

Electronic Conspicuity Mandate

Common Topics and Clarifications

Introduction

We have received a wide range of questions since the consultation on the proposed Electronic Conspicuity (EC) Mandate opened. Many of these questions have been raised through webinars, stakeholder engagement and correspondence with the CAA.

This document provides clarification on some of the most common questions. It is intended to support informed responses to the consultation and should be read alongside the consultation document and supporting material.

Some questions can be answered directly. Others relate to issues on which we are seeking views and evidence through the consultation before reaching a final position. We are interested in evidence covering both the potential challenges and the potential benefits of the proposed approach, including safety, interoperability and operational impacts. Stakeholders are encouraged to provide evidence and examples that support, challenge or refine the proposal.

The questions below reflect themes raised through stakeholder engagement and do not represent an exhaustive list of consultation responses.

Cost, Funding and Fairness

What assessment has the CAA made of the financial impact of the proposed EC Mandate?

We recognise that cost is one of the most significant concerns being raised by stakeholders. We also recognise that the impacts of any future EC Mandate are likely to vary across sectors, aircraft types and operating contexts.

The consultation seeks evidence on the costs and wider impacts of the proposed approach, including equipment purchase, installation, maintenance, training and operational impacts. We are particularly interested in understanding where costs may fall differently across sectors or create disproportionate impacts for particular groups.

A detailed assessment of costs, benefits and impact forms part of the wider rulemaking process that would be required before any regulatory change could be introduced. The

purpose of this consultation is, in part, to help gather the evidence needed to inform that work. Stakeholders are often best placed to provide information on the practical costs and challenges they may face, which is why the consultation asks specific questions on costs, impacts and implementation.

No final decisions have been made and consultation evidence will help inform the CAA's future analysis and conclusions.

Will there be a rebate scheme or other Government funding?

The current approach does not include Government funding or a further rebate scheme.

However, the consultation seeks evidence on costs and affordability. Stakeholders are encouraged to provide evidence on the financial impacts of the proposal, particularly where they believe costs may be disproportionate or create unintended consequences.

Has the CAA considered the impact on lower-value, permit, historic and specialist aircraft?

We recognise that some aircraft owners may face particular challenges in meeting the proposed requirements, especially where installation options are limited, aircraft values are relatively low, or preservation considerations apply. These issues have been raised repeatedly through stakeholder engagement and are an important area of interest for the consultation.

The consultation seeks evidence on where the proposed approach may create disproportionate impacts and whether alternative approaches may be appropriate in particular circumstances.

Will UAS operators contribute towards the costs of GA equipage?

The current proposed approach does not include arrangements for one group of airspace users to fund compliance by another group.

Under the proposed approach, operators would be responsible for meeting any requirements that apply to their own aircraft or operations. This principle would apply across all affected sectors, including General Aviation and uncrewed aircraft operators.

The consultation does not propose a funding mechanism through which one sector would contribute towards the equipage costs of another sector.

Benefits, UAS and the future of airspace

What benefits could operators see from greater electronic conspicuity?

The primary objective of the proposed EC Mandate is to improve safety through greater electronic visibility between airspace users. The consultation also identifies interoperability, integration and supporting equitable access to airspace as key policy objectives.

Depending on the type of operation, greater electronic visibility will support improved situational awareness, increase interoperability between airspace users and help enable future airspace concepts that rely on aircraft being electronically visible to one another.

The consultation is not proposing specific changes to controlled airspace access, air traffic services or other airspace structures. However, it recognises that greater interoperability may support the future integration of different airspace users and help reduce reliance on segregation where appropriate.

We are interested in stakeholder views on the wider operational impacts and benefits of the proposed approach.

Will greater electronic conspicuity change access to airspace or air traffic services?

The consultation does not propose specific changes to access arrangements for controlled airspace, Transponder Mandatory Zones (TMZs), Military Aerodrome Traffic Zones (MATZs), air traffic services or other airspace structures.

However, the consultation discusses the role that EC may play in supporting the safe integration of different airspace users while reducing reliance on segregation where appropriate.

Any future changes to airspace structures, access arrangements or air traffic services would need to be considered separately through the appropriate regulatory processes. The current consultation is focused on the proposed EC Mandate, which is intended to improve safety for all airspace users, including General Aviation, and support the integration of BVLOS operations. It does not introduce those changes.

Is the proposed EC Mandate primarily intended to enable BVLOS drone operations?

No.

The consultation identifies a number of objectives, including improving safety, supporting interoperability and enabling the integration of both existing and emerging airspace users. The proposal is not intended to favour one group of airspace users over another.

The consultation recognises that future airspace will need to accommodate both existing users and emerging operations, including Beyond Visual Line of Sight (BVLOS) uncrewed aircraft. The proposed approach is intended to support the safe integration of all airspace users within a shared airspace environment.

Equipment and Technical Requirements

What equipment would be required under the proposed EC Mandate?

