

Radio and Transponder Mandatory Zones

Consultation report on revised SARG Airspace Policy Statement

April 2021

1 Introduction

- 1.1 At a meeting of the National Air Traffic Management Advisory Committee (NATMAC) on 15 October 2020, the CAA presented proposals to amend our Airspace Policy Statement on Radio Mandatory Zones (RMZ) and Transponder Mandatory Zones (TMZ). This led to a consultation with the members of the NATMAC from 26 October 2020 to 18 December 2020.
- 1.2 The main purpose of reviewing and proposing amendments to the Policy for RMZ and TMZ was to seek to utilise alternative forms of electronic conspicuity data, for example ADS-B, within a TMZ. This, in turn, being driven by our work on the Airspace Modernisation Strategy and, specifically, the delivery of Initiative 11.
- 1.3 The CAA has now concluded its assessment of the responses from members of the NATMAC. This report provides an overview of the key themes identified by NATMAC members, a detailed consultation response document, and a brief on how the CAA intends to progress the amendment of the Policy for RMZ and TMZ.

2 Overview of responses

- 2.1 The CAA received a significant number of comments from 10 different stakeholder organisations, and we are grateful for the level of engagement that we received with this consultation. Taking advice from our Unmanned Aircraft Systems (UAS) Unit, we also extended the consultation to a number of key UAS stakeholders that were not fully represented on the NATMAC.
- 2.2 A detailed consultation response document is contained at [Annex A](#) where the CAA has provided an individual response to each comment received from stakeholders. In this report, we will highlight some issues of note that affect how we will proceed.

3 Issues of note

3.1 End of the UK/EU Agreement Transitional Period

- 3.1.1 When the UK was a member of the European Union (EU) some aviation law was made by the EU that had direct legal effect, as a European Regulation, in the UK. Where these Regulations were applicable in law at 2300 on 31 December 2020, they have been retained (and amended in UK domestic law) under the European Union (Withdrawal) Act 2018. In the specific context of this Policy for RMZ and TMZ, this means that the Standardised European Rules of the Air (SERA) have been retained in UK legislation and are now referred to as Reg UK (EU) No 923/2012 SERA.

- 3.1.2 On 31 December 2020, the CAA adopted¹ the acceptable means of compliance (AMC) and guidance material (GM) originally published by the European Union Aviation Safety Agency (EASA) as its policy with regard to compliance with the relevant EU law that has been retained under the European Union (Withdrawal) Act 2018; as such, the CAA is able to amend or create new AMC² and GM.
- 3.1.3 As a consequence, we have been advised by the CAA's Office of the General Counsel that much of the content of the Policy for RMZ and TMZ is considered to be AMC and GM to SERA.6005 'Requirements for communications and SSR transponders'. The CAA intends to:
- (a) Retain an abbreviated Policy for RMZ and TMZ that will:
 - (i) Explain the background to and purpose of RMZ and TMZ;
 - (ii) Describe how the CAP 1616 airspace change process applies to the establishment of RMZ and TMZ;
 - (iii) Describe the implementation timeline for and applicability of the revised policy on RMZ and TMZ; and
 - (iv) Contain hyperlinks to the AMC and GM that will be hosted on the CAA website. Note that we will be unable to co-locate the AMC and GM with the policy.
 - (b) Develop the content relating to the establishment and operation of RMZ and TMZ which was consulted upon with the NATMAC into AMC and GM to SERA.6005. Note that:
 - (i) at present, no AMC or GM to SERA.6005 exists; and
 - (ii) where we have indicated in Annex A that we have amended (or intend to amend) text in a specific way, these proposals will be carried forward into the new abbreviated policy, AMC and/or GM.
 - (c) Promulgate the AMC and GM through a [CAA ORS9 Decision](#) and through the CAA's [UK Regulations](#) 'micro-site' which contains [Reg UK \(EU\) No 923/2012 SERA](#) and its associated AMC and GM.
- 3.1.4 At present, we are unable to state when we will complete the process of developing the AMC and GM and associated ORS9 Decision documentation. However, we will utilise appropriate means of communication to promulgate the publication of the documents described above and will seek to engage with stakeholders to identify an appropriate implementation timeline for them.
- ## 3.2 Unmanned aircraft
- 3.2.1 A number of stakeholders commented upon the exception permitted to 'small' unmanned aircraft to not comply with the requirements of a TMZ. The wording of the text presented to NATMAC members in October 2020 reflected the content of Air Navigation Order (ANO) 2016 at the time of drafting; i.e. that Article 23(1)(c) described exceptions from application of provisions of the Order for 'small unmanned aircraft'. This included an exception from the requirement for carriage of radio navigation equipment in notified airspace; i.e. an exception from the requirement for carriage and operation of a Mode S SSR transponder.
- 3.2.2 Article 23(1)(c) was amended in late 2020 to state that an unmanned aircraft that is not subject to certification (i.e. it is in the Open/Specific category) is not subject to the rest of the ANO other than

