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The Aeromodellers Association (Scotland) Ltd.  
trading as :-

**SCOTTISH AEROMODELLERS ASSOCIATION**

Register office — 30 West Baldrige Road, Dunfermline, Fife, Scotland, KY12 9AW

**Application for Specific Conditions**  
**Permissions and Changes**  
**for SAA Article 16 Authorisation**





## Change Record

Issue No.	Change Description	Amended by and Signed	Date
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<b>1</b>	<b>SCOPE</b> .....	<b>4</b>
<b>2</b>	<b>INTRODUCTION OF SAA</b> .....	<b>4</b>
<b>3</b>	<b>FLYING ACTIVITIES</b> .....	<b>5</b>
<b>4</b>	<b>ACHIEVEMENTS SCHEME AND COMPETENCE</b> .....	<b>5</b>
<b>5</b>	<b>ORGANISATIONAL STRUCTURE</b> .....	<b>5</b>
5.1	SAA ORGANISATION AND CONTACT DETAILS .....	5
<b>6</b>	<b>RELEVANT PROCEDURES AND OCCURRENCE REPORTING</b> .....	<b>6</b>
<b>7</b>	<b>PERMISSIONS</b> .....	<b>7</b>
7.1	PERMISSIONS REQUESTED FOR ARTICLE 16 AUTHORISATION .....	7
<b>8</b>	<b>APPLICATION</b> .....	<b>8</b>
8.1	PHYSICALLY CONSTRAINED UNMANNED AIRCRAFT MTOM INCREASE TO 7.5KG .....	8
8.2	FREE FLIGHT MODEL AIRCRAFT .....	9
8.3	ADDITION OF FPV CLASS(A) AND (B).....	10
8.4	OPERATION OF A MODEL AIRCRAFT BY NON-UK PERSON .....	12
8.5	OPERATION OF A MODEL AIRCRAFT BY NON-MEMBER UNDER INSTRUCTION .....	13
8.6	AUTHORITY FOR SAA MEMBERS TO FLY MODELS LESS THAN 7.5KG ABOVE 400FT AND >7.5KG < 25KG AT ABOVE 400FT FOR SAA MEMBERS .....	14
8.7	ADDITION OF AUTHORITY FOR SAA TO GIVE PERMISSION FOR FLYING DISPLAYS AND EVENTS IN SCOTLAND .....	15



## 1 Scope

The scope of this document is to provide the rationale and data to support the SAA in its application for permissions/changes to obtain article 16 authorisations

This to allow the SAA and its members to fly their models in Scotland and the whole of the UK in line with other organisations throughout the UK.

SAA members should not be compromised when flying at events and competitions.

Certain models and competitions require flight to be higher than the cap722 open regulation such as gliders and F3a aerobatic competitions.

Hence the scope of this document is to present the SAA case for article 16 permissions and provide supporting evidence to show the SAA is a suitable organisation with safety to the fore

## 2 Introduction of SAA

The Scottish Aeromodelling Association (SAA) would like to apply for the following change/permissions for an article 16 authorisation.

The SAA exists as an Association of Scottish Aeromodelling Clubs and provides a variety of services, events, competitions and knowledge base for its members.

The SAA is the central body in Scotland dedicated to the support and maintenance of all model flying disciplines in the internationally recognised sport of Aeromodelling.

As such the SAA would like the authority to allow its members and clubs to fly their models out-with certain restrictions as have been afforded, by Article 16 authorisation, to other model organisations within the UK, and so allow its members to fly and compete with others on a level basis throughout the UK.

The SAA was formed over seventy years ago providing a Non-Profit Scottish body dedicated to the maintenance and support of the internationally recognised sport encompassing all model flying disciplines.

The SAA membership has typically 700 to 1000 members for which the majority hold a minimum achievement of **SAA Bronze**

The achievement scheme which is extensive and based on safe flying and education of SAA members to improve their skills can be obtained here by ctrl-click on link:-

[SAA-Achievement-Scheme.docx](#)



### 3 Flying Activities

There are many flying Clubs in Scotland with dedicated flying sites, and most are in rural settings. Members fly a variety of model types from power to gliders etc These are defined in the SAA Members Manual Safety and Guidance document which forms part of this application this can be viewed by ctrl-click on this hyper link

[SAA Members Handbook Safety Code and Guidance.docx](#)

### 4 Achievements Scheme and Competence

The SAA operates a comprehensive achievement scheme aimed at ensuring SAA members have high competence in flying and understanding the current regulations around model flying. The manual can be viewed here by ctrl-click on the hyperlink

