

# Public consultation on drones (unmanned aircraft) – technical standards for drones as a product and conditions for drone operations

Fields marked with \* are mandatory.

## Introduction

---

This Open Public Consultation is related to the possible adoption of common rules applicable to drone operations.

The objective of this initiative is to create a drone services market by enabling drone operations and to provide authorities with the effective tools to protect citizens.

The initiative will cover unmanned aircraft rules, requirement for operators and other requirements related to operations. To ensure the product safety, the proposal intends to make use of existing market entry and market monitoring mechanisms, including CE marking.

In order to allow drone services specific safety measures will be considered: registration and/or identification of the drone operator, "geofencing" (to prevent that drones enter a specific airspace, for instance around airports or around sensitive buildings or areas), qualification and training requirements for operators, support for the effective application of security or privacy measures. Concerning the fly zones, it is intended that local authorities will determine which drone and operator are allowed to fly in which airspace.

This initiative is part of the aviation package (COM(2015)613). It completes the high level drone requirements being set in the revised EASA Basic Regulation establishing a regulatory framework for drone operations.

## A. Respondent's profile

---

### \* 1. Your contribution

(Note that, whatever option chosen, your answers may be subject to a request for public access to documents under [Regulation \(EC\) N°1049/2001](#))

- can be published **with your personal information** (I consent the publication of all information in my contribution in whole or in part including my name or my organisation's name, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication)
- can be published provided that you remain **anonymous** (I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication.

- \*2. You are replying
- as an individual in your personal capacity
  - in your professional capacity or on behalf of an organisation

- \*3. Respondent's first name

*100 character(s) maximum*

Matti

- \*4. Respondent's last name

*100 character(s) maximum*

Salakari

- \*5. Email address

salakari@insuranceeurope.eu

- \*6. Respondent's country of residence

Belgium

- \*7. Name of your organisation

*100 character(s) maximum*

Insurance Europe

- \*8. Is your organisation included in the Transparency Register?

If your organisation is not registered, we invite you to register [here](#), although it is not compulsory to be registered to reply to this consultation. [Why a transparency register?](#)

- Yes
- No
- Not applicable

- \*8.a. If so, please indicate your Register ID number

*100 character(s) maximum*

33213703459-54

- \*9. Postal address of the organisation

*300 character(s) maximum*

Rue Montoyer 51  
1000 Brussels  
Belgium

- \*10. Country of organisation's headquarters

\* 11. Please specify your main field of activity or how you are mainly linked to the drones sector

- Individual citizen
- Aviation professional (working in the aviation industry as a pilot, crew member, controller, etc.)
- Air 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
- EU industry association
- EU workers association
- Research organisation/university/consultancy
- Other

\* 12. If you work for a company, please give an indication of its size

A **micro-enterprise** is defined as an enterprise which employs fewer than 10 persons and whose annual turnover and/or annual balance sheet total does not exceed EUR 2 million.

A **small enterprise** is an enterprise which employs fewer than 50 persons and whose annual turnover and/or annual balance sheet total does not exceed EUR 10 million.

A **medium-sized enterprise** is an enterprise which 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.

- micro-enterprise
- small enterprise
- medium-sized enterprise
- large enterprise

## B. What benefits can drones bring?

Drones are already used in several fields such as crop dusting, photogrammetry, inspection, construction, public safety, and more. Where used, drones have demonstrated that they can allow for more flexible and cheaper operations compared to traditional aviation and are equally safe.

13. What is your opinion on the following statements?

	Strongly agree	Agree	Disagree	Strongly disagree	No opinion
* Drones can help key public services, such as police, fire brigades, rescue operations	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Drones can be a promising source for jobs and growth	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Drones can create a new range of services to citizens and businesses	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Drones can adequately protect citizens from risks and at the same time lead to concerns related to safety, security or privacy.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The potential benefits of drones could outweigh the risks and threats they might pose.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

14. Are there any other benefits you would like to highlight in relation to drones?

*2000 character(s) maximum*

The insurance sector sees some key benefits of drones, which are considered in detail as follows:

#### Risk assessment and mitigation

- Drones can be used by insurers to identify, evaluate and mitigate risk in a wide range of insurance classes, which could in turn provide more accurate premiums. For example, drones can be used to monitor risks on an ongoing basis with the aim of mitigating against potential losses, such as monitoring an oil rig to ensure upkeep with a view to preventing an oil spill.

- Insurers can make use of drones to quickly and accurately inspect difficult to reach/inaccessible sites, including in post-disaster recovery scenarios. This, in particular, is seen as a key benefit in order to increase the speed of information captured post-disaster, whilst reducing the immediate risk to life from, for example, earthquake aftershocks. The use of drones will make claims adjusters' workflow quicker and in turn can increase the speed with which claims are paid to consumers.

