

EASA Opinion 06/2026 of 18 September 2026 (Security)

Summary of EASA Opinion 06/2026

EASA published the next iteration of the drone security proposals on Friday 18 September, as Opinion 06/2026: <https://www.easa.europa.eu/en/document-library/opinions/opinion-no-062026>

EASA proposes to amend Regulation 2019/945 and 947 to address growing security concerns with drone operations. The take-off mass threshold for registration of pilots (and application of age limits) is to be lowered from 250gr to 100gr. A direct remote identification (DRI) function as well as a take-off inhibition is to become mandatory for all unmanned aircraft, including privately built, of more than 100gr. Member States may also apply these new requirements to model aircraft operations under an Article 16 Authorisation. EASA also proposes a new maximum speed limit of 19 m/s (68.4 km/h) for all open category operations, including model aircraft operated under subcategory A3.

Summary of the EMFU Position

The European Model Flying Union (EMFU) shares growing security concerns associated with the misuse of drones. Model pilots are prepared to contribute to a safer and more secure Europe and have done so for well over a century. Any new measures must however be necessary, be targeted to address risks, be proportional and not unnecessarily further restrict model flying.

Model aircraft flying is usually exercised with privately built aircraft¹, away from population centers and buildings, within visual line of sight and without autonomous control modes (except for flight stabilisation assistance with no direct effect on the trajectory and lost-link assistance). The nature of model flying clearly distinguishes our sport from “drone” operations. The EMFU has therefore repeatedly called for a separate treatment of model flying, the need for which is again underlined by this EASA opinion. The safety and security risks of our sport are minimal and do not justify a mandatory DRI for model flying operations.

Instead of recognising the role and value of our sport, the proposals set out in EASA Opinion 06/2026 contain disproportionate new restrictions that will significantly restrict model flying in all EASA member countries. They:

- deprive tens of thousands of European pilots from their sport and hobby;
- significantly restrict access to model flying especially for young and new aviators and thus undermine the important role that model flying plays in support of Europe’s competitiveness in the aviation sector;
- diminish the sport’s ability to contribute to the development and deployment of new technologies, favouring large (Asia-based) producers over innovative European enterprises;

¹ Regulation 2019/947 defines “privately built unmanned aircraft” as “assembled or manufactured for the builder’s own use, not including UAS assembled from sets of parts placed on the market as a single ready-to-assemble kit” (Article 2(16)).

- create additional barriers for model flying sports competitions (representing around half of FAI competitions).

Moreover, the new proposals fail to honour the stated intent of the EU legislator when it adopted the new aviation basic regulation in 2018² and contradict the EU's role in developing the European dimension in sport, set out in the EU Treaty (Article 165).

The following changes must be made to the current proposals:

- 1. Technology neutrality and proportionality:** the EMFU reiterates that the minimal security risks of our sport do not justify the need for DRI. We take note that the decision on whether to apply new remote identification (DRI) requirement to operations “in the framework of model flying clubs and associations” (Article 16 Authorisation) is now to be made at Member State level. The legal text should clarify that national authorities considering such requirements must ensure that these:
 - a. Are necessary, proportionate to security and safety concerns and minimise impact on model flying in the framework of clubs and associations.**
 - b. Allow a broad set of remote identification options instead of on-board DRI as the only solution:** DRI has major drawbacks for model flying, including costs, weight, size and availability. It is technically impossible to implement in smaller models. Alternative and proven technologies are available, including an (online/digital) registry of flying sites, app-bases solutions as well as transmitter- and ground-based solutions.
 - c. Not require privately built aircraft to install a take-off inhibition:** Installing such take-off inhibition is an unnecessary and disproportionate requirement, is technically impossible or very complex and creates additional safety risks in case of an in-flight failure of the system.
- 2. Ensure the survival of model flying under the open category:** on average around 30% of all model aircraft flying in Europe continues to take place under the open category – in some countries even up to 100%. The open category is a key entry point for new and young pilots and in many countries accommodates specific sport categories such as slope soaring. The current proposals will all but prohibit model flying under the open category. The following changes must be made:
 - a. Remove the 19 m/s speed limit for model flying under the open category:** most model aircraft are fixed wing aircraft that need minimum forward air speed to fly. The proposed maximum speed (68.4 km/h) is close to the stall speed of many model aircraft. The ground speed of the aircraft also depends on the wind speed and cannot be limited to a set value. The speed limit must be removed for model aircraft operating under the open category, at least for operations under subcategory A3³ using privately

