules can be easily enforced and applied to RPAS operations.

The purpose of this section is to properly identify the causes of the problems so that they could be adequately addressed by any policy initiative.

## 1. What is your opinion on the factors that can negatively affect the use of RPAS?

## 1a. Access barriers and fragmentation of the RPAS market are the result of:

	Strongly disagree	Disagree	Agree	Strongly agree	No opinion
The need to obtain national authorisations in individual Member States	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Differences in national rules in various EU Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lack of common EU rules covering all types of RPAS	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of mutual recognition for national certificates	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gaps in the current EU legislation, which does not cover new concepts related to RPAS	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

1b. Legal and technological uncertainty are a result of:

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	Strongly disagree	Disagree	Agree	Strongly agree	No opinion
Missing key technologies that need to be validated	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Emerging and fast evolving RPAS sector cannot be rigidly regulated	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of EU or international standards	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

1c. RPAS pose a serious threat to safety, security and privacy, because:

	Strongly disagree	Disagree	Agree	Strongly agree	No opinion
RPAS will increase the traffic in the EU airspace	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
RPAS are not able to communicate effectively with 'manned' air traffic	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
RPAS are cheap and can be misused very easily even if the operations are controlled effectively	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
RPAS are prone to accidents and are a danger for citizens on the ground	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There is a lack of credible information on the magnitude of the risks	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Everybody can potentially buy and use an RPAS, even if that person is not aware of aviation rules	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

1d. The ineffective protection against safety, security and privacy risks related to RPAS operations is a result of:

	Strongly disagree	Disagree	Agree	Strongly agree	No opinion
New threats arising from RPAS operations that cannot be easily prevented by regulations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The absence of regulations which properly and sufficiently cover RPAS activities and related threats	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The difficulty to actually implement and enforce current regulations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

1e. Inadequate insurance regime is a result of:

	Strongly disagree	Disagree	Agree	Strongly agree	No opinion
The current rules were conceived for manned aircraft	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The lack of harmonised operational rules	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
There is not sufficient evidence to calculate the risk and hence the cost of insurance	<input type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

1f. Please elaborate on your answers to the above statements

First we have to do research whether common rules are a solution, secondly we can make a decision.

@1.c.1 Lower airspace in the beginning. Higher 'EU' airspace later.

@1.c.5 There is enough information to start legislation.

## E. Identification of the policy objectives

1. What should be the main EU policy objectives in relation to RPAS?

EUSurvey	All public surveys	Strongly disagree	Login Disagree	About Agree	Strongly agree	No opinion	Documentation
	RPAS should be promoted at the EU level because they are a promising source for jobs and growth and will offer new services to citizens and businesses*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
	Citizens should be protected from risks and concerns related to safety, security or privacy of RPAS*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	

1a. Please elaborate on your answers to the above statements

Good regulations that allow business is essential, but development of industry should be left to the market.

## F. Policy options and measures

In this section, you are invited to indicate which policy options offer the greatest potential to achieve the policy objectives. There are currently four main policy options under consideration:

1. The first policy option is the 'no-action' option as the basic scenario to compare the impact of the other options. No new measures at the European level would be envisaged. Also the security, privacy and liability dimensions would remain untouched. This means that the RPAS market below 150 kg operating mass would be developed on basis of the national safety rules and other existing European and national rules in the other areas. The existing EU rules for aircraft above 150 kg operating mass would be applied to RPAS above 150 kg without any modification. At the same, the regulatory and standardisation effort would continue at the international level through ICAO and JARUS.
2. The second policy option would adapt the current EU safety rules for unmanned aircraft above 150 kg operating mass, i.e. where the EU has competence. Hence, the European market would be developed through new European rules for RPAS above 150 kg and through national rules for RPAS below 150 kg operating mass. EASA would liaise with national authorities to ensure coherence between the two market segments, but no harmonisation of rules could be enforced for the light RPAS. The division of competences between the EU and MS regarding enforcement and monitoring of the safety rules would remain unchanged. The other dimensions like security, privacy and liability dimensions would remain under the current framework, without new rules being added.
3. The third policy option would entail an amendment of the safety legislation to establish a level playing with common rules for all RPAS, regardless of weight. The rules would be based on a risk classification scheme to identify the actual risks associated with particular RPAS operations. The idea would be to translate the notion of risk-proportionality into the rules, where operating mass would be one of the parameters complemented by a range of other criteria. The European rules would be implemented at the local level. EASA would get an extended certification competence to allow the development of European common requirements and Member States would remain to some extent responsible for certification, especially of lighter categories of RPAS. The rules would need to be conceived in such a way that they would facilitate the application of legislation in other areas (privacy, security), where competencies would be unchanged. Existing organisations, like the data protection authorities, would remain responsible for overseeing RPAS operations.
4. The fourth policy option builds on option three, but would also harmonize the certification process. EASA would become competent to manage the certification process of all types of RPAS on the basis of the common rules. Member States would remain responsible only for issuing operating licences. The common rules would also be conceived in such a way as to facilitate achieving high security and privacy levels, with potential centralisation of enforcement at the EU level.

