Australian Government
Civil Aviation Safety Authority

POLICY PROPOSAL
PP 2609US

Proposed RPA and model aircraft operations over or near people

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Acknowledgement of Country

The Civil Aviation Safety Authority (CASA) respectfully acknowledges the Traditional Custodians of the lands on which our offices are located and their continuing connection to land, water and community, and pays respect to Elders past, present and emerging.

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Overview

CASA is working to reduce regulatory burden and improve guidance and pathways for the RPAS community to better utilise drones in industry and recreational settings.

This policy proposal sets out CASA's proposed approach to enabling and regulating remotely piloted aircraft (RPA) and model aircraft operations over or near people (OONP) in a more contemporary, risk-based manner. It addresses regulatory gaps and limitations identified through operational experience, analysis of international practice, and input provided by a technical working group established by the Aviation Safety Advisory Panel (ASAP), while maintaining appropriate safety outcomes for people on the ground.

A CASA approval is currently required to conduct OONP, however, this policy proposal introduces new regulatory relief by permitting operations over and near people without a CASA approval, for:

- micro RPA and model aircraft[1] weighing 250 g or less (Chapter 3 of this policy proposal)
- operations where people are physically separated from the drone by a suitable barrier or structure, such as buildings or stationary vehicles (Chapter 4 of this policy proposal).

These proposed regulatory relief changes are intended to eliminate the need for unnecessary approvals for inherently lower risk activities.

For OONP that require an application and CASA approval, this policy proposal also outlines changes to CASA's existing OONP pathways for ReOC holders, currently set out in TMI 2024-01-RPA Operations over or near people. These proposed changes clarify when and how approvals apply, strengthen application requirements (including the use of concepts of operational and emergency response planning), and refine existing approval pathways to better address laceration risk, impact energy, moving vehicles, and operations over or near major gatherings or organised events.

The policy proposal also introduces new, and revises existing, approval pathways to improve operational gaps, including:

- amended treatment of operations over or near major gatherings or organised events (Section 5.3)
- a new pathway for low altitude operations not over people (Section 5.7)
- a new pathway for operations using a parachute recovery system (Section 5.8).

These proposed pathway amendments are designed to more efficiently enable previously difficult-to-assess operations while applying clear, outcome-based safety limits. Table 5 in Appendix A provides a summarised matrix highlighting the current policy set out in TMI 2024-01-RPA Operations over or near people and the proposed changes set out in this *Policy Proposal - PP 2609US.*

Collectively, the proposed changes aim to reduce regulatory burden for lower risk operations, provide greater certainty for industry, and allow CASA to focus its assessment resources on more complex and higher risk activities, while ensuring appropriate aviation safety outcomes.

We invite all relevant stakeholders to review the policy proposal and tell us about any concerns or challenges regarding these proposed changes. We also invite industry and the wider community to highlight any improvements that should be considered for operations over or near people. We will consider all feedback but may elect to defer action on some matters to a later date, so that achievable improvements can be delivered in the short term.

The policy proposal summarises the proposed regulatory alleviations and changes to application pathways—these proposals are mentioned in broad policy or broad actions rather than in specific wording. The exact wording will be addressed in subsequent legislative drafting and guidance material for OONP approvals published as an advisory circular (AC).

[1] Both known as and referred to as drones in this policy proposal.

Contents

1 Reference material

1.1 Acronyms

The acronyms and abbreviations used in this policy proposal are listed in the table below.

Table 1: Acronyms

Acronym	Description
AEB	Airworthiness and Engineering Branch, CASA
CASA	Civil Aviation Safety Authority
CASR	Civil Aviation Safety Regulations 1998
CONOPS	concept of operations
DPP	documented practices and procedures
EASA	European Union Aviation Safety Agency
ESO	emergency service organisation
ERP	emergency response plan
JARUS	Joint Authorities on Rulemaking for Unmanned Systems
NAA	national aviation authority
OONP	operations over or near people
ReOC	Remotely Piloted Aircraft Operator's Certificate
RePL	Remote Pilot Licence
RPA	Remotely Piloted Aircraft
PRS	parachute recovery system
SORA	Specific Operations Risk Assessment
TMI	temporary management instruction
VLOS	visual line of sight

1.2 Definitions

Terms that have specific meaning within this policy proposal are defined in the table below. Where definitions from the civil aviation legislation have been reproduced for ease of reference, these are identified by 'grey shading'. Should there be a discrepancy between a definition given in this policy proposal and the civil aviation legislation, the definition in the legislation prevails.

Table 2: Definitions

Term	Definition
active participant	A person who is participating directly in the specific activity to which the RPA is undertaking, and who is not RPA crew.

Term	Definition
	Note: The scope of persons who may be an active participant is broader than the scope of persons 'directly associated with the operation of the RPA' under regulation 101.245 of CASR and may include persons such as performers and emergency services personnel.
controlled environment	An area with access control to prevent third party entry.
emergency services operation	An RPA operation conducted solely for: • law enforcement purposes; or • the purpose of saving or protecting persons, property, or the environment.
emergency services organisation	Any of the following: • the Australian Federal Police • the Australian Defence Force • the Australian Maritime Safety Authority • the Australian Border Force • a State or Territory police service • a State or Territory fire service • a State or Territory emergency service • a State or Territory parks, wildlife, or forestry service • a State or Territory surf lifesaving service • a State or Territory environment protection agency
gathering of people	A group of people in close proximity, where there is limited free or open ground between individuals and where, if the RPA was to fail, it would have a very high likelihood of impacting a person due to the density of people and their inability to freely move away from the RPA. This may include beaches, parks, local events, birthday parties, or weddings.
gross weight	An RPA's maximum gross weight is the higher of: • the manufacturer's published maximum weight of the RPAs (if any); • the maximum weight of the RPAs specified in the operator's documented practices and procedures (if any); or • the actual maximum weight of the RPA during flight.
impact energy	Impact energy is the kinetic energy of the RPA at the point of impacting a person or object.
laceration	A cut that goes all the way through the layers of the skin and may require emergent medical attention.
major gathering or organised event	An organised or advertised event, generally with a high level of public interest, where a significant number of people come together in a specific location for a common purpose. The density of people is such that there is limited free or open ground between individuals and if an RPA was to fail, it would have a very high likelihood of impacting a person at the event. This may include events like outdoor concerts, festivals, and sporting events, as well as spontaneous gatherings such as large protests and rallies.
on notice	The person is made aware of the RPA operation prior to encountering the operation. This may be through the use of signage or alternative method.
over or near a major gathering or organised event	RPA operations would be considered over or near a major gathering or organised event where they are taking place over and within the boundary of the event, within 30 m from the boundary of the event, or at a distance from where,

Term	Definition
	due to the operating height of the RPA, the RPA would likely impact a person at the event should the RPA fail. Where there is no defined event boundary, it is expected that the boundary is at least 30 m from people participating in the event.
RPA crew	Persons with duties essential to the control or navigation of the RPA.
sustained overflight of a gathering of people	Holding above or hovering, flying back and forth or maintaining sustained flight over a gathering of people. This does not include transient overflight by the RPA or a momentary pause during the transient overflight.
sustained overflight of moving vehicles	Holding an RPA above or hovering, flying back and forth or maintaining sustained flight over a moving vehicle, or a roadway with moving vehicles such that if an RPA were to impact the roadway, it would be likely the RPA may impact a vehicle. This does not include transient overflight by the RPA or a momentary pause during the transient overflight.
transferred energy	Transferred energy is the energy transferred from an RPA to a person or object on impact. This excludes energy that is dissipated in the collision, e.g., energy loss due to RPA frangibility or deformation.
transient overflight	Considered a flight path of the RPA that is direct from point A to point B, transiting over an area.
unsheltered person	A person who is not segregated from an RPA by a structure or barrier.
vehicle	Any means of transport that has an occupant regardless of whether it is motorised. Examples include cars, motorcycles, bicycles, e-scooters, and boats.

