



Declaration of Model club / association for Compliance with Commission Implementing Regulation (EU) 2019/947 for issuing of authorisation for UAS operations in the framework of Model aircraft clubs and associations



The purpose of the declaration is to assist the club/association wishing to obtain an authorisation according to Article 16 of the regulation. This document is complementary to the requirements of Implementing Regulation EU 2019/947, as amended, and does not supersede or replace the information defined within the regulation and its AMC&GM.

The declaration incorporates the requirements of Implementing Regulation EU 2019/947, amended by Regulation EU 2020/639, Regulation EU 2020/746, Regulation EU 2021/1166, Regulation EU 2022/425, Regulation EU 2022/525 and AMC&GM, published with ED Decision 2019/021/R, ED Decision 2020/022/R and ED Decision 2022/002/R

The declaration should show compliance by referring in column “*Section/paragraph in the club/association documentation/procedures; attached documents*” where the relevant information in the club/association’s documentation could be found and explanation if not applicable.

This declaration, when completed, should be submitted with the application for initial authorization or in case of an amendment.

This declaration is to be used by:

- club/association - To assist them in demonstrating compliance with Implementing Regulation (EU) 2019/947 when obtaining authorisation for UAS operations in the framework of model aircraft clubs and associations
- competent authority - As an assessment document submitted to them for approval

For each detailed procedure described within the club/association’s documentation, the club/association should try to address the following questions:

Who should do it, what, when, where and how, including which procedure(s) and form(s) to be used?

Declaration of Model club/association for compliance with Implementing Regulation (EU) 2019/947			Type	Application for Authorisation for UAS operations in the framework of model aircraft clubs and associations	
Model Club / Association			Initial <input type="checkbox"/>		Amendment <input type="checkbox"/>
№	Requirement	Description	Completed by club/association	Completed by DCAC	
			Section/ paragraph in the club/association documentation/ procedures; attached documents	Check	Remarks
	Article 16	UAS operations in the framework of model aircraft clubs and associations			
1.	16(2)(b)	The model aircraft club or association shall establish organisational structure (A model aircraft club or association should identify persons who fulfil the role of managers and who are responsible with regard to safety, compliance monitoring and security of its services, as applicable; the titles and names of nominated postholders; the club/association’s chart showing the lines of responsibility between the persons).			
2.	16(2)(b)	The model aircraft club or association shall establish management system that includes: (1) clearly defined lines of responsibility and accountability throughout its organisation,			

		<p>including a direct accountability of the accountable manager;</p> <p>(2) a description of the overall philosophies and principles of the club/association with regard to safety, quality, and security of its services, collectively constituting a policy, signed by the accountable manager (The policy should include a commitment to improve towards the highest standards, comply with all the applicable legal requirements, meet all the applicable standards, consider the best practices, and provide the appropriate resources.);</p> <p>(3) a process to determine the hazards and associated risks inherent in the operation and establish mitigating measures – the identification of aviation safety hazards entailed by the activities of the club/association, their evaluation and the management of associated risks, including taking actions to mitigate the risk and verify their effectiveness; (risk management may be performed using hazard checklists or similar risk management tools or processes).</p> <p>(4) a process to identify changes within its organisation (management of changes should be a documented process);</p> <p>(5) maintaining personnel trained and competent to perform their tasks; (determine the necessary competence for personnel performing the activities; provide training or take other actions to achieve the necessary competence; maintain appropriate records of education, training, skills and experience; ensure that personnel are aware of the relevance and importance of their activities);</p> <p>(6) documentation of all management system key processes, including a process for making personnel aware of their responsibilities, and the procedure for the amendment of this documentation;</p> <p>(7) a function to monitor compliance of its organisation with the applicable requirements and the adequacy of the procedures. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure effective implementation of corrective actions as necessary;</p> <p>(8) general description and location of the facilities.</p>			
3.	16(2)(b)	The model aircraft club or association shall establish established procedures (operating, ground, emergency), that all members are required to follow.			
4.	GM1 Article 16	The model aircraft club or association may establish a procedure for UAS operations by persons who temporarily join in with the activities of the club or association (e.g. for leisure during holidays or for a contest)			
5.	16(2)(b)(i)	Remote pilots operating in the framework of model aircraft clubs or associations are informed of the conditions and limitations defined in the authorization.			
6.	16(2)(b)(ii)	Remote pilots operating in the framework of model aircraft clubs or associations are assisted in achieving the minimum competency required to operate the UAS safely and in accordance with the conditions and limitations defined in the authorization.			
7.	16(2)(b)(iii)	The model aircraft club or association takes appropriate action, proportionate to the risk posed when informed that a remote pilot operating in the framework of model aircraft clubs or associations does not comply with the conditions and limitations defined in the authorisation.			
8.	16(2)(b)(iii)	Considering the level of risk the model aircraft club or association may inform the competent authority, when informed that a remote pilot operating in the framework of			