¹ ORS9 CAA Decision No 1 "[Decision enabling EASA Acceptable Means of Compliance, Guidance Material and Certification Specifications adopted by EASA to continue to be valid in the United Kingdom from Exit Day onwards unless and until amended or withdrawn by the CAA](#)", dated 22 May 2021.

² 'Acceptable means of compliance (AMC)' means non-binding standards adopted by the competent authority to illustrate means to establish compliance with Regulation (EC) No 216/2008 and its implementing rules (UK (EU) Reg No 2017/373 Annex I Part-Definitions).

those exceptions listed. In the Open category (i.e. less than 25kg), within visual line of sight (VLOS) and below 400ft, typically, such unmanned aircraft are not required to comply with the requirements of a TMZ or RMZ. However, the CAA may 're-apply' requirements for Specific category operations (i.e. those that we issue an 'operational authorisation' for), if the CAA deem it necessary following a suitable risk assessment submitted by the unmanned aircraft operator.

- 3.2.3 This is the legislative position today and we will continue to review that position to ensure that it maintains pace with technology, airspace and air traffic management concepts as they develop.

3.3 The future

- 3.3.1 Stakeholder responses indicated a need to consider other forms of electronic conspicuity data and the future as it relates to the integration and management of unmanned aircraft³. The CAA is considering the next phase of development of SERA.6005 which could see us establish a clear delineation between a TMZ and a surveillance mandatory zone (SMZ); this latter structure being linked only to other forms of electronic conspicuity data, and could be a key enabler for the development of a unified approach to unmanned aircraft systems traffic management. Moreover, the CAA will, this year, begin the process of developing its electronic conspicuity standard (CAP1391) to increase its suitability for detection and useability on the ground. We encourage input from all interested stakeholders in developing this standard.
- 3.3.2 As such, the output from this consultation (i.e. the revised Policy for RMZ and TMZ and the accompanying AMC and GM) should be seen as a first step towards the delivery of Initiative 11 of the Airspace Modernisation Strategy.

4 Conclusion

- 4.1 The CAA is grateful for the level of engagement that we have received with this consultation, with comments from stakeholders contributing to improvements in the RMZ and TMZ provisions.
- 4.2 The UK's exit from the EU has affected how we will proceed but, the redevelopment of the RMZ and TMZ provisions into AMC and GM to SERA.6005 can be seen as positive in that it will increase their visibility to all stakeholders.
- 4.3 Whilst unmanned aircraft that are not subject to certification will, typically, remain exempt from the requirements of a RMZ and TMZ, technology continues to develop at pace. The development of a unified approach to unmanned aircraft systems traffic management is likely to compel us to undertake further work on airspace structures such as RMZ and TMZ.

³ The CAA's [CAP 1868](#) 'A Unified Approach to the Introduction of UAS Traffic Management' contains relevant information.

RMZ/TMZ Airspace Policy Statement – Consultation Response Proforma

Stakeholder:	Skyports
Line number:	n/a
Paragraph number:	3.2.3 [of the CAA's proposal document]
Comment:	This is welcomed as it is harder to detect Mode A and C. However, in a lot of areas where BVLOS drone operators want to establish a very low level TMZ (0-400ft AGL) to create an additional safety layer, the SSR interrogator coverage will not be adequate to enable passive systems to detect Mode-S equipped aircraft, as these still rely on a direct line of sight to the nearest SSR interrogator system. In order to enable TMZs to support BVLOS drone operations, the CAA will either have to allow the means of EC to be limited to ADS-B only or they will need to allow low power SSR interrogators to be installed and operated by drone operators as well to create additional low level Mode-S coverage
Proposed revised text:	
Justification:	
CAA Response	Noted. In response to ICAO State Letter 2019/77 the CAA is considering the implications of frequency congestion on 1030 MHz and 1090 MHz below 500 ft.

