PART696 Remotely Piloted Aircraft Systems

Additional Compliance Criteria & Guidance Material

Shell Group Requirements for Aircraft Operations (SGRAO) Issue 02

Document Revision Information

Version	Date	Amendment
1.0	28/06/2024	Draft
2.0	15/11/2024	Initial Release

Contents

Introduction

SGRAO PART-696 is part of the SGRAO suite of documents and must be read in conjunction with:

SGRAO Implementation Guide

IOGP Report 696 Version 1.0 for "Remotely Piloted Aircraft Systems"

This document provides additional guidance and expectations on how the IOGP Report 696 Version 1.0 for "Remotely Piloted Aircraft Systems" (RP696) must be implemented by the Contracted Aircraft operators and Shell Businesses.

SGRAO PART-696 governs the operation of Remotely Piloted Aircraft Systems (RPAS) and consists of 34 sections. RPAS operations can range from simple to highly complex, and the relevance of each section depends on the size and scope of the organization and the complexity of the tasks being performed.

Each section addresses the activities involved in delivering RPAS services and includes technical elements. Additionally, each section is structured with a Title, Purpose, Expectations, Processes and Practices, and Guidance documents. A 'responsible party' is designated for each element, either as the 'Company' (the entity engaging the RPAS operator) or the RPAS operator.

Please note that as the terms for RPAS and Unmanned Aircraft System (UAS) are often used synonymously, this Report has standardized the use of RPAS to mean both. Similarly, since remotely piloted aircraft (RPA), Unmanned Aerial Vehicle (UAV) and Unmanned Aircraft (UA) are also often used synonymously, this Report uses RPA for standardization.

NOTE

For operations classified as medium or high risk, **all chapters** of this manual are applicable.

For low-risk operations, only Chapter 1 (Regulatory Compliance) and Chapter 4 (Hazard Identification and Risk Assessment), along with the additional compliance criteria 1ACC.1 for insurance, are required.

List of Additional Compliance Criteria

Report	Chap	ACC	Description	ACC Threshold
696-1	1C.1	1ACC.1	Insurance requirement	To meet the Shell requirements for 1C.1, an operator is to obtain adequate general and aviation insurance coverage against operator liabilities in the event of an incident or accident as required by certain National Aviation Authorities and to the satisfaction of the relevant Business Unit.
696-3	3C3.4	3ACC.1	Emergency Response Planning	Shell requirement for 696-3, Section 3, MR3C.3.4: It is a Shell requirement to conduct an annual stakeholder ERP exercise. Applies for all projects greater than one year that are medium or high risk.
696-8	8C.1	8ACC.1	Approved Shell software for internal flights	To fully comply with operations conducted by Shell Operated Ventures (SOV), excluding contractors, an approved RPAS Management Software is to be used to assist in addressing the requirements. Applies for all projects greater than one year that are medium or high risk.

Table 2; Additional Compliance Criteria

Guidance Material

Guidance Material (GM) is non-binding explanatory and interpretation material issued by Shell Aircraft which helps to illustrate the meaning of a requirement or specification in the IOGP Report 696 or the ACC. It contains information, including examples, historic context and considerations to assist the user in the interpretation and application.

IOGP R696 Bow-Tie Set

In addition to the GM a dedicated Bow-Tie Set is available, which has been developed by Shell Aircraft to provide understanding on how the barriers should work together. The set is based on the IOGP Report 696 barriers.

Definitions & Acronyms

For definitions and acronyms used in the IOGP R69X-series, IOGP R696 offers comprehensive explanation.

RPAS specific definitions found in this document are defined below:

- **Crew Resource Management (CRM):**

  Is the effective use of all available resources for flight crew personnel to assure a safe and efficient operation, reducing error, avoiding stress and increasing efficiency.

- **Human Factors (HF):**

  Refers to environmental, organisational and job factors, and human and individual characteristics, which influence behavior at work in a way which can affect health and safety.

- **Safety Critical role(s):**

  Where personnel are carrying out, or responsible for, safety-related work, including those that have direct contact with the physical operation of the RPAS, those with operational contact who operate the RPAS, and those engaged in provision of maintenance and continuing airworthiness management of RPAS.

- **Safety Case**:

  Typically, the completion of a SORA Shielded operations, however, other Safety Risk Management processes are also acceptable.