² Recital 34 of Regulation 2018/1139 (“Basic Regulation”): “[...] acts [...] adopted on the basis of this Regulation, should take into account that such model aircraft have so far had a good safety record, especially those operated by members of model aircraft associations or clubs which have developed specific codes of conduct for such activities. In addition, when adopting those [...] acts, the Commission should take account of the need for a seamless transition from the different national systems to the new Union regulatory framework so that model aircraft can continue to operate as they do today, as well as take into account existing best practices in the Member States”.

³ Operations under subcategory A3 take place in areas where the pilot reasonable expects that no uninvolved person will be endangered and at a safe horizontal distance of at least 150 meters from residential, commercial, industrial or recreational areas (UAS.OPEN.040, Regulation 2019/947).

built aircraft without autonomous control modes except flight stabilisation assistance with no direct effect on the trajectory and lost-link assistance.

- b. **No direct remote identification requirements for model flying under the open category:** apart from not being necessary, on-board DRI as well as take-off inhibition is extremely difficult, if not impossible, to install on lighter model aircraft. Requirements to install this technology should be removed for operations under subcategory A3 using privately built aircraft without autonomous control modes except flight stabilisation and lost-link assistance. The same goes for the take-off inhibition requirement, which is technically even more challenging to install on all aircraft, regardless of mass, and does not bring additional security benefits, but does bring additional safety risks.
3. **Class C4 unmanned aircraft must remain available for model flying** (requirements aligned with the operation of model aircraft under A3) and the **apparent drafting mistake that discriminates privately built control line aircraft compared to certified control line aircraft** (exempted from any DRI requirements) must be corrected.

EMFU Proposals in detail

1. Remote identification requirements for operations under an Article 16 Authorisation (activities in the framework of model aircraft clubs and associations)

The EMFU reiterates that the minimal security risks of our sport do not justify the need for DRI and takes note of the reversal of the earlier proposals into a text that explicitly states that Member States may decide whether to introduce DRI requirements in an Article 16 Authorisation, without a fixed deadline for doing so.

The new draft is problematic in several points:

- a) Recital (4) wrongly refers to a possibility for Member States to “exempt” model flying rather than a possibility to require these activities to be remotely identifiable.
- b) The proposed text omits that any remote identification requirements to be introduced into an Article 16 Authorisation must be necessary, proportionate to safety and security risks and minimise impacts on the clubs or associations.
- c) The proposed text ignores the benefits of technology neutrality. On-board DRI units have major drawbacks and risks and are technically challenging or even impossible to add. Where needed, other proven options exist or are in development to ensure that model aircraft operations can be remotely identified in a manner that addresses safety and security concerns. This includes identification of flying sites on maps, web- or app-based solutions, as well transmitter- oriented technology or on-ground units for flying sites. It is incomprehensible why EASA advocates technology neutrality for electronic conspicuity and yet fixates on a single technology for DRI.
- d) The requirement to install in privately built model aircraft a take-off inhibition functionality that ensures that the DRI unit is operating correctly is unnecessary, disproportionate, technically impossible or difficult to realise and increases safety risks in case of an in-flight failure of the system.