Stakeholder:	Skyports
Line number:	n/a
Paragraph number:	4.2 [believed to refer to the CAA's proposal document]
Comment:	Suggest 'altitude' is included in addition to flight levels, as drones will operate below transition level.
Proposed revised text:	
Justification:	
CAA Response	Not accepted. It is assumed that Skyports is referring to the text at Annex A2.2(b)(iv) that relates to the initial call to be made by a pilot to the RMZ Controlling Authority. The term 'level' does not refer to flight levels but is a generic term relating to the vertical position of an aircraft in flight and meaning variously, height, altitude or flight level (UK (EU) Reg No 923/2012 Standardised European Rules of the Air (SERA) Article 2(93)).

Stakeholder:	Skyports
Line number:	n/a
Paragraph number:	4.3 [believed to refer to the CAA's proposal document]
Comment:	Further clarification would be beneficial here. If similar to special VFR crossing for controlled airfields this could force the TMZ owner to have primary surveillance over the area, which could make the process uneconomical.
Proposed revised text:	

Justification:	
CAA Response	Noted. There is no requirement, specified or implied, in the policy statement for a TMZ Airspace Controlling Authority to deploy primary surveillance radar within a TMZ. The reference to special VFR clearances is not understood. Special VFR flight means a VFR flight cleared by air traffic control to operate within a control zone in meteorological conditions below VMC.

Stakeholder:	Skyports
Line number:	n/a
Paragraph number:	4.3 [believed to refer to the CAA's proposal document]
Comment:	Further clarity required. TMZ requirements should apply to all airspace users including low level drone operations, however should consider different technology requirements (for example if an LTE tracker is being used), unless of course the TMZ applies >400ft AGL. The 'recognised traffic environment' could contain acceptable and interoperable levels of conspicuity at all levels. All traffic should comply with a TMZ regardless, it is an airspace requirement and unmanned aircraft should be included.
Proposed revised text:	
Justification:	
CAA Response	Noted. The text relating to 'small unmanned aircraft' reflected the content of Air Navigation Order (ANO) 2016 at the time of drafting. This Article was amended in late 2020 and the exemption for 'small unmanned aircraft' removed. Article 23(1)(c) now says that an unmanned aircraft that is not subject to certification (i.e. in the Open/Specific category) is not subject to the rest of the ANO other than those exceptions listed. In the Open category (i.e. less than 25kg), within visual line of sight (VLOS) and below 400ft, typically, such unmanned aircraft are not required to comply with the requirements of a TMZ or RMZ. However, the CAA may 're apply' requirements for Specific category operations (i.e. those that we issue an 'operational authorisation' for), if the CAA deem it necessary following a suitable risk assessment submitted by the unmanned aircraft operator. The CAA will amend the text to read: "Pursuant to Article 23(1)(c) of ANO 2016³ and notwithstanding the provisions within ANO 2016 relating to "flight restriction zones", other than those unmanned aircraft that are subject to certification⁴, unmanned aircraft are not required to comply with the requirements of a notified RMZ/TMZ. [³] ANO 2016 Article 23 describes exceptions from application of provisions of the Order for certain classes of aircraft, with paragraph (1)(c) relating to any unmanned aircraft other than those unmanned aircraft that are subject to certification. [⁴] ANO 2016 Schedule 1 defines "Unmanned aircraft subject to certification" as any unmanned aircraft forming part of a UAS required to be certified under Article 40(1)(a), (b) or (c) of the Unmanned Aircraft Delegated Regulation."

Stakeholder:	The Honourable Company of Air Pilots
Line number:	33
Paragraph number:	2.1.f
Comment:	In anticipation of ADS-B in+out being more broadly available/employed, 'Known traffic' could be defined in terms of pilot knowledge as well as ATCO/FISO knowledge
Proposed revised text:	Add: "When ADS-B in/out is more broadly available/employed, it is anticipated that this could be defined in terms of pilot knowledge as well as ATCO/FISO knowledge, reflecting the additional information available directly to the pilot.
Justification:	The change proposed flags up that in areas where traffic density makes it appropriate, it may be possible to designate TMZ without air traffic control, leaving separation and sequencing responsibility with the pilot (and/or UAV operator). This reinforces the notion that adopting electronic conspicuity has the potential to reduce further pilot dependency on air traffic services.
CAA Response	Not accepted. The term 'known traffic' has relevance to ATS providers as a means of internal communication between ATS personnel to convey the meaning that they are aware of both the details and intentions of the flight; this includes flight plan information whether filed as a full or an abbreviated flight plan. Electronic conspicuity will not convey this same meaning to flight crew, only the 3-D trajectory of a conflicting aircraft.