- **Shielded**:

  An operation that is within 100m laterally of, and below an adjacent obstacle.

Risk Definition

Risk	Low (similar to EASA Open Categories 1 -4)	Medium (similar to EASA Specific Category)	High
Definition	**Restrictions:** • No BVLOS • No flights over people (>30m from uninvolved people) • Not within controlled airspace or airport/heliport environment • Must remain below 120 m AGL unless shielded MTOM 25 Kg or less • No flights over highways (for RPAS MTOM 4 Kg or more) • No more than 1 pilot per RPAS • No mission specific government approvals required • Night ops OK if conditions above are met. • Contract exposure <50 sectors or otherwise agreed with Shell Aircraft	Examples: • BVLOS • When using a drone with MTOM (maximum take of mass) > 25 kg • Flying higher than 120m above ground level. • When dropping material • When operating drone in an urban environment, with a MTOM> 4 kg or without a class identification label • More than 1 RPAS per pilot • Contract exposure <50 sectors or otherwise agreed with Shell Aircraft	• Any combination of BVLOS/EVLOS/VLOS involving flights that do not meet low and medium risk criteria. • Contract exposure ≥50 sectors or otherwise agreed with Shell Aircraft
Assessment process	• Submit assurance request to regional SAL RPAS designee (i.e. ARF) • Reviewed by SAL designee, and if low risk, allocated to BU level RPAS low risk assessor • Assurance requirements as per Chapters 1, 4 and 1ACC.1 (insurance) • Use VLOS LE format (currently AE060)	• Submit assurance request to regional Shell Aircraft RPAS designee (i.e. ARF) • Standard assessment by BU regional focal point • Using report AE059 (Transitioning to webform in 2026)	• Submit ARF • Assessment undertaken by AA using AE061 AOA report
RPAS Assurance Auditor Competency Requirements	• BU level – Assurance specialist (e.g. HSSE Lead) • NAA RPAS license • Designated competent by SAL (2yr term) • Initial awareness training - 1 ICAO online courses (ICAO SMS) • IAW w SEAM LOD1 currency/competency requirements (2audit observations, 1 audit)	As per ATM for VLOS/BVLOS assessor (Shell Aircraft designated, AOS, AFP preferred for VLOS only qualification initially. Shell Aircraft advisors will retain VLOS assurance of medium risk operations and all BVLOS operations initially)	As per ATM for AA adviser
Currency	• According to local Shell requirements (if required by BU) • IAW w SEAM LOD1 currency/competency requirements (ref. SEAM Standards Management System & Conduct Assurance – 4, 5, 6)	As per ATM for VLOS/BVLOS assessor	As per ATM for AA adviser
Shell Aircraft Competency Assessment Program	• According to local Shell requirements • IAW w SEAM LOD1 currency/competency requirements (ref. SEAM Standards Management System & Conduct Assurance – 4, 5, 6)	As per ATM for VLOS/BVLOS assessor	As per ATM for AA adviser

Table 3; Risk Definition

Variations

Variation means minor deviation to the mandatory requirements as defined in IOGP R696-series, approved by relevant Shell Technical Authority – Air Transport (TA1). Consult the SGRAO Implementation guide for more information.

TA1/2 variations are indicated in the split boxes in the Guidance section. These variations are locally managed and registered.

List of TA1 Variations

Report	Chap	Description	Variation Details
696	3	SMS	The relevant Shell Air Technical Authority (TA1), if required, can vary requirement for Section 3 SMS where project is assessed as a medium risk.
696	18	VLOS Operations	The relevant Shell Air Technical Authority (TA1), if required, can vary the requirement of 18C.3 to meet the needs of the operation if a risk assessment to address single remote pilot operation has been undertaken and controls introduced to ensure ALARP

