



**PART IX - A SUMMARY REFERENCE OF NEW RPAS RULES VER 3.11 (10 Apr 25) with notes by D Cooke inskyphoto.com**

The Regulations build upon Part IX of the CARs and introduce new requirements to reflect the increased risks of the two new categories of operation:

- Medium drones that weigh above 25 kg up to and including 150 kg flying within VLOS near and over people, in both controlled and uncontrolled airspace; and
- Drones that weigh 250 g up to and including 150 kg flying BVLOS in unpopulated and sparsely populated areas, below 400 feet above ground level, and in uncontrolled airspace.

These rules came into force in Canada 1APR25 . . . "[N]"rules come into force 4 Nov 25 (See LAST pg)

**DIV I GENERAL - General Operating Flight Rules**

- 901.01 These rules apply to Small Remotely Piloted Aircraft Systems (RPAS-sRPAS) Minister will approve if applicant is qualified
- 900.07 You must call ATC or FltSvc if you loose control and inadvertently enter Class F Restricted airspace
- 900.08 Don't operate over or in a "Security Perimeter" established by authorities unless you are Police Fire or Rescue
- 900.09 (1) You must be Canadian or agent or rep of an RPAS operator to operate a commercial service
- 900.09 (2) Exceptions - PIC can be a foreign pilot you are authorized under a Free Trade Agreement w Canada or have an SFOC
- 900.09 (3) If your service holds a licence issued under section 61 of the Canada Transportation Act.
- 900.13 (1)(2) >250g Must be Registered unless under an SFOC under 903.03
- 900.14 Registration number must be clearly visible on the aircraft
- 900.15 Registrant must be a age 14 or older, Canadian Citizen, Permanent Resident, a corporation or Gov't Agency
- 900.16 Spells out the information needed to register a UAV (make, model, name addr ser No. etc)
- 900.17 The minister shall keep a database of all registerd UAVs
- 900.18 You must de-register any aircraft within 7 days of loss, destruction or by 60days of stopping use
- 900.18 Once registered you are legally responsible for operations and maintenance no matter who flies it
- 900.19 You must notify any change of address within 7 days
- 900.20 You must have a copy of your RPAS certificate with you during operations (in your phone is fine)

**DIVISION II - Small Remotely Piloted Aircraft and Medium Remotely Piloted Aircraft**

- 901.11 Either PIC or Observer must have the UAV in VLOS at all times except as below
  - (2) except for Extended VLOS Operations and Sheltered Operations (DIV VI) or unless under BVLOS or SFOC see 901.87 or 903.03
- 901.12 no flying over or within Police Fire rescue Security perimeter (unless approved by the ops commander)
- 901.13 Can't leave Domestic Airspace ie cross a border like Canada/US (Note: there's >5000miles of that in Canada)
- 901.14 You can't operate in Controlled Airspace except under Advanced Cert rules (901.71+)
- 901.15 notify ATC or airspace authority (FIS) if you enter ctrlrd airspace inadvertently or likely to
- 901.16 Stop operations immediately if anyone is or likely to be in danger
- 901.17 always give way to all other manned aircraft, balloons, gliders . . . everyone
- 901.18 STOP if there is any risk of collision with any other aircraft
- 901.19 No sick or tired or unfit crew allowed
- 901.19 (2) >12hrs since Alcohol or under influence of impairing substance (prescribed or other)
- 901.20 PIC and OBS must have good communications at all times
- 901.20 (1) ANY/ALL Observers used must have clear communications with PIC at all times
- 901.20 (2) Observers MUST communicate hazards to PIC in a timely manner
- 901.20 (3) Observers only monitor 1 UAV at a time see 901.40(1) or get an SFOC (903.03)
- 901.20 (4) Observers cannot observe while driving vessel vehicle of other aircraft (PIC 901.37)
- 901.21 Crews must obey the PIC instructions during flight
- 901.22 no living creatures on board UAVs . . (Unless authorized under SFOC)
- 901.23 These procedures mandated for all flights - be familiar with before take-off 901.24
  - Preflight Take-off Launch Approach Landing Recovery
  - Controller failure, Equipment failure, A/c Failure, C2 Loss, Fly-away, Flt Termination
  - Refer to MFG procedures, They must reflect above instructions
  - Now also refers to "detect and avoid" go read the actual 901.23 sub-paras
- 901.23 (3) No take-off without crew reviewing checklist/procedures that is available to PIC
- 901.23 (4) No operating UAV unless IAW established procedures
  - 901.24 Don't start without knowing ALL available info needed for the flight
  - 901.25 Stay below 400ft AGL MAX - you can go 100 ft over bldgs/structures if <200ft horiz
  - 901.25(2) otherwise get an SFOC see (903.03)
  - 901.26 Fly >100ft away from anyone except crew or actors (no overflight AT ANY ALTITUDE)
- 902.26 (b) For MEDIUM RPAS Stay more than 500ft away from anyone except crew