1.3 References

Legislation

Legislation is available on the Federal Register of Legislation website https://www.legislation.gov.au/

Table 3: Legislation references

Document	Title
CASA EX45/24	Operation of Remotely Piloted Aircraft Over Populous Area Exemption 2024
CASA 20/25	Operation of Certain Unmanned Aircraft and Rockets – Directions Instrument 2025
	Part 101 of the Civil Aviation Safety Regulations 1998

Advisory material

CASA's advisory materials are available at https://www.casa.gov.au/publications-and-resources/guidance-materials

Table 4: Advisory material references

Document	Title
AC 101-01	Remotely piloted aircraft systems - licencing and operations
ASTM Standard F3322-22	Standard Specification for Small Unmanned Aircraft System (sUAS) Parachutes
ASTM Standard F3389/F3389M-21	Standard Test Method for Assessing the Safety of Small Unmanned Aircraft Impacts
TMI 2024-01	RPA Operations over or near people – 2024-01

2 Background

There are multiple rules that govern drone operations over or near people (OONP):

- Regulation 101.245 of CASR prescribes that a person must not operate a drone within 30 m of a person without CASA approval.
- Subregulation 101.280(2) of CASR prescribes that a person must not operate a drone that is not a certified drone over a populous area.
- Direction 7 of CASA 20/25 extends and clarifies and extends these requirements by prohibiting operation within a person's safety zone, defined as a cylinder of 30 m diameter centred on a person with no height limit (the '30 metre rule'), unless approved by CASA.

Typically, all operations over or near people require a CASA approval. The approval process requires:

- Development of documented practices and procedures (DPP) to support the proposed operation
- Submission of a CASA application form and supporting documentation
- Payment of a fee to CASA
- Assessment of the application by a CASA Inspector.

Regardless of whether an OONP approval is issued or not, drone operations must not create a hazard to other people, property, or aircraft in accordance with regulation 101.055 of CASR.

Guided by international practice aligned to the Australian regulatory environment, CASA formalised its OONP approval policy in early 2024 and released TMI 2024-01-RPA Operations over or near people (the 2024 TMI).

The 2024 TMI provides 3 approval pathways for Remotely Piloted Aircraft Operator's Certificate (ReOC) holders through energy-based, consent-based and SORA-based assessments. Operations compliant with the 2024 TMI are eligible for approval for the purposes of Direction 7 of CASA 20/25, regulation 101.245 of CASR, and in most cases, an exemption from regulation 101.280 of CASR.

In the current regulatory framework, excluded RPA operators are unable to apply for approvals for operations outside of the standard RPA operating conditions (SOC), including for OONP.

CASA does not currently have a specific, documented OONP policy for drones weighing 250 g or less.

In December 2025, CASA, through the Aviation Safety Advisory Panel convened a Technical Working Group (TWG), comprising industry representatives with experience in OONP, to gather input on a draft OONP policy. Feedback from the TWG has been incorporated into this OONP proposed policy document for public consultation.

3 Operations over or near people with drones 250 g or less

CASA recognises micro drones present opportunities for industry and the wider community to conduct commercial and recreational activities with a lower inherent risk.

Chapter 3 of this policy proposal is targeted at the operational enablement of micro drones flown or operated by remote pilot licence (RePL) holders who; conduct commercial operations under a ReOC, or recreational activities while operating model aircraft, over or near people.

3.1 Current position

Currently, CASA does not have specific, documented policy for enabling OONP for micro RPA and model aircraft weighing 250 g or less[2]. Drones weighing 250 g or less must not be flown within 30 m of people who aren't directly associated with the operation of the drone.

3.2 Proposed change

CASA is proposing to enable drones weighing 250 g or less to operate within 30 m of people, without the need for a CASA approval, where the following criteria are met:

- the person operating the drone holds a remote pilot licence (RePL) for the relevant drone or aircraft category (such as, multirotor or fixed wing)
- the gross weight of the drone is not more than 250 g
- the drone maintains a safe distance[3] from any person not associated with the operation of the drone
- the drone is not operated:
  - over or near a major gathering or organised event[4]
  - above 400 ft above ground level (AGL)
  - beyond visual line of sight (BVLOS)
  - extended visual line of sight (EVLOS)
  - in low visibility environments i.e., fog or clouds
  - at night
  - as a one-to-many (swarm) operation
  - with the carriage of dangerous goods
  - autonomously.

CASA recommends:

- operators seek consent to operate over or near people who are not associated with the operation of the drone

[2] Known as drones weighing 250 g or less in this policy proposal.

[3] Safe distance is determined by the drone operator with consideration of factors such as speed, design, safety features etc. of the drone, as well as relevant details of the people in the area.

[4] Meaning over or near a densely populated event with a high level of public interest, such as an outdoor concert or festival.

- mitigating potential laceration injuries by using a drone with propeller guards or other laceration-mitigation technology.

It is proposed that operations over or near a major gathering or an organised event by a drone weighing 250 g or less would require an application, as well as documented practices and procedures, to be assessed by CASA. Additional information about operations over or near a major gathering or organised event can be found in Section 5.3 of this policy proposal.

3.3 Rationale

Drones weighing 250 g or less commonly present an inherently lower risk profile than heavier drones. The proposed change to enable drones weighing 250 g or less to be operated within 30 m of people, without the need for a CASA approval is intended to create a simplified, proportionate option for operations near people.

International approaches were key to shaping the policy. CASA proposes to adopt a middle-ground approach: recognising the inherent lower risk of drones weighing 250 g or less while requiring a higher level of remote pilot competency than some jurisdictions. Under the proposed policy, operators must hold a RePL reflecting Australia's mature training framework and potentially supporting a cautious, staged relaxation of rules for drones 250 g or less over time.

Proposed operational constraints are intentionally minimal. CASA has not proposed to mandate propeller guards or speed limits, instead, operators are to maintain a 'safe distance' from people, consistent with outcome-based regulation. The requirement to maintain a safe distance from a person is not intended to restrict overflight of a person, however remote pilots must ensure flights are not conducted in a hazardous manner.