Table 4; List of TA1 variations

R696-1	Regulatory Compliance
MR	**1B, 1C.1, 1C.2, 1C.3, 1C.4, 1C.5, 1C.6.**
Guidance Material	
1B	No guidance
1C.1	See 1ACC.1 for Shell requirement for insurance coverage. The RPA may need to be registered and should have the operator's name as well as the contact details clearly noted on the airframe
1C.1.1	No guidance
1C.1.2	No guidance
1C.1.3	No guidance
1C.1.4	No guidance
1C.1.5	See C1.6.13
1C.1.6	No guidance
1C.1.7	This may include security approvals from some countries
1C.1.8	No guidance
1C.2	No guidance
1C.3	No guidance
1C.4	Refer to the regional NAA regulations and operate within 696 as well as the relevant Shell Air Technical Authority (TA1)
1C.5	No guidance
1C.6	No guidance
1C.6.1	No guidance
1C.6.2	The Safety Case (SORA) is approved by relevant Shell Air Technical Authority (TA1)
1C.6.3	No guidance
1C.6.4	No guidance
1C.6.5	No guidance
1C.6.6	No guidance
1C.6.7	No guidance
1C.6.8	See ACC
1C.6.9	No guidance
1C.6.10	Risk assessment is approved by relevant Shell Air Technical Authority (TA1).
1C.6.11	The Safety Case (SORA) is approved by the relevant Shell Air Technical Authority (TA1). If hazardous cargo is carried, then dangerous goods approvals and qualifications are also required
1C.6.12	This should form part of Emergency Response Procedures
1C.6.13	The data from RPAS operations should be managed in accordance with the European Union General Data Protection Regulation (GDPR), national equivalent, or local Shell data security and privacy requirements, whichever is more stringent
1C.6.14	Cyber risk control guidelines are included in JARUS SORA, latest version
1ACC.1	To meet the Shell requirements for 1C.1, an operator is to obtain adequate general and aviation insurance coverage against operator liabilities in the event of an incident or accident as required by certain National Aviation Authorities and to the satisfaction of the relevant Business Unit.
1VAR.1	None

R696-2	Concept of Operations
MR	2B,2C.1, 2C.2, 2C.3.
Guidance Material	
2B	No Guidance
2C.1	JARUS SORA Annex A provides a template of a comprehensive CONOPS
2C.1.1	No guidance
2C.1.2	CONOPS should refer to the specific RPAS and Sensor(s) used for that specific operation
2C.1.3	No guidance
2C.2	Aviation Advisor for Shell is the relevant Shell Air Technical Authority (TA1)
2C.3	No guidance
2ACC.1	None
2VAR.1	None

R696-3	Safety Management System and quality assurance
MR	3B, 3C.1, 3C.2, 3C.3, 3C.4, 3C.5, 3ACC.1.
Guidance Material	
3B	An SMS is required for high-risk operations. The relevant Shell Air Technical Authority (TA1) can vary the requirements within the SMS guidance where applicable to the size and complexity of the operation. Where a project is assessed by Shell Aircraft as a low-risk operation, SMS is not required.
3C.1	To meet the intent of the SMS, an organization should have the following elements documented, appropriate to the size and complexity of the operation, as outlined in ICAO Annex 19, Appendix 2. - Safety policy and objectives - Safety risk management - Safety assurance - Safety promotion Guidance is also provided in Section 4 (Hazard and risk management) and Section 5 (Incident reporting and investigation).
3C.2	Refer to ICAO Doc 9859 for guidance on implementation of an SMS
3C.3	No Guidance
3C.3.1	No Guidance
3C.3.2	No Guidance
3C.3.3	No Guidance
3C.3.4	See 3ACC.1 for Shell requirement for ERP exercise requirements. Guidance is provided in Section 30 (Communications – lost link procedures) and Section 31 (Standby and emergency equipment) The ERP should address one of the following considerations: • Credible Emergency and Abnormal Operation Scenarios: • Injury to person on the ground. • Lost link procedures. • Lost or Degraded GPS. • Propulsion Failure. • RPA Fly-away. • Link interference. • Obstacle collision. • Wildlife interference, including bird strike. • Immediate notification of the appropriate ATC facility (if applicable). • An incident response checklist, including the relevant Shell contacts, (Shell Contract Holder) should be followed for any incident or accident; and • The designated landing site(s) are clear of any personnel and hazards
3C.3.5	No Guidance
3C.3.6	No Guidance
3C.3.7	No Guidance
3C.3.8	No Guidance
3C.3.9	Guidance provided in Section 6 (Management of change)
3C.3.10	Guidance provided in Section 7 (Audits)
3C.3.11	No Guidance
3C.3.12	A safety communication process, including safety meetings, that are attended by key personnel in the company
3C.3.13	No Guidance
3C.4	No Guidance
3C.5	Guidance provided in Section 7 (Audits)
3ACC.1	Shell requirement for 696-3, Section 3, MR3C.3.4: Requirement to conduct an annual stakeholder ERP exercise. For all projects greater than one year that are medium or high risk, this can be a desktop exercise.
3VAR.1	Shell does not require company to have SMS where project is assessed as low risk