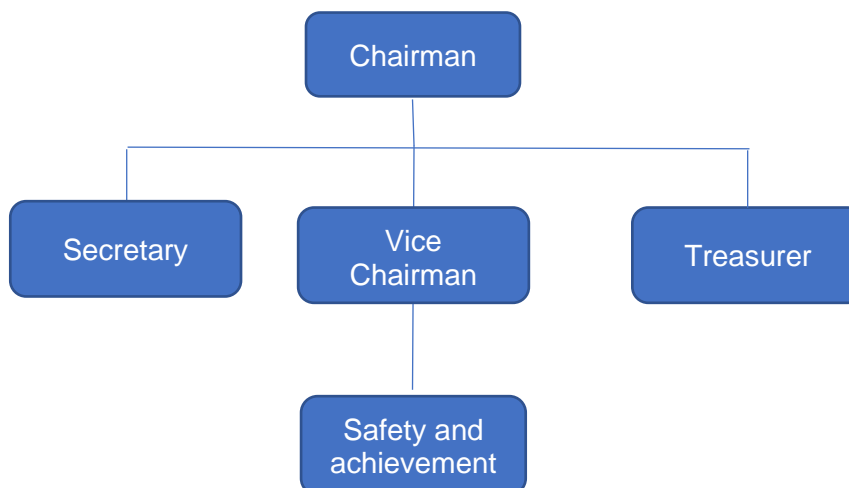
[SAA-Achievement Scheme.docx](#)

### 5 Organisational structure

The structure of the Scottish Aeromodelling Association (SAA) is shown below with the posts of those with significant control shown in the family diagram below: -

#### 5.1 SAA Organisation and Contact details

Persons with significant control within the SAA



#### Chairman

The main responsibility of The Chairman is to ensure a correct environment in which each Council Member may carry out his/her duties and be responsible for overseeing it to the highest possible ethical standards of conduct. The Chairman is responsible for setting the strategic direction for the year having taken into account the submissions from each council member.



### Vice Chairman

Understudy to Chairman. The Vice Chairman will normally, take charge of Training, Safety and Achievement Schemes, together with overseeing organisation of Association events.

### Secretary

The Secretary shall be the sole person responsible for all correspondence between the association and outside bodies, and between the association and clubs. The Secretary is responsible for the distribution of the SAA Council Meeting minutes in a timely manner before the next Council Meeting. The Secretary shall send copies of the Council Meeting minutes to the Board of Guardians in a timely manner.

### Treasurer

The Treasurer is responsible for the financial affairs of the SAA and will operate a suitable accountancy system to suit the needs of the SAA. Complete transparency of all financial matters will be required.

The main Contact for this submission is **Steve McDonald** email [chair@saaweb.uk](mailto:chair@saaweb.uk)

Other contact details are:-

Secretary	Bob Lemm	email <a href="mailto:sec@saaweb.uk">sec@saaweb.uk</a>
Treasurer	Richard Blanski	email <a href="mailto:treas@saaweb.uk">treas@saaweb.uk</a>
Vice Chairman	Dougie Sheppard	email <a href="mailto:vchair@saaweb.uk">vchair@saaweb.uk</a>
Safety Officer	Dougie Sheppard	email <a href="mailto:safety@saaweb.uk">safety@saaweb.uk</a>

All other council members are on the SAA web site at <https://www.saaweb.uk>

## 6 Relevant procedures and occurrence reporting

The SAA have procedures and occurrence reporting and these are outlined in the Members Handbook Safety and Guidance and a reporting form is available CTRL-click hyperlinks to view

[SAA Occurrence reporting Form.docx](#)



## 7 Permissions

The SAA would like to be considered for the following permissions and will provide supporting document in line with the requirements of CAP722F for model flying as a sport and recreation particularly in Scotland but also throughout the UK for SAA members so they can participate in events and competitions

### 7.1 Permissions requested for Article 16 authorisation

The following is a list of the “specific cases “(permissions /changes) for article 16 authorisation that the SAA would like to apply for:-

- Physically constrained Unmanned aircraft MTOM increase to 7.5Kg
- Free flight model aircraft permissions added
- First Person View model aircraft conditions to be added for both condition (a) and (b) flown in a sterile area or the remote pilot accompanied by an observer helper who must keep visual line of sight (VLOS) for the FPV remote pilot
- Allow operation of a model aircraft by non-members under instruction
- Allow operation of a model aircraft by non-UK person
- Allow models below 7.5kg to fly above 400ft for SAA members
- Allow the SAA permission to review Scottish model clubs flying sites with a view to giving permission / authorisation, (*if the site meets the requirements,*) for members to fly models, of mass greater than 7.5kg but less than 25kgm, to fly above 400ft. at an SAA authorised site
- Allow the SAA to have the permission to review and to give authorisation for model flying displays and events in Scotland



