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**Polish Chamber of Unmanned Systems**

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**European Union Aviation Safety Agency (EASA)**

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**Subject: Scope of Planned EASA Regulatory Activities Concerning Training Requirements for UAS Operations in the Specific Category**

Dear Sir or Madam,

On behalf of the Polish Chamber of Unmanned Systems, an industry organization representing UAS operators, training entities, and unmanned technology providers in Poland, we would like to express our appreciation for EASA's ongoing efforts to harmonize regulations and maintain a high level of aviation safety across the European Union.

In light of the analytical work currently being undertaken by EASA, as well as announcements regarding potential amendments to training requirements for UAS operations in the "specific" category, we kindly request clarification on the issues outlined below, which are of significant importance from both an operational and training-market perspective.

**1. Scope of the planned regulatory activities concerning training in the "specific" category**

We kindly ask for information on which specific areas of training within the "specific" category EASA currently considers to require further clarification or regulatory refinement, as well as the anticipated scope and nature of the planned changes.

In particular, we would appreciate clarification on whether the contemplated actions relate to:

- the structure of training programmes,
- the scope of required theoretical knowledge,

- practical competence requirements,
- training methodology,
- or the principles governing recognition and harmonisation of training across Member States.

Clarifying these matters would enable stakeholders to better prepare for potential changes and to engage constructively in the ongoing dialogue.

## **2. Consideration of postponing new training regulations until operational feasibility improves**

We also kindly request that EASA consider postponing any new training regulations for the “specific” category until the overall situation regarding the practical feasibility of operations in this category improves.

In particular, we wish to highlight the issue of the mandatory establishment of a controlled ground area, which in many Member States significantly limits the ability to conduct UAS operations in real operational environments. In this context, it is worth noting the national solutions adopted in Poland, where this requirement has been waived in certain scenarios, contributing to improved operational feasibility while maintaining an appropriate level of safety.

In our view, further changes to training requirements will be most effective and proportionate once the operational framework for the “specific” category is fully functional and coherent.

## **3. Ongoing EASA work on correcting existing regulations in the “specific” category**

We would also appreciate information on whether EASA is currently undertaking work aimed at analysing and potentially correcting the existing regulations governing operations in the “specific” category, and if so, which specific areas or provisions are under review.

Understanding the direction of these efforts would be highly valuable for operators, training entities, and national authorities, enabling more effective planning of competence development and investment in the UAS sector.

We would like to emphasise that the Polish Chamber of Unmanned Systems remains fully open to dialogue and expert cooperation with EASA.

We stand ready to participate in technical consultations, share operational experience, and jointly develop solutions that are effective, proportionate, and grounded in real safety data.

Kind regards,  
*Polish Chamber of Unmanned Systems*  
*Management Board*