R696-4	Hazard identification and risk assessment
MR	4B, 4C.1, 4C.2, 4C.3, 4C.4, 4C.5.
Guidance Material	
4B	No Guidance
4C.1	The following Sections provide guidance on areas for consideration when undertaking a risk assessment for operations and associated ground support tasks are found in the following sections: Section 10 (Explosive atmospheres), Sections 18 (VLOS and EVLOS Operations), Section 19 (BVLOS Operations), Section 22 (night operations), Section 26 (Communications – RPAS/ground control station link), Section 30 (Communications and lost link procedures), Section 33 (Maintenance), and Section 34 (Battery/Fuel management)
4C.2	No Guidance
4C.3	The following sections provide guidance on how hazards and risks can be identified in the CONOPS: Section 2 (Concept of operations), Section 23 (Pre-flight procedures), and Section 24 (Pre-flight Brief)
4C.3.1	No Guidance
4C.3.2	Locations that have a higher risk of radio frequency disruption or GPS degradation (such as large offshore facilities) should have specific controls identified. Further guidance is available within Section 26 (Communications – RPAS/ground control station link) Systems with redundant propulsion and power for offshore, as well as hazardous site locations, with the ability to maintain control of the aircraft in the event of a power loss should be considered
4C.3.3	Section 11 (Fatigue Management) and Section 17 (Human factors) provides further guidance A Fitness for Work program should include: • A process to check that the remote pilot should be in a physical and mental condition such that they would not endanger the safe operation of the RPAS, other aircraft, persons, environment, animals, or property. • A Fatigue Risk Management System (FRMS) that considers the workload for the RPAS pilot and other members of the RPAS operations team
4C.4	Controls should demonstrate that risks are evaluated to ALARP
4C.5	Not required for Low risk RPAS operations (as per table 3)
4ACC.1	None
4VAR.1	None

R696-5	Incident reporting and investigation
MR	5B, 5C.1, 5C.2.
Guidance Material	
5B	This is further guidance for SMS components, refer to Section 3C.3.7 (Incident reporting, investigation, and learning)
5C.1	No Guidance
5C.2	For Shell any incidents should be reported to the Shell Contract Holder
5ACC.1	None
5VAR.1	None

R696-6	Management of change
MR	6B, 6C.1, 6C.2.
Guidance Material	
6B	This is further guidance for SMS components, refer to Section 3C.3.9 (Management of Change)
6C.1	No Guidance
6C.2	No Guidance
6ACC.1	None
6VAR.1	None

R696-7	Audits
MR	7B, 7C.1, 7C.2, 7C.3, 7C.4, 7C.5.
Guidance Material	
7B	No Guidance
7C.1	The Shell Air Technical Authority (TA1) is responsible for the use of Shell Aircraft approved RPAS operators.
7C.2	For Shell, this is for projects greater than one year with company to conduct its own internal audits within 3 months of project commencement
7C.3	For further guidance refer to 690-1, Section 11, (Continuous improvement – assurance). Auditors should have successfully completed a recognized auditing qualification
7C.4	The RPAS operator has a system that tracks findings as well as corresponding corrective actions to closure
7C.5	No Guidance
7ACC.1	None
7VAR.1	None