The EMFU proposes the following changes:

Recital (4): In view of the specific characteristics of operations conducted within the framework of model aircraft clubs and associations, and taking into account their

demonstrated safety record and low security risk, it is appropriate to allow a degree of regulatory flexibility regarding the conditions applicable to such operations. Member States should therefore decide whether to require, in the authorisations issued in accordance with Article 16 of Implementing Regulation (EU) 2019/947, ~~to exempt UAS operated within that framework from the requirement to be equipped with a direct~~ remote identification function for UAS operated within that framework ~~for cases where necessary, in proportion to such risks and for cases where these cannot be addressed through the~~ it is justified by the local operating environment and the organisational structure, management system and safety and security arrangements of the model aircraft club or association concerned.

Newly proposed Article 16(5):

“In the authorisation referred to in point 1, the competent authority may require that ~~if a UAS is operated UAS operations~~ in the framework of model aircraft clubs and associations, ~~it shall be equipped with a direct~~ can be identified remotely. Such requirements shall be necessary and proportionate to safety and security risks of these operations. ~~remote identification function compliant with paragraph (3) of Part 6 of the Annex to Delegated Regulation (EU) 2019/945 and shall not be permitted to take off if the consistency check defined in point (3)(b) of Part 6 of the Annex to Delegated Regulation (EU) 2019/945 is not passed”.~~

2. Ensuring the survival of model flying under the open category

EASA appears to operate on the assumption that all model flying should take place under an Article 16 Authorisation and that there is no longer a need to accommodate the sport under the open category. That assumption is wrong and shows a lack of understanding of our sport.

The share of model flying operations varies widely between countries. Depending on the amount and scope of Article 16 Authorisations issued, a prohibition of model flying in the open category will affect around 30% of model flying operations, in some countries even up to 100%⁴.

Importantly, the open category continues to be an important avenue for new pilots to enter the sport. Closing this access point risks depriving the sport of an important share of new entrants. In some countries the open category also continues to accommodate a large share of specific types of model aircraft flying such as slope soaring.

Moreover, in some countries the Article 16 Authorisations are closely based upon, or written as exemptions from, the open category. Some countries, such as Finland, also accommodate model flying in the open category at club flying sites designated as UAS geographical zones under Article 15 of Regulation 2019/947, with exemptions from certain open category requirements. Member States must retain the possibility to exempt model flying operations within such zones from the proposed new requirements.

The following changes must be made to the proposal:

- a) **Remove the 19 m/s (68.4 km/h) speed limit for model aircraft operations under the open category.** The proposed speed limit now also includes operations with privately built aircraft (but not Class C4 unmanned aircraft systems, thus discriminating European privately built aircraft compared to mostly Asian imports) under subcategory A3. This is where most model flying operations take place. 68.4km/h is below the stall speed of many model aircraft (especially with a bit of tailwind). The speed limit will prohibit most model flying operations under the open category.

⁴ Based on national estimates provided by EMFU members.

- b) **Remove the requirement to install a DRI module for model.** Apart from not being necessary, on-board DRI as well as take-off inhibition is extremely difficult, if not impossible, to install, especially on lighter model aircraft (for reasons of space, weight, power consumption and missing sensors). Requirements to install this technology should be removed for operations under subcategory A3 using privately built aircraft without autonomous control modes (except flight stabilisation assistance with no direct effect on the trajectory and lost-link assistance). The same goes for the take-off inhibition requirement, which is technically even more challenging to install on all aircraft, regardless of mass, and does not bring additional security benefits, but does bring additional safety risks.
- c) **Allow for alternative remote identification functionality**, such as web- or app-based as well as ground-based solutions. These solutions already being implemented and are proven to work in practice (electronic conspicuity) and can be easily adapted for remote identification functionality. It is incomprehensible why EASA favours technology neutrality for electronic conspicuity and yet fixates on a single technology for remote identification.
- d) **Remove the requirement to install a functionality that prevents a privately built aircraft from taking off if the operator registration number is not (correctly) uploaded (consistency check).** The EMFU does not understand what added value installing such take-off inhibition has for privately built aircraft. The operator of the aircraft can simply check the functionality of the DRI module (e.g. a green light). If the module is not working, then the operator is not allowed to take off. Installing a functionality that prevents a privately built aircraft from taking off if the consistency check is not passed is technically extremely challenging and often impossible. Moreover, adding such functionality adds an unnecessary safety risk in case of an in-flight failure of the system.

