#	Para	Comment Provider	Comment / Justification	Response	Resulting Text
1.	Article 4 - 'Open' category of UAS operations, para 1 (e)	TMA comment 1	**The proposal is acceptable but would be improved if the following changes were made**: UAS operating in VLOS at altitudes up to 120 meters (approximately 400 feet) could intersect with seaplane operations, which often occur at low altitudes during takeoff and landing phases under VFR. Given that both UAS and seaplanes may operate at similar low altitudes, it is advisable to implement **additional situational awareness** measures for UAS operators in areas where seaplanes are active. This could include **mandatory listening watch** on relevant communication frequencies or the use of **electronic conspicuity devices**.	Noted **1. Separation through altitude flown** MCAR-2 (Rule of the Air), Chapter 4 (Visual Flight Rules), paragraph 4.6 states the following: "Except when necessary for take-off or landing, or except by permission from the CAA, **a VFR flight shall not be flown**: a) over the congested areas of cities, towns or settlements or over an open-air assembly of persons at a height less than **300 m (1 000 ft) above the highest obstacle** within a radius of 600 m from the aircraft; b) elsewhere than as specified in 4.6 a), at a **height less than 150 m (500 ft)** above the ground or water." MCAR-UAS B, Article 4 ('Open' category of UAS operations), paragraph 1 (e) states: "during flight, the unmanned aircraft is maintained **within 120 metres from the closest point of the surface of the earth**, except when overflying an obstacle, as specified in Part A of the Annex" Therefore, seaplanes will not be flying below 150 m except for takeoff and landing and UAS will not be flown above 120 m. **2. Geographical zones established for Safety, security, privacy and environmental reasons**	No Change

#	Para	Comment Provider	Comment / Justification	Response	Resulting Text
				1. The regulation (**refer Article 15 of MCAR-UAS B**) requires identification and publication of Geographical zones based on safety, security, privacy and environmental reasons. These zones will be decided based on the information from stakeholders (e.g. Min of Defense, Min. of homeland security, Maldives National Air Traffic Service, Airports, Airlines, Min. of Environment…etc.) and the information will be uploaded to a dedicated webpage. It is not practical to identify the geographical zones in the regulation as the zones may change. Geographical zones information will be in digital format in order to upload to the drones so that the geo-awareness system works. **2.1 How does a person know if he can fly in a location?** CAA plans to publish maps identifying geographical zones where all drone flights are forbidden or where a person needs to have a **flight authorisation** before starting the operation. In most countries, apps for mobile phones are available to easily identify where one can fly. CAA wishes to do the same and develop a dedicated webpage for drones. Flight authorisations are different from the operational authorisation required for the 'specific category'. A **flight authorisation is applicable to all operations** in '**open**' or '**specific**' category and is issued by the authority/entity identified in the maps. For example, we may want to restrict the flights over an environmentally sensitive area or a riskier area such as industrial area or over a prison etc. We may then publish a geographical zone requiring that all drone operations conducted in these zones **must have a**	

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				flight authorisation issued by the authority managing the area (e.g. Min. of Environment, the owner of the industry or Min. of Homeland Security etc..). **GM2 Article 15(1) Operational conditions for UAS geographical zones** states "If a flight authorisation is required to enter a UAS geographical zone, the CAA will also establish the related procedure and designate the entity responsible for providing such authorisation." **Manned aircraft takeoff and landing areas will be prohibited areas for UAS operation and identified as such in the geographical zone map**. GM1 Article 15(3) Operational conditions for UAS geographical zones, describes how geographical zones may be set. Detailed information related to a respective UAS geographical zone, such as details of restrictions, maximum height, maximum noise level, application procedure for flight authorisation, etc., may be provided when the UAS operator selects the respective zone on the website or on the smartphone application. **3. Remote pilot qualification and training** We have made the regulations (MCAR-UAS A and MCAR-UAS B) to be proportionate. The regulation MCAR-UAS B is operation centric and therefore, the UAS operation is categorized to "**Open** category operation", "**Specific** category operation" and "**Certified** Category operation".	

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				Open category is low risk, Specific category is medium risk and Certified category is high risk. The open category is further subdivided into A1, A2 and A3. The Specific category is also subdivided to **low**, **medium** and **high risk**. High risk specific category requires the aircraft (UA/drone) to be certified. Specific category operation requires **risk assessment** by the operator and **operational approval** from CAA, in addition to **operator registration**. Certified category operation requires operator certification similar to manned aircraft operator certification and the remote pilot requires a license. In Open and Specific category operation, the pilot does not require a license but requires training and competency commensurate with the risk, for example, open category is of lower risk than Specific category. AMC3 UAS.SPEC.050(1)(d) Responsibilities of the UAS operator, states: "Depending on the type and risk of the intended UAS operation, the UAS operator may propose, as part of the application for an operational authorisation, additional theoretical knowledge training in combination with the practical-skills training that is specific to the intended UAS operation as described in the OM." OM is Operations Manual	

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				Radio communications and phraseology is one module recommended in the AMC. **4. Use of electronic conspicuity devices** Before granting Operational Authorisation for '**Specific category**' operations, CAA may require technologies like ADS-B in and out.	
2.	Article 11 - Rules for conducting an operational risk assessment, para 4 (b) iii	TMA comment 2	**The proposal is acceptable but would be improved if the following changes were made**: UAS operators are required to assess risks related to air traffic, including maintaining separation from other aircraft. In areas where seaplanes operate under VFR, there is a heightened need for effective de-confliction strategies to prevent mid-air incidents Recommend that the operational risk assessment explicitly addresses potential interactions with seaplane and VFR operations. De-confliction strategies should include coordination protocols, awareness of common seaplane routes, and possibly the integration of detect-and-avoid technologies.	Noted We have made the regulations (MCAR-UAS A and MCAR-UAS B) to be proportionate. The regulation MCAR-UAS B is operation centric and therefore, the UAS operation is categorized to "**Open** category operation", "**Specific** category operation" and "**Certified** Category operation". Open category is low risk, Specific category is medium risk and Certified category is high risk. In open category the risk is reduced by having restrictions on the operation and this includes limiting the weight of the MTOM of UA and allowing only Visual Line of sight (VLOS). Therefore, no risk assessment is required for open category. The specific category already requires risk assessment (refer MCAR-UAS B Article 11), and the terms and limitations of such specific category operator will be specified in their Operation Authorisation issued by the CAA. **The CAA plans to publish on the website all the Operation Authorisations issued together with the relevant details.** This will allow other parties (e.g. air operators,	No Change

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				aerodrome operators, Maldives National Air Traffic service...etc.) to contact them. In risk assessment of specific category, the operator is required to assess both the **ground risk** and **air risk**.	
3.	Article 15 - Operational conditions for UAS geographical zones, para 1 (a)	TMA comment 3	**The proposal is acceptable but would be improved if the following changes were made**: The establishment of UAS geographical zones could overlap with areas used by seaplanes for takeoff and landing, especially in low-altitude water aerodromes, leading to potential airspace conflicts. Recommend that UAS geographical zones be carefully coordinated with existing seaplane and VFR flight paths to prevent conflicts. Consideration should be given to exempting or adjusting zones in areas of high seaplane activity	Noted Refer response 1 points 1 and 2. Geographical zones will be identified after coordination with all stakeholders (e.g. airlines, airports, Ministry of Defense, Directorate of Aviation Security Administration, Maldives National Air Traffic service, Ministry of Homeland Security, Police, Ministry of Environment...etc.)	No Change
4.	Not specified by the comment provider	Environmental Protection Agency (EPA). EPA comment 1	**The proposal is acceptable but would be improved if the following changes were made**: 1. When CAA defines UAS geographical zones, we would like to include Protected Areas of the Maldives within the UAS geographical zones. We would like to include protected areas as areas that need prior flight authorization and subject	Noted **1. Geographical zones established for Safety, security, privacy and environmental reasons** The regulation (**refer Article 15 of MCAR-UAS B**) requires identification and publication of Geographical zones based on safety, security, privacy and environmental reasons. These zones will be decided based on the information from stakeholders (e.g. Min of Defense, Min. of homeland	No change