When considering the safe distance, consideration should be given to the speed, design, and safety features of the drone, as well as considering the activities including the age and capacity, location or the density of people in the area.

When operating near people, consideration should be given to reducing the risk of laceration injuries. Many drones include propeller guards or propellers designed to reduce this risk. Operating a drone with a high potential to cause a significant laceration, or operating at high speed, in close proximity to people may be considered a hazardous operation under regulation 101.055 of CASR.

Any drone retrofitted with propeller guards (or other ancillary equipment) must retain a gross weight of 250 g or less.

3.4 Industry impact analysis

This proposal is expected to benefit RePL holders who intend to conduct commercial and/or recreational drone activities, as well as holders of a ReOC who employ licenced remote pilots and elect to operate drones less than 250 g. CASA proposes these alleviations would not be constrained by the limitation on placing micro RPA on a ReOC under Subpart 101.F of CASR.

CASA notes the current structure of Part 101 of CASR does not permit micro RPA to be operated under a ReOC; however, a ReOC holder may choose to operate micro RPA outside of the ReOC, consistent with the relevant and applicable rules and legislation.

Under the current OONP framework, an operator is required to apply for an approval from CASA. A general exemption, or other such legislative instrument, to enable these operations would reduce the time, cost, and effort required from industry to prepare those applications.

Operators who have historically received an approval from CASA to conduct OONP may elect to operate under this proposed policy instead of re-applying for an approval. This would reduce administrative burden for CASA and allow resources to be directed toward operations that are more complex, more novel or higher risk.

4 Operations where a physical barrier separates the drone from people

CASA, through the review of current operations over and near people recognises the need to bolster the eligibility of activities conducted where a physical barrier separates the drone from a person.

Consistent with CASA's proposed approach to enabling low risk operations in Chapter 3, this proposal intends to enable anyone who flies a drone with a gross weight up to 25 kg, may do so over or near people within the conditions outlined in Section 4.2 of this policy proposal.

4.1 Current position

In the context of OONP, Part 101 of CASR does not differentiate between persons who are sheltered from the drone (i.e., indoors or protected from harm by a physical barrier), and persons who are unsheltered (i.e., outdoors or with no physical barrier present). As a result, operations where a physical barrier separates the drone from people requires a CASA approval, despite a lower inherent risk.

4.2 Proposed change

CASA proposes to enable OONP where all people are protected from harm by a structure or barrier, without requiring a CASA approval, where certain conditions are met:

- the gross weight of the drone is 25 kg or less
- all people within 30 m of the drone, who are not directly associated with its operation, such as a bystander, are separated from the drone by a structure or a barrier
- the structure or barrier can provide reasonable protection to people within 30 m of the drone, in the event of a failure or loss of control of the drone
- in the event of a collision between the drone and the structure or barrier, any person, at the time of the collision, is not likely to be injured because of the collision
- if a person is no longer separated from the drone by a structure or a barrier, the operator should take reasonable steps to ensure the drone is not operated within 30 m of the person as per existing aviation safety rules
- where the structure or barrier is a vehicle, the vehicle is stationary.

CASA recommends drone operators engage with relevant stakeholders and seek consent before operating over a building or structure.

4.3 Rationale

The proposed policy would allow drones to operate within 30 m of people, who are not directly associated with the operation of the drone, without needing a CASA approval provided those people are protected by a structure or barrier that provides reasonable protection from potential impact. Determining whether the structure or barrier offers reasonable protection is an outcome-based assessment and remains the responsibility of the drone operator.

If a person moves outside the protected area or is no longer shielded by the barrier, existing aviation safety rules apply. The drone must not be flown within 30 m of that person and overflight is always prohibited where the person is not protected by the structure or the barrier[5]. Operators therefore need to be able to respond quickly if an unsheltered person unexpectedly enters the area of operation. For this reason, the proposed

[5] Unless OONP is permitted through another CASA approval, regulation, or other legislative instrument.

policy is intended for smaller, localised operating areas where the operator can be confident that all people within 30 m remain protected. It is not intended to support operations conducted over broad or dispersed areas.

International policies for OONP were considered when developing this proposal. CASA's current requirement to obtain approval to fly over a person who is protected by a barrier is considerably more onerous than approaches adopted in some comparable jurisdictions.

From a risk perspective, allowing operations within 30 m of people increases the potential for injury. However, when a suitably protective structure or barrier is present, the risk of impact or harm is reduced to an acceptable level. The proposed policy maintains acceptable safety for people on the ground and does not introduce additional risks to crewed aircraft.

4.4 Industry impact analysis

This proposal is expected to benefit commercial drone operators, including operators of micro RPA, excluded RPA, and holders of a ReOC. However, it may also benefit non-commercial drone operators.

The proposed policy aims to remove the need for CASA approvals for lower risk operations where the regulatory burden is disproportionate to the actual risk. Streamlining these requirements would reduce time, cost, and administrative effort for industry. It would also allow CASA to redirect assessment resources toward more complex, novel, or higher risk operations, improving overall regulatory efficiency and safety oversight.

Additionally, under the current regulatory framework, many commercial drone operators, particularly excluded RPA operators, cannot apply for a CASA approval at all. The proposed policy provides a pathway for these operators to these undertake lower risk activities.

This proposed policy is intended to enable use cases such as real estate photography or roof and asset inspections. Although not within CASA's scope, the reduction of regulatory burden for drone roof and asset inspections potentially reduces the need for workers to perform hazardous tasks such as working at height.

The holder of a ReOC electing to operate under this proposed policy (and subsequent legislative instrument, when made) may need to amend their DPP. This amendment would be considered a non-significant change; a non-significant change does not require CASA approval and is not subject to any CASA fees. A non-significant change must be notified to CASA within 21 days of changes being made to the operator's DPP.

5 Changes to policy for OONP approvals

CASA's current policy to assess and approve OONP applications for holders of a ReOC, is within Temporary Management Instruction RPA Operations over or near people - 2024-01 (the 2024 TMI).

The 2024 TMI contains three pathways for OONP applications:

- Pathway 1 - Informed consenting active participants
- Pathway 2 - Unlikely to cause serious harm upon impact
- Pathway 3 - SORA based assessments.

Pathways 1 and 2 have been revised and include an updated understanding of the relevant risks and expected alleviating impacts of the new proposed pathways in this policy proposal. Discussion on these pathways is set out in Sections 5.5 and 5.6 of this Chapter.

Operations and applications that fall outside of these pathways are assessed by CASA on a case-by-case basis and should continue to include a safety case.

This Chapter also proposes 2 new pathways for which CASA approval would be required:

- low altitude operations not over people (section 5.7)
- operations using a parachute recovery system (section 5.8).

Chapter 5 does not apply to the proposed operations and alleviations in Chapters 3 and 4 of this policy proposal.

5.1 Requirement for a concept of operations to support applications

5.1.1 Current position

The 2024 TMI does not specify whether a concept of operations (CONOPS) is required to support an OONP application. As a result, some OONP applications include little to no detail on the proposed operation.