## 8 Application

Then following the SAA application in tabular form as is required by: -

[CAP722F Model Aircraft Operations Policy and Guidance para 7.1.1](#)

### 8.1 Physically constrained Unmanned aircraft MTOM increase to 7.5Kg

Article of Regulation	Requirement	Requested Change	Reason	Supporting Evidence
Physically restrained model aircraft  Article 16 permission		<p>(1) Permission is not required to operate a 'control line model aircraft' or 'round-the-pole model aircraft' within an Aerodrome Flight Restriction Zone, providing all the following conditions are met:</p> <p>(2) 'Control line model aircraft' and 'round-the-pole model aircraft' operated within the limits of this authorisation, are exempt from the competency requirements set out in section 3.12.</p> <p>(3) 'Control line model aircraft' and 'round-the-pole model aircraft' are exempt from all the requirements set out in ANO article 265E, providing all the following conditions are met:</p> <p>a) The tether line does not exceed 25m.  b) The flight does not take place within the Runway Protection Zone (RPZ) part of the FRZ.  c) The MTOM does not exceed 7.5Kg.  d) The flight does not take place over, or within the boundary of the protected aerodrome unless permission for the flight has been obtained, as described in ANO article 94A.</p>	To allow the SAA and its clubs to have parity with other model organisations in the UK for flying in Scotland	SAA handbook





## 8.2 Free flight model aircraft

Article of regulation	Requirement	Requested change	reason	Supporting evidence
Addition of free flight model aircraft permission		<p>(1) Before launching a 'free flight model aircraft', the remote pilot, taking into account the expected performance of the aircraft, the weather conditions, and any flight termination device fitted to the aircraft, shall be reasonably satisfied that the expected flight path will not infringe a Flight Restriction Zone, or any other airspace restriction (unless prior permission for flight within the airspace has been obtained).</p> <p>(2) The operation of free flight model aircraft must only be carried out within the limits and conditions of this authorisation, or within the Open category of operations.</p> <p>(3) A 'free flight model aircraft' shall not be</p> <ul style="list-style-type: none"> <li>a. Launched, unless from an area which the remote pilot is able to satisfy themselves is free from uninvolved people.</li> <li>b. Launched, until the remote pilot has identified the area within which he or she believes the aircraft will remain (the 'flight volume') based on the considerations in (1).</li> <li>c. Flown, unless the remote pilot is satisfied that the aircraft will remain within the flight volume.</li> <li>d. Flown, unless the remote pilot is satisfied at the point of launch, that no uninvolved persons will enter flight volume and may be endangered by the flight of the free flight model aircraft.</li> </ul> <p>(4) A 'free flight model aircraft' shall not be deliberately flown beyond the visual line of sight of the remote pilot, unless otherwise in accordance with a suitable authorisation.</p>	To allow the SAA and its clubs to have parity with other model organisations in the uk for flying in Scotland	SAA handbook



### 8.3 Addition of FPV class(a) and (b)

Article of regulation	Requirement	Requested change	reason	Supporting evidence
<p>Addition of FPV class (a) and (b) to article 16 authorisation</p>		<p>(1) A model aircraft, which is not a 'large model aircraft', may be flown by a remote pilot using first person view (FPV) equipment subject to the limitations of this authorisation, and following conditions (a) or (b), either:</p> <p>a) The aircraft is flown in accordance with all of the following conditions:</p> <ul style="list-style-type: none"> <li>i. Within a sterile area- meaning a cordoned off, closed area that uninvolved persons are excluded from; and</li> <li>ii. The aircraft is not flown at a height in excess of 160 feet (50 meters) from the surface; and</li> <li>iii. In accordance with procedures specifically set out for the purpose of the event, and in accordance with instruction from the race director or other nominated person, including any 'terminate race and land immediately' instruction; and</li> <li>iv. Any observers are suitably briefed and aware of their responsibilities, including the monitoring of people or aircraft entering the cordoned off area.</li> </ul> <p>or</p> <p>b) The aircraft is flown in accordance with all of the following conditions: i. The remote pilot is accompanied by a competent observer who maintains direct unaided visual contact with the unmanned aircraft sufficient to monitor its flight path in relation to other aircraft, persons, vehicles, vessels and structures for the purpose of avoiding collisions and advises the remote pilot accordingly.</p>	<p>To allow the SAA and its clubs to have parity with other model organisations in the UK for flying in Scotland</p>	<p>SAA handbook</p>



