

UPDATED MITIGATION MEASURES AND LOCAL CONDITIONS FOR UAS OPERATIONS IN ITALY

In accordance with Art 13 of Reg (EU) 2019/947, for Cross Border Operations the operators need to "... **provide the national Authority of the Member State of intended operation with an application including the following information:**

- a) A copy of the operational Authorization granted to the UAS operator in accordance with Art 12; and**
- b) The location(S) of the intended operation including the updated mitigation measures, if needed, to address those risks identified under Article 11(2)(b) which are specific to the local airspace, terrain and population characteristics and the climatic conditions."**

Moreover, according to AMC1 Art 13, **"The UAS operator should:**

- 1) Identify the applicable local conditions in the area of operation;**
- 2) Adapt the operational procedures, as necessary:**
 - i. To comply with the applicable local conditions; and**
 - ii. As required by the application to the new location(s) of the mitigation measures, identified in the operational authorization."**

In accordance with the aforementioned article and AMC1, the following scheme has been made to assist the foreign operators in identifying local conditions/requirements, providing compliance evidence and identifying the necessary updated mitigations measures.

Risk areas to be evaluated by ENAC Cross Border - ART 13 (1)(b)	Risks to be identified by the operator as per ART 11(2)(b)	EVALUATIONS TO BE MADE TO OPERATE IN ITALY: "LOCAL" CONDITIONS TO BE APPLIED AND MITIGATIONS/PROCEDURES UPDATE
LOCAL AIRSPACE	Types Of Airspace	OPERATORS Should: 1. Verify airspace compatibility using maps on "D-Flight", the Italian portal for safe drone operations: https://www.d-flight.it/web-app/ 2. UAS operations may require a "Temporary Reservation of Airspace" (TRA). ENAC Circular ATM-09A outlines procedure and form.
	Airspace volume	Verify that the involved airspace is appropriate for the Operation Authorization obtained from the National Authority. Request TRA if needed

	Operational requirements for geographical zones	1. OPERATORS should verify the presence of Geographical ZONES (GZ) on the “D-Flight” portal. 2. In case of operations inside a GZ created for safety reasons around an aerodrome, operators must request a TRA as per ENAC Circ. ATM-09A; 3. In case of penetration of other kinds of GZ (ex: archeological sites, natural parks, prisons, model club zones), operators must ask permission to fly, either to ENAC or to the Authority that requested the GZ institution, according to the type of GZ as per ENAC Circ. ATM-09A. Requests should be sent using the appropriate form, available as attachment of ENAC Circ. ATM-05B.
TERRAIN	OROGRAPHY	Since a great part of Italy is composed by hilly or mountainous terrain, Operators must verify the orography of the intended area of operations and demonstrate compatibility with Radio link .
POPULATION CHARACTERISTIC	Overflowed population	1. Overflowed population areas characteristics must be clearly documented. Operational volume and risk buffers must be evident and compatible with the authorization received; 2. Compatibility of VLOS operations with the definition of VLOS by Reg (EU) 2019/947 must be clearly stated and defined. For UAs up to 25 kg, in any case, the definition of VLOS is NOT considered applicable when operating at distances exceeding 500 mt between the UA and the remote pilot. 3. Application of M1 mitigation must be adequate to Italian citizen’s lifestyle (ex: in southern Italy, in summer time, there are more people in the open air at night than during day time) and all criteria must be satisfied in accordance with the chosen location of operations. 4. If operating over cities, and whenever the operator needs to segregate a public area, an agreement with the local authorities (e.g. police, municipalities) must be signed. 5. If operating over urban areas, an ERP must always be in place. 6. If the ERP is used, it must be updated with the Italian Emergency Authorities contact

		numbers. The operator must appoint a person who is able to speak Italian to contact and deal with the authorities in case of emergency.
CLIMATIC CONDITIONS		Different climatic zones characterize Italy, with very hot summers, heavy storms in springtime, very cold weather on the mountains and dense fog on the northern plains in autumn and winter time. Operators must demonstrate compatibility of their operations with the climatic conditions of the chosen location in the specific period of the year updating contingency procedures to cope with them.

ADDITIONAL REQUIREMENTS

1. **Drone light shows** are always required to operate over a Controlled Ground Area and, if deemed necessary by ENAC, in Temporary Restricted Area. TRA are created through the issue of a NOTAM, that must be requested by the operator at least 15, 35 or 60 days in advance depending on the type of airspace and following the procedures foreseen in **ENAC Circular ATM-09A**.
2. **Drone light shows with the use of pyrotechnics are allowed under these following additional conditions:**
 - Only Operations in SAIL I or II and pyrotechnics of class T1 are allowed;
 - The use of class T1 pyrotechnics has to be expressly included in the Operational Authorization;
 - The Ground Risk buffer has to be incremented taking into account the maximum projected distance on the ground of the pyrotechnics.
3. **The concept of “Populated Area” is not “straight forward” when applied to operations intended to be conducted over the center of cities and towns, especially in BVLOS conditions.** As a matter of fact main squares, principal shopping areas, monumental areas, city parks, stadiums, congested traffic areas, easily fall within the definition of “assembly of people”: a very accurate and detailed evaluation of flying patterns and day/time flight schedule should be performed by the operator, along with the implementation of additional mitigation measures such as, for example, the use of multiple observers.
4. **INSURANCE:** Insurance is required regardless of the weight of the UAS. UAS operators must ensure that their insurance coverage complies with the requirements of the UAS-IT regulation, ART 27. A copy of the insurance certificate shall be made available to ENAC upon request.
5. **To comply with art. 23 of Italian UAS-IT regulation, in case of BVLOS operations** the pilot shall plan the flight by means of “**d-flight**” website, in accordance with the procedures established by ENAC. Operators have to register first on the d-flight portal and receive a “UAS Operator registration number”. This number is NOT to be considered valid as Country registration in accordance with art. 14 of EU Reg. 2019/947, but it’s only a “temporary number” to be used for the purposes of the Cross Border Operation.