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Federal Department of the Environment, Transport,
Energy and Communications DETEC
Federal Office of Civil Aviation FOCA
Unmanned Aircraft Systems (UAS)

FOCA GM

Guidance Material

Changes to an operational authorization issued by FOCA in accordance with Article 12 (EU) 2019/947

Guidance to FOCA-UAS-APP-NoM

Scope	AMC and GM to Article 11 of Implementing Regulation (EU) 2019/947
Applies to	UAS operations in the 'Specific' category for which an operational authorization has been issued by FOCA
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Log of Revision (LoR)

Date	Issue	Revision	Highlight of Revision	Prepared by	Released by
13.02.2026	1	0	First Issue – UAS	UAS/Ops	UAS/Lead

0 Purpose

This guidance is intended to assist Unmanned Aircraft System (UAS) operators in submitting a Notice of Modification (NoM) to inform FOCA of any changes that may affect the risk assessment underpinning their operational authorisation issued in accordance with Article 12 of (EU) 2019/947.

In particular, this GM provides additional information to help applicants better understand what constitutes '**significant changes**' as defined in [AMC2 UAS.SPEC.030\(2\)](#).

Correctly identifying significant changes is essential to maintain regulatory compliance and ensure safe UAS operations.

SIGNIFICANT CHANGES TO THE OPERATIONAL AUTHORISATION

AMC2 UAS.SPEC.030(2)	<ul style="list-style-type: none">a) Any non-editorial change that affects the operational organization, or affects any associated documentation that is submitted to demonstrate compliance with the requirements established for the organization, should be considered to be a significant change.b) With regard to the information and documentation associated with the organization, changes should be considered to be significant when they involve, for example:<ul style="list-style-type: none">(1) changes in the operations that affect the assumptions of the risk assessment;(2) changes that relate to the management system of the UAS operator (including changes of key personnel), its ownership or its principal place of business;(3) non-editorial changes that affect the operational risk assessment report;(4) non-editorial changes that affect the policies and procedures of the UAS operator; and(5) non-editorial changes that affect the OM (when required).
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❖ **Changes affecting the risk assessment assumptions**

Any changes and updates to the operation that alters the parameters of the original risk assessment are considered “significant”.

For instance, the following non-exhaustive examples of changes **are considered significant**:

- Adding new location(s) in case in case of a precise/location-specific authorization.
- Changing and/or expanding the ‘approved’ operational area (e.g., operating in a populated environment while the authorization covers sparsely populated environment, operating in different airspace characteristics).
- Modifying the operational volumes (e.g., flight geography or ground risk buffer) or operational times, when specified.
- Changing the concept of operations (e.g., from mapping to spraying operations, from surveillance to dangerous goods delivery).
- Changing UAS or UAS model, affecting the risk assessment parameters.
- Changing and/or revising mitigation measures (after identifying new risk factors, etc.).
- Including new modes of operation (e.g., from VLOS to BVLOS).
- Including new risk categories (e.g., cybersecurity risks).
- Changes to TMPR (e.g., detection system).
- etc.

❖ **Changes to the UAS operator’s management system**

Changes related to the organizational structure and key safety responsibility.

For instance, the following non-exhaustive examples of changes **are also considered significant**:

- Change of key management or accountable personnel and responsible for operations (e.g., Accountable Manager, Safety Manager, Operations Manager, etc.).
- Change of ownership and duty of responsible person.
- Change in company registration and any changes in the general information.
- etc.

❖ **Changes to the Operator’s Policies, Procedures, Operations Manual and OSOs applicability**

Significant updates/changes to the UAS Operations Manual, internal policies governing safety, training, maintenance, operational procedures and related OSOs assessment.

For instance, the following non-exhaustive examples of changes **are also considered significant**:

- Change of emergency procedures (ERP).
- Change of checklists, flight procedures (i.e. OSO #8 validation, ERP criteria).
- Including new types of operational restrictions.
- etc.

Additional guidance and examples are provided in the next sections.

1 Major significant changes vs. Minor significant changes

1.1 Major significant changes

A change is considered **major** if it affects one or more SORA steps and **has an impact on the risk assessment**. The table below provides additional information and examples for each SORA step.