		<p>ii. The MTOM of the aircraft does not exceed 3.5Kg.</p> <p>iii. The aircraft is not flown:</p> <p>A. Within an aerodrome FRZ, unless appropriate permission has been obtained.</p> <p>B. At a height of more than 1000ft above the surface, unless it is a rotorcraft with more than 1 lift generating rotor or propeller in which case the height shall not exceed 400ft above the surface.</p> <p>C. Unless within an area as set out in section 3.7.</p> <p>D. Over or within 50m of any 'assemblies of people'.</p> <p>E. Within 30m of any vessel, vehicle or structure which is not under the control of the remote pilot.</p> <p>F. Within 30m of any 'uninvolved person'.</p>		
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## 8.4 Operation of a model aircraft by non-UK person

Article of Regulation	requirement	Change Required	reason	Supporting evidence
<p>Permission to be added to article 16</p>		<p>(1) Non-UK residents may operate model aircraft in accordance with all operating conditions of this authorisation, provided that they meet all the following conditions:</p> <p>a) Hold temporary or full membership of the SAA b) Comply with the rules and practices of the SAA</p> <p><b>Note 1:</b> <i>Any non-UK remote pilot must meet the requirements of section 3.12 in respect to pilot competence.</i></p> <p><b>Note 2:</b> <i>Any non-UK UAS operator must comply with the registration requirements set out in 3.5. This may be achieved by displaying the operator ID of a UK 'host' operator, with their agreement and understanding of their legal obligations as a UAS operator of the aircraft.</i></p>	<p>To allow the SAA and its clubs to have parity with other model organisations in the uk for flying in Scotland</p>	<p>SAA Handbook</p>



## 8.5 Operation of a model aircraft by non-member under instruction

Article of Regulation	requirement	Change Required	reason	Supporting evidence
Permission be added to article 16		<p>(1) For the purposes of conducting 'trial flights' by non-members, the non-member may operate the controls of the model aircraft whilst under the direct instruction and supervision of a member. In such an instance, the remote pilot receiving instruction does not need to comply with the competence requirements of set out in section 3.12.</p> <p>(2) The registration requirements and registration display requirements (as set out in section 3.5) still apply.</p>	To allow the SAA and its clubs to have parity with other model organisations in the uk for flying in Scotland	SAA handbook



### 8.6 Authority for SAA members to fly models less than 7.5kg above 400ft and >7.5kg < 25kg at above 400ft for SAA members

Article of Regulation	Requirement	Requested Change	Reason	Supporting Evidence
<p>Permission to be added to authorisation</p> <p><i>UAS IR Article 4(1)(e)</i></p>	<p>1. Operations shall be classified as UAS operations in the 'open' category only where the following requirements are met: (a) the UAS belongs to one of the classes set out in Delegated Regulation (EU) 2019/945 or is privately built or meets the conditions defined in Article 20; (b) the unmanned aircraft has a maximum take-off mass of less than 25 kg; (c) the remote pilot ensures that the unmanned aircraft is kept at a safe distance from people and that it is not flown over assemblies of people; (d) the remote pilot keeps the unmanned aircraft in VLOS at all times except when flying in follow-me mode or when using an unmanned aircraft observer as specified in Part A of the Annex; (e) during flight, the unmanned aircraft is maintained within 120 meters from the closest point of the surface of the earth, except when overflying an obstacle, as specified in Part A of the Annex (f) during flight, the unmanned aircraft does not carry dangerous goods and does not drop any material;</p> <p>2. UAS operations in the 'open' category shall be divided in three sub-categories in accordance with the requirements set out in Part A of the Annex.</p>	<p>(1) The operation of model aircraft within this authorisation is limited to a height of 120m (400ft), unless the conditions below are met. (2) A model aircraft is permitted to fly at a height in excess of 120m (400ft) above the surface, in accordance with the limitations of this authorisation, if all the conditions in sub paragraphs a) to e) below are met. a) The model aircraft is not a rotorcraft with more than two lift generating rotors or propellers; b) The model aircraft is not an 'automated model aircraft'; c) The model aircraft is not being flown within the Flight Restriction Zone of an aerodrome, unless operating with the appropriate permission from the aerodrome as set out in ANO article 94A. d) The model aircraft remains within the visual line of sight of the remote pilot; e) The mass of the model aircraft (MTOM- see section 3.6) shall not exceed 7.5Kg, with the exception of the circumstances in (e(i), (ii) or (iii)) below; i. The model aircraft is a glider, the mass (MTOM) of which does not exceed 14Kg. In this case, it may not be flown at a height greater than 120m above the remote pilot but may be flown at a height exceeding 120m above the surface directly beneath the glider. ii. The model aircraft is being operated at an established club site approved for the operation of model aircraft with a MTOM greater than 7.5Kg but less than 25Kg above 400ft, by the SAA, following the conditions set out in section 4.7. iii. The model aircraft is being operated within the conditions set out in section 4.4(6) (model aircraft within a display), for the purpose of flying within a 'model aircraft flying display'.</p>	<p>To allow SAA member to fly and compete as other model organisations in the UK within the SAA conditions imposed by article 16</p>	<p>SAA members handbooks</p>