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			certain UAV operations to be conducted under certain standards & conditions based on restrictions and prohibitions defined in environmental law, regulations, directives, guidelines and permits. **1.1. Law, Regulations and Directives** The Protected Areas of the Maldives declared under the **Environment Protection and Preservation Act of Maldives, law no. 4/93** and the **Protected Areas Regulation - 2018/R-78** among these zones. There are **93 Protected Areas that cover the vast extent of 651 km²** which is **almost double the land area of the country**. There are specific gazette publications for each protected area, management plans and management regulations and guidelines that define activities that are allowed and prohibited in these protected areas. Almost all protected areas are habitats of protected species of the Maldives. That means all protected areas will have one or more species that are protected under the **Protected Species Regulation - 2021/R-25** Furthermore, all vegetation within a protected area, and within a 20m buffer	security, Maldives National Air Traffic Service, Airports, Airlines, **Ministry of Environment**...etc.) and the information will be uploaded to a dedicated webpage. **It is not practical to identify the geographical zones in the regulation as the zones may change**. Geographical zones information will be in digital format in order to upload to the drones so that the geo-awareness system works. **2.1 How does a person know if he can fly in a location?** CAA plans to publish maps identifying geographical zones where all drone flights are forbidden or where a person needs to have a **flight authorisation** before starting the operation. In most countries, apps for mobile phones are available to easily identify where one can fly. CAA wishes to do the same and have a dedicated webpage for drones. Flight authorisations are different from the operational authorisation required for the 'specific category'. A **flight authorisation is applicable to all operations** in '**open**' or '**specific**' category and is issued by the authority/entity identified in the maps by the state. For example, we may want to restrict flights over an environmentally sensitive area or a riskier area such as industrial area or over a prison etc. We may then publish a geographical zone requiring that all drone operations conducted in these zones **must have a flight authorisation issued by the authority managing the area** (e.g. Min. of Environment or EPA, the owner of the industry or Min. of Homeland Security etc..).	

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			zone from the protected area boundary are protected under the **Regulation for Protection and Preservation of Island Vegetation and Flora in the Maldives – 2022/R-92** Therefore, these protected areas are protected by law, monitored and conserved under the above **three regulations**. **1.2. Guidelines** Some protected areas are conserved due to unique geographical features such as bays and inlets, mangroves, underwater over-hangs and caves etc. Other areas are protected to conserve nesting and roosting birds, or congregation of megafauna such as whale sharks, manta rays or specific species of plants. **There are published guidelines regarding UAS operations near certain life forms**. For instance, a certain distance from lifeforms needs to be maintained even when flying small recreational drones. This is because even such drones have been observed to affect and disturb life forms such as roosting and nesting birds. Such birds attack drones and get injured especially during nesting season and roosting times. This behaviour has sometimes led to damage to drones as well. Therefore, **our guidelines and**	**GM2 Article 15(1) Operational conditions for UAS geographical zones** states "If a flight authorisation is required to enter a UAS geographical zone, the CAA will also establish the related procedure and designate the entity responsible for providing such authorisation." **GM1 Article 15(3) Operational conditions for UAS geographical zones**, describes how geographical zones may be set. Detailed information related to a respective UAS geographical zone, such as details of restrictions, maximum height, maximum noise level, application procedure for flight authorisation, etc., may be provided when the UAS operator selects the respective zone on the website or on the smartphone application.	

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			regulations and directives prohibit visiting certain protected areas between dusk and dawn and advise best practices to maintain a certain vertical and horizontal distance from birds when flying UAVs. These **guidelines and prohibitions can apply to whole protected areas such as islands and sandbanks too**. Therefore, it is important to get approval from EPA prior to any type of UAV operation over a protected area and near a protected species. **1.3. Permits** Photography and Videography in some protected areas such as Hanifaru Area requires a special permit from EPA. Therefore, any UAV collecting RGB images and videos in a protected area needs to get permission from EPA. **In order to carry out research on protected areas and protected species, whoever is carrying out the research using UAVs is subject to EPA approved Species Research Permit or Protected Area Research Permit**. Any type of UAV data collected for mapping purposes (data collected to generate an orthomosaic or a DEM/DTM) is considered research data. Any multispectral or hyperspectral data		

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			captured is considered research data. Any UAV data that collects data from the electromagnetic spectrum other than RGB is considered research data. Furthermore, UAV data collected to observe, monitor a geographical feature or a life form will be considered as research data. Therefore, any UAV operations that collect data that can be used for research purposes, as explained above, require pilots and or the operators to acquire the relevant permits from EPA. **Therefore, it is important to get approval from EPA prior to a UAV operation that collects research data over a protected area and near a protected species**. **Protected Areas of the Maldives area declared by the Ministry of Climate Change, Environment and Energy**. Environment Protection Agency is the environmental regulator and the custodian of the protected areas and species protected by the Ministry. All protected areas of the Maldives are under the jurisdiction of the Ministry of Climate Change, Environment and Energy and the Environmental Protection Agency. Environmental Protection Agency will provide protected area boundaries along with the respective, laws, regulations, directives, management plans, guidelines		

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			and permits that dictate the need for EPA authorization in protected areas when the Maldives Civil Aviation Regulation MCAR - Unmanned Aircraft Systems comes into effect.		
5.	Not specified by the comment provider	EPA comment 2	**2. UAS operations, even in open category, in certain protected areas, need to be authorized by EPA.** Protected areas with bird roosting and nesting sites should require EPA authorization prior to UAV operations. It is recommended to restrict all classes of UAVs to a minimum altitude (vertical distance from ground) of 100m over bird roosting and nesting sites among protected areas and prohibit any UAV flights between 6pm and 6am (night operations) over such protected areas**.** **Visiting such protected areas at night is also prohibited**. UAV takeoff and landing in such areas should follow EPA guidelines.	Noted Refer response 4. The details concerning the areas, times of the year and flight authorization procedure by EPA can be discussed later as the zones are not identified in the UAS Regulations. Rather the regulation requires identification and publishing of the zones.	No change
6.	Not specified by the comment provider	EPA comment 3	**3. EPA utilizes UAV surveying as a standard method for quick assessments**. Therefore, **we request an exemption from CAA authorization or a special permit from CAA** to EPA to conduct UAV operations under specific category when investigating noncompliance cases. If each UAV operation in the above-mentioned cases gets authorization from CAA, we believe	Not Accepted The provision is there in the UAS regulation to apply and get the Operational Authorisation as a Specific Category operator. The UAS regulation package also includes Guidance Material (GM). Therefore, there is no need for an exemption for something already allowed in the regulation. CAA can grant EPA a generic operational authorization, if the conditions are met, so that EPA can have more	No change

#	Para	Comment Provider	Comment / Justification	Response	Resulting Text
			that it will delay our investigations. We recommend CAA to provide EPA with a special permit subject to EPA maintaining the required standards and protocols and SOPs or conditions set by CAA. In addition to the regulations highlighted in section 1.1 of this document, EPA is responsible for implementing the regulations listed below. 3.1. Waste Management Act and Regulations made under the Act. 24/2022 3.2. Reclamation and Dredging Regulation 3.3. EIA Regulation 3.4. Penalty and Liability Regulation EPA staff attend the sites or locations to investigate cases of noncompliance when reported. EPA staff carry out surveys and investigations to collect data. These surveys and assessments are an important part of the case investigation. The investigations of such cases lead to fines and other penalties as dictated by the relevant laws and Regulations. Some of these cases, due to their nature, need to be attended rapidly and UAV data collection is one such method of rapid data collection for investigations. Most of	flexibility. Below is the relevant content from the guidance material to the regulation: **"GM2 UAS.SPEC.030(2) Application for an operational authorization** '**GENERIC**' VERSUS '**PRECISE**' OPERATIONAL AUTHORISATION According to Article 12 of this Regulation, the CAA may decide to grant a 'generic' operational authorisation, i.e. an operational authorisation that is applicable to an indefinite number of flights taking place in locations generically identified, during the period of validity of the operational authorisation. (Contrary to the 'generic' operational authorisation, an operational authorisation that is limited to the number of flights and/or to known locations identified by geographical coordinates will be called 'precise' operational authorisation.) **CONDITIONS FOR ISSUING A 'GENERIC' OPERATIONAL AUTHORISATION** A 'generic' operational authorisation does not contain any precise location (geographical coordinates) but applies to all locations that meet the approved conditions/limitations (e.g. density of population of the operational and adjacent area, class of airspace of the operational and adjacent area, maximum height, etc.). The UAS operator is responsible for checking that each flight they conduct: — meets the mitigations and operational safety objectives derived from the SORA and the	

