

38 Merrion Square
Dublin 2
Ireland

t + 353 (0)1 644 5500
e info@scsi.ie
w www.scsi.ie

European Aviation Safety Agency (EASA)

Peter van Blyenburgh
UVS International
86 rue Michel Ange
FR-75016 Paris
France

11th August 2017

Notice of Proposed Amendment 2017-05 (A & B)

Dear Mr. van Blyenburgh,

Thank you for your email notification of the 14th May 2017 in relation to the notice of proposed amendments to 2017-05 (A&B).

By way of background, the Society of Chartered Surveyors Ireland (SCSI) is a professional body representing over 5000 surveyors across construction, land and property related disciplines. We work in partnership with the Royal Institution of Chartered Surveyors (RICS), promoting and maintaining the highest professional standards for our industry in the interest of the public.

Following consultation with our Chartered Geomatics and Minerals Surveyors, who frequently operate UAV technology as part of their professional service offering, we outline our comments and concerns as follows;

1. In Ireland, there are existing licensed operators of UAS's that have undergone formal training and competency testing to demonstrate skills for the operation of UAS's. We recommend that existing authorised operators should be provided with exceptions under the regulations. Licensed operators in Ireland have already borne considerable expense to become licensed and demonstrate compliance. This should be recognised at the implementation of the new regulations.

2. Under the proposed amendments, it is unclear if there are any time limits specified for the Competent Authority to approve operation authorisations. SCSi recommends that there should be an indicative timeline for approvals to ensure activities remain commercially viable.
3. From a practical viewpoint, SCSi is unsure how Competent Authorities may perform unscheduled inspections of all UAS operators. SCSi questions how this might be performed by Member States. Will guidance issue to Competent Authorities in respect of any risk profiling of operators before the issuing of licences or will the auditing be under the full control of Member States?
4. Finally, SCSi is concerned over the validity of the following on page 45 of the document;

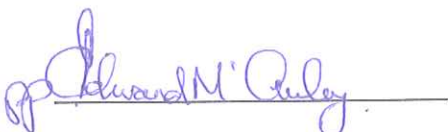
'For the purpose of demonstrating compliance with this Regulation, a UAS operator shall grant access to any person authorised by the competent authority at any time to any facility, document, records, data, procedures or any other material relevant to its activity subject to authorisation or declaration, whether this person is contracted to do so or not.'

This may prove difficult to obtain and SCSi is concerned over the commercial sensitivity of data as the 'authorised person' at this point is unknown and guidance should be provided to Member States of how best to nominate this 'authorised person'.

We hope that you find our comments and feedback constructive and if you require any further information, please do not hesitate in contacting me.

Yours sincerely,

Raymond Murphy FSCSI FRICS



Geomatics Surveying Professional Group