- A/c - Aircraft (all kinds UAV or normal)
- ADS-B IN - Nearby A/c warning systems
- ACK - Acknowledge ( like a clearance)
- AGL - Above Ground Level
- ATC - Air Traffic Control
- ASL - Above Sea Level
- BVLOS - Beyond Visual Line Of Sight
- C2 - Command & Control Radio/Wire/Optical Link
- CFS - Canada Flight Supplement
- Critical Surface - Wing, blades Ctrl Surfaces
- CTRL - Control or Controller
- ELT - Emergency Locator Transmitter
- EVLOS - Extended VLOS
- FPV - First Person View CTRLR
- IAW - In Accordance With
- MOD - Any modification of the "system"
- MFG - Manufacturer's
- NVG - Night Vision Goggles
- PIC - Pilot In Command
- RPIC - Remote PIC ( I just threw that out there)
- RPAS - Remotely Piloted Aircraft System (includes UAV and CTRLR)
- RPOC - Remote Pilot Operations Certificate
- sRPAS - Small RPAS (between 0.25-25kg)
- SAFE - Complies with Standard 922 (DRAFT)
- SFOC - Special Flight Operations Certificate
- Sheltered OPs - Nearby Structure/Towers
- SOP - Standard Operating Procedures
- SI - Staff Instruction (see No. 623.001)
- STD921 - RPAS Operator Review Standard (TC)
- STD922 - RPAS Safety Assurance Std DRAFT (TC)
- TP15263 - Small RPAS Knowledge Req's (TC)
- TC - Transport Canada

[N]

By D Cooke

TC - Transport Canada  
UAS - Unmanned Aerial System (a/c + CTRL)  
UAV - Unmanned Aerial Vehicle (drone only)  
VLOS - Visual Line Of Sight  
WAS - Water Aerodrome Supplement

[N]

[N]

[N]

[N]

[N]

[N]

[N]

**Document Set**

(Hard or Soft copy)

**REQUIRED** (on-site)

RPAS Registration  
RPAS Manual  
PIC Cert & Logs (recency)  
Site Survey  
Proof of Insurance (if Apl)  
Property Permission  
Checklist (incl Emerg)  
RPAS Ops Procedures

**OPTIONAL**

Company SOPs Stds  
Company Training Manual  
Training Records

**EQUIPMENT**

Fire Extinguisher  
Sign/Safety Vest

- 901.27 Site Survey must be done, including
  - Type of Airspace (CLASS) - Define boundaries physical and electronic (GeoFence)
  - Evaluate Altitudes (AGL) Approach and Departing routes
  - Check distance from manned A/c ops, airports, heliports and other aerodromes
  - Locate and note height of obstacles towers ,bldgs, masts, wires, cell towers, wind turbines and obstacles etc
  - Check forecast weather conditions at planned time - (and do a local weather check before you fly)
  - Evaluate distance from any bystanders who are NOT crew or actors Re EVLOS and "Sheltered Ops"
  - Know standoff distances for BVLOS ops in sparcely populated areas
- 901.28 ensure enough fuel or energy for the flight
  - PIC to ensure everyone knows their role and has been briefed including emergency equipment
  - what's max distance the A/c can travel without endangering aviation or others
- 901.29 PIC to ensure a/c is serviceable, & maintained IAW MFG instructions and equip is installed properly & serviceable
- 901.30 Manuals must be available to PIC and Crew members on site (print or electronic form)
- 901.30 (2) Under BVLOS ops Operators Manual must be available to PIC and crew at all times
- 901.31 Must fly IAW MFG instructions ( like no high winds, rain, prohibited maneuvers, check the manual)
- 901.32 No autonomous flight unless PIC can take control at any time
- 901.33 No take-off launch approach or land unless site is safe and no likelihood of collision with anything
- 901.34 Weather condition at planned time must be IAW MFG instructions/limits and ALWAYS VLOS
  - (2) MEDIUM RPAS Ops must Stay within 2 miles distance if visibility < 4Miles
  - (3) No BVLOS Ops in less than VFR weather (<3miles vis and clear of cloud)
  - (4) Special visibility rulls apply for certain aircraft that meet 922 Standard and/or SFOC rules
- 901.35 No flying in icing or potential ice without anti-ice, de-ice or ice detection equip
  - No frost, snow or ice on any a/c "Critical Surfaces" see manuals too
- 901.36 don't fly formation or in proximity with another aircraft unless pre-arranged between pilots
- 901.37 no fly while driving any other vehicle/vessel or A/c at the same time
- 901.38 no FPV unless observer provides detect & avoid VLOS and an observer can deconflict hazards
  - (1)(2) BVLOS mus use Lighting/strobes - defines colour duration visual aspect (min 1mile vis)
  - (3) Lighting can be turned off to enhance safety (PIC authority)
- 901.39 No Night FPV without nav lights ON and visible both with or without assisted NVG
- 901.39 (2) Don't fly with NVG unless PIC or OBS have other means to detect full visible light spectrum
- 901.40 NO operating multiple a/c from one controller unless IAW MFG instructions
- 901.4 (2) NO operating multiple UAVs at the same time except under SFOC
- 901.41 Need SFOC for "advertised outdoor event" - public gathering concert, sports event, market or festival etc
  - (2) 901.41 has exemption for Police Fire / Rescue or to "save human life"
- 901.42 no HANDOVER of PIC unless prearranged & risk analysis and procedures followed to minimize CTRL loss
- 901.43 no ops carrying anything that creates a hazard or can injure people or animals or GET AN SFOC
  - NO explosives, corrosives, flammables, biohazard, weapons, ammo or "war equipment" (look it up)
  - Can't carry anything attached by a line unless IAW the operating manual
- 901.44 don't activate flight termination if it can cause a further hazard or endanger aviation safety or anyone
- 901.45 No ELT allowed on UAVs
- 901.46 No flying in transponder space without transponder and pressure altitude equipment
- 901.46 (2) You CAN fly (in Transponder Space) if you request & ATC gives clearance (and you ACK) BEFORE entering
- 901.47 no fly if UAV may interfere with the established traffic pattern (Ref CFS or WAS water aerodrome supplement)
- All BVLOS Ops must be >5NMiles from any airdrome (incl water) unless under SFOC
- 901.47 (2) STAY AWAY >3 nm from center of an airport >1nm from heliport center (unless Advanced Cerificate and Clearance) 901.62
- 901.47 (3) NO less than 3 nm from Military aerodrome or get an SFOC issued under 903.03
- 901.48 (1) You have to keep Flight Records -names, dates, times and crews for each flight
  - (b) Maintenance Records - names dates of actions taken, for MODS MFG name, model, part name installed
  - Keep any instructions provided for the work done (NOTE: It's the Part's MFG instructions they want, not the MFG of the UAV)
- 901.48 (2) Flight records must be kept for 12 months, maintenance records 24 months (from the day the record was created)
- 901.48 (3) If you sell your system you must transfer ALL past 24 months of 901.48 1(b) maint records to new owner
- 901.49 STOP ops if any following happens until analysis of cause and corrective/mitigation action is taken to correct
  - Unintended UAV contacts with any person, especially if injury requires medical attention (**SEE NOTES Pg4**)
  - Unanticipated damage to UAV - adverse control response or flight characteristic
  - a/c exceeds geo-fence or planned distance or altitude (apparently you can intentionally CRASH one, no report)
  - if UAV becomes uncontrolled - fly-away or is missing, collides with or is at "RISK" of collision with another a/c
  - Also, if there is a police report or Civil Aviation Occurrence Report filed by you or anyone else, you file
- 901.49 (2) Keep analysis of any 901.49 for 12 months after the date any record is created (make them avail to Ministry)

**DIVISION IV - BASIC OPERATIONS**

- 901.50 You can't drop anything from a UAV "in flight"
- 901.51 Reporting on any "service declarations" made by PIC (complex - look it up)
- 901.52 (reserved)
- 901.53 The following (this Blue area) is for ALL OPS other than advanced ops per 901.62 (a) thru (d)
- 901.54 Must be >14 yrs old, hold a BASIC or ADVANCED Small RPAS VLOS (TP15263 based on STD921) under 14 PIC can fly if supervised by someone who has BASIC 901.55 or ADVANCED 901.64 (1biii) and/or hold Level 1 "Complex Operations" issued under 901.90
  - (2) Does not apply if under supervision (training) by a qualified instructor for that operation
- 901.55 Minister will issue certificate if you are >14yr old and pass the appropriate exam
  - (b) including Basic and advanced 250g up to 150kg certificates
- [N] 901.56 Every 24 months - write/pass either certificate or a Flt Review or any one recurrent training **now incl Complex Ops**
- [N] 901.56 (2) you must keep 24 months of records showing you have met recency requirements **now incl Lvl 1 Complex Ops**
- 901.57 MUST have Small RPAS certificate and a logbook with you when flying to document recency
- 901.58 Don't copy exam questions, help or accept help during exam or complete any question for someone else
- 901.59 Wait 24hrs before re-taking failed exam

**DIVISION V - ADVANCED OPERATIONS**

**SEE IMPORTANT INTERPRETATIONS Pg5.**

- 901.62 Advanced Ops needs MFG Declaration 3 areas - Controlled airspace 901.71-72 - Ops <30m but > 5m 901.69(1)(a) - <5m (1)(c) <100ft(30m) but >16.4ft (5m) from people, except crews and actors (see 901.69 +MFG declaration)  
For <16.4ft (5m) your UAV MFG must declare it meets Standard 922 for any/all the 3 names operations 901.69 (a) (b) (c)  
Flight <3nm airports and <1nm heliports centers must be IAW 901.73 ( Any airport needs published procedures)  
**Sheltered Ops** <100ft above <200ft near any structure and Extended VLOS Ops  
**Extended VLOS** Uncontrolled Airspace >30m from people. OBS required and stay within 2 nm of OBS & Ctrl Stn  
**MEDIUM VLOS RPAS** Ops in uncontrolled airspace allowed 100-500 ft from people not involved  
**MEDIUM VLOS RPAS** Ops in controlled airspace or <100ft from people
- 901.63 PIC must be >16yrs, hold SRPAS ADVANCED VLOS Certificate or under Flight Review or supervised by Advanced holder or hold Level 1 Complex Ops Cert under 901.90 or under supervision of someone who does
- [N] 901.64 Minister will award SRPAS ADV if >16yrs, has passed ADV Exam (80%) and Flight Review <12months from application
  - (b) **Level 1 Complex cert now includes up to 150kg**
  - (c) **Flight Review now includes up to 150kg**
- 901.65 Recency req'mts for ADVANCED Certificate. Within 24 months prior to any flight you must:(with records) be issued sRPAS ADV or **Lvl 1** Cert, pass that exam or pass a Flight Review or show recurrent training was done per 921.04
- 901.66 MUST have, SRPAS ADV (VLOS) **Lvl 1** Certificate, Flight Logs, and/or recency documentation on-site of flight (see doc set)
- 901.67 Don't cheat on exams - don't do anything in 901.58
- 901.68 Wait 24 hrs for retest after failed Flight Review
- [N] 901.69 (1) Except (901.69(2)).You cannot fly without your UAV Reg Cert showing MFG Declaration of 901.69(a) (b) and (c); **Now includes up to 150kg (MEDIUM RPAS) 922 Compliant re:100-500ft standoff and controlled airspace etc**
- 901.69 (1) (a) Controlled airspace
  - (b) <100ft (30m) Horiz from public but >16.4ft (5m) except own crew or actors,
  - (c) <16.4ft of anyone per (901.69(2)) - but not overhead AT ANY ALTITUDE
  - (2) Grandfathered a/c designated "compliant" prior to 1April19 treated as MFG declared (SI 623.001)
- 901.7 Can't fly any modified RPAS unless YOU can demonstrate compliance with Standard 922 RPAS Safety (But HOW?) and MODs Must be done IAW UAS manufacturer & the part MFG instructions (ie: MFG of the MOD -AND - UAV MFG)  
**This is NEVER going to happen for many practical reasons so there is NO clear path to modify a commercial UAV Only the manufacturer of a UAV can declare compliance with Safety Standard 922 so MODs are out.**
- 901.71 Flight in Controlled Airspace - You must request ATC with date, time and duration of ops plus the following:  
UAV Category, Reg # and physical characteristics of a/c  
Vert and Horiz boundaries of area of ops (GeoFence) + Flight Route to access the area  
Proximity to manned flying ops approaches, departures and traffic pattern  
Name contact #'s and RPAS certificate # for PIC  
Means of 2 way COMM with ATC - Lost Link and fly-away procedures  
Emergency Procedures incl process and time needed to terminate ops + **Anything else requested by ATC**
- 901.71(2) In controlled airspace, you CAN fly higher than 400ft AGL if ATC approves (**NOT LIKELY**)
- 901.72 You must acknowledge and follow ALL ATC instructions in controlled airspace
- 901.73 <3nm airports and <1nm heliports centers you must follow "the established procedures ... applicable to that airport"  
**HINT: Few if ANY Control Zones actually have any published RPAS procedures yet (as of April 2025)**
- [N] 901.74 (1) Rules for Sheltered Ops and Extended VLOS
  - (a) You must be at the proper place and time for launch and recovery

No <100ft or <3mi airports <1mi Hel without mfg declaration 901.69

NavDrone APP is the only practical way to get authorized normally

- (b) Aircraft stays within 2nm of PIC AND Observer
- (c) Stay 100 ft away from bystanders at any altitude
- (2) Extended VLOS PIC and OBS must provide detect and avoid UNAIDED
- 901.75 For Extended VLOS Observers must have either Basic Advanced or Level 1 Complex certificate  
Stay in VLOS within 2 miles of the aircraft at all times
- 901.76-901.86 reserved
- DIVISIONS VII VIII IX Reserved

**DIVISION VI - LEVEL 1 COMPLEX OPERATIONS You can now apply for RPAS Operator Certificate (RPOC) (write exam April 1, 2025)**

- 901.87 These rules apply to sRPAS BVLOS in Uncontrolled airspace not less than 1km from a populated area  
or sRPAS BVLOS in sparsely populated areas Uncontrolled airspace < 1km from a populated area
- 901.88 You must be an RPAS operator agent or employee of an RPAS Operator  
and hold an RPAS Operator Certificate
- 901.89 Be least 18 Yr old and hold a Level 1 Complex Ops certificate (Student under supervision excepted)
- 901.90 Conditions under which Minister will grant a certificate (18yrs old, 20 hr Ground School pass exam & Flight review)
- 901.91 24 month rule for Level 1 Complex either exam/flt review/recurrent in 24 months
- 901.92 Keep your certificate and currency with you during FLT OPS
- 901.93 Don't cheat on exams 901.58
- 901.94 Need to wait 24 hrs to retest after failure
- 901.95 Your aircraft must comply with Safety Standard 922 to fly Level 1 Complex ops  
(2) Exception if you can provide Vision-Based Detect and Avoid IAW Safety STD 923
- 901.96 Exception if your system is modified in compliance the MOD manufacturer's instructions  
(2) Or unless the system is modified in compliance w "the Instructions of the person who made the declaration"

**DIVISION IX - MEDICAL REQUIREMENTS**

- 901.156 RPAS Medical Declaration Rules
- 901.157 The Minister will approve RPAS medical apps for 5 years unless extension is granted
- 902.158 The Minister has discretion to issue approvals in the public interest
- 901.159 The Minister's Medical Fitness discretion 30 days
- 901.160 RPAS Medical Certificate Reconsideration of assessment
- 901.161 RPAS Medical examiner's responsibilities
- 901.162 Examination for Renewal of RPAS Medical Certificate

**DIVISION X - TRAINING AND FLIGHT REVIEW**

- 901.175 Flight Reviewer must have Cert endorsed as Flight Reviewer or Level 1 Complex Ops  
Show they are affiliated with a Training Provider
- 901.176 Must be 18yrs held Adv or Lvl1 for 6 Months before applying for Flight Reviewer Certificate  
(c) and complete Flight Reviewer Exam
- 901.177 No Cheating on exams
- 901.178 wait 24 hrs after exam fail to rewrite
- 901.179 Training Provider must be Canadian
- 901.180 Trg Provider must submit declaration on who their Flight Reviewer are IAW 901.181 or recind in 7 days
- 901.181 Flight Review must be IAW training rule and Flt Review Rules on Safety 921
- 901.182 Trg Provide must declare Std 921.08 and appoint a Chief Ground Instructor /Minister within 30 days of changes
- 901.183 Chief Ground Instructor must have Level 1 Cert and Reviewer under 901.176
- 901.184 Trg Provider shall send written proof of students completing ground school

**DIVISION XI - RPAS DECLARATION**

- 901.194 This is how to make a UAV safety Declaration IAW Canadian Std 922
- 901.195 You must identify any RPAS safety or compliance deficiencies to the Minister immediately
- 901.196 Minister shall issue an Acceptance letter if you meet Std 922 and maintenance requirements  
[Lots more to read here suggest you look at the Real 901.196](#)
- 901.197 Operators need to have a Service Difficulty Reporting Systems with means of receiving reports
- 901.198 Service Difficulty Reports must be investigated and a course of action provided
- 901.199 Operators need to file annual report on Service Difficulties and actions taken on each declaration date
- 901.200 Person making a Declaration must provide copies to all users incl manuals updates and fixes
- 901.201 Maint and safety Records must be kept for min 2yrs and provided to Minister if requested
- 901.202 to 901.212 reserved

**DIVISION XII - RPAS OPERATORS CERTIFICATE**

- 901.213 RPAS eligibility Must be Canadian, Permanent Resident or Canadian Govt Agency or Canadian Prov Corporation
- 901.214 Information shall issue an Operator Certificate if requirements are met
- 901.215 RPAS Cert shall contain legal name addr cert # and date of issue

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- 901.216 Operators need an Org Chart, suitable a/c, a maint capability and has max 7 days to notify of any changes
- 901.217 Operators must maintain Ops Manual SOPs and Training & Qualification Standards & send copies to Minister
- 901.218 Operators must establish Flt Safety goals IS hazards provide incident/accident reporting and maintenance reps
- 901.219 Operators must establish a training program and maintain operating standards
- 901.220 Operators must appoint a Maintenance Chief
- 901.221 and Maint control process with Maint Control Manual (MCM)
- 901.222 Operators shall designate PIC for each operation IAW Division VI
- 901.223 Operators must have record keeping FLT logs Employees, training aircraft, maintenance MODs dates and actions
  - (2) Flight Records must be made available to the Minister at any time requested for past year (a/c & maint 2 years)

**Subpart 3 - SPECIAL FLIGHT OPERATIONS (now includes application fees)**

- [N] 903.01 Operations need SFOC (903.03) for ANY of the following ( Needs 30 WORKING days notice to apply for SFOC)
  - >25kg, BVLOS, Foreign Operator, >400ftAGL, >5 UAV from 1 controller, Any special aviation or advertised event even <250g Hazardous payloads (901.43(1)), or less than 3nm from Military installations (901.47(3))
  - Anything else the ministry wants to
- [N] 903.02 Application for SFOC now required for (but not limited to)
  - [N] Operations Under DIV III
  - [N] MEDIUM Complexity Ops like >150Kg Commercial Air Svc,
  - [N] Operations >400ft not covered by Sheltered or Extended Ops
  - [N] >5 RPAS operated by 1 Controller/PIC
  - [N] Operations Outside Domestic Airspace
- (4) Rules for SFOC for HIGH Complexity Ops <5nm from aerodromes Higher altitudes, Carrying people, low weather etc
- (5) Combined complexity ops defaults to the complexity of the highest one
- (6) Rules on what to submit to the minister for verylow/low complexity ops
- (7) Rules on what to submit to the minister for mediumj or high complexity ops
- 903.02.1 How to amend an existing SFOC
- 903.03 Minister shall issue SFOC with above info - if you show ops won't adversely effect aviation safety or other people
- 903.04 What the SFOC certificate will contain

**NEW SFOC PROCESS**

**Effective 4 NOV25** The new regulations have removed the requirement for a SFOC-RPAS for most lower-risk BVLOS and medium-sized drone operations. BUT - No flying BVLOS, EVLOS, or Sheltered operations until November 4, 2025 to avoid 2025 Confusion over what's allowed

**Very low complexity operations**

Non-Canadian citizens can be approved

**Low complexity operations**

Flying at an advertised Event (including Micro drones <250g)

BVLOS ok IF - 18yrsOld, Pass online exam, complete 20hr ground School and pass a Flight Review

**Medium complexity operations**

UAV >150kg or foreign pilots for commercial ops

Flights above 122m or 400ft "that are not Sheltered Ops"

Operate >5 UAVs VLOS or more than 1 BVLOS

**High complexity operations**

BVLOS other than Sheltered Ops, Extended VLOS (EVLOS) or Low risk BVLOS under Level 1 Complex Ops rules

Flying payloads referred to in 901.43(1)

BVLOS at an aerodrome

Medium-size drones VLOS or BVLOS in adverse weather

Carrying passengers (or any living being)

Flying at an airshow either as performer or filming to cover event, surveillance fire or for security

requires standard CARS 603 SFOC application like traditional aircraft

Anything not covered here that Transport might think up

**IMPORTANT INTERPRETATION NOTES**

**DEFINITIONS** 2 key definitions are still worded poorly (imprecisely)

**Flight termination system** means a system that, on activation, terminates the flight of a remotely piloted aircraft.

Should be Reworded Flight does not "terminate" particularly in Fixed Wing. Only **control** is "Terminated". May glide quite far or fall ballistically to impact **fly-away** means, in respect of a remotely piloted aircraft, an interruption or loss of the command and control link such that the pilot is no longer able to control the aircraft and the aircraft **no longer follows its preprogrammed procedures** or operates in a predictable or planned manner.

"Fly-away" is more often human error than system failure. The a/c is still flies its preprogrammed procedure and WILL continue flying in a predictable . . . but unplanned manner. Better to say "no longer follows the intentions of the operator." Simpler for all cases Usually, a fly-away is following the last command or procedure the a/c received . . . just not the operator's intentions.

By D Cooke

C2 signal loss is a rare hardware failure, usually operator error or interference unknown to the operator. Flight path is still predictable.

**DECLARATION** Not just 1 but 3 separate advanced ops - MFG's USE CASE declaration is required to be specifically listed on EACH UAV Reg.(a)(b)( c)  
If your UAV Reg only lists only "control zones" (a) then you still can't operate <30m or <5m or overhead (b) ( c)  
AC 922.001 Sect 7.0 says All MODs must be done IAW MFG recommendations, so few if any 3rd party MODs will ever qualify  
Generally no Quad is allowed overhead because loss of 1 engine is catastrophic and unrecoverable and someone gets hit on the head  
Otherwise you are limited to BASIC ops without each USE CASE being listed on your UAV Registration Certificate

**MODIFICATIONS** Declaration of 922 by MFG or MOD is a simple 1 min on-line form but an onerous commitment to it's 82 pages of requirements  
Declaration of 922 is simple but comes with huge liabilities such that few if any MOD builder will do it (see 922 Sect 4.0)  
If you do the MOD yourself you accept "the same obligations of the MFG" 922 Sec 7.0 (3) (Serious liability implications)  
Does a 3rd Party "Payload" count as a MOD? Probably if MFG has not tested it as part of it's declaration

**OVERFLIGHT**

Where the PART IX talks about No getting closer "AT ANY ALTITUDE" it should be interpreted that you cannot fly overhead  
any closer than the horizontal standoff specified, so consider standoff as a "Vertical Cylinder" as high as the radius  
This means the 901.62 (b) MFG Declaration allows NEAR people but you need 901.62( c) on your UAV Reg for OVER people

**ACCIDENT**

901.49 If anything odd or unexpected happens like contact any thing or person, ops must STOP and not resume until investigated  
And resolved and not resumed until corrective action is implemented  
However, if you claim it was intentional then ops can continue and no report is required unless there is injury or report filed  
by Police, Fire rescue or anyone files an Air Incident Report - Maybe you were filming a "HOW NOT TO video"  
No report needed if the collision with a boat, car, building or outhouse if it's "anticipated"?  
Technically anything else you hit is anticipate just moments before it hits - no report required. We only care about aircraft and people

**NO DECLARATION**

901.62 is where all the action is since it brings in 922 standards, declarations and MODs and all that. . .  
Para 901.62 it seems is the ONLY Advanced ops when special restrictions apply Control Zones, close to and over people  
To me it reads that you aren't prevented from any Commercial Ops "DIV V Advanced Ops" . . anywhere . . .  
There seems to be the ONLY 3 special cases where Manufacturer declarations are required.  
EXCEPT Control Zones, near airports or closer than 100ft from anything (which is a lot but workable for many tasks)