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			these cases of noncompliance occur in industrial/inhabited areas and in inhabited islands. **Hence, EPA UAV operations shall fall under a specific category.** The Draft UAS regulation requires special authorization from CAA prior to UAV operations under the specific category. We understand that EPA needs to be registered with CAA as a UAV operator, and we have no objection to EPA remote pilots to become CAA certified pilots. We also have no objections to incorporate in our protocols CAA approved risk assessment too. However, due to the nature of regulatory, monitoring and assessment work, it will not be reasonable for the EPA as a regulatory body to wait for CAA authorization in such cases considering the fact that this authorization process may take a long time. EPA's investigations in respect of compliance assessments are time bound and require immediate data collection for effective investigation and to ensure legal finish.		requirements listed in the operational authorisation; and — takes place in an area whose characteristics and local conditions are consistent with the GRC and ARC classification of the SORA as approved by the CAA. The UAS operator should anyhow check whether the CAA has published a geographical zone in the area of operation according to Article 15 of this Regulation, requiring a flight authorisation (e.g. this may be the case for the areas covered by U-Space). A flight authorisation should not be confused with an operational authorisation."	
7.	Not specified by the	Maldives National Defence Force	Doc. Ref.	ސިވިލް އޭވިއޭޝަންގެ އަންގަވާނޭ އެއަރކްރާފްޓް ސިސްޓަމްސް އާއި ގުޅޭ 2 ރެގިއުލޭޝަނަށް ކުރުން	<u>Noted.</u>	No change

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	comment provider	(MNDF), Ministry of Defence. (MNDF comment 1)	Verbatim	މި ނޯޓިސް އޮފް ޕްރޮޕޯސްޑް ރޫލްމޭކިންގ އަކީ މޯލްޑިވްސް އަހަރުގެ ޔޫރަޕިއަން ޔޫނިއަން އޭވިއޭޝަން ސޭފްޓީ އެޖެންސީގެ "އީޒީ އެކްސެސް ރޫލްސް ފޯރ އަންމޭންޑް އެއަރކްރާފްޓް ސިސްޓަމްސް" ބޭނުންކުރެގެން ތައްޔާރުކުރެގެން ތައްޔާރުކުރައްވާ ރެގިއުލޭޝަނަކަށްވާތީއާއި "NPRM 2024-04" މިހާރުއޮތް ގޮތް ރަނގަޅުކަމުގައި ދެންނެވީމެވެ. މީގެ އިތުރުން ދަފާއީ ބޭނުންތަކަށް އޮޕަރޭޓުކުރާ އަންމޭންޑް އެއަރކްރާފްޓް ސިސްޓަމްސް މިރެގިއުލޭޝަނުން އިސްތިސްނާކޮށްދެއްވުން އެދެމެވެ.	Aircraft operated by the Military is outside the mandate of CAA but military aircraft operated in civil environment shall comply with the Rules of the Air (MCAR-2) and other requirements such as geozones.	
			Translation	Since NPRM 2024-04 issued by Maldives CAA is based on "Easy Access Rules for Unmanned Aircraft Systems" published by the European Union Aviation Safety Agency (EASA), the draft rule is acceptable. Furthermore, UAS operated for defense purposes shall be exempted from this regulation		
8.	Not specified by the comment provider	Maldives National Defence Force (MNDF), Ministry of Defence.	Doc. Ref.	ސިވިލް އޭވިއޭޝަންގެ އަންމޭންޑް އެއަރކްރާފްޓް ސިސްޓަމްސް އާއި ގުޅޭ 2 ރެގިއުލޭޝަނަށް ކޮމެންޓް	<u>Noted.</u> 1. The regulation (**refer Article 15 of MCAR-UAS B**) requires identification and publication of Geographical zones based on safety, **security**, privacy and environmental reasons. These zones will be decided based on the information from stakeholders (e.g. **Min of Defense**, Min. of homeland	No change
			Verbatim	މިހާރުވެސް ސެކިއުރިޓީ އެސެސްމަންޓުން ރެސްޓްރިކްޓްކުރެވިފައިވާ އޭރިއާ/ޒޯން ބޭކުގެ މަތިން އެއްވެސް އަންމޭންޑް އެއަރކްރާފްޓް		

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		(MNDF comment 2)		ސިފައިންގެ ތަހުލީލުކުރާ ބިދޭސީ ފަރާތްތަކުގެ ކަންތައްތަކާ ގުޅުންހުރި ތަންތަނުގެ ލިސްޓެއް ތަކެއް ހަމަ ކުރުން		
			Translation	Include in this regulation to state that UAS shall not be operated above areas/zones restricted for security purposes, unless approval is obtained from the Maldives National Defence Force.	security, Maldives National Air Traffic Service, Airports, Airlines, Min. of Environment...etc.) and the information will be uploaded to a dedicated webpage. It is not practical to identify the geographical zones in the regulation as the zones may change. Geographical zones information will be in digital format in order to upload to the drones so that the geo-awareness system works. **2. How does a person know if he can fly in a location?** CAA plans to publish maps identifying geographical zones where all drone flights are forbidden or where a person needs to have a **flight authorisation** before starting the operation. In most countries, apps for mobile phones are available to easily identify where one can fly. CAA wishes to do the same and have a dedicated webpage for drones. Flight authorisations are different from the operational authorisation required for the 'specific category'. A **flight authorisation is applicable to all operations** in '**open**' or '**specific**' category and is issued by the authority/entity identified in the maps by the state. For example, we may want to restrict the flights over a environmentally sensitive area or a riskier area such as industrial area or over a prison etc. We may then publish a geographical zone requiring that all drone operations conducted in these zones **must have a flight authorisation issued by the authority managing the area** (e.g. Min. of Environment, the owner of the industry or Min. of Homeland Security etc..). **GM2 Article 15(1) Operational conditions for UAS geographical zones** states "If a flight authorisation is	

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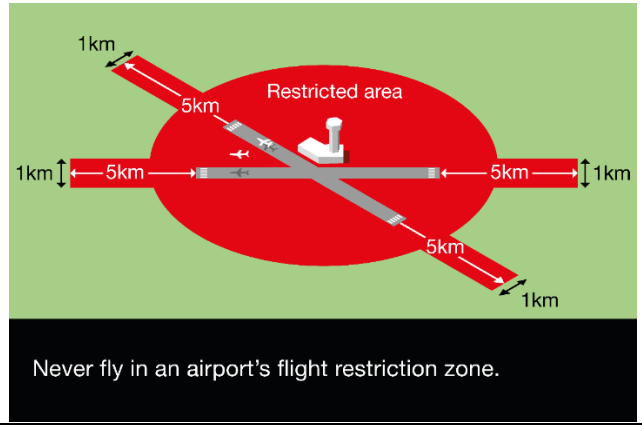
					required to enter a UAS geographical zone, the CAA will also establish the related procedure and designate the entity responsible for providing such authorisation."	
9.	Not specified by the comment provider	Directorate of Aviation Security Administration (DASA), Ministry of Defence.	**The proposal is not acceptable but would be acceptable if the following changes were made**: Attached is the unmanned aircraft guidance material we have developed, which should be included in the regulations, as it currently overlooks the security-related components.		See below for response to specific points in the unmanned aircraft guidance material shared by the Directorate of Aviation Security Administration (DASA).	See below
10.	Not specified by the comment provider	(DASA comment 1)	Doc. Ref.	ތަންކޮށް ބަލައިގަތުމަށް ދަރަނި ތަކެއް ދިވެހި ރާއްޖޭގެ ސިވިލް ހަވާއިދުގައި ހިމެނުމަށް ކުރިން ދަތުރުކުރާ ބަދަލުގައި ހިމެނުން ކަށަވަރުކުރުމަށް ފަރާތްތަކުން 4.2 ގެ 6. ވަނަ ކަންތައް ފުރިހަމަ ކުރަންވާނެ.	Noted. Drones and remotely piloted aircraft of any size must not be flown within the Flight Restriction Zone (FRZ) of a protected aerodrome, without appropriate permission. These will be known through published geographical zone maps. The exact size of this area and the minimum capability of the UAS will be decided based on consultation with relevant stakeholders (e.g. Directorate of Aviation Security Command (DASA), Airport operator, Maldives National Air Traffic Service (MNATS), airlines).	No change
			Verbatim	4. ތަންކޮށް ބަލައިގަތުމަށް ދަރަނި ތަކެއް ކުރިން ދަތުރުކުރާ ފަރާތްތަކުން ހިމެނުން ކަށަވަރުކުރަންވާ ކަންތައް 4.2 ގައި ބުނެފައިވާ ގޮތުގެ ތެރެއިން، ދަތުރުކުރާ ފަރާތަކީ (2 km) ގެ ދެމިހުރި ދާއިރާ ތެރެއަށް ވަދެ، ދަތުރުކުރާ ފަރާތް		