1. To what extent do you agree with the following options to address the problems affecting the EU RPAS market?

	Strongly disagree	Disagree	Agree	Strongly agree	No opinion
Option 1: No additional action is needed at the EU level at this moment of time	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 2: EU should regulate RPAS where it has already competences (i.e. above 150 kg) and leave smaller RPAS for Member State legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 3: EU should amend the safety legislation to cover all RPAS regardless of weight, but proportional to the risk associated with the specific RPAS operations. The implementation of the common rules would mostly remain at the Member State level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Option 4: EU should amend the safety legislation to cover all RPAS regardless of weight, and EASA would manage the certification of RPAS, not the national authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

1a. Please elaborate on your replies and/or suggest any additional options to be considered (including proposals for different packaging of measures in the options)

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The Netherlands require a good impact assessment on the effects of options 2-4. After that a decision can be made on basis of subsidiarity.

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2. Please indicate which measures should be taken in order to better support the development of the RPAS market and address the related concerns?

2a. Rulemaking and division of competencies

	Strongly disagree	Disagree	Agree	Strongly agree	No opinion
The market is still not mature enough and should not be regulated yet	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The rules should be developed at international level (i.e. by ICAO) and not by the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
EU rules should reflect international developments and standards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Before any regulation is proposed there is a need for validation of technologies and development of recognised standards	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Current EASA safety rules sufficiently cover larger RPAS (above 150kg) and do not need to be changed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
EU should only propose safety rules for heavy RPAS (above 150kg), while small RPAS should remain under a national competence	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Safety rules should be harmonized at the EU level, but need to be implemented by national authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
EASA should become the central institution for certification and implementation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Too detailed rules should not be proposed as they would suffocate the newly emerging industry	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Certification and licencing of lighter RPAS operations is best performed at local level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Companies should have the possibility to choose the certifying authority which may be European or national	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
All types of RPAS, regardless of weight, should require airworthiness certification, operator certification and (remote) pilot licensing	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Certificates and licenses delivered somewhere in the EU should be recognised throughout the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

2b. Mitigation of safety risks

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All public surveys	Strongly disagree	Disagree	Agree	Strongly agree	No opinion
RPAS should only be allowed to fly when separated from manned air traffic (i.e. in segregated airspace)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The risk of an operation depends besides the weight also on the speed of the aircraft	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The risk of an operation depends besides the weight of the aircraft also on the reliability of the system	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The risk of an operation depends besides the weight of the aircraft also on the place where operations take place	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The risk of an operation depends besides the weight of the aircraft also on the type of operation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The risk of an operation depends besides the weight of the aircraft also on the quality of the RPAS operator	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The focus of safety rules, at least for lighter RPAS below 150 kg, should lie upon the operator and to a lesser extent the aircraft	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A strong safety management system of the operator should be introduced as the most effective tool to guarantee safety	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
RPAS operations should be authorised at a local level, taking into account local circumstances.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The level of regulatory control of RPAS vehicles and operations should be proportionate to risk	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EASA should develop a common risk classification scheme	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## 2c. Mitigation of security risks

	Strongly disagree	Disagree	Agree	Strongly agree	No opinion
Security can be effectively enforced under the current rules	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Eliminating gaps in the safety regulation will also allow better control of security risks and no additional security specific changes would be needed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EASA should integrate security considerations in its rules on RPAS	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## 2d. Mitigation of privacy risks

	Strongly disagree	Disagree	Agree	Strongly agree	No opinion
The experience with Google Street View demonstrates that the existing data protection legislation should sufficiently protect data, derived from RPAS operations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New specific measures are necessary to ensure privacy protection in the case of commercial use of RPAS	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New specific measures are necessary to ensure privacy protection in the case of use of RPAS by police or security forces	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Data protection legislation needs to be strengthened at the EU level if civil use of RPAS is allowed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National data protection authorities should identify privacy threats related to the applications of RPAS and develop adequate protection measures where necessary	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National civil aviation authorities should share information with data protection authorities in order to ensure privacy protection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The ability to identify an operator of an RPAS is a key aspect of ensuring privacy protection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## 2e. Liability and insurance



All public surveys	Strongly disagree	Disagree	About Agree	Strongly agree	No opinion
RPAS operations should be treated as other aviation as regards liability and insurance	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further work is needed to gather evidence on risks from RPAS in order to inform premium setting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

2f. Would you like to comment or add any other measure that could improve the current regulatory system for RPAS?