The consultation proposes performance requirements rather than mandating specific products or manufacturers. This is intended to provide flexibility for operators and allow

industry to develop solutions that meet the required standards. The proposed requirements vary depending on the type of operation being undertaken. Full details are set out in the consultation document and the EC Technical Concept of Operations (CAP3140).

Would my existing EC equipment be compliant?

The proposed approach is based on meeting defined performance requirements rather than carrying a particular device. Whether an existing device would be compliant depends on its performance characteristics and the type of operation being undertaken.

We are aware that stakeholders have raised questions about the future status of CAP1391 devices and, in particular, the SkyEcho 2. Based on the current EC Technical Concept of Operations, the SkyEcho 2 would meet the performance requirements associated with Position 4 and therefore would be capable of meeting the proposed mandate requirements for aircraft operating at or below the 140-knot threshold.

Stakeholders who are unsure whether a particular device may meet the proposed performance requirements should consult the equipment manufacturer in the first instance. The CAA will continue to provide information and guidance as the project develops, although any future compliance assessments would ultimately be based on the published performance requirements.

More generally, the consultation does not determine compliance based on product name alone. Compliance would be based on whether the equipment meets the required performance standards.

Why are requirements such as ADS-B, SIL/SDA and the 140-knot threshold included in the proposal?

These requirements are based on the technical approach developed through the EC Technical Concept of Operations and the supporting research. They are intended to support interoperability and provide a level of performance consistent with the objectives of improving safety and enabling a common electronic visibility baseline across different airspace users.

The consultation seeks evidence on whether the proposed requirements are practical and achievable for the mandate across different sectors of aviation. Stakeholders are encouraged to provide evidence where they believe alternative approaches could achieve the same outcomes.

Historic and Specialist Aircraft

How would the proposed EC Mandate affect historic, vintage and specialist aircraft?

We recognise that some aircraft may face particular technical, operational or preservation challenges in meeting the proposed requirements. This includes some historic, vintage

and specialist aircraft, aircraft with limited installation options and aircraft that are difficult to modify.

While the scope of our current proposed approach includes all civil general air traffic not already required to carry and use ADS-B equipment, we are seeking evidence on where this may create disproportionate impacts and whether there are particular circumstances that should be considered before any final decisions are made.

Stakeholders are encouraged to provide evidence on the nature and scale of these challenges, including operational, technical and preservation considerations.

Will exemptions be available?

The consultation does not currently propose exemptions for particular aircraft categories.

However, the consultation discusses the possibility of alternative means of compliance where the same safety outcomes can be achieved through different approaches. We are seeking evidence on where such approaches may be appropriate.

Any future decisions on exemptions, alleviations or alternative compliance arrangements would need to be considered against the safety and policy objectives of the proposed EC Mandate.

International Operations

How would the proposed EC Mandate affect international flying?

The consultation applies to aircraft operating within UK sovereign airspace below Flight Level 100, including foreign-registered aircraft operating in that airspace. The focus of the proposal is on what is needed to support the safe and effective operation of aircraft within UK airspace.

We recognise the importance of interoperability for UK operators flying abroad and for overseas aircraft visiting the UK. International interoperability and regulatory clarity are among the issues considered within the consultation.

The consultation seeks views and evidence on any international or cross-border impacts that should be considered before any final decisions are made.

Is the CAA working with EASA and other international partners?

Yes.

We continue to work with our international partners on EC and the future integration of airspace users. The proposed approach seeks to align with relevant international standards where appropriate, while reflecting the UK's own operational requirements and policy objectives.

However, the requirements that apply in other countries remain matters for their own aviation authorities. Operators flying internationally should continue to comply with the requirements of the states in which they operate.

What happens next

Has the decision already been made?

No.

The consultation has been launched to gather views and evidence on the proposed approach. No final decisions have been made and the consultation is an opportunity for stakeholders to help inform future policy development.

The CAA is particularly interested in evidence relating to costs, implementation, technical requirements, operational impacts and any unintended consequences of the proposed approach.

What will happen to consultation responses?

All consultation responses will be reviewed and analysed before any final decisions are made. The CAA will consider the evidence and views submitted by stakeholders alongside other relevant information gathered through the consultation process.

As with any consultation, the CAA will consider both the strength of stakeholder views and the evidence provided in support of those views. The consultation is an opportunity to gather evidence and perspectives; it is not a vote.

How will the outcome be communicated?

Following the consultation, the CAA intends to publish information on the outcome and the next steps. This will include an explanation of the rationale for key decisions and any changes made as a result of consultation feedback.

Should the CAA decide to pursue regulatory changes, further work would be required as part of the relevant rulemaking processes before any new requirements could be introduced.

Thank you for taking part

We encourage all stakeholders to respond to the consultation, particularly where they can provide evidence, operational experience or practical insight that may assist our assessment of the proposed approach.

Consultation responses will play an important role in informing future policy development and any subsequent regulatory decisions.