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
			Translation	Concept paper submitted for deciding prohibited areas for operation of Unmanned aircraft or unmanned free balloons. 4. Prohibited areas for Unmanned Aircraft operation: 4.2. Within 2 km of Airports (land aerodromes)	For further information on geographical zones and flight authorisations, refer to the response given to MNDF comment 2, in row 8 of the table. Some countries decide the FRZ as below 	
11.	Not specified by the comment provider	(DASA comment 2)	Doc. Ref.	ތަކުރާރުކުރެވޭ ބަދަލުތަކުގެ ތެރެއިން ދަށުގައި ބަޔާންކުރާ ގޮތަށް ދަށ ވެއްދުމަށް ފަރުވާކުރާ ކޮންސެޕްޓް ޕޭޕަރ. ދަށ ވެއްދުމަށް ފަރުވާ ކުރާ ގޮތް 7. ދަށ ވެއްދުމަށް ފަރުވާ ކުރާ ގޮތް 4.3	Noted. Regarding geographical zones, see the response to DASA comment 1 in row 10. List of Aerodromes and map locations of water aerodromes can be made available on CAA website.	No change
			Verbatim	4. ތަކުރާރުކުރެވޭ ބަދަލުތަކުގެ ތެރެއިން ދަށ ވެއްދުމަށް ފަރުވާ ކުރާ ގޮތް 4.3 ކޮންމެ ބަދަލެއްގެ ވަކި ތަނެއް ތަކެއް ނަމަ ކޮންމެ ބަދަލެއް ތަކެއް ނަމަ (5 km) ފަސް ކިލޯމީޓަރ ދުރުގައި، ކަނޑައެޅިފައި ހުންނަ ތަނެއް: ބަދަލު ގެންދާ ގޮތުގެ ކޮންމެ ބަދަލެއްގެ ދެކުނުގެ ފަރާތުގައި ހުންނަ ގޮތަށް		

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
			Translation	4. Prohibited areas for Unmanned Aircraft operation: 4.3. Within 5 km of water aerodromes and ad hoc water aerodromes **Note**: To include locations of water aerodromes as an annex		
12.	Not specified by the comment provider	(DASA comment 3)	Doc. Ref.	ތަކުރާރުކުރެވޭ ދުރުމިނުގައި ދަތުރުކުރުމުގެ ކުރިން ބަލައިގަތުމަށް ތިބާ ދަތުރުކުރާ ތަނުގެ ދަށުން ލިބިފައިވާ ހުއްދާ ގުޅިގެން ބަލައިގަތުމަށް ލިބިދޭ ކަންކަމުގެ 7. ގެ ދަށުގައި 4.3. ގައިވާ ގޮތަށް ހުއްދަ ދޫކުރުން	Not accepted. Drones shall be operated within the limits prescribed by the manufacturer and within the limits specified in the Operational Authorisation granted by the CAA in case of “Specific category”. For example, drone operation may be stopped due to strong wind or heavy rain. Weather related provisions are in the regulation. For example, refer to UAS.OPEN.030 UAS OPERATIONS IN SUBCATEGORY A2, paragraph 1 (a) and AMC1 UAS.OPEN.030(2)(c), (b)(1), GM1 UAS.SPEC.030(3)(e), 5.1 (e) (2)	No change
			Verbatim	ފާސްކުރެވިފައިވާ ގާނޫނުގައި ބަޔާންކޮށްފައިވާ ގޮތަށް ތަކުރާރުކުރެވޭ ދުރުމިނުގައި ދަތުރުކުރުމުގެ ކުރިން ބަލައިގަތުމަށް ލިބިދޭ ކަންކަމުގެ ގޮތުގައި ދަތުރުކުރާ ތަނުގެ ދަށުން ލިބިގެންވާ ހުއްދާ ގުޅިގެން ބަލައިގަތުމަށް.		
			Translation	4. Prohibited areas for Unmanned Aircraft operation: 4.3. … • Temporarily prohibit drones where the local weather is severe		
13.	Not specified by the	(DASA comment 4)	Doc. Ref.	ތަކުރާރުކުރެވޭ ދުރުމިނުގައި ދަތުރުކުރުމުގެ ކުރިން ބަލައިގަތުމަށް ލިބިދޭ ކަންކަމުގެ ގޮތުގައި ދަތުރުކުރާ ތަނުގެ ދަށުން ލިބިގެންވާ	Not accepted. See response to DASA comment 3 in row 12.	No change

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
	comment provider			ށ. 8 ، ކުށްވެރި ކަންތައް ކުރުމަށް ބޭނުންކުރާ ބަދަލުގައި ކަމަށް ވާނަމަ 4.3. ފަރުވާ ދިނުމަށް ކުރިން	
			Verbatim	ފާސްކޮށް ދީފައި ހުންނަ ތަކެއް ނުވަތަ ހުންނަ ތަކެއް، ކުރިން ހުންނަ ތަކެއް ބަދަލުކުރުން، ހުންނަންޖެހޭ ގޮތަށް ހުންނަންޖެހޭ ތަކެއް ހުންނަންވާ ގޮތަށް ބަދަލުކުރުން.	
			Translation	4. Prohibited areas for Unmanned Aircraft operation: 4.3. ... • If the Department of Meteorology issues yellow or red alert to a region/area, drone operation shall be stopped for the designated area and period.		
14.	Not specified by the comment provider	(DASA comment 5)	Doc. Ref.	ތަންކޮށް ބަދަލުގެ ގޮތުގައި ތަކެއް ފާސްކޮށް ދީފައި ހުންނަ ތަކެއް ކުރުމަށް ބޭނުންކުރާ ބަދަލުގައި ކަމަށް ވާނަމަ ށ. 9 ، ކުށްވެރި 7.	Noted. The regulation permits the relevant party for the geographical zone to give flight authorization. The maximum altitude in restricted or prohibited areas under the flight authorization can be limited to 45 m, as suggested. However, in permitted areas (i.e. not a prohibited or restricted area), UAS can be operated up to an altitude of 120 m.	No change
			Verbatim	7. ތަކެއް ފާސްކޮށް ދީފައި ހުންނަ ތަކެއް ކުރުމަށް ބޭނުންކުރާ ތަކެއް ފާސްކޮށް ދީފައި ހުންނަ ތަކެއް ބަދަލުކުރުމަށް • ފާސްކޮށް ދީފައި ހުންނަ ކަންތައް ކުރުން	

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
				• މިނިސްޓްރީ އޮފް ޑިފެންސް – ޑައިރެކްޓިރޭޓް އޮފް އޭވިއޭޝަން ސެކިއުރިޓީ އެޑްމިނިސްޓްރޭޝަންގެ ބޭނުމަށް • މޯލްޑިވްސް ނޭޝަނަލް ޑިފެންސް ފޯސް ބޭނުމަށް • މޯލްޑިވްސް ޕޮލިސް ސާވިސްގެ ބޭނުމަށް • އެއަރޕޯޓް އޮޕަރޭޓަރގެ ރަސްމީބޭނުންތަކަށް • ކައުންސިލް ތަކާއި ރިސޯޓް ތަކުގެ ރަސްމީ ބޭނުންތަކަށް • އަންމޭންޑް އެއަރކްރާފްޓް އެރުވޭނެ އެންމެ އުސްމިނަކީ 45 މީޓަރަށެވެ. • އަންމޭންޑް އެއަރކްރާފްޓް އޮޕަރޭޓް ކުރާ ފަރާތުގެ ލޮލަށް ނުފެންނަ ހިސާބަށް އަންމޭންޑް އެއަރކްރާފްޓް އޮޕަރޭޓް ކޮށްގެން ނުވާނެއެވެ.		
			Translation	7. UAS can be allowed to operate in prohibited areas under the following special cases. When required by: • State institutions • Ministry of Defence, Directorate of Aviation Security Administration (DASA)		