Stakeholder:	NATS
Line number:	38-46
Paragraph number:	(h) and (i)
Comment:	Will the use of EC devices with Transponder Mandatory Zones cause HF problems in the future, if the technology is rolled out across the UK? From both a pilot and a controller perspective, transponder means transponder, and everyone knows what this technology is. The use of a more generic term would be advantageous. The text in para (h) and (i) is confusing as it mentions the fact that TMZs are transponder areas but also mentions that they could also employ EC devices. Therefore, in line with other changes e.g. Radar Service has changed to Surveillance Service, would it not be better to name these areas "Surveillance Mandatory Zones (SMZ)" rather than TMZs? This will differentiate the change to all stakeholders and eliminate any potential HF risk. Imagine a future scenario where an aircraft flies from an existing TMZ towards a TMZ which now has EC capability. How will the pilot know easily what the equipage rules are for EC within the new TMZ?
Proposed revised text:	Add to the Policy "Surveillance Mandatory Zones (SMZ)" where the use of EC devices is permitted.
Justification:	HF related issues and consistent use of the term "Surveillance".
CAA Response	Partially accepted. The policy statement does not seek to alter the meaning of transponder and the CAA requirement for flight within a TMZ is clear; all flights operating in airspace designated by the competent authority as a TMZ shall carry and operate SSR Mode S Elementary

	Surveillance transponders. These aspects are enshrined in law through UK (EU) Reg No 932/2012 SERA SERA.6005. However, the revised policy statement permits ANSPs, as TMZ Controlling Authorities, to prescribe alternative provisions for that particular airspace which may include the use of alternative forms of electronic conspicuity device. In order to avoid confusion, the CAA will amend the definition of a 'recognised air traffic environment', as follows: "'Recognised air traffic environment' is the situation which results from the deployment of a transponder mandatory zone (TMZ) where all air traffic within a defined volume of airspace is conspicuous to air traffic services through the carriage and operation of a Mode S SSR transponder (unless operating in compliance with alternative provisions prescribed for that particular airspace by the TMZ Controlling authority that will achieve a cooperative electronic conspicuity environment), but where there is no requirement for air traffic to maintain continuous air-ground voice communication watch." Acknowledging the human factors associated with the use of alternative forms of electronic conspicuity data within a TMZ, the CAA is considering the next phase of development of this legislation could see us establish a clear delineation between a TMZ and a surveillance mandatory zone (SMZ) which could be linked only to other forms of electronic conspicuity data.
--	--

Stakeholder:	BGA
Line number:	48-49
Paragraph number:	3.1
Comment:	BGA challenge the wording.
Proposed revised text:	The objective of a RMZ/TMZ is to enhance the conspicuity of aircraft operating within, or in the vicinity of, complex or otherwise busy unprotected airspace
Justification:	If a section of airspace is not complex or busy it doesn't need protection.
CAA Response	Accepted. The CAA accepts the need to revise the wording relating to "complex, or otherwise busy unprotected airspace". The CAA will amend the text to read: "The objective of a RMZ/TMZ is to enhance the conspicuity of aircraft operating within, or in the vicinity of, complex, or otherwise busy unprotected airspace, in order to maintain a balance between safe, efficient operations and fair, equitable access for all airspace users."

Stakeholder:	GAA
Line number:	48-49
Paragraph number:	3.1
Comment:	GAA challenges the wording.
Proposed revised text:	Change from: The objective of a RMZ/TMZ is to enhance the conspicuity of aircraft operating within, or in 48 the vicinity of, complex, busy or otherwise

	unprotected airspace, in order to maintain a balance between safe, efficient operations and fair, equitable access for all airspace users. to: The objective of a RMZ/TMZ is to enhance the conspicuity of aircraft operating within, or in the vicinity of, complex or otherwise busy unprotected airspace, in order to maintain a balance between safe, efficient operations and fair, equitable access for as many airspace users as possible.
Justification:	If a section of airspace is not complex or busy it doesn't need protection.
CAA Response	Partially accepted. The CAA accepts the need to revise the wording relating to "complex, or otherwise busy unprotected airspace". The CAA do not accept the insertion of the caveat "...fair, equitable access for as many airspace users as possible." The text in paragraph 3.1 is based on that contained in the CAA (Air Navigation) Directions 2017 (as amended) which states that the CAA must seek to ensure "that the needs of all airspace users is reflected on an equitable basis". The CAA consider that it would be inappropriate to caveat this text in the way proposed. The CAA will amend the text to read: "The objective of a RMZ/TMZ is to enhance the conspicuity of aircraft operating within, or in the vicinity of, complex, or otherwise busy unprotected airspace, in order to maintain a balance between safe, efficient operations and fair, equitable access for all airspace users."

