



*European Aviation Safety Agency
Proposal to create common rules for operating drones in
Europe*

Private Security Services Industry views

The [Confederation of European Security Services](#) (CoESS) welcomes the EASA's Proposal to create common rules for operating drones in Europe, published on 31 July 2015.

CoESS acts as the voice of the private security industry, covering 26 countries in Europe and representing 2.2 million guards, over 60,000 companies and generating a turnover of over €32M.

The private security services provide a wide range of services, both for private and public clients, ranging from Ministry/EU Institutions buildings to nuclear plants, airports, critical infrastructure facilities, inter-modal transport hubs, public transport stations and areas, national governmental agencies and institutions (such as asylum seekers centers, public hospitals, universities, etc). The role of security in protecting people, assets, and society at large is increasing and public-private partnerships in security are becoming the norm in Europe.

In performing its mission, the private security industry follows abides by codes of ethics and codes of conduct and is sensitive to citizens' concerns regarding data protection and privacy. Whilst this aspect is not covered in this document, as it does not fall under EASA's scope to address this, we feel that concerns must be discussed in an open and transparent way, as well as the technological means that can be used to address them. It is crucial that citizens have a full understanding of how private and public players abide by legislation on data protection and privacy.

As indicated in the EASA document, and highlighted in the Riga Declaration, drones represent a huge opportunity for Europe, creating jobs and economic opportunities. Likewise, for the private security services, drones represent an interesting and useful addition to the range of technological means and equipment already being used by private security services. It is also in line with the concept of "new security company", whereby people and technology are combined in such a way as to optimize the service to clients.

General comments on the EASA Proposals:

As the representative of the private security services industry in Europe, CoESS supports the spirit of the regulatory framework along the following principles:

- Risk- and performance based approach
- Progressive and operation-centric



The document does not specifically refer to private security services. As indicated above, CoESS expresses high interest for the use of drones in private security operations, as a useful support to current security solutions offered to clients.

The private security services industry, together with law-enforcement agencies or rescue services, performs specific security and safety operations. Whilst they must abide by the same rules as any other economic operator, their activities require swift and centralized handling of authorizations, as they cover the protection of people and assets. As a result, risk-assessment should rather cover types of operations (e.g.: building surveillance, event security) rather than each and every occurrence of such operations.

What is more the employees who work for the private security industry are all licensed and specifically trained to perform missions that can be technically complex and sensitive, and are used to cooperating with the police and other law enforcement agencies.

Specific comments

Our understanding of the document is as that drones used by security services would fall under the “specific category” (=medium risk) (Proposal 20)

Under this category, the operator would have to:

- Perform safety risk assessments (Proposal 21), covering both the drone and the operation and list of measures to minimise or mitigate risks, and compile an appropriate operations manual, including conditions/limitations of operations, including training and qualification for personnel, maintenance, as well as occurrence reporting and oversight of suppliers.
- Obtain Operation Authorisation (OA) from the competent authority (Proposal 22). In this respect, we would request that these authorisations cover types of operations rather than specific occurrence of operations. For example, conducting drone surveillance of office buildings located on private grounds, should be defined as a “type of operation”, as opposed to each drone for each office building on private grounds having to be authorized. We would request clarification on how exactly this proposal is meant to be used.
- Proposal 23 is in line with the way that private security services are used to performing operations, as long as the delivery of the OA is not subject to long and bureaucratic procedures. In view of the nature of operations that our industry performs, it would be counter productive and even dangerous in some instances to delay granting the OA. Maybe this requires a special procedure, similar to that which could be used for public security services. Similarly, the 3rd provision in proposal 23 should be interpreted in such a way as to support, not hamper, the protection of people and assets, which is our mission. We therefore feel that the Implementing Rules (IR) should reflect the special and distinctive role of private security companies in the process for obtaining the OA.



- The second part of Proposal 23, related to the training of personnel, is fully in line with the way that the industry works. Our employees are licensed and hold specific qualifications and skills, and are also specifically trained to perform sensitive operations.
- CoESS has started a dialogue with manufacturers and think tanks, such as EUKA.org (European Drones Knowledge Area). We expect that this dialogue will allow us to have a better common understanding of equipment-related issues and development, addressed in Proposal 24 through 26.
- For the type and nature of operations performed by private security companies, it should be possible to operate as described under ROC (Remote Operator Certificate) privileges, as outlined in Proposal 27, without falling under the Certified (higher-risk) category.

CoESS will closely follow the legislative developments in the EU Institutions and is eager to meet up with the relevant EU representatives and join any relevant Forum or Stakeholder group to give concrete examples of our activities and how we would use drones in support of these.

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