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
				• Maldives National Defence Force • Maldives Police Service • Airport operator • Councils and Resorts for their formal needs For the above special cases; • the UAS cannot be operated above 45 metres and • shall be within visual line of sight		
15.	Not specified by the comment provider	(DASA comment 6)	Doc. Ref.	ތަންކޮށްގެން ހުއްދަ ދިނުމުގެ ކޮންޓްރޯލް ފްރޭމްވާކް ހެދުމަށް ކަނޑައެޅިފައިވާ ގޮތުގެ ދަށުން ކުރިއަށް ގެންދާ ކަންތައްތަކުގެ ލިސްޓުގެ 10. ވަނަ ބައި 8.3.	Noted. MCAR-100 requires relevant organization (e.g. airport operator) to take the necessary measure against UAS threats as per their Safety Management System (SMS). There is international guidance available on Drone Incident Management at Aerodromes.	No change
			Verbatim	8. ދުރުވެސްފަތުގެ ތަރުބިއްޔާ ހިންގާ ބައިތަކާ ގުޅުންހުރި ކަންކަމުގެ ވަޒީފާތަކާ ދައުރުތަކާ ބެހޭ ކަންކަން:		
			Translation	8. Roles and responsibilities of (relevant) institutions:		

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
				8.3. Erecting barriers in vulnerable areas as an anti-drone measure		
16.	Not specified by the comment provider	(DASA comment 7)	Doc. Ref.	ތަންކޮށްދިނުމުގެ ކުރިން ތަންކޮށްދިނުމުގެ ކުރިން ލިބިގެންވާ ތަކެތި ބަލައިގަތުމަށް ކުރިން ހުށަހަޅާ ·10 ދުވަހުގެ ·8·4	Noted. **MCAR-UAS B** paragraph 7 of foreword states "Proportionate risks mitigation requirements should be applicable to UAS operations according to the level of risk involved, the operational characteristics of the unmanned aircraft concerned and the characteristics of the area of operation." **MCAR-UAS B** Article 11 is **Rules for conducting an operational risk assessment**. The relevant organization (e.g. airport operator) shall take the necessary measure against UAS threats as per their Safety Management System (SMS). There is international guidance available on Drone Incident Management at Aerodromes. Refer MCAR-100 on integrated safety management system. MCAR Air Ops, MCAR-CAMO and MCAR-145 also include SMS.	No change
			Verbatim	·8 ދަތުރުތަކުގައި ތަރުތީބުގެ ދާއިރާ ތަންކޮށްދިނުމުގެ 8·4 ކުރިން ހުށަހަޅާ ކަންކަމާ ގުޅުންހުރި ދިވެހި ރައްޔިތުންގެ ދިރިއުޅުމަށް ހުރިހާ		
			Translation	8. Roles and responsibilities of (relevant) institutions: 8.4. Identify the standards for assessing the dangers posed by unmanned aircraft		
17.	Not specified by the comment provider	(DASA comment 8)	Doc. Ref.	ތަންކޮށްދިނުމުގެ ކުރިން ތަންކޮށްދިނުމުގެ ކުރިން ލިބިގެންވާ ތަކެތި ބަލައިގަތުމަށް ކުރިން ހުށަހަޅާ ·10 ދުވަހުގެ ·8·5	Noted. This can be done by all relevant parties (e.g. CAA, airports, Police...etc) and various means can be used (e.g. posters, media...etc).	No change
			Verbatim	·8 ދަތުރުތަކުގައި ތަރުތީބުގެ ދާއިރާ ތަންކޮށްދިނުމުގެ 8·5 ކުރިން ހުށަހަޅާ ކަންކަމާ ގުޅުންހުރި ދިވެހި ރައްޔިތުންގެ		

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
				ސަރަހައްދުގައި އޮޕަރޭޓްކުރުމުން ކުރިމަތިވެދާނެ ނުރައްކާތަކަށް އަންގައި ހޭލުންތެރިކުރުވުން		
			Translation	8. Roles and responsibilities of (relevant) institutions: 8.5. Raising public awareness regarding the dangers of operating unmanned aircraft inside or near airports.		
18.	Not specified by the comment provider	(DASA comment 9)	Doc. Ref.	އަންމޭންޑް އެއަރކްރާފްޓް ނުވަތަ އަންމޭންޑް ޑްރީ ބޫޓުން ދިވެހިރާއްޖޭގައި އުފެއްދުން ވަނީ ސަރަހައްދުތައް ކަނޑައެޅުމަށްބެކި ހުރަހަޖެ ކޮންސެޕްޓް ކަރުދާސް. ސަފުހާ 10. ފުރަގަރާފް 8.6.	<u>Noted</u> MCAR-UAS B Articles 10 (Rules and procedures for the airworthiness of UAS) states: "Unless privately-built, or used for operations referred to in Article 16, or meeting the conditions defined in Article 20, UAS used in operations set out in this Regulation shall comply with the technical requirements and rules and procedures for the airworthiness issued by the CAA under Maldives Civil Aviation Act 2/2012." We have made the regulations (MCAR-UAS A and MCAR-UAS B) to be proportionate. The regulation MCAR-UAS B is operation centric and therefore, the UAS operation is categorized to "**Open** category operation", "**Specific** category operation" and "**Certified** Category operation". Open category is low risk, Specific category is medium risk and Certified category is high risk. The open category is further subdivided into A1, A2 and A3.	No change
			Verbatim	8. މުއައްސަސާތަކުގެ ދައުރާއި ޒިންމާތައް 8.6 އަންމޭންޑް އެއަރކްރާފްޓް އިމްޕޯޓް ކުރުމުގައި ވަކި ސްޓޭންޑަރޑެއް ޤާއިމް ކުރުން		
			Translation	8. Roles and responsibilities of (relevant) institutions: 8.6. Establish standards for drone imported to the Maldives		

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
					Regulation **MCAR-UAS A Article 6** lists the Obligation of Manufacturers and **Article 7** Lists the Obligations of Authorised Representatives of Manufacturers. Regulation **MCAR-UAS A Article 8** (Obligation of importers), **paragraph 2 (c)** states "Before placing a product on the Maldivian market, importers shall ensure that the product bears the conformity marking and, when required, the UA class identification label and the indication of the sound power level" Regulation **MCAR-UAS A Article 9** (Obligation of distributors), **paragraph 2** states "Before making a product available on the market, distributors shall verify that the product bears the conformity marking and, when applicable, the UA class identification label and the indication of the sound power level, is accompanied by the documents …" UAS Class Identification Label is from C0 to C6 where C0 to C4 is applicable to Open Category and C5 and C6 are applicable to Specific Category. Regulation **MCAR-UAS A Section 3 Articles 12 to 17 is about Conformity of the Product.** This Conformity Marking can be CE for products conforming to EU standards and UKCA for products conforming to UK standards. The Specific category is also subdivided to low, medium and high risk. High risk specific category requires the aircraft (UA/drone) to be certified.	

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
					An operator conducting an operation in the specific category must demonstrate that the drone used is compliant with the technical requirements defined in the operational authorisation issued by the CAA. **The technical requirements depend on the level of risk of the operation**. For operations with lower risk (e.g SAIL I and II according to SORA) the CAA may accept a drone with class identification label. Certificate of Airworthiness will only be issued for certified aircraft. Therefore, the technical standards depend on the level of risk of the operation.	
19.	Not specified by the comment provider	(DASA comment 10)	Doc. Ref.	ތަންކޮށްގެން ތަރައްޤީކުރަންޖެހޭ ކަންތައްތަކާ ގުޅޭ ބާރުތަކާއި ދާއިރާތަކުގެ ކަންކަން ބަލާ ގޮތުގެ 8.7 ވަނަ ނަންބަރާ ގުޅިގެން 10 ވަނަ ނަންބަރުގައި	Noted. The regulation (**refer Article 15 of MCAR-UAS B**) requires identification and publication of Geographical zones based on safety, security, privacy and environmental reasons. For further information on geographical zones and flight authorisations, refer to the response given to MNDF comment 2, in row 8 of the table. Refer also to the response given to DASA comment 1 in row 10.	No change
			Verbatim	8. ދާއިރާސާސީކުރުމާ ބެހޭގޮތުގައި 8.7 ވަނަ ނުކުތާ ގުޅިގެން ބާރުތަކާއި ދާއިރާ-ފާސްކުރާ ތަނާ ގުޅޭ ކަންކަން ބަލާ ގޮތުގެ		
			Translation	8. Roles and responsibilities of (relevant) institutions: 8.7. Based on risks, establish geofencing and designate prohibited zones		

