

Alternative Means of Compliance

Agricultural, horticultural and forestry UAS Operations

AltMoC No. IT-UAS-2026-002 – EASA Flextool ref. No. Alt-1790

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	
Rule paragraph(s)	Article 11

List of Effective Pages:		
Page number	Revision number	Revision date
1	Rev.0	13 th August 2026
2	Rev.0	13 th August 2026
3	Rev.0	13 th August 2026

Ente Nazionale per l'Aviazione Civile (ENAC) contacts for this AltMoC	
ENAC Department	Innovative Air Services Department
Contact details (email)	mobilita.innovativa@enac.gov.it

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

The present AltMoC issued by ENAC constitutes an alternative means of compliance to Article 11 of Regulation (EU) 2019/947, in view to simplify the authorisation process for agricultural, horticultural and/or forestry UAS operations under specific conditions.

Specifically, this AltMoC applies to operations conducted:

1. with untethered UAs having maximum characteristic dimensions (e.g., wingspan, rotor diameter/area, or maximum distance between rotor tips in the case of a multicopter) up to 5 m;
2. with the unmanned aircraft kept in VLOS of the remote pilot at all times;
3. following the operational limitations specified in the UAS manufacturer's instructions;
4. within a controlled ground area located in a sparsely populated environment;
5. for a UAS operation in connection with agricultural, horticultural or forestry activities, over an area used for such activities, including take-off and landing area;
6. at a flight height not exceeding 20 m AGL, or up to 20 m above the top of a natural or artificial obstacle;
7. in controlled or uncontrolled airspace, provided that there is a low probability of encountering manned aircraft; and
8. operated by a remote pilot who meets the following requirements:
 - a. holds a certificate of remote pilot theoretical knowledge and an accreditation of completion of the STS-01 practical skill training in accordance to UAS.STS-01.020 point (1)(e);
 - b. Ability to apply operational procedures (normal procedures, emergency procedures, flight planning, pre- and post-flight inspections) in accordance with the flight manual and the operations manual;
 - c. Certificate of attendance and successful completion of a Crew Resource Management (CRM) course provided by entities/organisations assessed by ENAC;
 - d. Ability to manage aeronautical communications;
 - e. Having received additional theoretical and practical training, provided by the operator, related to the specific operation to be conducted, developed in accordance with AMC1 and AMC2 UAS.SPEC.050(1)(d) and (1)(e);
9. with an unmanned aircraft which is:
 - (a) operated with an active and up-to-date system to prevent the unmanned aircraft from breaching the flight geography;
 - (b) operated with active and updated direct remote identification system and geo-awareness function.

Together with the PDRA AltMoC IT-UAS-2026-002, ENAC has made available a pre-compiled compliance checklist, whose pre-filled items are directly derived from the corresponding pre-defined Operations Manual. Both documents are provided to operators as support tools to facilitate the correct and consistent demonstration of compliance with the applicable PDRA requirements.

2	<i>Assessment demonstrating that the IR(s) are met</i>
ENAC has developed this AltMoC introducing a characteristic dimension of 5 metres for the UA, a maximum flight height of 20 m to be maintained during the operations, over a controlled ground area in a sparsely populated environment and other conditions for the applicability that are generally in line with the requirements of the declarative approach outlined in the EASA NPA 2026-103. The dimension up to 5 m adjustment shifts the iGRC from 1 to 2 but does not change the final SAIL level, which remains at SAIL II with a final ARC-b. The evaluation confirms that the increase in characteristic dimension does not affect the residual risk, and all SAIL II mitigations remain appropriate. Moreover, considering the operational speed limited to 5 m/s, the low operating height, and the restricted battery capacity of the UAS typically employed in these operations, the adjacent area has been predetermined to extend up to 1 km. Therefore, the method of compliance ensures a risk level that is acceptable and equivalent to that achieved through the standard means of compliance. For the above reasons, compliance with the regulation is achieved.	

3	<i>Regulatory wording of the used AltMoC</i>
AltMoC ENAC No. IT-UAS-2026-002 to Article 11 Rules for conducting an operational risk assessment. <u>The text of the AltMoC is contained in the document “PDRA AltMoC IT-UAS-2026-002 Ed. agosto 2026 Rev.0”.</u> Note 1: UAS Operators are required to specify in the application for the operational authorisation in specific category and in their Operations Manual if they are using this AltMoC. Note 2: This AltMoC is applicable in Italy. In case of cross-border operations the alternative means of compliance established with this AltMoC needs to be adapted to the requirements of the State of Operations, processed and accepted by the Competent Authority of that State.	