@2a all, 2c.3, 2d.4 The Netherlands require a good impact assessment on the effects of options 2-4. After that a decision can be made on basis of subsidiarity.

@2b.1 In a phased approach, it will be an option in the future to fly in the manned air space, but only on strict rules.

@2b.8 A sms should be introduced, but should be related to the complexity of the operation. So it will be more a 'light' than a 'strong' sms. Competence based training of the operator and the pilot will be as important as a sms.

### G. Impacts of policy options

The selection of a preferred option should take into account the economic, social and environmental impacts. This section should help in identifying what are the main benefits and shortcomings of the four policy options

1. How do you assess the possible impacts of the first policy option (no new actions)?

	No impact	Negative impact	Mixed impact	Positive impact	No opinion
Compliance and administrative costs for EU businesses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Compliance and administrative costs for national administrations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Compliance and administrative costs for EASA	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Employment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
RPAS market growth	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Competitiveness of the EU RPAS operators globally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Competitiveness of the EU RPAS manufacturers globally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Innovation in the RPAS sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Security of the EU airspace	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Safety in the EU airspace	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Safety of citizens on the ground	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Privacy protection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Citizens' trust in RPAS operations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>
Natural environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

2. How do you assess the possible impacts of the second policy option (adopting EU safety rules above 150 kg)?

EUSurvey

All public surveys	No impact	Negative impact	Mixed impact	About Positive impact	Down No opinion
Compliance and administrative costs for EU businesses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Compliance and administrative costs for national administrations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Compliance and administrative costs for EASA	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Employment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
RPAS market growth	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competitiveness of the EU RPAS operators globally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competitiveness of the EU RPAS manufacturers globally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Innovation in the RPAS sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Security of the EU airspace	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safety in the EU airspace	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safety of citizens on the ground	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Privacy protection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Citizens' trust in RPAS operations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Natural environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3. How do you assess the possible impacts of the third policy option (adopting EU safety rules for all RPAS)?

	No impact	Negative impact	Mixed impact	Positive impact	No opinion
Compliance and administrative costs for EU businesses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Compliance and administrative costs for national administrations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Compliance and administrative costs for EASA	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Employment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
RPAS market growth	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competitiveness of the EU RPAS operators globally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competitiveness of the EU RPAS manufacturers globally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Innovation in the RPAS sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Security of the EU airspace	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safety in the EU airspace	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safety of citizens on the ground	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Privacy protection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Citizens' trust in RPAS operations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Natural environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4. How do you assess the possible impacts of the fourth policy option (adopting EU safety rules for all RPAS, giving new certification competences to EASA and central oversight)?

EUSurvey

All public surveys	No impact	Negative impact	Mixed impact	About positive impact	Downside opinion	Documentation
Compliance and administrative costs for EU businesses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
Compliance and administrative costs for national administrations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
Compliance and administrative costs for EASA	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
Employment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
RPAS market growth	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
Competitiveness of the EU RPAS operators globally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
Competitiveness of the EU RPAS manufacturers globally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
Innovation in the RPAS sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
Security of the EU airspace	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
Safety in the EU airspace	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
Safety of citizens on the ground	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
Privacy protection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
Citizens' trust in RPAS operations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	
Natural environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	

5. Please describe in more details any of the identified impacts and/or indicate any other impacts of the policy options or their measures.

Please provide your assessment of these impacts.

The Netherlands agree that the aspects mentioned in the questions are relevant in deciding the best way forward. However we want to form an opinion on that question on a solid impact assessment, and not on opinions that are not scientifically based.

## H. Other questions

1. Are there any other issues you would like to highlight in relation to this initiative?

The Netherlands agree that the aspects mentioned in the questions regarding future EU-regulations are relevant in deciding the best way forward. However we want to form an opinion on that question on a solid impact assessment, and not on opinions that are not scientifically based.

2. Please give reference to any studies or documents that you think are of relevance for this consultation, with links for online download where possible

A lot of information is available at ICAO and JARUS. They are not mentioned here, because this information is known by the Commission.

3. You may also upload any document relevant for this consultation