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
20.	Not specified by the comment provider	(DASA comment 11)	Doc. Ref.	ތަންކޮށްގެންވާ ތަކެއްޗާ ބެހޭގޮތުގެ ދަށުން ދަތުރުކުރާ ފަރާތްތަކުގެ ވާޖިބާ ޒިންމާ ދެނެގަތުމާ ބެހޭ ގޮތުގެ ދަށުން ދަތުރުކުރާ ފަރާތް ރަޖިސްޓަރ ކުރުމުގެ ·10 ވަނަ ދަށްދެނެ ·8·8	Not accepted. **The rule is designed to register the drone operator except for certified drones where a Certificate of Registration is issued.** Once registered, drone operator receives a '**drone operator registration number**' that needs to be **displayed** with a sticker **on all the drones they own, including those privately built**. The operator must also **upload it** into the 'Drone's **remote identification system**'. However, a person **does not** need to register if the drone(s): 1. weighs less than 250g and has no camera or other sensor able to detect personal data; or 2. even with a camera or other sensor, weighs less than 250g, but is **a toy**; Regarding registration, refer points (17) and (18) of foreword of the regulation **MCAR-UAS B**, and **Article 14** of the same regulation.	No change
			Verbatim	·8 ގަވަރنمަންޓުގެ ބަދަލުގައި ތިބޭ ފަރާތްތަކުގެ ·8·8 ވާޖިބާ ޒިންމާ		
			Translation	8. Roles and responsibilities of (relevant) institutions: 8.8. Establish a drone registration mechanism		
21.	Not specified by the comment provider	(DASA comment 12)	Doc. Ref.	ތަންކޮށްގެންވާ ތަކެއްޗާ ބެހޭގޮތުގެ ދަށުން ދަތުރުކުރާ ފަރާތްތަކުގެ ވާޖިބާ ޒިންމާ ދެނެގަތުމާ ބެހޭ ގޮތުގެ ދަށުން ދަތުރުކުރާ ފަރާތް ރަޖިސްޓަރ ކުރުމުގެ ·11 ވަނަ ދަށްދެނެ ·8·9	Noted. **1. Remote pilot training requirements in the 'open' category** The open category is further subdivided into A1, A2 and A3. a) Privately built drones (under 250 gram) - No training required. **A1 (can also fly in subcategory A3)** b) C0 (under 250 gram) - Read carefully the user manual. **A1 (can also fly in subcategory A3)** c) C1 (under 900 gram)	No change
			Verbatim	·8 ގަވަރنمަންޓުގެ ބަދަލުގައި ތިބޭ ·8·9 ދަތުރުތެރިކަމުގެ ހޯދުމާ ބެހޭ ގޮތުގެ ދަށުން ދަތުރުކުރާ ފަރާތް ރަޖިސްޓަރ ކުރުމުގެ		
			Translation	8. Roles and responsibilities of (relevant) institutions:		

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
				8.9. Establish the standards for remote pilot certification and the conditions to be fulfilled by a remote pilot.	○ Read carefully the user manual ○ Obtain a 'Proof of completion for online training' for **A1/A3** '**open**' subcategory by: ▪ Completing the online training ▪ Passing the online theoretical exam **A1 (can also fly in subcategory A3)** d) C2 (under 4 kg) ○ Read carefully the user manual ○ Obtain a 'Proof of completion for online training' for **A2** '**open**' subcategory by: ▪ Having a 'Proof of completion for online training' for **A1/A3** 'open' subcategory ▪ Conducting and declare a **practical** self- training ▪ Passing an **additional** theoretical exam at the CAA or proctored online **A2 (can also fly in subcategory A3)** e) C3 (under 25 kg), C4 (under 25 kg) & privately built drones (under 25 kg) ○ Read carefully the user manual ○ Obtain a 'Proof of completion for online training' for A1/A3 '**open**' subcategory by: ▪ Completing the online training ▪ Passing the online theoretical exam	

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
					<table><tr><th>'Open' - Subcategory</th><th>class identification label type of drone</th></tr><tr><td rowspan="3">A1 Urban areas but not over crowds or outside of urban areas</td><td>class identification label 0, 1</td></tr><tr><td>Privately built drone with MTOM < 250 g and Speed < 19 m/s</td></tr><tr><td>Drone without class identification label with MTOM < 250 g incl. fuel and payload. As of 1 January 2023</td></tr><tr><td>A2 Urban areas keeping at least 5 m (or 30 m depending on the features of your drone) from people, or outside of urban areas</td><td>2</td></tr><tr><td rowspan="3">A3 Outside of urban areas</td><td>class identification label 2, 3, 4</td></tr><tr><td>Privately built drone with MTOM < 25 kg Speed < 19 m/s</td></tr><tr><td>Drone without class identification label with MTOM < 25 kg incl. fuel and payload. As of 1 January 2023</td></tr></table> **2. Remote pilot training requirements in the 'specific' category** For operation falling under the 'specific' category, the training depends on the operation intended. So unless the operation falls into a standard scenario, after the risk assessment, the operator will need to propose a possible training course to the CAA. The authority will, in each case, evaluate the adequacy of the training, and if they confirm it in the operational authorisation, the training will become the required training. If your operation falls into a standard scenario, the remote pilot must:	

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
					• hold a certificate of remote pilot theoretical knowledge for operation under standard scenarios; • hold an accreditation of completion of the STS-01 practical skill training. To do so, the remote pilot must complete and successfully pass an online training course. Both the certificate and accreditation can be issued by a competent authority or an entity chosen to do so. For standard scenarios, the CAA is responsible for issuing certificates. For operations in the 'specific' category that are not covered by standard scenarios, the training will be defined in the operational authorisation provided by the CAA. **3. Remote pilot training requirements in the 'certified' category** For operation falling under the 'certified' category, the pilot will require a license that meets ICAO Annex 1 standard. We have made the regulations (MCAR-UAS A and MCAR-UAS B) to be proportionate. The regulation MCAR-UAS B is operation centric and therefore, the UAS operation is categorized to "**Open** category operation", "**Specific** category operation" and "**Certified** Category operation". Open category is low risk, Specific category is medium risk and Certified category is high risk. The open category is further subdivided into A1, A2 and A3.	

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
					The Specific category is also subdivided to low, medium and high risk. High risk specific category requires the aircraft (UA/drone) to be certified. Specific category operation requires risk assessment by the operator and operational approval from CAA, in addition to registration. Certified category operation requires operator certification similar to manned aircraft operator certification and the remote pilot requires a license. In Open and Specific category operation, the pilot does not require a license but requires training and competency commensurate with the risk, for example, open category is of lower risk than Specific category. Refer **Article 6** (Certified category UAS operation) **paragraph 1** and **Article 8** (Rules and procedures for the competency of remote pilots). For responsibilities of the remote pilot, refer to **UAS.OPEN.060** (for open category), **UAS.SPEC.060** (for specific category), and for standard scenarios under specific operations, UAS.STS-01.040 and UAS.STS.02.040.	
22.	Not specified by the comment provider	(DASA comment 13)	Doc. Ref.	ތަންކޮށް ބަލައިގަތުންތަކުގެ ދަށުން ކުރިއަށް ގެންދާ ފަރުވާތަކާ ގުޅޭ ގޮތުން ކަނޑަށް ދާ ބޯޓުތަކުގެ ސަލާމަތާ ގުޅޭ ގޮތުން ކަނޑަށް ދާ ބޯޓުތަކުގެ ސަލާމަތާ ގުޅޭ ގޮތުން 11· ވަނަ ބައި 8·10	Not Accepted. The UAS ecosystem is quite varied. It is not possible to give specific requirements that cover all scenarios. The Regulations specify standards for the aircraft, C2 links and the stations based on the operation. For specific category UAS, the technical specifications of the UAS will be provided to the CAA before granting an Operational Authorsation. An Operations Manual will also	No change
			Verbatim	8· ދުރުން ހިންގާ ފަރުތަކާ ގުޅޭ ގޮތުން 8·10 ވަނަ ބައި ދަށުން ބަލައި ގެންދާ ކަންތައްތަކާ ގުޅޭ ގޮތުން ކަނޑަށް ދާ ބޯޓުތަކުގެ		