5.1.2 Proposed change

It is proposed that CASA seek additional details of how an operator intends to conduct OONP at the application submission stage. This may be through the submission of a CONOPS or through questions on the application form.

5.1.3 Rationale

Including a CONOPS or operational detail to support an application ensures CASA can properly consider identified operational risks, better understand the intended interaction with other CASA approvals, and include any appropriate controls. If a CONOPS is required as part of an application, it is intended that this is scalable so it does not impose unnecessary burden on operators and it should reflect the complexity of the proposed operation.

Including a CONOPS or operational detail also improves CASA’s understanding of how industry is using OONP and supports future policy development.

5.2 OONP outside of standard RPA operating conditions

5.2.1 Current position

The 2024 TMI does not specifically consider OONP that is intended to be conducted in conjunction with other CASA instruments of approval that permit operations outside of the standard RPA operating conditions[6] (SOC)/drone safety rules.

5.2.2 Proposed change

Unless specifically considered as part of the application and determined by CASA to be acceptably safe, or unless it is determined that specific operational profiles for OONP do not introduce an unacceptable level of risk, approvals that are granted based on the pathways in the OONP guidance would include a condition that the approval cannot be used in conjunction with the following operations, without additional application requirements and CASA assessment:

- above 400 ft AGL
- BVLOS
- EVLOS
- in low visibility environments i.e., fog or clouds
- at night
- that are one-to-many (swarm)
- that are autonomous
- where dangerous goods are carried.

5.2.3 Rationale

The conduct of OONP outside of the SOC (except as contemplated in Chapters 3 and 4 of this policy proposal that does not require a CASA assessment) may increase the risk to people in the vicinity of the operation and requires specific consideration by CASA as part of the assessment of the application. Should CASA determine an OONP operational profile outside of the SOC is acceptably safe, this condition may be revised to include and permit the newly assessed additional operational profile.

This detail being understood by CASA at the point of application would allow CASA to better understand trends and safety factors that may enable future policy.

5.3 OONP over or near a major gathering or organised event

5.3.1 Current position

The 2024 TMI does not specifically consider OONP that is intended to be conducted over or near a large, outdoor event where a significant number of people are densely covering the ground. This includes events such as outdoor concerts and professional sporting events.

[6] CASR 1998 Part 101.238 Meaning of standard RPA operating conditions (SOC)

5.3.2 Proposed change

It is proposed that operations over or near a major gathering or organised event are restricted unless the operator is specifically approved for such operations.

A *major gathering or organised event* is proposed to be defined as:

> *An organised or advertised event, generally with a high level of public interest, where a significant number of people come together in a specific location for a common purpose. The density of people is such that there is limited free or open ground between individuals and if a drone was to fail, it would have a very high likelihood of impacting a person at the event. This may include events like outdoor concerts, festivals, and sporting events, as well as spontaneous gatherings such as large protests and rallies.*

It is proposed that the approval of operations over or near a major gathering or organised event is not event specific and is Australia-wide.

Operations would be considered ‘over or near' a major gathering or organised event when operated:

- over or near people within the boundary of the event, or
- over or near people within 30 m from the boundary of the event;
- otherwise at a distance from where, due to the operating height of the drone, the drone would likely impact a person at the event should the drone fail.

It is intended that emergency service organisations (ESO) would not be subjected to any restriction for emergency-related drone operations over or near a major gathering or organised event.

For each event, through a condition on the approval, it is proposed that the operator must:

- notify CASA, by CASA’s preferred method, of their intent to operate over or near a major gathering or organised event at least 7 calendar days before the event
- obtain, and keep a record for 7 years, an invitation or letter of agreement from the event organiser inviting the operator to operate at the event. Details required to be in the invitation include date/s for the event or series of events. This record must be provided to CASA upon request.

It is proposed that operations over a major gathering or organised event can be applied for:

- by holders of a ReOC, through the 'Unlikely to cause serious harm upon impact' pathway (currently Pathway 2) and the 'SORA-based assessments' pathway (currently Pathway 3)
- by holders of a ReOC, outside of any documented OONP pathway, provided a safety case is provided and accepted by CASA
- by operators of micro RPA, provided they hold the relevant RePL for that category of drone and develop DPP to support the operation.

5.3.3 Rationale

Operating over or near a major gathering and organised event presents an elevated risk due to:

- high population density, meaning a drone failure is likely to result in impact with a person
- increased air risk, as large, high-profile events attract more drones, raising the likelihood of drone-to-drone collisions that may also increase ground risk.

The term *major gathering or organised event* is intended to be outcome-based and not quantitative, aligning with concepts of ‘assemblies of people’ and ‘open-air assemblies’ used internationally.

This definition is not intended to apply to areas where no major gathering or organised event is taking place such as a populated beach or park, or to events such as a private wedding or a birthday party.

The proposed pathways for an application over or near major gatherings or organised events have been chosen for their inherent lower risk, level of robustness and assurance through the SORA methodology, or through compliance with other standards such as ASTM F3389/F3389M-21.

Through a proposed condition on the approval, operators must obtain documented permission or an agreement from the event organiser to operate over or near the event. This ensures operators coordinate with event organisers and emergency services to support a robust emergency response plan (see Section 5.4 of this policy proposal). This requirement would also likely reduce the number of drones in the area and decrease the likelihood of a drone-to-drone collision.

This proposal has been informed by international approaches to operations over large events. For example, Transport Canada introduced the concept of ‘advertised events’, under which drone operators (including micro RPA operators) must initially obtain an event-specific approval to operate over an advertised event. CASA is not proposing to require event-specific approvals.

5.4 Requirement for an emergency response plan

5.4.1 Current position

Under the 2024 TMI, an emergency response plan (ERP) is not a requirement for all OONP operations.

5.4.2 Proposed change

Through a condition on an approval required for OONP, an ERP would also be required. The ERP should be commensurate with the complexity and risk of the operation.

Where an operation is over or near a major gathering or organised event, the ERP should be informed by engagement with relevant emergency services and the event organiser (where applicable) for the major gathering or organised event.

5.4.3 Rationale

The purpose of an ERP is to provide a comprehensive framework for responding to incidents and accidents involving drones and limiting the potential for escalation of the emergency.

An ERP would provide a safety benefit for OONP. An ERP is intended to limit the escalating effect after an impact with a person, should it occur. The implementation of an ERP, that is proportionate to the level of risk associated with the operations, can be a valuable risk mitigation tool for relatively low effort by industry. To assist operators in knowing where to start and the types of issues to address, CASA has developed an optional template for use by industry to minimise administrative burden.

5.5 Refinement of TMI 2024-01 Pathway 1 – Informed consenting active participants

5.5.1 Current position

Pathway 1 'Informed consenting active participants' of the 2024 TMI, provides that an approval may be issued where, amongst other criteria, the drone is below 25 kg, the people within 30 m are limited to active participants, such as people who are required to be there for the purpose of the drone operation, and the active participants have been briefed on and consented to the operation.

The 2024 TMI pathway 1 does not include specific operational controls or require operators to provide a robust safety case as part of their application detailing how risk to active participants is reduced. It also does not allow consent to be provided digitally, and it restricts operations to active participants aged 18 years of age or older.

5.5.2 Proposed change

It is proposed to include consideration of laceration protection, the requirement for a safety case to support the application as well as requirements for specific DPP, the requirement to maintain a 'safe distance' from active participants, that consent may be digitally recorded, and a separate drone weight limit where operations are over or near active participants below 18 years of age.

Under the revised pathway, operations over or near people may be approved where all the following conditions are met:

- the drone weighs not more than 25 kg gross weight, and not more than 7 kg gross weight where the active participant is under 18 years of age
- where practicable, the drone has no exposed rotating parts that would lacerate human skin upon impact
- the operator provides a safety case with controls to minimise the likelihood or consequence of impact to a person, such as speed restriction, use of PRS, no expected overflight of a person, etc.
- the drone maintains a safe distance[7] from active participants
- the operation is conducted in a controlled environment[8] with only active participants[9] and RPA crew present
- the operation is conducted by an organisation or person that is the holder of an ReOC
- active participants are briefed on information such as the operational details, flight paths, the risk of serious injury or fatality, emergency procedures and response plan, safety mitigators in use, the right not to consent to the operation, and the right to withdraw consent or have the drone operations discontinue
- active participants provide written or digitally recorded consent for drone operations to be conducted closer than 30 m
- all RPA crew that will be within the controlled environment for the specific operation should be briefed
- the operator has DPP to manage the risks of the operation to ensure the safety of active participants and any specific consideration for close proximity operations are addressed in the risk assessment
- the drone is not operated over or near a major gathering or an organised event.

The person conducting the briefing in a language the active participant understands, can be either:

- physically present, briefing and responding in person, or
- virtually present, online in real time, briefing and responding visually and with sound.

5.5.3 Rationale

This pathway applies to operations where all people within 30 m of the drone are informed, consenting, active participants in a controlled environment. Although participants provide consent, CASA must still be satisfied that the operation does not pose an unreasonable risk to people; the requirements for the safety case and DPP helps to achieve this.

Risk controls, such as laceration protection, propeller guards, obstacle-avoidance systems, safe distances, and avoiding direct overflight, are important considerations. Operators are expected to submit a safety case proportionate to the operation’s risk, outlining mitigations, as well as relevant DPP outlining how risk is managed, particularly for close proximity operations.

[7] Safe distance is determined by the drone operator with consideration of factors such as speed, design, safety features etc. of the drone, as well as relevant details of the people in the area.

[8] An area with access control to prevent third party entry.

[9] A person who is participating directly in the specific activity to which the drone is undertaking, and who is not RPA crew. For example, actors and film crew on set of a film who are all essential to the purpose of the drone operation, that is, the filming of a TV show or movie.

Operators are encouraged to use the smallest possible drone where appropriate and to use all available safety mitigators, including those above what is required in the approving instrument. The requirement to maintain a safe distance from active participants is not intended to restrict overflight of a person.

Feedback from the TWG indicated that the previous restriction on participants under 18 was overly burdensome; the updated approach would allow minors to participate if the drone weighs 7 kg or less. RPA over 25 kg remain excluded from this pathway due to safety concerns, consistent with international approaches.

Due to the requirement for operations in this pathway to be within a controlled environment with only briefed, active participants present, it is not expected that operations meeting these criteria would be considered a *major gathering or organised event*.

5.6 Refinement of TMI 2024-01 Pathway 2 - Unlikely to cause serious harm upon impact

5.6.1 Current position

Pathway 2 'Unlikely to cause serious harm upon impact' in the 2024 TMI provides that an approval may be issued where, amongst other criteria, the potential impact energy transfer of the drone is not greater than 15 joules (or 34 joules in specific circumstances). This may be due to factors such as lower drone weight or other safety mitigators such as frangibility or use of parachute recovery systems (PRS). The maximum energy transfer permitted under Pathway 2 must be demonstrated based on the likely drone impact trajectories, including reasonable abnormal situations. The calculation will usually require a combination of both vertical and horizontal kinetic energy.

The current pathway 2 provides that operations near people within a 1:1 ratio should not occur with a drone that has exposed rotating parts that would lacerate[10] human skin upon impact. Additionally, the pathway requires that a drone operated within 15 m horizontally of a person should not be operated at a height less than 3 m above the height of the person unless:

- the drone has no exposed rotating parts that would lacerate human skin upon impact; or
- the drone has a functional obstacle avoidance system that restricts the drone from operating within 5 mm horizontally of the person.

Pathway 2 provides that sheltering may be used as a means of meeting the maximum impact energy threshold where the drone weighs not more than 25 kg, including where the shelter is a moving vehicle travelling at less than 50 km/h unless informed consent has been obtained. The current pathway does not consider sustained overflight of moving vehicles.

Contracted organisations conducting emergency services operations on behalf of emergency services organisations are excluded from the higher kinetic energy threshold (34 joules) in the pathway.

Additionally, the wording used to express the kinetic energy threshold limits in this pathway inadvertently prevents the use of other standards as a means of demonstrating the transferred energy of a small drone impact.

Where a PRS is used to achieve the kinetic energy threshold, the pathway does not currently include specific consideration of wind speed.

The current TMI pathway does not consider operations over or near a major gathering or organised event.

[10] In the context of OONP, a laceration is defined as a cut that goes all the way through the skin and may require emergent medical attention, in comparison to an abrasion, meaning a superficial injury to the skin.

5.6.2 Proposed change

The proposed policy change intends to clarify and narrow the pathway allowing drones that are unlikely to cause serious harm to a person upon impact due to factors such as lower drone weight or other safety mitigators such as frangibility or use of a PRS.

It is proposed that drones should be compliant to the testing standard outlined in *ASTM F3389M-21 - Standard Test Method for Assessing the Safety of Small Unmanned Aircraft Impacts* or an alternate standard acceptable to CASA. CASA may also recognise compliance assessments conducted by other national aviation authorities (NAA).

Laceration protection under this pathway is proposed to apply to all RPA. The drone should have no exposed rotating parts that would lacerate human skin upon impact.

It is proposed to remove sheltering as a means to meet the kinetic energy threshold; Chapter 4 of this policy proposal outlines a separate proposal for enablement of drone operations where a structure or barrier separates the RPA from people within 30 m.

It is proposed to include a prohibition of sustained overflight of moving vehicles[11] travelling at speeds greater than 60 km/h in this pathway unless:

- the drone operation occurs over a controlled environment
- the driver is on notice[12] of the drone operation (15 joules threshold), or
- the driver has consented to the drone overflying the vehicle (34 joules threshold, excluding emergency service operations).

It is proposed to include contracted organisations conducting emergency services operations on behalf of an emergency services organisation in the higher transferred energy threshold limit of 34 joules, and to express the kinetic energy threshold limits as:

The maximum impact energy will not cause injury to a human being that is equivalent to or greater than the severity of injury caused by a transfer of:

- 15 joules of kinetic energy upon impact from a rigid object, where the operation is not an emergency services operation
- 34 joules of kinetic energy upon impact from a rigid object, where the operation is not an emergency services operation and where consent from relevant persons has been obtained
- 34 joules of kinetic energy upon impact from a rigid object, where the operation is an emergency services operation either conducted by an emergency services organisation or an organisation contracted by an emergency services organisation.

It is proposed to require that the operator has suitable DPP for assessing and monitoring actual wind speeds and wind gusts, prior to launch and during the flight at the relevant operating heights, as well as DPP for discontinuation of operations where wind speeds exceed pathway limits and consideration of likely direction of drift if drone is under parachute deployment.

It is proposed that operations under pathway 2 can be approved for operations over or near a major gathering (see Section 5.3 of this policy proposal) where the maximum impact energy will not cause injury to a human being that is equivalent to or greater than the severity of injury caused by a transfer of 15 joules of kinetic energy upon impact from a rigid object.

[11] Holding a drone above or hovering, flying back and forth or maintaining sustained flight over a moving vehicle, or a roadway with moving vehicles such that if a drone were to impact the roadway, it would be likely the drone may impact a vehicle. This does not include transient overflight by the drone or a momentary pause during the transient overflight

[12] The person is made aware of the drone operation prior to encountering the operation.

5.6.3 Rationale

This pathway is intended for drones that are unlikely to cause serious harm to a person upon impact due to factors such as lower drone weight or other safety mitigators such as frangibility or use of PRS.

Unless opposing evidence is provided, it would be assumed that all kinetic energy from a drone is transferred to a person upon impact. Where an operator provides evidence that a collision would result in transferred energy less than the assumed energy transfer (e.g., due to frangibility), the provided data is to be validated by CASA. Such applications would require significant additional time to consider and assess.

The proposed policy simplifies and extends the prohibition on exposed rotating parts (which could cause lacerations) to all RPA. This can be achieved through several means, including:

- PRS that automatically stop propeller rotation on deployment
- propeller guards or shrouds
- propeller designs that prevent laceration, such as folding props.

It is appropriate to consider overflight of moving vehicles. Sustained overflight increases exposure time and therefore the likelihood of a drone striking a fast-moving vehicle in the event of a failure, which is why clearer and more conservative controls are being introduced.

CASA defines *sustained overflight* as hovering, holding, repeated passes, or any continued flight over moving vehicles where an impact would be reasonably likely in the event the drone fails. This does not include one-off or brief transits.

CASA has reassessed the risk and determined that a higher speed limit of 60 km/h is appropriate for sustained overflight. Sustained overflight is permitted when vehicles travel below 60 km/h, but when they exceed 60 km/h, it is only allowed if:

- the operation is conducted in a controlled environment
- the driver is aware of the drone activity.

There is no speed limit proposed for brief, one-off transit over roads or vehicles where there is very minimal exposure time.

The 34 joule kinetic energy threshold, previously limited to ESOs, is being expanded to also cover organisations contracted by ESOs. This change poses no additional aviation safety risk and is expected to support community safety during emergency or disaster response operations.

The policy wording for energy-limit requirements in this pathway has been updated to allow the use of the ASTM F3389M-21 test method for demonstrating compliance with impact energy thresholds. The policy also allows for potential future standards or CASA's acceptance of another NAA's assessment. This is aimed at recognising the assessment of existing systems. CASA recently published a list of remotely piloted aircraft systems deemed compliant with PRS systems, and CASA intends to encourage manufacturers to seek recognition, reducing workload for operators.

5.7 New pathway - Low altitude operations not over people

5.7.1 Current position

CASA does not have a documented policy for OONP that cannot meet the criteria of Pathways 1 and 2, where the operation is solely conducted at a low operational altitude, and a PRS cannot be used.

SORA (Pathway 3) was not intended to be used to assess low level operations, within visual line of sight (VLOS), over or near people where the flight path is primarily concentrated in locations over transient unsheltered population that would incur an increased probability of impact from a loss of control event. For

example, low level power line inspections where the drone traverses a footpath with fluctuating unsheltered population underneath.

5.7.2 Proposed change

CASA proposes that SORA is not used to assess OONP below parachute deployment height for operations that are within VLOS.

A specific pathway has been created to assess and enable low altitude operations that were previously approved under the 2024 SORA-based assessment Pathway 3. Under this new pathway, low altitude operations over or near people may be approved where all the following conditions are met:

- the drone weighs not more than 1.5 kg
- the operation is conducted by an organisation or person that is the holder of an ReOC
- the operational altitude is between 13 ft and 33 ft AGL (4 m and 10 m respectively) when within 30 m of people not directly associated with the operation of the drone, with a maximum operating altitude of 49 ft AGL (15 m) for short-duration obstacle clearance
- no expected overflight of people
- in the event of unavoidable overflight of a person, the remote pilot is expected to manoeuvre immediately to minimise overflight
- the drone is not engaged in sustained overflight of moving vehicles travelling at speeds greater than 60 km/h, unless:
  - the drone operation occurs over a controlled environment
  - the driver is on notice of the RPA operation.
- the drone is operated at low speed to reduce the effect of an impact
- the operator has established DPP to facilitate the reduction of RPA speed and flight planning to ensure operation is maintained within the maximum operational altitude
- the remote pilot maintains VLOS of the drone and the surrounding area
- the drone is not operated over or near a major gathering or organised event.

It is expected that the operator minimises sustained overflight during their operation and considers the conduct of operations where it is likely a lower traffic density is present.

5.7.3 Rationale

Low altitude drone operations pose unique risks because the aircraft has a small fall area and is operated below parachute deployment height, meaning some common mitigations cannot be used. For this reason, SORA is likely to be unsuitable for assessing such operations. CASA has proposed a dedicated pathway.

The pathway limits drone weight to 1.5 kg and reduces the risk to people through minimising exposure, that is, no intended overflight of people even though flight 'near' people is permitted.

Operating heights are constrained to:

- maximum 10 m (with short-term obstacle clearance up to 15 m) supports typical use cases such as powerline inspections
- minimum 4 m provides roughly a 2 m buffer above people nearby when no lateral separation buffer exists.

Intentional overflight of people is not permitted. Where unavoidable over flight occurs, it is expected the drone is manoeuvred immediately to minimise exposure.

Overall, risk under this pathway is considered controllable because exposure to people is highly limited through height, weight and operational restrictions.

5.8 New pathway - Operations with a parachute recovery system

5.8.1 Current position

CASA does not have specific policy or a specific pathway for drone with a PRS. However, operations under Pathway 2 do facilitate an operation over or near people with a PRS.