R696-8	Operations manual
MR	**8B 8C.1. 8ACC.1.**
Guidance Material	
8B	See 8ACC.1 for Shell requirement for the use of RPAS Management Software.
8C.1	No Guidance
8C.1.1	Guidance is provided in: • Section 18 Visual line of Sight and Extended Visual line of sight operations, • Section 19 Beyond Visual Line of Sight Operations, • Section 21Focused/Sterile cockpit – cell phones and personal electronic devices, • Section 22 Night operations, • Section 23 Pre-flight procedures, • Section 24Pre-flight briefing, • Section 25 Pre-flight actions, • Section 26 Communications – RPAS/ground control station link, • Section 27 Communications – on-site personnel communications, • Section 28 Communications – aviation-band radio, Section 29 Communications – cell phones, • Section 30 Communications – lost link procedures, • Section 32 Airworthiness, • Section 33 Maintenance, and • Section 34 Battery/fuel management
8C.1.2	No Guidance
8C.1.3	Section 20 (Weather) provides guidance on RPAS performance factors to be incorporated into the OM
8C.1.4	No Guidance
8C.1.5	Guidance is provided in Section 14 (Crew -Recency) and Section 15 (Crew – Training)
8C.1.6	Guidance is provided in Section 11 (Fatigue Management)
8C.1.7	No Guidance
8C.1.8	Only required if multiple aircraft operations have been approved by the relevant Shell Air Technical Authority (TA1)
8ACC.1	To fully comply with operations conducted by Shell Operated Ventures (SOV), excluding contractors, an approved RPAS Management Software is to be used to assist in addressing the requirements
8VAR.1	None

R696-9	Offshore/helideck operations
MR	**9B, 9C.1, 9C.2.**
Guidance Material	
9B	No Guidance
9C.1	No Guidance
9C.2	No Guidance
9ACC.1	None
9VAR.1	None

R696-10	Explosive atmospheres
MR	10B, 10C.1.
Guidance Material	
10B	Section 4 (Hazard and risk management) provides further guidance
10C.1.1	Section 4 (Hazard and risk management) provides further guidance
10C.1.2	Section 4 (Hazard and risk management) provides further guidance
10C.1.3	For Shell this is the relevant HSSE representative of the site
10C.1.4	No Guidance
10ACC.1	None
10VAR.1	None

R696-11	Fatigue management
MR	11B, 11C.1.
Guidance Material	
11B	This is further guidance for Hazard and Risk Identification and Risk Assessment, refer to Section 4C.3.3
11C.1	No Guidance
11ACC.1	None
11VAR.1	None

R696-12	Crew – qualifications and experience
MR	12B, 12C.1, 12C.2.
Guidance Material	
12B	No Guidance
12C.1	No Guidance
12C.1.1	All RPAS operations to be conducted in accordance with NAA requirements
12C.1.2	Where the NAA approves operations with appropriate flight crew license (e.g. VLOS) this is deemed to have met minimum requirements
12C.1.3	No Guidance
12C.2	No Guidance
12C.3	No Guidance
12C.4	The relevant Shell Technical Authority (TA1) approval is required for the use of a PICUS.
12C.5	No Guidance
12C.6	The relevant Shell Technical Authority (TA1) approves these “exceptions” (for Shell considered as TA1 variations).
12ACC.1	None
12VAR.1	None

R696-13	Crew – medical certification
MR	13B, 13C.1, 13C.2.
Guidance Material	
13B	No Guidance
13C.1	Prior to flying, the Remote Pilot should confirm their Fitness for Work to the Chief Remote Pilot
13C.2	No Guidance
13ACC.1	None
13VAR.1	None

R696-14	Crew - recency
MR	14B,14C.1, 14C.2.
Guidance Material	
14B	No Guidance
14C.1	It is expected that recency requirements will be detailed in the Company Operations Manual and should be linked back to the Company SMS.
14C.2	No Guidance
14ACC.1	None
14VAR.1	None

R696-15	Crew – training
MR	15B, 15C.1, 15C.2, 15C.3, 15C.4, 15C.5, 15C.6, 15C.7.
Guidance Material	
15B	No Guidance
15C.1	No Guidance
15C.2	Training requirements for VO are detailed in 15C.6
15C.3	The training must be consistent with the complexity of operation; This meets expectation of 15B
15C.4	No Guidance
15C.5	No Guidance
15C.6	No Guidance
15C.7	No Guidance
15ACC.1	None
15VAR.1	None

R696-16	Drug and alcohol policy
MR	16B, 16C.1, 16C.2, 16C.3.
Guidance Material	
16B	No Guidance
16C.1	No Guidance
16C.2	Safety Critical roles are defined as those where personnel are carrying out, or responsible for, safety-related work, including those that have direct contact with the physical operation of the RPAS, those with operational contact who operate the RPAS, and those engaged in provision of maintenance and continuing airworthiness management of RPAS
16C.3	No Guidance
16ACC.1	None
16VAR.1	None