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
				(އަންމޭންޑް އެއާކްރާފްޓް އަދި ފްރީބަލޫން އުދުއްސުވަން ނުވަތަ އަންމޭންޑް އެއާކްރާފްޓް އަދި ފްރީބަލޫން ކޮންޓްރޯލް ކުރުމަށް ބޭނުން ކުރާ އިލެކްޓްރޯނިކް ޑިވައިސްތަކާއި ރިމޯޓް ޕައިލެޓް ސްޓޭޝަންތައް ސާފުކޮށް ބަޔާންކުރުން. އަދި އެ ޑިވައިސްތަކާއި ސްޓޭޝަންތަކުގައި ބޭނުންކުރަނީ ކޮންކޮން ސޮފްޓްވެއަރ އެއްކަން ސާފުކޮށް ބަޔާންކުރުން)	be required. CAA will share the template for the Operations Manual so that the applicants can use it.	
			Translation	8. Roles and responsibilities of (relevant) institutions: 8.10. To clearly explain which electronic systems can be operated using remote control (To clearly specify the devices used to control unmanned aircraft or unmanned free balloons and electronic systems used in the remote pilot stations, including details of the software used)		
23.	Not specified by the comment provider	(DASA comment 14)	Doc. Ref.	އަންމޭންޑް އެއާކްރާފްޓް ނުވަތަ އަންމޭންޑް ފްރީ ބަލޫން ދިވެހިރާއްޖޭގައި އުދުއްސުން މަނާ ސަރަހައްދުތައް ކަނޑައެޅުމަށްޓަކައި ހުށަހަޅާ ކޮންސެޕްޓް ކަރުދާސް. ސަފްހާ 11، ޕެރެގްރާފް 8.11.	<u>Noted.</u> See response to DASA comment 8 in row 17.	No change
			Verbatim	8. މުއައްސަސާތަކުގެ ދައުރާއި ޒިންމާތައް		

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
				8.11 ތާއީދުކުރުމާއި ދަތުރުތަކެއްގައި ކުރިއަށްގެންދާ ތަރައްގީ ކުރުމަށް ހިތްވަރު ދިނުން		
			Translation	8. Roles and responsibilities of (relevant) institutions: 8.11. should include running public education and awareness campaigns		
24.	Not specified by the comment provider	(DASA comment 15)	Doc. Ref.	ތަންކޮށް ބަލަހައްޓާ ދާއިރާ ތަކުގެ ތެރެއިން ރޭޑިއޯ ފްރީކުވެންސީ ބޭނުންކުރާ ތަންތަނުގައި ކުރިއަށް ގެންދާ ކަންތައް ހިންގުމަށް ކުރިން ސިވިލް ޔޫ.ޔޭ.ސް ކުރިއަށް ގެންދާ ކަންތައް ހިންގުމަށް ކުރިން 11· ގެ ދަށުން ·8·12	Noted. This will be done by CAA in consultation with Communication Authority of Maldives, if non-open spectrum frequencies are used. **GM1 AMC1 Article 11 Rules for conducting an operational risk assessment**, states the following: "Aspects other than safety, such as security, privacy, environmental protection, the use of the radio frequency (RF) spectrum, etc., should be assessed in accordance with the applicable requirements established by the CAA, or by other regulations in the Maldives."	No change
			Verbatim	8· ދުރުބަސްތަކުގެ ފަރުދުން ތިންވަނަ ފަރާތަކަށް 8·12 ދިމާވާ ކަންކަމުގެ ދެކޮޅަށް ވާހަކަ ދެއްކުމަށް ބާރުދޭ ފަރާތެއް ކަމަށް		
			Translation	8. Roles and responsibilities of (relevant) institutions: 8.12. Determine the radio frequencies allowed for UAS operation		
25.	Not specified by the comment provider	(DASA comment 16)	Doc. Ref.	ތަންކޮށް ބަލަހައްޓާ ދާއިރާ ތަކުގެ ތެރެއިން ރޭޑިއޯ ފްރީކުވެންސީ ބޭނުންކުރާ ތަންތަނުގައި ކުރިއަށް ގެންދާ ކަންތައް ހިންގުމަށް ކުރިން ސިވިލް ޔޫ.ޔޭ.ސް ކުރިއަށް ގެންދާ ކަންތައް ހިންގުމަށް ކުރިން 11· ގެ ދަށުން ·8·13	Noted. The CAA appreciated the effort and initiation of Ministry of Health in organizing several meetings and training sessions on UAS, which was done as part of facilitating the start of UAS operation for medical purposes.	No change
			Verbatim	8· ދުރުބަސްތަކުގެ ފަރުދުން ތިންވަނަ ފަރާތަކަށް		

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
				8.13 އެންމެ އެދެވޭގޮތަށް ހަލުވިކަމާއެކު ފިޔަވަޅު އެޅިގެންދާނީ، ކަމާއި ގުޅުންހުރި ހުރިހާ ފަރާތްތަކާއި އަދި ސްޓޭކް ހޯލްޑަރުންނާއި (ޑާސާ، އެމް.އެން.ޑީ.އެފް، އެމްނެޓްސް، އެއަރޕޯޓް އޮޕަރޭޓަރ، އެއަރ ޓްރެފިކް ކޮންޓްރޯލް ސަރވިސް، ޕައިލަޓުން، ރިމޯޓް ޕައިލަޓުން، ޕޮލިހުން، ލޯކަލް އޮތޯރިޓީސްތައް) އެކު އެޅުމަށް ކަނޑައެޅިފައިވާ ފިޔަވަޅުތަކާއި ޕްރޮސީޖަރތައް ކުރިއާލާ މަޝްވަރާކުރުމާއި ފުރިހަމައަށް މައުލޫމާތު ބަދަލު ކުރުން	This NPRM is also part of consultation and the NPRM contains not only the rules but guidance material. Geozones will also be established after consultation with relevant parties.	
			Translation	8. Roles and responsibilities of (relevant) institutions: 8.13. For effective and quick implementation of necessary measures, there shall be early consultation and proper communication between all stakeholders (e.g. DASA, MNDF, airport operator, MNATS, pilots, remote pilots, Police, local authorities)		
26.	Not specified by the comment provider	(DASA comment 17)	Doc. Ref.	އަންމޭންޑް އެއަރކްރާފްޓް ނުވަތަ އަންމޭންޑް ޑްރީ ބޭނުން ދިވެހިރާއްޖޭގައި އުދުހުން މަނާ ސަރަހައްދުތައް ކަނޑައެޅުމަށްޓަކައި ހުށަހެޅޭ ކޮންސެޕްޓް ކަރުދާސް. ސަފްހާ 11. ޕެރެގްރާފް 8.14.	<u>Not accepted.</u> The regulations require drone identification and existing rules (e.g. MCAR-13B) require occurrence reporting **1. Drone registration and remote identification system**	No change
			Verbatim	8. މުއައްސަސާތަކުގެ ދައުރާއި ޒިންމާތައް		

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
				8.14 ތަންކަންތައް ހިއްސާކުރާ ތަންތަނުގެ ވާޖިބުތަކާއި ދައުރުތައް ދެނެގަތުން ކަމަށްވާ ގޮތުން ޔူ.ޔޭ.ސް ގެ ހާދިސާ ރިޕޯޓް ކުރުމުގެ ގޮތެއް ތަންކޮށްދިނުން	
			Translation	8. Roles and responsibilities of (relevant) institutions: 8.14. Establish a reporting mechanism for UAS related occurrences	**1.1. Is it required to register the drone (i.e. a certificate of registration for the aircraft)?** Unless the unmanned aircraft/drone is certified (i.e. a type certificate is issued for the aircraft), drones do not need to be registered, but **the person or organisation, as drone operator/owner, must register themselves**. The operator/owner register once, independently of how many drones the operator has operating in the '**open**' or the '**specific**' category. The registration will be valid for a period defined by CAA, after which the operator/owner needs to renew it. However, a person **does not** need to register if the drone(s): 1. weighs less than 250g and has no camera or other sensor able to detect personal data; or 2. even with a camera or other sensor, weighs less than 250g, but is **a toy**; A drone is certified when it has a certificate of airworthiness issued by the CAA. **In this case, it requires registration**. A certified drone is needed only when the risk of the operation requires it. **So, certification is never needed for drones operated in the 'open' category**. **1.2. What happens once the drone operator is registered?** Once registered, the drone operator receives a '**drone operator registration number**' that needs to be **displayed** with a sticker **on all the drones you own, including those privately built**. The operator must also **upload it** into the 'Drone's **remote identification system**'.	

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
					1.3 What is Direct remote identification? '**direct remote identification'** means a system that ensures the local broadcast of information about a unmanned aircraft in operation, including the marking of the unmanned aircraft, so that this information can be obtained without physical access to the unmanned aircraft; There are two types of remote identification with respect to Unmanned Aircraft (UA). They are: • Network Remote Identification (NRI), and • Direct Remote Identification (DRI) NRI purpose is to ensure connection between UAS and the U-Space DRI purpose is to make the UA visible and its number plate accessible **Direct remote ID operation** ▪ UAS operator registers with CAA ▪ In return, he receives his registration number ▪ He loads his registration number to the UA remote ID system ▪ In flight, remote ID is **broadcasted** ▪ An observer close to the UA **displays the data on his personal device** ▪ Authorities (e.g. **Police, MNDF**) can check ID validity ▪ Authorities (e.g. **Police, MNDF**) have access to information on the UAS operator in registration database	

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
					Benefits of remote ID ▪ Permanent transmission (reduce the accessibility of ready-to-use UAS for criminal purposes) ▪ Works everywhere (no need of U-space, intermediaries) ▪ Enables detecting of all surrounding drones ▪ **Allows to locate the pilot for quick intervention** ▪ **Enables access to the registration database** ▪ Ensures operator's accountability ▪ Increases pilot's responsibility **2. Occurrence reporting system** The CAA website allows online reporting of occurrences. All approved organizations (e.g. airlines, airport operators) are required to have an internal and external reporting mechanism, for both mandatory and voluntary occurrences. This is required as part of their Safety Management System (SMS). Furthermore, as per **MCAR-UAS B Article 19**, each UAS operator shall report to the CAA on any safety-related occurrence and exchange information regarding its UAS in compliance with MCAR-13B.	
27.	Not specified by the comment provider	(DASA comment 18)	Doc. Ref.	ތަންކޮށް ބަލައިގަތުމަށް ދަތުރުކުރާ ފަރާތްތަކުގެ ދަށުން ހިންގާ ސަރަހައްދުތަކުގައި ކަންކަން ކުރަންވާނެ ގޮތް ބަޔާންކުރާ 12 ވަނަ ޕެރެގ්‌ރާފް 10.1	Not accepted. See response to DASA comment 11 in row 20.	No change
			Verbatim	ފަންކޮށް ބަލައިގަތުމަށް ދަތުރުކުރާ ފަރާތްތަކުގެ		

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
				10·1 ދާއިރާގައި ރަޖިސްޓްރީ ކުރެވިފައި ނުވާ ދުރުއަލުން ގަބޫލު ކުރެވޭ ގޮތެއް ނުދެވޭނެ ކަމަށް
			Translation	10. Maldives Civil Aviation Authority: 10.1. shall not allow UAS operation without registration
28.	Not specified by the comment provider	(DASA comment 19)	Doc. Ref.	ދުރުއަލުން ގަބޫލު ކުރެވޭ ވިލާތަކާ ދެކޮޅަށް ދާ ދުރުއަލުން ގަބޫލު ކުރެވޭ ގޮތެއް ހަދާ ގޮތުގެ ގޮތުގައި 12· ގެ ދަށުން ·10·2
			Verbatim	10· ފެނުވުނު ގޮތުގެ ދަށުން ދާ ދުރުއަލުން ގަބޫލު ކުރެވޭ ގޮތެއް 10·2 ދާއިރާގައި ރަޖިސްޓްރީ ކުރެވިފައި ނުވާ ދުރުއަލުން ގަބޫލު ކުރެވޭ ގޮތެއް
			Translation	10. Maldives Civil Aviation Authority: 10.2. shall require unmanned aircraft operators to have a license.
29.	Not specified by the	(DASA comment 20)	Doc. Ref.	ދުރުއަލުން ގަބޫލު ކުރެވޭ ވިލާތަކާ ދެކޮޅަށް ދާ ދުރުއަލުން ގަބޫލު ކުރެވޭ ގޮތެއް ހަދާ ގޮތުގެ

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
	comment provider			ކޮންސެޕްޓް ކަރުދާސް. ސަފްހާ 12. ޕެރެގްރާފް 10.3. ނޯޓް: މި ކަރުދާހުގައި ހިމެނިފައިނުވާ ސަރަހައްދުތަކުގައި އަންމޭންޑް އެއަރކްރާފްޓް އޮޕަރޭޓްކުރުމުގެ ހުއްދަ ދިނުމަށް ބޭނުންވާ ބޭނުންވާ އުސޫލުތައް އެކުލަވާލުން.	MCAR-UAS B Articles 10 (Rules and procedures for the airworthiness of UAS) states: “Unless privately-built, or used for operations referred to in Article 16, or meeting the conditions defined in Article 20, UAS used in operations set out in this Regulation shall comply with the technical requirements and rules and procedures for the airworthiness issued by the CAA under Maldives Civil Aviation Act 2/2012.” We have made the regulations (MCAR-UAS A and MCAR-UAS B) to be proportionate. The regulation MCAR-UAS B is operation centric and therefore, the UAS operation is categorized to “**Open** category operation”, “**Specific** category operation” and “**Certified** Category operation”. Open category is low risk, Specific category is medium risk and Certified category is high risk. The open category is further subdivided into A1, A2 and A3. Regulation **MCAR-UAS A Article 6** lists the Obligation of Manufacturers and **Article 7** Lists the Obligations of Authorised Representatives of Manufacturers. Regulation **MCAR-UAS A Article 8** (Obligation of importers), **paragraph 2 (c)** states “Before placing a product on the Maldivian market, importers shall ensure that the product bears the conformity marking and, when required, the UA class identification label and the indication of the sound power level”	
			Verbatim	11. މޯލްޑިވްސް ސިވިލްއޭވިއޭޝަން އޮތޯރިޓީ 10.3 އަންމޭންޑް އެއަރކްރާފްޓް ތަކުގެ އެއަރވަދިނަސް ހުރުން		
			Translation	10. Maldives Civil Aviation Authority: 10.3. shall ensure airworthiness (standard) of unmanned aircraft. **Note**: Establishing the procedures for the issue of permits to operate UAS in areas not covered by this (concept) paper		

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
					Regulation **MCAR-UAS A Article 9** (Obligation of distributors), **paragraph 2** states "Before making a product available on the market, distributors shall verify that the product bears the conformity marking and, when applicable, the UA class identification label and the indication of the sound power level, is accompanied by the documents …" UAS Class Identification Label is from C0 to C6 where C0 to C4 is applicable to Open Category and C5 and C6 is applicable to Specific Category. Regulation **MCAR-UAS A Section 3 Articles 12 to 17 is about Conformity of the Product.** This Conformity Marking can be CE for products conforming to EU standards and UKCA for products conforming to UK standards. The Specific category is also subdivided to low, medium and high risk. High risk specific category requires the aircraft (UA/drone) to be certified. An operator conducting an operation in the specific category must demonstrate that the drone used is compliant with the technical requirements defined in the operational authorisation issued by the CAA. **The technical requirements depend on the level of risk of the operation**. For operations with lower risk (e.g SAIL I and II according to SORA) the CAA may accept a drone with class identification label. Certificate of Airworthiness will only be issued for certified aircraft.	

#	Para	Comment Provider	Comment / Justification		Response	Resulting Text
					Therefore, the technical standards depend on the level of risk of the operation. **Response to note**: The rule includes procedures to permit operation of UAS for civil purposes.	
30.						

No comments received from the following organisations:		
1. Island Aviation Services Limited (IASL)	2. Villa Air Pvt Ltd	3. Manta Air Pvt Ltd
4. Beond-Simdi Operations Pvt Ltd	5. Regional Airport Company Limited	6. Maldives Airports Companies Limited (MACL)
7. Maldives National Air Traffic Services (MNATS)	8. Villa Airport	9. Kadhdhoo Airport
10. Kaadedhdhoo Airport	11. Dhaalu Airport	12. Gan Airport
13. Maldives Police Service	14. Ministry of Homeland Security	15. Ministry of Economic Development and Trade
16. Ministry of Health	17. Ministry of Transport and Civil Aviation	18. Ministry of Tourism
19. Ministry of Youth Empowerment, Information, and Arts	20. Ministry of Cities, Local Government and Public Works	21. Ministry of Fisheries and Ocean Resources
22. Communications Authority of Maldives	23. Local Government Authority	24. Male' City Council
25. Maldives Customs	26. Maldives Ports Limited (MPL)	27. State Trading Organisation
28. National Disaster Management Authority	29. National Centre for Information Technology	30. Maldives National University
31. National Centre for the arts	32. Housing Development Corporation	

Terminology

Accepted	The CAA agrees with the comment and any proposed amendment is wholly transferred to the revised text
Partially accepted	The CAA either agrees partially with the comment or agrees with it but the proposed amendment is only partially transferred to the revised text.
Noted	The CAA acknowledges the comment but no change to the existing text is considered necessary.
Not Accepted	The comment or proposed amendment is not shared by the CAA.