



Welcome to the ADSE Airworthiness Newsletter

Autumn is here. Time for a clean-up. And I thought: why not clean up the newsletter while I'm at it? What do you think?

The aim of my newsletter is to try to round up technical airworthiness subjects, rather than operational subjects (e.g. OPS rules). However, something in that domain caught my eye this month.

About 99% of the technical regulations we deal with are driven from a safety perspective. Lately, security is putting a foot in as well now and then. One of the safety-driven elements in the UAS operational rules is the 250 gram threshold. In short: a drone with a take-off mass of 250 grams or more generally requires the operator to be registered. The 250 gram threshold is historically linked to the risk and consequences of an uncontrolled impact of small UAS (drones). That safety driven UAS rule is now proposed to change for security reasons, driven by the European Commission's Drone and Counter-Drone Security Action Plan: the 250 gram threshold will be lowered to 100 grams.

EASA has published [Opinion 06/2026](#) as part of the “regular” update of Regulations (EU) 2019/947 and 2019/945. Basically, an opinion is EASA saying to the Commission: here is our proposed regulatory text; now you decide whether to put it into the regulation. This is not a regular update if you ask me, but rather a security update.

The most notable subjects for drones in the open category, are:

- The 250 gram threshold is lowered to 100 grams take-off mass for the requirement to register as a drone operator, for identity verification during registration, and for the requirement for an active direct Remote Identification (RID) function. The UAS operator registration number also needs to be uploaded to the UAS system.
- The UAS should technically prevent operation if the operator registration number has not been correctly uploaded or the consistency check is not passed. In other words, the drone itself becomes one of the security cheese slices of Reason.
- Model aircraft clubs get a specific national discretion, if this alleviation is properly integrated in the national rules that is.

- The proposal also affects privately built UAS, which pushed back hard on the 100 grams proposal.
- For legacy UAS, there will be a transition period. Legacy UAS with a take-off mass of 900 grams or less are exempt from the requirement to retrofit a Remote ID add-on, because installing such equipment on very light UAS was considered technically unfeasible. Legacy UAS above 900 grams will ultimately need to be equipped with a compliant Remote ID add-on, with a transition period of 48 months after entry into force of the new regulation.

So, we are seeing something happening here. A threshold that sits inside what we normally regard as an aviation safety framework is now being changed primarily for security and traceability reasons. And that makes me wonder where the line between safety and security in aviation regulation will be drawn in the future...

As always: Stay safe, secure and airworthy!

Eelco Bakker

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EASA

- EASA [published](#) a Proposed Amendment to CS-25 (NPA 2026-03 - **Regular update of CS-25**). The expiration date for comments is 07/12/2026. The NPA addresses 20 subjects, under which:
 - Alternative fire-extinguishing agents
 - Landing gear safe separation
 - Object entrapment between movable parts of seats and associated furnishings
 - Means to prevent escapees from bypassing the intended evacuation route
 - Composite materials used on aircraft seat structures
 - Equipment, systems, and installations covered by CS 25.1309(a)(2)
 - 'Flight Crew Alerting'
 - Installation of physical secondary barriers
 - Powerplant fire protection — shut-off means
- EASA [started](#) a CS-27 public consultation regarding **Alternative Loading Conditions** for CS 27.923 Compliance Demonstration During Flight Tests. Closing date of consultation 07/10/2026
- EASA [published](#) their opinion to the Commission (Opinion 07-2026) regarding Take-off performance parameters and position errors, in order to make amendments to Regulation (EU) 2015/640 (and Part-26) on additional airworthiness requirements. It proposes to mandate the installation of a take-off performance monitoring system (TOPMS) on large aeroplanes used in commercial air transport and produced on or after a certain date.

- EASA and the DGCA Indonesia [signed](#) a Working Arrangement on Airworthiness Certification. It mainly covers the acceptance of Indonesia of products and parts released in Europe.

FAA

- The FAA [updated](#) AC 43.13-2 (now at amendment C) regarding the Acceptable Methods, Techniques, and Practices for Aircraft Alterations. This AC contains methods, techniques, and practices for the inspection and alteration on nonpressurized areas of civil aircraft of 12,500 pounds gross weight or less. This data generally pertains to minor alterations.
- The FAA [published](#) InFo 26015, regarding inspections done by pilots on civil aircraft of 12,500 pounds gross weight or less. These inspections constitute maintenance as defined in 14 CFR part 1 and require approval or disapproval for return to service in accordance with § 43.11.
- The FAA [released](#) Order 1030.8 regarding FAA Safety Management. This order establishes the safety management policy and requirements for the Federal Aviation Administration (FAA) to create a unified Safety Management System (SMS) and improve the FAA's ability to proactively identify hazards and manage risk at the enterprise level.

Upcoming EASA events (**red** = new)

- **2026 Sep 29** [On-line event](#): **In-Flight Turbulence** Study using Data4Safety
- 2026 Sep 29-30 [On-site event](#): General Aviation **Structures** Workshop (Köln)
- 2026 Sep 29-30 [On-site event](#): ICAO/EASA Third Global RSOO / RAO Forum for **Aviation Safety** (Georgetown, Guyana)
- 2026 Oct 07-08 [Hybrid event](#): **Part-IS** Workshop 2026
- **2026 Oct 16** [On-site event](#): **Aerodrome Equipment** Workshop (Köln)
- 2026 Oct 20-21 [On-site event](#): EASA **Helicopters Flight Test** Workshop (Köln)
- **2026 Oct 21** [On-site event](#): **SAFE 360° - Safety in Aviation Forum for Europe 2026**
- 2026 Oct 27-28 [Hybrid event](#): **Innovative Air Mobility** Implementation Forum (**Agenda now available**)
- 2026 Nov 18-19 [On-site event](#): EASA Annual **Safety Conference 2026**
- 2026 Nov 30-Dec 3 [On-site event](#): EASA **Rotorcraft Symposium** and European Rotors (Lyon)
- 2027 Jan 27-28 [On-site event](#): EASA **Business Jets Workshop 2027**

Other News

- The CAA-UK sent out a recent [NCSC alert](#) that points to increased targeting of internet-exposed Operational Technology (OT) systems and edge devices. One of the key messages is simple: don't assume that your systems are not accessible from the internet – check it. Old equipment, legacy connections, and misconfigurations can create unexpected exposure. The recommendations are also relevant outside OT, so this is a useful reminder to check what is sitting on the edge of your network.

Want to receive the next edition?

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"In theory, there is no difference between theory and practice."