The EMFU proposes the following changes:

- a) Remove the 19 m/s speed limit for model aircraft operations under the open category (A3) through adding “unless the aircraft does not have automatic control modes except for flight stabilisation assistance with no direct effect on the trajectory and lost link assistance provided that a pre-determined fixed position of the flight controls in case of lost link is available⁵” at the end of the following paragraph UAS.OPEN.040, (4)(a)(ii).
- b) Remove the requirement to install an DRI module for model aircraft through adding “unless the aircraft does not have automatic control modes except for flight stabilisation assistance with no direct effect on the trajectory and lost link assistance provided that a pre-determined fixed position of the flight controls in case of lost link is available” at the end of UAS.OPEN.040, (4)(a)(iii)
- c) Allow for alternative remote identification options through amending the proposed point (9) under UAS.OPEN.050 as follows: “if the unmanned aircraft has a take-off mass, including payload, of 100 g or more, ensure that it the UAS is operated with an active direct remote identification function compliant with paragraph (3) of Part 6 of the Annex to Delegated Regulation (EU) 2019/945, with the UAS operator registration number successfully uploaded therein or the operator activates one of the alternative remote identification options listed in [refer to separate list that contains 1) web- or app- based remote identification options; 2) a ground-based remote identification options (UAS

⁵ This text is based on the requirement for Class C4 unmanned aircraft systems set out in Regulation 2019/945, Annex, Part 5 (Requirements for a class C4 UAS), under (3).

transmitter, separate transmitter, ...) – this list could be based on the technologies considered for electronic conspicuity].

- d) Remove the requirement to install a functionality that prevents a privately built aircraft from taking off if the consistency check is not passed by deleting UAS.OPEN.040, (4)(a)(iv).

3. Keep Class C4 Unmanned aircraft system open for model flying

The unmanned aircraft systems (UAS) Class C4 was initially created for model flying. The recitals of both Regulation 2019/945 (recital 4) and 2019/947 (recital 28) explicitly refer to the need keep this class free from disproportionate technical requirements for the benefit of model flying. The EASA opinion now requires these aircraft to 1) integrate DRI; 2) include a take-off inhibition; and 3) have a unique serial number.

The location where these aircraft are flown (A3) and the fact that they have no autonomous flight control modes means that the safety and security risks of these aircraft are minimal. These aircraft should thus be exempted from the new DRI requirements.

The EMFU proposes the following changes:

Align the remote identification requirements for Class C4 UAS with those for model aircraft operated under the open category, set out above.

4. The same treatment for tethered aircraft that are privately built as for those that are certified

The EASA proposal exempts tethered aircraft weighing less than 1kg from the registration requirements. Moreover, it exempts certified tethered aircraft in all classes defined in Regulation 2019/945 from remote identification requirements. The same exemption is not included in Regulation 2019/947 for privately built tethered aircraft. This appears to be a drafting omission as there are no reasons for treating privately built tethered aircraft different from certified tethered aircraft.

The EMFU proposes the following changes:

Add “unless tethered,” at the beginning of the following paragraphs:

- UAS.OPEN.020, (5)(a)(iii)
- UAS.OPEN.040, (4)(a)(iii)
- UAS.OPEN.050, (9)

About the European Model Flying Union (www.emfu.eu)

The European Model Flying Union (EMFU) works to preserve and protect the interests of the model flying community in Europe, a community with an estimated 500'000 active pilots. We represent more than 200'000 of these model aircraft pilots through our member clubs and associations in 15 countries.

More information on our members and our work can be found on: www.emfu.eu.