SORA Step	Description
Ground Risk Class (GRC)	Change affecting ground risk level
Air Risk Class (ARC)	Change affecting air risk level
Mitigation measures (Ground risk mitigation, air risk mitigation, TMPR)	Change altering risk mitigations or introducing/removing them, impacting Medium or High level of robustness
Operational Safety Objectives (OSOs)	Change impacting Medium or High level of robustness
Operational procedures (Normal, Contingency, Emergency)	Any modification to operational procedures leading to have an impact on Medium or High OSOs level of robustness
Containment	Change affecting containment type (i.e from basic to enhanced or viceversa)
Semantic model (FG, OV, GRB)	When this change leads to any modification of the above items
Change of UAS model/type	When this change leads to any modification of the above items

Major significant changes:

- **require an updated risk assessment;**
- **require submission of updated evidence related to the affected OSOs;**
- **require an amendment of the operational authorization.**

1.2 Minor significant changes

A change is considered **minor** if it affects one or more SORA steps but **has NO impact on the risk assessment** (or the affected OSOs), for example (non-exhaustive):

- Updates to internal policies or documentation that do not impact the risk assessment;
- Adjustments in operational details that not change risk levels (e.g., administrative updates, procedural clarifications, etc.);
- Change of UAS model that has no impact on risks, mitigations, performance or operational procedures;
- Change involving Low mitigations and/or OSOs level of robustness;
- Update list of trained personnel;
- etc.

Minor significant changes:

- **require evidence demonstrating that the change has no impact on the risk assessment (including OSOs);**
- do not require a new risk assessment;
- do not require an amendment of the operational authorization.

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Direct references:

- Practical examples are listed in **Chapter 3**.
- Procedures for UAS operators and recommendations are provided in **Chapter 4**.
- Schematic model of the change procedure is provided in **ANNEX A**.

2 Non-significant changes

According to [AMC2 UAS.SPEC.030\(2\)](#), **editorial changes**, such as correcting typos or formatting updates, are **not considered significant**.

Non-significant changes:

- do not require the submission of a Notice of Modification (NoM) to FOCA;
- do not require an amendment of the operational authorization.

Non-significant changes to the UAS operator's documentation may be managed through sub-version control in accordance with the versioning codification set out in Chapter 4.4.

Below are changes examples that are generally **not considered significant**:

Type of Change	Reason	Examples
Editorial corrections	Do not affect operational or safety requirements	Fixing typos or updating document formatting
Contact detail updates	No impact on operations or risk	Changing phone numbers, email addresses, or billing addresses
Routine maintenance adjustments	Part of normal operational practices	Scheduled drone battery replacements or software patches
Cosmetic changes to branding	No impact on operational procedures or risk assessment	Adjusting company name styling
Minor scheduling changes	Does not alter operational scope or risk	Shifting flight times within the same operational windows and scope
Internal administrative changes	No effect on operation safety or compliance	Changing office layout
...

3 Practical example: Significant vs. Non-Significant change

Note that the provided examples are not exhaustive.

Change Type	Significant	Major /Mminor	Explanation
Changing UAS – new drone Example:higher weight, addition of parachute	Yes	Major	Affects risk assessment and operational procedures
Changing UAS – new model with similar technical parameters i.e. UA of same category and type (rotorcraft or fixed wing, VTOL, etc.)		Minor	Risk assessment and operational procedures not affected
Replacing key accountable managers (Safety, Compliance,..)		Major	Key personnel change affecting management system
Software update to flight control system		Major	Can affect operational performance and safety
Updating contingency and emergency procedures		Major	Affects safety and operational procedures
Expanding flight area		Major	Changes operational risk and area of operations
Change affecting OSOs or mitigation with Low LoR		Minor	Declarative scenario
Change affecting OSOs or mitigation with Medium/High LoR		Major	Non declarative scenario
Adding new mission type (i.e. transport of Dangerous Goods)		Major	Change the risk assessment
...	
Changing the Operations Manual layout	No	N/A	Formatting update, no procedural impact
Changing the billing address			Administrative update, no impact on operation
Fixing spelling mistakes in documents			Editorial correction without operational impact
Changing company phone number			Administrative update, no impact on operation
...			...

4 Procedures for operators and recommendations

4.1 Internal Evaluation

Prior to implementing any modification to UAS operations, the operator shall perform an internal assessment to determine whether the proposed change qualifies as a significant change in accordance with AMC2 UAS.SPEC.030(2) and the “Major” vs. “Minor” classification as described above.

Where there is uncertainty regarding the classification of the change or whether it is subject to notification, the operator should contact FOCA in advance to clarify the applicable change category and the related regulatory obligations.

4.2 Changes required upon FOCA demand

FOCA may require operators to update their documentation, procedures, or operational material as a consequence of amendments to Swiss (or EU) regulations, or due to changes affecting the Swiss aviation framework, where applicable.

In such cases, the Accountable Manager will be formally notified of the required change, including the scope of the update, the applicable implementation timeline, and any additional guidance.