		model aircraft clubs or associations does not comply with the conditions and limitations defined in the authorisation.			
9.	GM1 Article 16(2)(b)(iii)	The model aircraft club or association shall report to the competent authority any occurrences that cause an injury to persons or where the safety of other aircraft was compromised, as defined in Article 135 of Regulation (EU) 2018/1139.			
10.	GM1 Article 16(2)(b)(iii)	The club/ association shall report to the competent authority, and to any other organisation required to be informed, any accident, serious incident and occurrence as defined in Regulation (EU) No 996/2010 of the European Parliament and of the Council and Regulation (EU) No 376/2014.			
11.	GM1 Article 16(2)(b)(iii)	Reports shall be made as soon as practicable, but in any case, within 72 hours of the club/ association identifying the condition to which the report relates, unless exceptional circumstances prevent this.			
12.	16(3)	The applicant shall specify the conditions under which operations in the framework of the model aircraft clubs or associations may be conducted.			
13.	GM2 Article 16	The applicant may require an establishment of zones where UAS are exempted from certain technical requirements, and/or where the operational limitations are extended, including mass or height limitations, that are acceptable to the competent authority.			
14.	Records keeping	The following records shall be kept: - details of training given to an individual (ground & flight training, progress reports, assessment reports) as appropriate and information of the individual for a period of three years; - personnel records (proof of qualification, experience, competency, training, checking) for a period of three years; - reports, related to compliance monitoring activities for a period of five years; - hazards identification, risk assessment and mitigation measures for a period of three years. - report on the activity report for a period of three years.			
15.	Access	For the purpose of determining compliance with the relevant requirements of Implementing Regulation (EU) 2019/947, the model aircraft club or association shall grant access at any time to any facility, UAS, document, records, data, procedures or any other material relevant to its activities, subject to the authorisation, whether it is contracted or not, to any person authorised by the competent authority.			
16.	Facility requirements	The model aircraft club or association shall have facilities in place allowing the performance and management of all its activities.			
17.	Aerodromes and operating sites	The model aircraft club or association shall only use aerodromes and operating sites that are adequate for the type of UAS and operation concerned.			
18.	Annual internal review	<i>The annual internal review should consist of a comprehensive assessment whether the club/association effectively carries out the tasks and responsibilities. Specific emphasis should be given to the following:</i> (a) availability of sufficient resources; (b) conduct of training in accordance with the organizational procedures; (c) random checks of training records; (d) used UAS including their documents and maintenance records, as appropriate; (e) aerodromes and operating sites, including associated facilities; (f) evaluation of both adequacy and effectiveness of the follow-up, corrective and, as applicable, remedial action taken after non-compliances that have been detected internally or by the competent authority; (g) assessment of the safety policy including its means and methods for its adequacy and currency; (h) assessment of the effectiveness of the implementation of the mitigation measures, as foreseen in the club/association's safety policy.			
19.	Annual activity report	With regard to the past calendar year, the annual activity report should contain at least lists of: (1) all the activities conducted in the framework of model aircraft clubs and associations;			

		(2) names of all instructors involved in the provision of training, if any (3) number of members – permanent and temporary; (4) all UAS used, (5) all occurrences, accidents and incidents that occurred during its activities; and (6) any other information that is deemed relevant by the club/association.			
20.	Findings	After the competent authority has communicated a finding to a model aircraft club or association, the model aircraft club or association shall take the following steps within the time period determined by the competent authority: (a) identify the root cause of the non-compliance; (b) define a corrective action plan /take the necessary corrective action to terminate the non-compliance and, where relevant, remedy the consequences thereof/; (c) demonstrate corrective action implementation to the satisfaction of the competent authority within a period agreed with that authority.			
21.	Safety briefing	The model aircraft club or association shall ensure that, prior to take-off members are given a briefing on: (1) emergency procedures; (2) operational procedures associated with UAS operation. The briefing referred to in (2) may be replaced by an initial and recurrent training programme. In such case the model aircraft club or association shall also define recency requirements.			
22.	ERP	The model aircraft club or association shall, in cooperation with other stakeholders, develop, coordinate and maintain an emergency response plan (ERP) that ensures orderly and safe transition from normal to emergency operations and return to normal operations. The ERP should provide the actions to be taken by the club/association or specified individuals in an emergency and reflect the size, nature and complexity of the activities performed by the club/association.			

Any observations/non-compliances:	<i>to be completed by DCAC</i>

For and behalf of the club / association

Name (accountable manager):

Signature:

Date:

Verified by DCAC

Name (inspector):

Signature:

Date: