

Expanded Narrative to Accompany DronesQuad's Presentation to SDOs

by

Quadrilateral Discussion Group on Drones (a.k.a. DronesQuad)



05 Feb 2026

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CONFIGURATION CONTROL OF THIS DOCUMENT

<u>CHANGE CONTROL LOG</u>		
<u>Release Date</u>	<u>Nature of Change</u>	<u>SDOs Brief to Release Date</u>
05 Feb 2026	Update format of Change Control Log / Added “tool” analogy to Pg 6	CEN Plenary (05 Feb 2026)
14 Nov 2025	Minor corrections and edits / Added "The Forward to" ICAO Annex 6 Part IV...	ISO Plenary (Wk of 17 Nov 2025) & JARUS MoC WG (19 Nov 2025)
10 Oct 2025	added Ask.DronesQuad / Title to the header	RTCA (10 Oct 2025)
01 Oct 2025	added simultaneous compliance to Basis of HPSC table	EUSCG (01 Oct 2025)
22 Sep 2025	Original	ASTM (19 Sep 2025)
<i>dd mmm yyyy</i>	<i>Example – acceptable to use bullet format</i>	<i>ABCDE SDO (dd mmm yyyy)</i>

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OBJECTIVE OF THIS DOCUMENT

This document supplements the PowerPoint slide deck presented to the Standards Development Organizations (SDOs) during the roll out of the DronesQuad “HPSCriteria” and “Content Considerations for SDO Standards”.

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IMPORTANCE OF THIS DOCUMENT

DronesQuad (DsQ) is providing this to the Standards Development Organizations (SDOs) as a supplement to the PowerPoint slide deck presented to the SDOs and expands on many of the accompanying narratives during that presentation. This is intended to assist those not in attendance of the presentation and as a reminder for those who attended.

This document also provides context to how the four authorities plan to work with the SDOs through the generation of the Standards and the nature of support DsQ is committed to providing.

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BACKGROUND

One thing that most civil aviation authorities (CAA) can agree upon as of late is that the civil introduction of drones has rapidly brought about a new paradigm in civil aviation. The emergence of a new class of aircraft has trended towards a new category in the safety assurance continuum positioned below Product type certification but still within the purview of regulatory oversight with reliance on a declarative process without a formal design approval.

Over the past several years, many CAAs raced to keep up with innovation and released their respective framework of regulations, standards, orders, policies and guidance material with the intent of supporting their emerging domestic industries. While the JARUS SORA played an important role in establishing a common language for drone operational risk assessment, airworthiness-wise several authorities still did not share a common approach and safety continuum. This lack of a unified language presents a significant challenge for industry and SDOs, as it can necessitate the development of similar, but not identical, standards and compliance methods for each domestic framework.

In 2019, the RPAS Task Force within Transport Canada Civil Aviation (TCCA) began reaching out to those authorities – ANAC, EASA and the FAA - with well-established state of design relationships working together since a long time on classical type certification and accompanying supporting processes and regulatory frameworks¹. Discussion began on drone-related airworthiness efforts centering on shared understanding and commonalities among the four authorities.

DronesQuad (DsQ)

By 2020, a discussion group was established amongst the aforementioned authorities at the working-engineer level where the subject matter experts directly involved in the development of their respective drone regulatory frameworks could inform each other of developments, challenge each other's mindsets and think out loud about new concepts without the formality of representing an "official" position of their respective authority.

DsQ activities/discussions focused on the "Specific" operational risk category which ICAO explained in the Forward to their July 2024 update to Annex 6, Part IV. The update compliments the existing Joint Aviation for Rulemaking of Unmanned Systems (JARUS) language. Part IV now denotes "Medium" operational risk as the "Specific" category which is sandwiched between the "Open" and the "Certified" categories of operations. Further, Part IV identifies the Specific category operational risk level as below

¹ Those authorities working under the common umbrella provided by the CMT (certification management team).

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that which warrants the full application of manned aviation principles. The JARUS Specific Operational Risk Assessment (SORA) is one methodology used to analyse safety risk.

Specific Operational Risk Assessment (SORA) Implementation within DsQ

The regulatory framework of numerous CAAs for drone operations capitalise on the JARUS SORA, however amongst the DronesQuad, SORA is not applied by all authorities and/or is applied with domestic modifications to the process. At the time of writing this document, the following surmises the extent of SORA adoption by the participating authorities:

- ANAC will adopt SORA 2.5 with potential domestication, incorporated by the RBAC nº 100 proposal now under adjudication of comments by ANAC.
- EASA incorporated SORA into their AMC and is adopting a Europeanized version of SORA 2.5.
- FAA has not adopted SORA but leverages the concepts developed by SORA in its airworthiness framework.
- TCCA domesticated the SORA as a tool to assess operational risk in support of their issuance of Special Flight Operations Certificate (SFOCs – a flight authority that permits operations outside of current regulations). TCCA has adopted SORA 2.5 with modifications, in particular “M2” mitigation is an acceptable Means of Compliance (MoCs) to the “design” Operational Safety Objectives (OSO), however it does not reduce the overall Specific Assurance and Integrity Level (SAIL).

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DsQ PROPOSAL EXPLAINED

High-level Product Safety Criteria (HPSCriteria)

It became evident to DsQ that harmonization of the design requirements already embedded in each domestic regulatory framework was not feasible. As DsQ discussions continued it became evident that the expectations in terms of Means of Compliance (MoC) were still relatively aligned despite the specific wording of alike requirements. It was realized that if DsQ had a common set of standards endorsed as MoCs then that would be sufficient to facilitate transferability in the absence of harmonized regulations. The question then became, without physically cowriting the MoCs with the Standards Development Organizations (SDOs), how does DsQ get the SDOs to develop standards that the authorities could endorse as MoCs. The conclusion was to develop a common set of criteria that the SDOs could use to write their standards against. The HPSCriteria evolved to meet that intent. In effect, the HPSCriteria is a tool to promote the development of these industry consensus standards.

HPSCriteria are DronesQuad “endorsed” (DsQ-endorsed) performance-based, product design and organizational requirements affecting the UAS and corresponding design, production or service-provider organizational processes and procedures.

The “Criteria” meets or exceeds the domestic requirements of each participating authority. **The HPSCriteria have no legal basis within each Authorities’ respective domestic framework.** In respect to the required domestic product declarations, the DsQ-endorsed Standards, now Means of Compliance to the Criteria, can be cited in a declaration to each authorities’ domestic regulations.

Content Considerations for SDO Standards

The HPSCs criteria as well as the Content Considerations for SDO Standards are presented in tabular form. It must be noted that DsQ did not identify an exhaustive list of what should be in the Standard. The SMEs writing the Standard should bring together the basic elements to fill in the gaps, leveraging industry best practice. However, the DsQ has identified key expectations, elements and reference material that the SMEs ought to consider towards the Standard. The content consideration should be interpreted as benchmarks for the development of standards. SDOs and SMEs are free to enhance them and go beyond what is expected by DsQ. DsQ has made a concerted effort not to impose a solution for the Standards. By incorporating these elements, SDOs can create standards that are more likely to be endorsed by the DsQ authorities, streamlining the path to product declarations for the industry.

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Cross Referenced Tables within “HPSCriteria” and “Content Considerations for SDO Standards” Document

These tables were generated to assist the SDOs in understanding the HPSCriteria, what DsQ was looking for in MoCs, the intent of specific word selections and terminology. Further, the cross-reference tables place the Criteria, paragraph by paragraph with the corresponding Content Considerations for SDO Standards which is guidance on what the Standard should consider.

DronesQuad “endorsement” of SDO Standards as MoCs to the HPSCriteria

DsQ will support the SDOs in producing Standards of quality and substance for DsQ “endorsement” as MoCs to the HPSCriteria. DsQ will retain their consistent approach to decision making based on consensus. Consensus will remain essential so that SDOs focus on the HPSCriteria rather than fixating on particular domestic requirements.

Each Authority will publish domestic material indicating specific SDO standards as MoCs to their respective domestic requirements. The following approach is planned:

- FAA will “endorse” the SDO standard by referencing it in the Notice of Availability in a similar process to the NOA posting the NPRMS.
 - FAA plans to use a web-based application where declaration to each requirement of Part 108 will have a dropdown list of SDO Standards that the FAA recognizes as compliant.
- ANAC, EASA and TCCA will publish lists of endorsed MoCs via their respective AMC and/or guidance material.

Principles of Product Transferability

Over the last two years, DsQ has been focused on the principle of product “transferability” with the intent of facilitating the transfer of products across international borders as efficiently as possible, respecting regulatory frameworks and the common objective of enabling safe products.

The focus of this work is the establishment of a unified set of airworthiness criteria (HPSCriteria) and means of compliance (DsQ-endorsed SDO standards) among the four authorities, aimed at the Specific category of UAS and based on declarative processes. This approach will pave the way for product transferability between authorities, reducing costs and lead times.

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For the foreseeable future, a Product Declarant is required to make a separate declaration to each authority's regulatory requirements. CMT authorities may in the future agree on a transferability framework incorporated into updates to bilaterals and/or implementation procedures.

Finally, it is important to highlight that product transferability does not imply operational authorization; operators must still seek local operational approvals from each authority.

Currently, the Products envisioned to be transferable through the adoption of the HPSCriteria is encapsulated in the following table.

Authority	Basis of HPSCriteria (Compliance to HPSCriteria means <u>simultaneous compliance to all</u>)
ANAC	RBAC nº 100 – consultation closed, currently comment adjudication. - Declarative up to SAIL III
EASA	EASA AMC to Article 11 of Regulation 2019/947 - Statement of Compliance up to SAIL III
FAA	PART 108 NPRM, dated July 2025 - Declarations based on Subpart G and H of the August 5 th NPRM
TCCA	Up to and including the Low Risk BVLOS rule (SOR/2025-70 March 6, 2025) - Declaration and Pre-Validated Declarations - Declarative up to an unmitigated SAIL III

Standards Development Organizations (SDOs) Engagement

DronesQuad is engaging with SDOs with the intent of harnessing industry best practices with broad applications to varying product designs, market niches and organizations that design and manufacture those same products.

There are many SDOs of varying sizes, subject matter expertise, geographic applicability, regional profiles and organization/process structures. As a small subset of the respective authorities' Product Airworthiness teams, DsQ has too few resources to effectively engage every organization that may want to propose a standard for DsQ consideration towards endorsement as an MoC. As a consequence, although open to other discussions, DsQ will focus on those SDOs that have a large span of influence with potentially existing/updated material that can be considered within the first year. DronesQuad will

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endeavour to maintain a level playing field between all SDOs that chose to participate. There is no intention of excluding any organization.

The first group of SDO have been identified as ASTM F38, EUROCAE WG-105, ISO SC-16/TC-20, RTCA SC-228, CEN/TC 471, JARUS SRM MoC Task Force, RTCA SC-228, and EUSCG.

The DsQ has identified the opportunity that the European UAS Standards Coordination Group (EUSCG), as an existing coordinating group of the identified SDOs could facilitate coverage of all the required Standard to address the HPSCriteria, minimize duplication (although multiple endorsed SDO Standards (MoCs) are of benefit to industry), avoid gaps, assure visibility of efforts toward said MoCs and provide a one stop source of industry references in regards to HPSCriteria and DsQ-endorsed SDO Standards (MoCs). DsQ will engage in due time.

DronesQuad efforts are focused on a critical path of having endorsed standards in place for the effective date of Part 108, subparts G and H.

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DsQ's "ASK" OF PARTICIPATING SDOs

While the HPSCriteria are not regulatory requirements in any jurisdiction, they represent an aligned super-set of technical requirements which, when complied with in their totality, allow for declarations / statements of compliance to be made in four jurisdictions (Brazil, Canada, EU, US). It is recognized that not all of the HPSCriteria are required in all jurisdictions, therefore the scope of a particular standard of which an SDO takes ownership in developing a MOC may focus on a particular aspect of compliance.

The Standards Development Organization community should evaluate the HPSCriteria along with their respective membership and areas of expertise to avoid unnecessary duplication of the development of industry consensus standards towards endorsement as Means of Compliance by DsQ.

As the HPSCriteria are performance-based technical standards, the industry consensus standards which are developed with the intention of being endorsed as MoCs must support declarations of compliance to the standard and as such be: specific, auditable, and reflect industry best practices for the specific technology or process. It is recognized this may result in multiple standards covering similar topics but for different technologies (e.g., point-to-point radios, networked radios).

The SDO Standards should focus on the SMART principles to be eligible for endorsement by DsQ as a MoC to the HPSCriteria. SMART being Specific, Measurable, Achievable, Relevant, Testable.

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PROPOSED BENEFITS OF DsQ-ENDORSE SDO STANDARD (MoC)

Leveraging Expertise and Best Practices:	Standards are developed by industry experts from design, production, maintenance and operation sectors. Using a multidiscipline collaborative process assures that standards reflect the latest knowledge, best practices, and technological advancements. This in turn leads to a more robust and safer industry for the Authorities to oversee.
Facilitates Market Access:	Harmonized industry standards reduce barriers to international trade. Companies can design products to a recognized standard, making it easier to sell them in multiple markets without significant re-engineering and/or revisiting compliance demonstrations.
Streamlined Compliance:	Endorsement of the industry consensus standards as MoCs by the Authorities provide clear and well-understood pathways for compliance. In the absence of industry consensus standards, the Authorities tend to generate guidance material that is more conservative and process intensive.
Development and Testing Cost Reduction:	Clear specifications and test methodologies may reduce the time and cost associated with product development, quality control, testing and compliance demonstration.
Faster Adoption of New Technologies:	The standards development process can be more agile than the traditional regulatory rulemaking process. This allows for quicker incorporation of new technologies and safety advancements into accepted practices, benefiting both innovation and safety.

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FUTURE EXPANSION OF HPSCriteria APPLICABILITY

DronesQuad is committed to defining a process wherein increased operational risk can be addressed using the current HPSCriteria and potentially new or expanded Criteria to address operational risks greater than SAIL III. That said, it is imperative to focus the immediate efforts on the context provided in the previous table for setting the bar to provide Standards associated to a compliance process based only on declaration / statement of compliance.

DsQ is committed to keeping the SDOs up to date on all developments toward higher operational risks.

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DRONESQUAD CORE MEMBERS

Antonio Marchetto
antonio.marchetto@easa.europa.eu

Stefan Ronig
stefan.ronig@easa.europa.eu

Rui Carlos
rui.carlos@anac.gov.br

Jeff Bergson
Jeffrey.Bergson@faa.gov

Chris Richards
Christopher.J.Richards@faa.gov

Cyrus Roohi
Cyrus.Roohi@faa.gov

Craig Bloch-Hansen
craig.bloch-hansen@tc.gc.ca

Marco Mariotti
marco.mariotti@tc.gc.ca



DronesQuad Core Members

CONTACT DRONESQUAD FOR QUESTIONS



Questions?

ASK DronesQuad via:

TC.Ask.DronesQuad-Demande.a.DronesQuad.TC@tc.gc.ca

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