### 8.7 Addition of Authority for SAA to give permission for flying displays and events in Scotland

Article of Regulation	Requirement	Requested Change	Reason	Supporting Evidence
<p>Permission to be added to</p> <p>Article 16</p>		<p>(1) Any operator and remote pilot who wishes to operate a model aircraft as part of a 'model aircraft flying display' event may do so within the limits and conditions of this authorisation. (2) Any SAA club wishing to host a 'model aircraft flying display' in accordance with this authorisation, must first obtain a permit from the SAA (3) The SAA must assess each request for a 'model aircraft flying display', and where it considers it safe and appropriate, issue a permit for the event to take place. The club responsible for the event must satisfy the association that the event has been organised in accordance with the relevant SAA procedures. (4) Any such 'model aircraft flying display' which takes place above 400ft, must be notified to other airspace users through the use of a NOTAM. (5) It is the responsibility of the organiser of the 'model aircraft flying display' to ensure that it is carried out safely. The SAA shall carry out necessary and appropriate oversight of such events, and ensure a suitable risk assessment is carried out, reviewed and approved prior to such a display. (6) For the purpose of flying within a 'model aircraft flying display', the height limit of 400ft/120m for any model aircraft with a MTOM greater than 7.5Kg but less than 25Kg, may be increased as necessary, for the purpose of the flying display event. This temporary height limit must be set out within the SAA permit for the 'model aircraft flying display', and shall apply to any model aircraft with a MTOM greater than 7.5Kg but less than 25Kg flying within the display. (7) Any aircraft flying as part of a 'model aircraft flying display' organised within the limits of this Authorisation must fly in accordance with the limits and conditions set out within this authorisation. Such a display may be organised which includes the flight of a 'large model aircraft', however such aircraft must be flown in accordance with the terms of their own operational authorisation and the Article 16 Authorisation issued to the LMA. (8)</p>	<p>To allow the SAA and its clubs to hold flying events and displays in Scotland</p>	<p>SAA handbook Flying displays</p>



		<p>Any model aircraft pilot operating a jet turbine powered model aircraft for the purpose of a 'model aircraft flying display', must be able to demonstrate sufficient currency of pilot competence, by having flown as a minimum, three complete display routines within the preceding 90 days of the 'model aircraft flying display', one of which must have been flown within the preceding 30 days, on an aircraft which is reasonably representative of the aircraft to be flown within the display event. Note 1: If the 'model aircraft flying display' is conducted within the limits of this Article 16 authorisation, then no further authorisation is required from the CAA. Any display event involving the flight of model aircraft outside the limits of this authorisation (including mass limits, financial remuneration for the UAS operator or other valuable consideration for the UAS operator, height limits or otherwise) must apply for an Operational Authorisation in the Specific Category in accordance with CAP 722 and CAP 722A. Note 2: The Operation of a model aircraft within a full-sized aircraft flying display event, as permitted under Article 86 of the Air Navigation Order, may require the SAA to issue a permit under section 4.4 (3), in order to adjust the maximum height within the operational authorisation for the large model aircraft involved. Note 3: The operation of any Large model aircraft within a 'model aircraft flying display' organised under this (SAA) Article 16 authorisation, must also be permitted by the LMA. This may be achieved through the issue of a 'joint permit' Note 4: The term 'reasonably representative' in section 4.4(8), in relation to a jet powered model aircraft, refers to an aircraft which is similar in mass, flying characteristics and aircraft type.</p>		
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