Stakeholder:	The Honourable Company of Air Pilots
Line number:	56
Paragraph number:	3.1
Comment:	Similar to the comment on line 33, future safety awareness includes ADS-B-derived STCA and MSAW.
Proposed revised text:	Add a bullet point as follows: "in the future, when ADS-B in/out is more broadly available/employed, it is anticipated that enhanced conspicuity could enable on-board STCA and MSAW without reliance on an air traffic service."
Justification:	Supports the notion that adopting electronic conspicuity has the potential to reduce further pilot dependency on air traffic services.
CAA Response	Noted. Noting that paragraph 3.1 already makes reference to the contribution of conspicuity to airborne collision and/or avoidance systems, STCA and MSAW are ground-based safety nets (SKYbrary is a useful resource that has related articles) and thus do not relate to airborne systems. The value of electronic conspicuity in mitigating the risk of MAC is well understood, as is the potential role of ADS-B (through TIS-B) in improving a pilot's situational awareness of proximate traffic. Accepting the value of a terrain avoidance and warning system (TAWS) in mitigating the risk of CFIT, the CAA is unsure of the value of ADS-B in this regard.

Stakeholder:	BGA
Line number:	66-67

Paragraph number:	4.3
Comment:	The change sponsor should be instructed to demonstrate change requirements – not just identify them.
Proposed revised text:	RMZ/TMZ should be of the minimum dimensions practicable to meet the safety requirements as demonstrated by the change sponsor.
Justification:	The change sponsor should quantitatively DEMONSTRATE safety requirements for a change... 'IDENTIFYING' them is not sufficient
CAA Response	Not accepted. Paragraph 3 of the extant airspace policy statement states that “RMZ or TMZ should be of minimum practical dimensions to meet the safety requirements” but does not state the source of those safety requirements. Paragraph 4.3 of the revised policy seeks to address this by placing this requirement upon airspace change sponsors. Airspace change sponsors are required to comply with the airspace change process detailed within CAP 1616 and the ‘safety requirements’ are one aspect of the justification that airspace change sponsors are required to provide to support their proposal. The airspace change process has been designed to reflect modern standards for regulatory decision-making, and is fair, transparent, consistent, and proportionate. Stage 4a of the Airspace Change Process requires sponsors to submit their Final Options Appraisal which includes the safety assessment. The CAA assesses the safety case prior to reaching a decision on the proposal.

Stakeholder:	GAA
Line number:	66-67
Paragraph number:	4.3
Comment:	The change sponsor should be instructed to demonstrate change requirements – not just identify them. Although the CAP1616 process should ensure this there is no harm in stating it.
Proposed revised text:	Change from: RMZ/TMZ should be of the minimum dimensions practicable to meet the safety requirements identified by the change sponsor. To: RMZ/TMZ should be of the minimum dimensions practicable to meet the safety requirements as demonstrated by the change sponsor.
Justification:	The change sponsor should quantitatively DEMONSTRATE safety requirements for a change... 'IDENTIFYING' them is not sufficient
CAA Response	Not accepted. Paragraph 3 of the extant airspace policy statement states that “RMZ or TMZ should be of minimum practical dimensions to meet the safety requirements” but does not state the source of those safety requirements. Paragraph 4.3 of the revised policy seeks to address this by placing this requirement upon airspace change sponsors. Airspace change sponsors are required to comply with the airspace change process detailed within CAP 1616 and the ‘safety requirements’ are one aspect of the justification that airspace change sponsors are required to provide to support their proposal. The airspace change process has been designed to reflect modern standards for regulatory decision-making, and is fair, transparent, consistent, and proportionate.

