



European Aviation Safety Agency
Hermann-Pünder-Straße 3
50679 Köln
Germany

Re: Introduction of a regulatory framework for the operation of drones

25th September 2015

To whom it may concern,

The SCSi is the largest professional body for the property, construction and land sectors in Ireland and works in partnership with RICS in the public interest; setting and maintaining the highest standards of competence and integrity among the profession and providing impartial, authoritative advice on key issues for business, society and governments worldwide

In response to the request for submissions in relation to proposed Draft Regulations for the Operation of Drones our Mineral Surveying Professional Group has compiled the following comments:

1. The proposed regulations do not provide for recognition of Remotely Piloted Aircraft System Pilots (RPAS) pilot qualifications that many operators have already obtained in member states. For example, some of our members are fully qualified and licenced RPAS operators in Ireland. This has cost considerable time and expense.
2. Whilst the proposed draft regulations recognise that there are existing licencing regimes in place in some member states they provide no dispensation for existing licenced operators. This point needs to be addressed in the regulations. There should be no further training / licencing requirements for existing licenced operators in member states.

This is not exhaustive list of comments on the proposed regulations and the SCSi would welcome the opportunity to discuss the impact of the regulations and there impact on Ireland in more detail

Regards,

Peter Kinghan
Chair of the Minerals Surveying Professional Group
Society of Chartered Surveyors Ireland

Ben King
Chair of the Geomatics Professional Group
Society of Chartered Surveyors Ireland