

Alternative Means of Compliance

Operations under PDRA-S01 without parachute AltMoC No. IT-UAS-2026-001 – EASA Flextool ref. No. Alt/26/0017

This document is an Alternative Means of Compliance (AltMoC) issued by ENAC with reference to Reg. (EU) 2019/947, Art. 11.

Regulatory reference:	
Regulation (EU) 2019/947 Article 11	
Rule paragraph(s)	AMC4 Art.11 "Rules for conducting an operational risk assessment" - Predefined Risk Assessment PDRA-S01 Version 1.2 Edition September 2023

List of Effective Pages:		
Page number	Revision number	Revision date
1	Rev.0	2 nd February 2026
2	Rev.0	2 nd February 2026
3	Rev.0	2 nd February 2026

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1 Full description of the AltMoC, which includes reasoning of the AltMoC

The present AltMoC constitutes an alternative means of compliance with the provisions of the Predefined Risk Assessment PDRA-S01 in cases where the operator does not use a class C5-marked UAS.

Specifically, under item 6 – Technical conditions/UAS, point 6.2, PDRA-S01 requires the use of a UAS compliant with Part 16 of Regulation (EU) 2019/945, except that the UAS does not need to:

- bear a class C3 UAS or a class C5 UAS identification label;
- have an MTOM of less than 25 kg;
- be exclusively powered by electricity, if the UAS operator ensures that the environmental impact caused by the use of non-electric UAS is minimised;
- include an information notice that is published by EASA and provides the applicable limitations and obligations, as required by the UAS Regulation; and
- include the manufacturer's instructions for the UAS, if it is privately built; however, information on its operation and maintenance, as well as on the training of the remote pilot, should be included in the OM.

In addition to the points listed above, this AltMoC does not foresee the need to “include means to reduce the effect of the impact dynamics” stated at point 5(c) of Part 16 of Regulation (EU) 2019/945.

Furthermore, this AltMoC introduces a modification to point 3.8 of PDRA-S01 concerning the minimum distances for calculating the Ground Risk Buffer, by providing for the use of the 1:1 rule.

2 Assessment demonstrating that the IR(s) are met

The assessment is based on the following considerations. Operations conducted with a UAS within a Controlled Ground Area ensure that no uninvolved persons are present within the operational area and the ground risk buffer. As a result, the use of systems intended to reduce impact dynamics (e.g., parachutes) does not influence the applicable Ground Risk level.

The application of the 1:1 rule, in place of the table provided in point 3.8 of PDRA-S01 for determining the minimum Ground Risk Buffer, represents a more conservative and simplifying approach. This method ensures that, in the event of activation of the FTS, and taking into account the reduced operating speed (5 m/s) -already required under point 5.3.9(e)- the UAS will impact the ground within the boundaries of the Controlled Ground Area.

For the above reasons, compliance with the regulation is achieved.

3 Regulatory wording of the used AltMoC

Legenda:

~~Deleted text~~

Added text

The text of the AltMoC is the following:

AltMoC to AMC4 Article 11 Rules for conducting an operational risk assessment:

“3.8 - For the operation of untethered UAS, the ground risk buffer should cover a distance beyond the external limit(s) of the contingency area. ~~That distance should be at least as defined below:~~
That minimum distance should be calculated in accordance with the 1:1 rule.”

and

“6.2 - As an alternative to point 6.1, the UAS operator may use a UAS that complies with the requirements of Part 16 of the Annex to Regulation (EU) 2019/945, except that the UAS does not need to:

- bear a class C3 UAS or a class C5 UAS identification label;
- have an MTOM of less than 25 kg;
- be exclusively powered by electricity, if the UAS operator ensures that the environmental impact that is caused by the use of non-electric UAS is minimised;
- include an information notice that is published by EASA and provides the applicable limitations and obligations, as required by the UAS Regulation; and
- include the manufacturer’s instructions for the UAS, if it is privately built; however, information on its operation and maintenance, as well as on the training of the remote pilot, should be included in the OM.
- include means to reduce the effect of the UA impact dynamics.

Note 1: The UAS can comply with point (9) of Part 4 of the Annex to Regulation (EU) 2019/945 by using an add-on that complies with Part 6 of the Annex to that Regulation

Note 2: If the UA does not bear a physical serial number that is compliant with standard ANSI/CTA 2063-A ‘Small Unmanned Aerial Systems Serial Numbers’ and/or does not have an integrated system of direct remote identification, it can comply with point (9) of Part 4 of the Annex to Regulation (EU) 2019/945 by using an add-on that complies with Part 6 of the Annex to that Regulation.

Note 3: UAS Operators and/or Recognised Entities are required to specify in their Operations Manual if they are using this AltMoC.