R696-17	Human factors
MR	17B, 17C.1.
Guidance Material	
17B	Further information available at https://flightsafety.org/toolkits-resources/past-safety-initiatives/operators-guide-to-human-factors-in-aviation-oghfa/
17C.1	No Guidance
17ACC.1	None
17VAR.1	None

R696-18	Operations – visual line of sight and extended visual line of sight
MR	18B, 18C.1, 18C.2, 18C.3, 18C.4, 18C.5, 18C.6, 18C.7.
Guidance Material	
18B	No Guidance
18C.1	No Guidance
18C.2	No Guidance
18C.3	The relevant Shell Technical Authority - Air Transport (TA1), if required, can vary the requirement of 18.C.3 to meet the needs of the operation if a risk assessment to address single remote pilot operation has been undertaken and controls introduced to ensure ALARP
18C.4	No Guidance
18C.5	No Guidance
18C.6	No Guidance
18C.7	No Guidance
18ACC.1	None
18VAR.1	The relevant Shell Technical Authority - Air Transport (TA1), if required, can vary the requirement of 18C.3 to meet the needs of the operation if a risk assessment to address single remote pilot operation has been undertaken and controls introduced to ensure ALARP

R696-19	Operations – beyond visual line of sight
MR	19B, 19C.1, 19C.2, 19C.3, 19C.4, 19C.5.
Guidance Material	
19C.1	No Guidance
19C.1.1	No Guidance
19C.1.2	No Guidance
19C.1.3	A specific risk assessment and safety case should be developed and documented for BVLOS as part of the company's SMS. The accepted default process for the assessment is the Joint Authorities for Rulemaking on Unmanned Systems (JARUS), Specific Operations Risk Assessment (SORA) methodology, however other Safety Risk Management (SRM) processes may be considered by Shell Aircraft
19C.1.4	No Guidance
19C.2	No Guidance
19C.3	No Guidance
19C.4	Safety Case approval by NAA if required and the relevant Shell Air Technical Authority
19C.5	No Guidance
19ACC.1	None
19VAR.1	None

R696-20	Weather
MR	20B, 20C.1, 20C.2, 20C.3.
Guidance Material	
20B	No Guidance
20C.1	Aerodrome observations can be used if within 10NM of the RPAS operation
20C.2	No Guidance
20C.3	No Guidance
20ACC.1	None
20VAR.1	None

R696-21	Focused/sterile cockpit – cell phones and personal electronic devices
MR	21B, 21C.1, 21C.2, 21C.3, 21C.4.
Guidance Material	
21B	No Guidance
21C.1	No Guidance
21C.2	No Guidance
21C.3	No Guidance
21C.4	No Guidance
21ACC.1	None
21VAR.1	None

R696-22	Night operations
MR	**22B, 22C.1, 22C.2, 22C.3, 22C.4, 22C.5.**
Guidance Material	
22B	No Guidance
22C.1	No Guidance
22C.1.1	Safety Case approval by NAA if required and the relevant Shell Air Technical Authority – Air Transport (TA1)
22C.1.2	No Guidance
22C.2	No Guidance
22C.3	Night operations should only be conducted when specific approval has been obtained from the relevant Shell Air Technical Authority (TA1).
22C.4	No Guidance
22C.5	No Guidance
21ACC.1	None
21VAR.1	None

R696-23	Pre-flight procedures – pre-flight planning
MR	**23C.1, 23C.2,**
Guidance Material	
23B	It is expected that most risks will have been identified in previous risk assessment activities, however these will be verified, and any site-specific risks will be identified on the day of the operation. Note that not all elements will be applicable depending on the size and complexity of the operation.
23C.1.1	No Guidance
23C.1.2	No Guidance
23C.1.3	No Guidance
23C.1.4	No Guidance
23C.1.5	No Guidance
23C.1.6	No Guidance
23C.1.7	No Guidance
23C.1.8	Preflight planning considers the establishment of appropriate buffer zones and implementation of geofence(s), if available
23C.1.9	No Guidance
23C.1.10	No Guidance
23C.1.11	No Guidance
23C.1.12	Procedures are checked and confirmed by the relevant Shell Air Technical Authority (TA1)
23C.1.13	No Guidance
23C.1.14	No Guidance
23C.1.15	No Guidance
23C.2	No Guidance
23ACC.1	None
23VAR.1	None.