5.8.2 Proposed change

A specific pathway for OONP operations with drone utilising a PRS is proposed. Under this proposed pathway, OONP may be approved when all the following conditions are met:

- the drone is operated by a ReOC holder
- the drone is fitted with a PRS that has been deemed compliant to the relevant standard by CASA or a recognised NAA
- in the event of PRS activation, the operator should consider how people in the immediate vicinity of the falling RPA will be alerted to the hazard
- the drone has no exposed, rotating parts that would lacerate[13] human skin upon impact (many PRS automatically stop motors upon activation, which meets the intent of this requirement)
- the drone is operated at or above the minimum deployment height for the parachute system as specified by the manufacturer
- the operator must ensure compliance with all conditions from the relevant equipment manufacturer, relating to the use of the parachute system
- the operator has suitable DPP to properly operate the PRS including methods or systems that determine Lowest Safe Altitude throughout the operations operating area, maintenance, fitment, and activation of PRS
- the operator has suitable DPP for assessing and monitoring actual wind speeds and wind gusts, prior to launch and during the flight, at the relevant operating heights, as well as DPP for discontinuation of operations when wind speeds exceed pathway limits and consideration of likely direction of drift if RPA is under parachute deployment
- the drone is not engaged in sustained overflight of a gathering of people[14]
- the drone is not engaged in sustained overflight of moving vehicles travelling at speeds greater than 60 km/h, unless:
  - the drone operation occurs over a controlled environment
  - the driver is on notice of the RPA operation.
- the maximum impact energy of the drone under parachute descent is 34 joules, including with the consideration of wind speed

[13] In the context of OONP, a laceration is defined as a cut that goes all the way through the skin and may require emergent medical attention, in comparison to an abrasion, meaning a superficial injury to the skin.

[14] A group of people in close proximity, where there is limited free or open ground between individuals and where, if the drone was to fail, it would have a very high likelihood of impacting a person due to the density of people and their inability to freely move away from the drone. This may include beaches, parks, local events, birthday parties, or weddings.

- the drone is not operated over or near a major gathering or organised event.

5.8.3 Rationale

This proposed pathway introduces a framework for drones operating over or near people using a PRS. The pathway limits the total impact energy under parachute descent to 34 joules, with operators required to factor in wind speed, vertical descent rate, and aircraft mass, as wind can significantly increase impact energy. Although 34 joules is a total energy limit (unlike Pathway 2's transferred energy limits), the likelihood of a serious (AIS 3+) injury remains relatively low, particularly as deformation and deflection reduce the actual energy transferred.

The pathway requires drones to have no exposed rotating parts on parachute deployment, which most PRS systems already achieve by automatically stopping motors.

In the event of PRS activation an operator should consider the operating environment and take suitable actions to alert non-involved participants. This may be through verbal communication, active alarm system integrated into PRS, or other methods.

A fixed weight limit is not imposed because the 34 joule constraint naturally restricts the maximum usable drone mass. Operators would need to calculate whether their aircraft meets the threshold under various descent and wind conditions. It is proposed to include a formula that can be used to calculate the impact energy of the drone under parachute.

A PRS should be deemed compliant with ASTM F3322-22 (or an equivalent standard) by CASA, although CASA may also recognise assessments conducted by other NAA. CASA intends to publish a list of PRS systems deemed eligible, encouraging manufacturers to seek recognition and reducing workload for operators.

The PRS is the primary risk control in this pathway, based upon compliance with the ASTM standard. This standard does not however assess the serviceability of the drone attached to the PRS and therefore CASA determines that this standard does not provide the higher threshold for sustained overflight of gatherings of people.

A *gathering of people* is intended to be qualitative, with no specific quantity of people prescribed to align with international concepts of ‘assemblies of people’ or ‘open-air assemblies’. It is intended to be defined as:

> *A group of people in close proximity, where there is limited free or open ground between individuals and where, if the drone was to fail, it would have a very high likelihood of impacting a person due to the density of people and their inability to freely move away from the drone. This may include beaches, parks, local events, birthday parties, or weddings.*

Operations have to remain above the PRS minimum deployment height, and operators should use DPP to assess terrain variations to prevent inadvertent low altitude flight. They should also monitor wind speeds at relevant heights during flight and cease operations if limits are exceeded.

5.9 Removal of certain data collection requirements

5.9.1 Current position

Existing data collection requirements on OONP approvals include collection of data such as:

- the drone operated
- minimum distance the drone was operated from people
- the consequences of any collision and if abnormal procedures were used.

5.9.2 Proposed change

It is proposed to remove existing data collection requirements.

5.9.3 Rationale

Feedback indicated that the requirement to document and collect the minimum distance the drone was operated from people was often impractical. Other data collected is otherwise a duplication of already collected as part of standard operations and/or as part of an ATSB report in the event of a collision. Drone operators should familiarise themselves with the ATSB's existing mandatory reporting requirements.

5.10 Implementation

The policy for OONP approvals, and associated guidance material, is intended to be published in advisory circular 101-01 (AC 101-01) as a supplementary annex (proposed as Annex C). In conjunction with the publication of the AC, CASA will develop and publish implementation artefacts and undertake communication activities to support industry transition to the new requirements. Timeframes for the publication of the AC and associated implementation artefacts will be communicated to industry after CASA concludes the public consultation process and settles the OONP policy.

5.10.1 New applications

CASA intends to provide early notification about the upcoming publication of Annex C to AC 101-01. Applications submitted after the publication of Annex C to AC 101-01 will need to apply the methodologies, assumptions, definitions, and acceptance criteria described in Annex C to AC 101-01 when developing their submission.

5.10.2 Applications under assessment

CASA will continue to assess applications submitted before the publication of Annex C to AC 101-01 in accordance with requirements under the 2024 TMI.

5.10.3 Changes to applications under assessment

Applicants currently under assessment or awaiting assessment may elect to amend their application to align with the requirements of Annex C to AC 101-01. Applicants intending to make such amendments are encouraged to contact CASA to discuss the proposed changes and any potential assessment implications. Where amendments are made, applicants should clearly identify the revised elements and demonstrate how the updated material satisfies the relevant requirements and policy positions.

5.10.4 Renewals of existing approvals

Following the publication of Annex C to AC 101-01 applications for renewal of approvals will be assessed against the updated requirements of the AC. Where this may result in an increase of required evidence, CASA will work with affected approval holders to provide an appropriate period of transition to the updated requirements, looking at operational and risk considerations.

5.11 Industry impact analysis

Proposed refinements to CASA’s existing OONP approval framework in TMI 2024 01 are expected to improve clarity, consistency, and proportionality. Key impacts include:

- clearer expectations at application stage, such as CONOPS/operational detail, or safety case
- more targeted approvals aligned to specific operational profiles
- greater certainty around restrictions, such as SOC interactions or major gatherings.

New and refined pathways provide tailored routes to approval for operations that were previously difficult to assess or inconsistently approved, reducing rework and ambiguity for operators.

Requiring clearer operational detail, as well as safety cases for some operations, should improve assessment quality and reduce the risk of overly broad approvals, supporting more consistent regulatory decision-making. For more complex, potentially higher risk applications, this may increase assessment time and cost.