#### Growing product line

Drones are a developing and expanding product line for insurers and currently significant capacity exists in the aviation sector (for commercial operations and large drones), the liability sector (also for commercial operations) and in some personal lines sectors as add-ons to household policies or as niche policies.

More generally, the benefits of drones to specific sectors are substantial, for example:

- The use of images taken by drones in combination with the application machine learning can provide insight and competitive advantage to the agricultural industry, for example. The use of aerial analytics on crops could lead to lower costs on insurance and more tailored policies.

## C. Which problems should be addressed in priority?

Drones however could pose problems in terms of privacy and security aspects. People can be concerned by the fact that drones are flown over private properties, or by the noise and other nuisances drones could bring. The security aspect is also often raised in relation to drones.

15. What are in your opinion, the main issues to be addressed with regard to drones operations?

	Strongly agree	Agree	Disagree	Strongly disagree	No opinion
Drones may only fly if it is clear (to relevant authorities) who is flying the drone and what is the purpose and the objective of the drone flight (e.g. delivery or emergency flight)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Drones will affect the protection of privacy.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Drones should not be allowed to fly freely over city centres at low altitude.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Drones are a security threat and should be prohibited.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Drones will become another source of nuisance in terms of noise.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Drones will become another source of nuisance in terms of greenhouse gases emissions.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

16. Are there any other potential issues you would like to highlight in relation to drones?

*2000 character(s) maximum*

- The drones (unmanned aircraft) industry is growing rapidly and unevenly, which challenges regulators to provide adequate oversight as well as technical support. In addition, drones (UAs) are treated differently across Member States, both by regulators and users. This results in a fragmented legal landscape in Europe, which may inhibit market growth and hinder investment in the technology. This is of further concern when considering the potential for cross-border use.

- Data on the practical use of drones and on accidents involving drones is currently insufficient in quantity and quality to draw meaningful conclusions as the market is at such a nascent state.

- Concerns over security and privacy in relation to drones are general concerns. Insurers strongly support support a no-fly-zone near or close to airports, and is encouraged by the action taken by many Member States to prohibit drones flying at or near airports. Lastly, some insurers offer professional indemnity insurance that can help cover the cost of damages awarded for breach of privacy against drone operations.

- Insurers will look to use drones to assess damages to properties or post-disaster damages, for example. This will mean that insurers will occasionally require access to fly over residential properties, so there should be a straightforward means of gaining consent to fly over built-up areas when there is sufficient reason to do so.

Once the new Regulation on common rules in the field of civil aviation will enter into force, the EU competence on drones will be extended, regardless of their weight. In particular, the lighter unmanned aircraft of less than 25kg. So far, some Member States have already adopted rules to guarantee the

safety of simple operations for light drones, while other Member States are preparing rules. There has not been a consistent approach across Europe on how to regulate them and rules differ between EU Member States.

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

17. What can limit the development of drones?

	Strongly agree	Agree	Disagree	Strongly disagree	No opinion
The need to obtain national authorisations in individual Member States to operate drones can limit their use across different Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There are differences in national rules in various EU Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of mutual recognition for national certificates can limit their use across different Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legal and technological uncertainty are a result of missing key technologies that need to be validated	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legal and technological uncertainty are a result of emerging and fast evolving drones sector that cannot be rigidly regulated	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legal and technological uncertainty are a result of lacking of EU or international standards	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

18. Which factors could undermine the safety, security and privacy risks related to drones operations?

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

The difficulty to actually implement and enforce current regulations at national level	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
--	-----------------------	-----------------------	----------------------------------	-----------------------	-----------------------

## D. Opinion

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

19. Overall, what is your opinion on the main problems affecting the development of the drones market?

	Strongly agree	Agree	Disagree	Strongly disagree	No opinion
Drones are not fully accepted within civil societies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Commercial Drone operations require a significant volume to become profitable in the long term	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Uncertainty about future drone rules hinders investment decisions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

20. Please elaborate on your answers to the above statements

*2000 character(s) maximum*

Insurance Europe represents the European (re)insurance industry and cannot comment on the validity of the above three statements. While commercial drone operations are at a nascent stage in Europe (re)insurers see the potential in drones both from an underwriting and commercial-use perspective.

## E. Other issues

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

*2000 character(s) maximum*

Please refer to Insurance Europe's accompanying comments through the link in response to question 22.

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

*2000 character(s) maximum*

Please refer to further Insurance Europe comments accompanying this consultation response on its website here: <https://www.insuranceeurope.eu/response-ec-public-consultation-drones-unmanned-aircraft>

## **Useful links**

[Consultation page \(https://ec.europa.eu/info/consultations/2018-drones\)](https://ec.europa.eu/info/consultations/2018-drones)

---

## **Contact**

Yves.BORMANS@ec.europa.eu

---