	Stage 4a of the Airspace Change Process requires sponsors to submit their Final Options Appraisal which includes the safety assessment. The CAA assesses the safety case prior to reaching a decision on the proposal.
--	--

Stakeholder:	NATS
Line number:	66-69
Paragraph number:	4.3
Comment:	There are many instances where, for the simplicity of airspace design and comprehension of the airspace users it is preferable for the RMZ/TMZ to not be the “<i>minimum dimensions practicable</i>”. The introduction of numerous TMZs in the future, each with a potential different sponsor and ANSP, could result in a confusing patchwork effect over the UK. The safety implications of this and the possibility of the risk of increased infringements or required EC equipage required should be taken into account when choosing the optimal size of a TMZ.
Proposed revised text:	Remove “RMZ/TMZ should be of the minimum dimensions practicable to meet the safety requirements identified by the change sponsor.”
Justification:	Simplification of design of TMZ/RMZ boundaries to aid identification by airspace users. E.g. abutting with an existing TMZ, or simplifying the boundary using “rubber-banding”.
CAA Response	Not accepted. Acknowledging the importance of the simplicity of airspace design and comprehension of that airspace design by airspace users, our guiding principles in airspace design are that it is the minimum required to maintain a high standard of air safety, that the needs of UK airspace users are reflected on an equitable basis and that we comply with our international obligations. Paragraph 4.3 reflects these principles by requiring RMZ/TMZ to be of the “minimum dimensions practicable to meet the safety requirements identified by the change sponsor”. These safety requirements should be expected to address issues such as design simplicity and comprehension by airspace users. “Minimum dimensions practicable” is considered by the CAA to include, amongst other things, design complexity, taking into consideration adjacent airspace structures, and risk of infringements. All stakeholders will have an opportunity to comment on a proposed design at the engagement phase of the CAP 1616 process and can highlight any issues they feel exist if these have not already been addressed in key stakeholder engagement. The ACP process requires a sponsor to respond to each of these comments, explaining why they disagree with a response if this scenario arises. These comments and responses are incorporated into the sponsor's consultation response document which is assessed by the CAA prior to a decision to approve the airspace change proposal.

Stakeholder:	GAA
Line number:	68-69
Paragraph number:	4.3

Comment:	As currently written the English is incorrect for the intended meaning. Using the existing Stansted TMZ airspace as an example it is surrounded by Class D and Class G airspace.
Proposed revised text:	Change from: it adopts the background classification of the surrounding airspace to: it adopts the background classification of the airspace that it is embedded within
Justification:	Clarity, particularly for those whose first language is not English
CAA Response	Accepted. The CAA will amend the text to read: "The existence of a RMZ/TMZ does not confer or suggest any particular airspace classification; it adopts the background classification of the airspace that it is embedded within."

Stakeholder:	GAA
Line number:	74-76
Paragraph number:	4.5
Comment:	As an unmanned aircraft of 19.9kg plus fuel can represent a significant risk to manned aircraft what is the rationale behind this paragraph?
Proposed revised text:	Without the reasons behind this paragraph being worded as it is it isn't possible to propose revised text.
Justification:	The justification for the paragraph being there has not been published.
CAA Response	Noted. The text of paragraph 4.5 reflected the content of Air Navigation Order (ANO) 2016 at the time of drafting. This Article was amended in late 2020 and the exemption for 'small unmanned aircraft' removed. Article 23(1)(c) now says that an unmanned aircraft that is not subject to certification (i.e. in the Open/Specific category) is not subject to the rest of the ANO other than those exceptions listed. In the Open category (i.e. less than 25kg), within visual line of sight (VLOS) and below 400ft, typically, such unmanned aircraft are not required to comply with the requirements of a TMZ or RMZ. However, the CAA may 're apply' requirements for Specific category operations (i.e. those that we issue an 'operational authorisation' for), if the CAA deem it necessary following a suitable risk assessment submitted by the unmanned aircraft operator. The CAA will amend the text to read: "Pursuant to Article 23(1)(c) of ANO 2016³ and notwithstanding the provisions within ANO 2016 relating to "flight restriction zones", other than those unmanned aircraft that are subject to certification⁴, unmanned aircraft are not required to comply with the requirements of a notified RMZ/TMZ. [3] ANO 2016 Article 23 describes exceptions from application of provisions of the Order for certain classes of aircraft, with paragraph (1)(c) relating to any small unmanned aircraft other than those unmanned aircraft that are subject to certification. [4] ANO 2016 Schedule 1 defines "Unmanned aircraft subject to certification" as any unmanned aircraft forming part of a UAS required to be certified under Article 40(1)(a), (b) or (c) of the Unmanned Aircraft Delegated Regulation."