Civil Aviation Bill

Drone Alliance Europe submission

Briefing for the Public Bill Committee | October 2026

About Drone Alliance Europe

Drone Alliance Europe (DAE) is a trade association representing manufacturers and operators of unmanned aircraft systems (UAS). Our mission is to advance safe, efficient and innovative drone operations, and to promote a risk-proportionate, performance-based regulatory framework that enables Beyond Visual Line of Sight (BVLOS) operations and increasing autonomy at scale. We advocate for harmonisation of standards across Europe and internationally, and for building public confidence in the safe integration of drones into shared airspace. Our members include Amazon, Farada Group, Flying Basket, Manna, Urban Ray, Wing, Wingtra and Zipline.

We welcome the opportunity to contribute to the Committee's scrutiny of the Civil Aviation Bill. DAE supports the Bill's overarching purpose, but we have identified one priority area where a targeted drafting improvement would ensure the Bill delivers on its stated policy intent without inadvertently constraining the emerging UAS sector. This submission sets out that concern and the specific amendments we recommend.

Our position on the Bill

DAE generally supports the Bill and its ambition to establish an aviation regulatory framework that can keep pace with technological change. A more agile approach to rule-making, and the modernisation of the Civil Aviation Authority's (CAA) powers, are firmly in the interest of the UAS sector and of the United Kingdom's wider economic and innovation objectives. We welcome recognition at Second Reading that drones are beginning to transform our airspace.

However, in reviewing the proposed drafting, we have identified an area where inadvertently broad drafting and inherited definitions will present challenges to the wider UAS sector if left unaddressed. Parts of the Bill were drafted using definitions designed for conventional, crewed commercial aviation. Applied without adjustment to unmanned operations, these risk capturing drone delivery within a regime not intended for it. We therefore propose the amendments below.

The change we want to see

We seek amendments in one area: the Bill's definitions should be narrowed so that the consumer-protection provisions reflect their stated policy intent and do not inadvertently capture uncrewed freight and drone delivery. The suggested wording follows.

1. Scope of definitions – risk of inadvertently capturing uncrewed freight and drone delivery

The consumer-protection provisions are, in principle, directed at passengers, consumers and airports. The definition of "air transport service" in Clause 1(8) is lifted from the Civil Aviation Act 1982, drafted long before commercial drones existed, and does not obviously exclude drone delivery. Applying a passenger and consumer-protection regime to unmanned commercial cargo delivery is misplaced and risks bringing such operations into scope without ministerial intention or sector consultation. We propose the following baseline amendments to narrow the Bill's scope so that it reflects stated policy intent.

Proposed amendments

- In Clause 1(2), delete paragraphs (b) and (c), and renumber the existing paragraphs (d) and following accordingly.
- In Clause 1(2), insert the following at the end of the clause: "…but may not include provision governing cargo delivery services by unmanned aircraft systems."
- Insert a new Clause 1(6) as follows (and renumber the existing paragraphs (6) and following accordingly): "(6) The Secretary of State shall not exercise the power referred to in subsection (1) unless the Secretary of State has consulted a) the Civil Aviation Authority, and b) such persons whose interests are, or are reasonably likely to be, materially affected by the proposed regulations, including operators of unmanned aircraft systems."
- In Clause 1(8) the following definitions are to be revised: "'air transport service' means a service for the carriage by air of passengers (and does not include a service for the carriage by air of cargo only)"; "'airport services' means services provided at an airport for the purposes of — a) the arrival or departure of passengers and their baggage; or b) the processing of passengers or baggage between their arrival and departure, including facilities for car parking".

- In Clause 1(8), the definition of “cargo” shall be deleted.
- Insert the following at the end of Schedule 16A to the Digital Markets, Competition and Consumers Act 2024 (as inserted by Schedule 1 to the Bill): “Nothing in this Schedule shall apply to a commercial practice by, or on behalf of, an operator of unmanned aircraft systems holding an operational authorisation granted under the specific category in accordance with assimilated law or successor domestic legislation, where the practice relates solely to the provision of cargo delivery services by unmanned aircraft systems.”

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