R696-24	Pre-flight procedures – pre-flight brief
MR	24B, 24C.1.
Guidance Material	
24B	No Guidance
24C.1	This should also cover relevant items identified in Section 23C.1
24ACC.1	None
24VAR.1	None

R696-25	Pre-flight procedures – pre-flight actions
MR	25B, 25C.1.
Guidance Material	
25B	No Guidance
25C.1	No Guidance
25ACC.1	None
25VAR.1	None

R696-26	Communications – RPAS/ground control station link
MR	26B, 26C.1, 26C.2, 26C.3, 26C.4.
Guidance Material	
26B	No Guidance
26C.1	No Guidance
26C.2	No Guidance
26C.3	No Guidance
26C.4	No Guidance
26ACC.1	None
26VAR.1	None

R696-27	Communications – on-site personnel communications
MR	27B, 27C.1, 27C.2, 27C.3.
Guidance Material	
27B	No Guidance
27C.1	No Guidance
27C.2	Some operations may be conducted as single operator as per Table 4, and these elements may not be applicable
27C.3	No Guidance
27ACC.1	None
27VAR.1	None

R696-28	Communications – aviation-band radio
MR	28B, 28C.1, 28C.2, 28C.3.
Guidance Material	
28B	No Guidance
28C.1	No Guidance
28C.2	No Guidance
28C.3	No Guidance
28ACC.1	None
28VAR.1	None

R696-29	Communications – cell phones
MR	29B, 29C.1, 29C.2.
Guidance Material	
29B	No Guidance
29C.1	No Guidance
29C.2	No Guidance
29ACC.1	None
29VAR.1	None

R696-30	Communications – lost link procedures
MR	30B, 30C.1, 30C.2, 30C.3, 30C.4, 30C.5, 30C.6, 30C.7, 30C.8.
Guidance Material	
30B	
30C.1	No Guidance
30C.2	Should have lost link logic / capability that meets JARUS SORA OSO requirements if no NAA guidance
30C.3	No Guidance
30C.4	No Guidance
30C.5	No Guidance
30C.6	No Guidance
30C.7	No Guidance
30C.8	No Guidance
30ACC.1	None
30VAR.1	None

R696-31	Standby and emergency equipment
MR	31B, 31C.1, 31C.2.
Guidance Material	
31B	No Guidance
31C.1	No Guidance
31C.2	No Guidance
31ACC.1	None
31VAR.1	None

R696-32	Airworthiness
MR	32B, 32C.1, 32C.2, 32C.3, 32C.4, 32C.5, 32C.6, 32C.7, 32C.8, 32C.9.
Guidance Material	
32B	No Guidance
32C.1	No Guidance
32C.2	No Guidance
32C.3	This is the relevant Shell Air Technical Authority (TA1).
32C.4	No Guidance
32C.5	No Guidance
32C.6	No Guidance
32C.7	No Guidance
32C.8	No Guidance
32C.9	No Guidance
32ACC.1	None
32VAR.1	None

R696-33	Maintenance
MR	33B, 33C.1, 33C.2, 33C.3, 33C.4, 33C.5, 33C.6, 33C.7, 33C.8, 33C.9.
Guidance Material	
33B	No Guidance
33C.1	No Guidance
33C.2	No Guidance
33C.3	This could be via OEM training, an agreed course with NAA, or by documented in-house competency requirements
33C.4	Program should be appropriate to the size and complexity of the Operator
33C.5	No Guidance
33C.6	No Guidance
33C.7	No Guidance
33C.8	No Guidance
33C.9	No Guidance
33ACC.1	None
33VAR.1	None

R696-34	Battery/fuel management
MR	34B, 34C.1, 34C.2, 34C.3.
Guidance Material	
34B	No Guidance
34C.1	No Guidance
34C.2	OEM procedures and logging are acceptable for meeting these requirements, e.g. smart batteries. However, an operator should ensure there is a documented process for monitoring and reviewing battery health.
34C.3	Shell Fuel Quality Assurance Management Procedures where applicable
34ACC.1	None
34VAR.1	None