Although some applications may require more upfront detail, this is expected to decrease downstream clarification cycles and support better data collection to inform future policy development. Where possible, CASA will continue to consider ways to expedite applications. For example, the recent publication on the CASA website of remotely piloted aircraft systems deemed compliant, assists applicants to choose a system that would not require further review by CASA's Airworthiness and Engineering Branch (AEB) prior to operational approvals.

Overall safety is strengthened through:

- clearer thresholds for energy, laceration risk, and overflight
- explicit treatment of major gatherings and moving vehicles
- mandatory emergency response planning for approved operations
- pathways specifically designed around known risk profiles, such as low altitude VLOS operations, and PRS use.

The policy changes are intended to better align risk controls with actual exposure, ensuring safety is preserved while approvals become more predictable and proportionate.

6 Submitting your view and what next

We would like to hear your views on the proposals we have presented.

Please review the proposals and provide your feedback and any additional concerns not covered in this document.

Your feedback will make a valuable contribution to CASA's policy decision making process and help to fully inform CASA of the perceived impacts on stakeholders regarding the proposals.

CASA will consider all comments received as part of this consultation process and incorporate changes as appropriate.

Comments on this consultation should be submitted through the CASA Consultation Hub by close of business 20 May 2026.

Appendix A
RPA Operations over or near people - Summary table of change

A.1 Current State vs Proposed future State Comparison table

Source material: TMI 2024-01 (current) and CASA Policy Proposal (PP 2609US) (future)

Table 5: Summary table of change

Topic	Current state (TMI 2024-01)	Proposed future state (PP 2609US)
Scope & applicability		
Who it applies to	ReOC holders only.	[CHANGED] Expanded to ReOC holders, excluded RPA operators, and RePL holders for certain low-risk operations.
CASA approval required?	Approval is usually required to operate within 30 m of, or over a person.	[CHANGED] Not required for: (1) drones less than or equal to 250 g (≤250 g) that meet prescribed conditions. (2) operations where a physical barrier separates all people from the drone and meets prescribed conditions.
Policy for OONP - proposed general approvals		
Drones ≤250 g pathway – Micro RPA Chapter 3	No specific documented pathway. Subject to 30 m rule. CASA approval required.	[NEW]: Approval-free pathway for RePL holders. Drones ≤250 g, safe distance maintained Standard RPA operating conditions apply.
Barrier/sheltered operations Chapter 4	Requires CASA approval despite reduced risk. Sheltering is used as an energy mitigation tool in Pathway 2 of TMI 2024-01.	[NEW]: No CASA approval required where all people within 30 m are separated by a suitable barrier, drones ≤25 kg. Removed from Pathway 2 energy calculation.
Policy for OONP - Approval pathways – ReOC required		
Pathway 1 — consenting active participants	Written consent required adults (18+) only. No specific laceration controls or safety case required.	[CHANGED]: Written or digitally recorded consent. Drones ≤25 kg.

Topic	Current state (TMI 2024-01)	Proposed future state (PP 2609US)
Section 5.5	No provision for digital consent. No minimum separation distance specified. Drones ≤25 kg.	Minors (under 18) permitted where drone is ≤7 kg. Laceration protection required where practicable. Safety case now required. Safe distance must be maintained. Virtual/online briefing permitted.
Pathway 2 — unlikely to cause serious harm Section 5.6	Max 15 J (or 34 J with consent or for ESOs). Sheltering permitted as energy mitigation. Laceration controls apply within 1:1 ratio only. Moving vehicles permitted under 50 km/h. Contracted ESO operators excluded from 34 J threshold.	[CHANGED]: Sheltering removed as energy mitigation. Laceration controls apply to all RPA. Moving vehicle threshold raised to 60 km/h. Contracted ESO operators included in 34 J threshold. Energy limits reframed to reference ASTM F3389M-21. Wind speed DPP required for PRS operations.
Pathway 3 — SORA-based Chapter 5	SAIL 4 eligible. Airworthiness OSOs validated by AEB. M1 sheltering rules apply. M2 robustness levels defined.	[MINOR CHANGE]: Broadly retained. SORA not recommended for low-altitude VLOS operations below PRS deployment height.
Low altitude operations pathway Section 5.7	No dedicated pathway. Previously assessed under SORA (Pathway 3).	[NEW]: Dedicated pathway for drones ≤1.5 kg, 4–10 m AGL, no intended overflight of people, VLOS only, ReOC required.
Parachute recovery system (PRS) pathway Section 5.8	No dedicated pathway. PRS could be used as an energy reduction measure within Pathway 2.	[NEW]: Dedicated pathway. PRS must be CASA-recognised, max 34 J under parachute descent including wind, no sustained overflight of gatherings of people, wind speed DPP required.
Outside defined pathways Chapter 5	Requires approval by CASA Executive. Includes SAIL 5+ SORA operations.	[UNCHANGED]: Retained. Applications must include a safety case.
Application requirements		
Concept of operations (CONOPS) Section 5.1	Not required. Some applications submitted with minimal operational detail.	[NEW]: Required (or equivalent operational detail via application form). Scalable to complexity of operation.
Emergency response plan (ERP)	Not required for all operations. Referenced in consent briefings only.	[NEW]: Required via approval condition for all OONP approvals. Must be proportionate to risk.

Topic	Current state (TMI 2024-01)	Proposed future state (PP 2609US)
Section 5.4		Must involve event organiser and emergency services for major gatherings.
Safety case Chapter 5 and Section 5.5	Not required under Pathways 1 or 2.	[NEW]: Required under revised Pathway 1. Required for applications outside a defined pathway.
Operational restrictions		
Operations outside standard conditions (BVLOS, night, autonomous, etc.) Section 5.2	Not specifically addressed. No explicit condition restricting combination of OONP approval with other instruments.	[NEW]: Approval conditions will explicitly restrict use with BVLOS, EVLOS, night, autonomous, swarm, dangerous goods, and above 400 ft AGL operations unless specifically assessed and approved.
Major gatherings and organised events Section 5.3	Not specifically addressed. No specific controls or dedicated pathway.	[NEW]: Restricted unless specifically approved. Defined as high-density events where drone failure would very likely impact a person. Requires 7-day CASA notification, event organiser agreement. Accessible only via specific pathways or case-by-case application. ESOs exempt for emergency operations.
Moving vehicles Chapter 5	Sheltering permitted under 50 km/h. Sustained overflight not specifically addressed.	[CHANGED]: Sustained overflight of vehicles >60 km/h prohibited unless controlled environment or driver consent/notice. Sustained overflight of gatherings of people prohibited under PRS pathway. Brief transit not restricted.
Data & reporting		
Data collection requirements	Required on all approvals: the drone operated, minimum distance flown from people, collision consequences, use of abnormal procedures.	[REMOVED]: Proposed to be removed. Considered impractical and duplicative of existing ATSB mandatory reporting.
Guidance & publication		
Policy and guidance process	Temporary Management Instruction (TMI 2024-01) is an internal CASA document published for external awareness.	[CHANGED]: To be published as Advisory Circular 101-01, Annex C. Publicly accessible guidance document.