The operator shall subsequently implement the required change and submit it to FOCA through a Notification of Change, clearly identifying the modification as an FOCA-mandated change and stating the relevant justification. Following approval or confirmation, the operator shall ensure that all affected personnel are appropriately informed and trained prior to the implementation of the change.

4.3 Notification and Update of the Operational Authorization

All significant changes, whether Major or minor, shall be notified to FOCA through a Notice of Modification (NoM) form. The notification shall include, as a minimum:

- a clear and comprehensive reason of the change;
- a detailed list of all modifications, including identification of the affected documents and relevant sections or chapters;
- a complete set of the revised documentation.

4.4 Recomended versioning codification

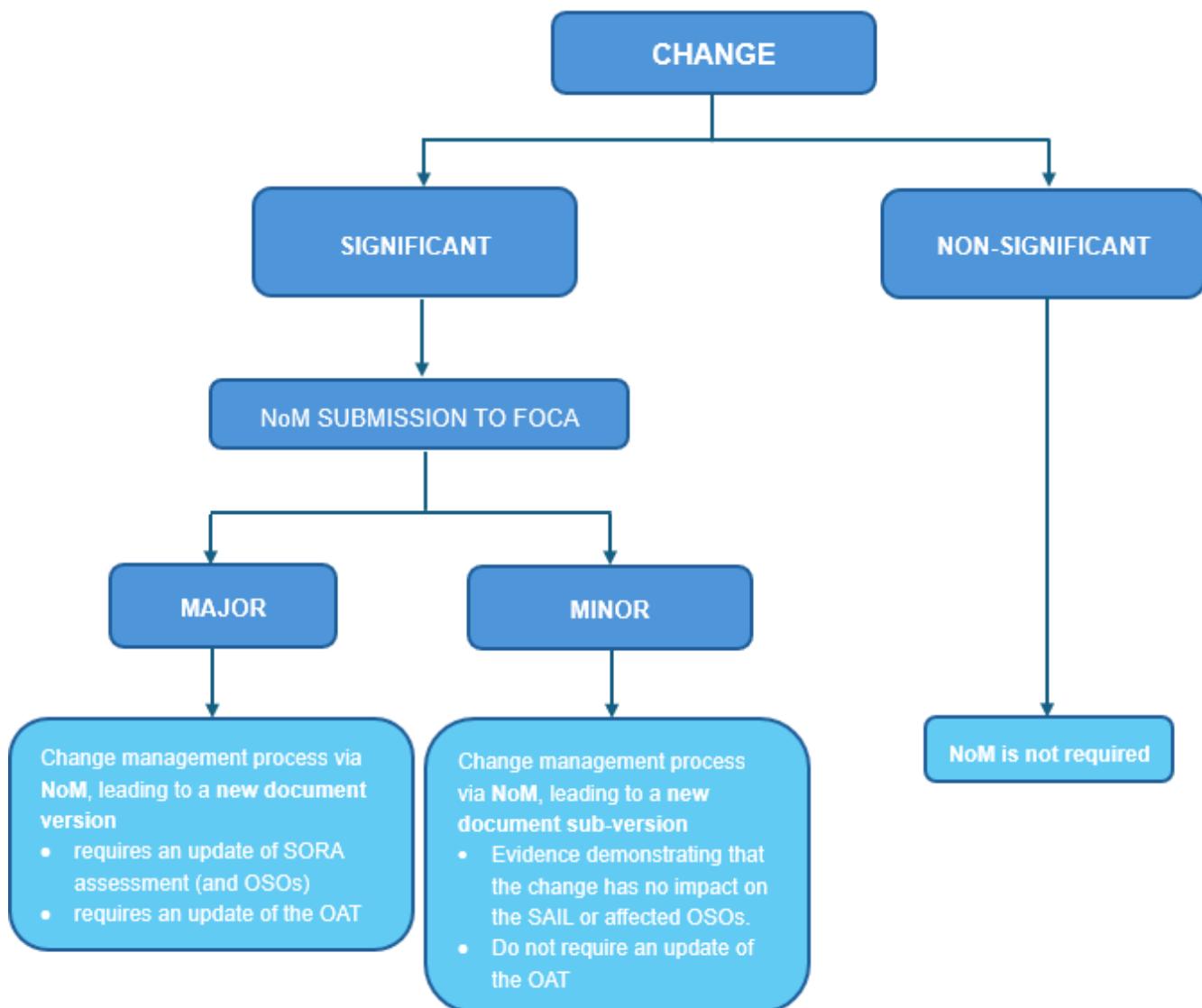
The MDL and the associated documents (OM, ERP, etc.) should follow a defined semantic versioning. Example:

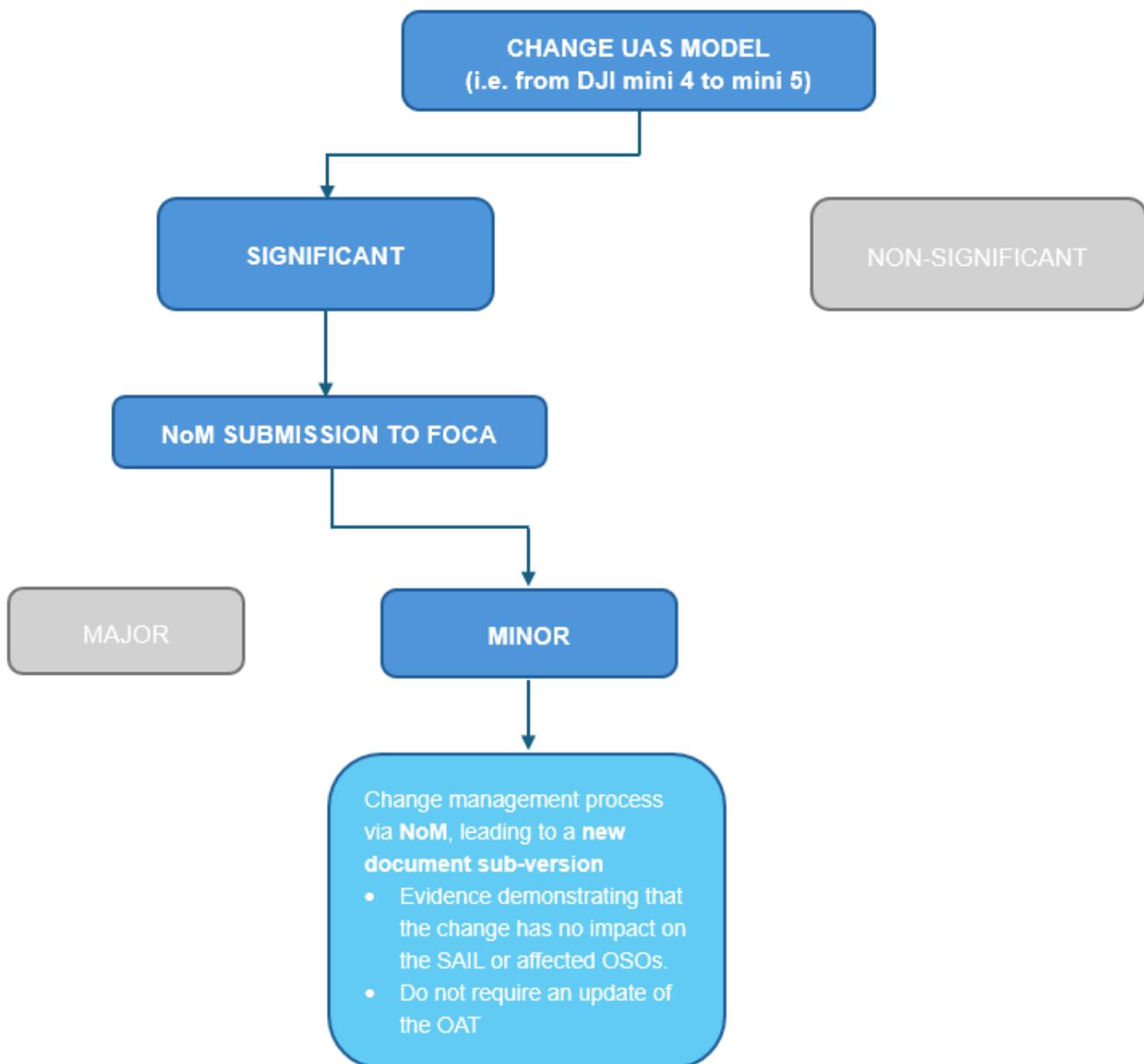
Document: OM Revision X.Y.z (or OM Issue X , Revision Y.z)	
X	Major change
Y	Minor change
z	Non-significant change (optional). This may also be incorporated under the minor change level Y

- **Major** change: increasing **X** (e.g., from MDL **1.5.1** to MDL **2.0.0**)
- **minor** change: increasing **Y** (e.g., from OM **1.5.1** to OM **1.6.0**)
- Non-Significant change: increasing **z** (e.g., from OM **1.5.1** to OM **1.5.2**)

Note:

Equivalent version coding is deemed acceptable, for instance using letters, alphanumeric coding or Issue and Revision terminology: e.g. OM Issue 1 Rev. 2, or Version 1.2, or Revision A Version 2, etc.

ANNEX A

ANNEX B – Example 1

ANNEX C – Example 2