香港特別行政區政府
民航處
Civil Aviation Department
The Government of the Hong Kong Special Administrative Region

Small Unmanned Aircraft Advisory Circular No. AC-017

Date: 24 April 2026

Permission for Cross-boundary Small Unmanned Aircraft Operations within the Context of Regulatory Sandbox X

1. Background

1.1 Under the Small Unmanned Aircraft Order ("SUA Order"), small unmanned aircraft ("SUA") operations are regulated under a risk-based approach and classified according to the weight of the SUA and the operational risk level.

1.2 According to section 16(1A) of the SUA Order, SUA shall be operated for a flight that is wholly within Hong Kong. Operations not meeting such requirement, i.e. cross-boundary operations, are categorised as "**Advanced Operations**" for which a prior permission under section 37 of the SUA Order is required from the Civil Aviation Department ("CAD").

1.3 This Advisory Circular ("AC") sets out the requirements for permission to operate an SUA for cross-boundary operations within the context of regulatory sandbox X.

2. Applicability

2.1 This AC applies to the applicant/SUA operator ("operator") who intends to apply for a permission from the CAD to operate an SUA for cross-boundary operations without carrying any person on board within the context of regulatory sandbox X. The operator is reminded that the requirements set out in this AC may not be exhaustive and additional information may be required to substantiate the applications to ensure aviation safety.

2.2 In addition to the regulatory requirements stated in paragraph 1.2 above, other regulatory requirements under SUA Order, e.g. registration and labelling of SUA, registration of remote pilots, training and assessment, equipment, other operating requirements and insurance, apply to **the part of the flight within Hong Kong**. For the part of the flight

outside Hong Kong, the operator shall also observe and comply with all applicable rules, regulations and regulatory requirements set out by relevant local authorities.

2.3 The operator shall note that, unless otherwise specified by the CAD in the permission concerned, in any one flight, only **one type of advanced operations** shall be involved. Should other type(s) of advanced operation, e.g. operation within Restricted Flying Zone, carriage of dangerous goods, operations not meeting other operating requirements, **a separate application** to the CAD detailing such operational circumstances and corresponding safety mitigations is required. The operator shall refer to the detailed requirements for each type of operations provided in the respective ACs as referenced in No. AC-001 "Current List of Publications related to Small Unmanned Aircraft".

2.4 If beyond visual line of sight ("BVLOS") SUA operations are involved in the proposed cross-boundary operations, No. AC-013 "Permission for Small Unmanned Aircraft Beyond Visual Line of Sight Operations within the Context of Regulatory Sandbox" shall also be observed. No. AC-013 sets out the applicable regulatory requirements (such as operating requirements, personnel qualifications and training, SUA system requirements (including the detect and avoid system adopted) and SUA maintenance).

3. Interface with Other Relevant Authorities and Requirements

3.1. In general, the operator shall ensure that all necessary permission from relevant authorities within and outside Hong Kong are obtained before conducting the cross-boundary operations.

3.2. In particular, the operator is reminded to obtain the necessary customs approvals in advance for their proposed cross-boundary operations. For more information on Hong Kong customs' approval, please contact Customs and Excise Department ("C&ED") (*https://www.customs.gov.hk/en/contact-us/index.html*).

3.3. SUA owners and remote pilots shall also observe all such other requirements governed by other legislation in Hong Kong, such as the Telecommunications Ordinance and Personal Data (Privacy) Ordinance, etc. and follow relevant requirements and/or guidelines such as aviation security set out by the CAD, telecommunication, privacy, cyber security, data security, protection of ecology and wild animals, etc. set out by any other Government bureaux / departments, regulatory authorities, land owners or other stakeholders where necessary to ensure the safe operations of the SUA at all times.

4. Approval by Relevant Airspace Authorities and Notification Requirements

4.1. For the part of the flight outside Hong Kong, approval from relevant authorities (e.g. air traffic control authorities) outside Hong Kong shall be sought by the operator of cross-boundary operations.

4.2. The operator shall be responsible for coordinating with, and seeking comments from, other local airspace users (e.g. Government Flying Services ("GFS")) on the proposed cross-boundary operations.

4.3. Notwithstanding that Advanced Operations Permission has been granted, time slots for operations shall normally be requested from the Air Traffic Management Division ("ATMD") of the CAD at least 5 working days in advance by providing the following information: take-off and landing date, time, locations, altitude, flight route and emergency contact details.

4.4. On the date of operation, the operator shall contact Hong Kong Air Traffic Control Tower at +852 2910 6815 for final approval before commencing operations and upon completion thereof.

4.5. It is the responsibility of the operator to coordinate with the local airspace users to ensure segregation between the operations of the SUA and the local airspace users. In the case that there are emergency operations by local airspace users (e.g. GFS) that will take place in vicinity of the flight route, the operator shall immediately abort their operations, hover or descend their SUA onto a pre-determined emergency landing site, as appropriate.

5. Network Coverage

5.1. The operator shall ensure the adequacy of mobile radio and Global Navigation Satellite System signal strength, coverage and integrity for Command and Control Link throughout the intended operating areas and/or flight routes. Appropriate assessment shall be conducted before the operations to ascertain the signal strength and levels of interference at the operating areas and/or flight routes.

5.2. If the operation relies on any external services, such as LTE (4G / 5G), internet services etc., the operator shall demonstrate that the performance and availability of the service is adequate for the intended cross-boundary operations.

5.3. For SUA operations using public mobile networks in Hong Kong, the operator is reminded that according to Office of the Communications Authority ("OFCA")'s requirements, the operator shall coordinate with the relevant mobile network operator(s) to ensure mobile network coverage along the intended operating areas and/or flight routes. If a private radiocommunications network is adopted, the operator shall demonstrate its capability in terms of network infrastructure and radio coverage and its usage in compliance with the licensing requirements established by and to the satisfaction of OFCA. Relevant information is available on OFCA's website with the following link:

https://www.ofca.gov.hk/en/consumer_focus/guide/help_for_consumers/information_on_radio_applications/unmanned_aircraft_systems_drones/index.html

6. Emergency Procedures

6.1. The remote pilot shall determine suitable response and fail-safe mechanism for emergency during operation, e.g. loss of command and control link. Any alternative landing site and/or flight route shall be identified in the application documents to all relevant authorities.

7. Insurance Requirements

7.1. A policy of insurance shall be in force during advanced SUA operations for third-party liability (for bodily injury and/or death) arising out of or caused by the SUA operations. The minimum coverage is HKD $10 million for flight by Category A or B SUA. For operations of Category C SUA, please refer to No. AC-014 "Permission for Category C Small Unmanned Aircraft Operations and Pre-defined Scenario #1".

8. Flight Tracking and Records

8.1. To enhance airspace situational awareness, the operations shall be supported by technologies for electronic detection (or other alternative means of compliance) of the SUA and also air traffic in the proximity of the operating areas and/or flight routes (e.g. ADS-B IN, web-based real-time tracking services). Such data may be required to be transmitted to the CAD real-time and/or as requested.

8.2. The operator shall ensure the continuous broadcast of remote identification (remote ID) of the SUA in flight with information such as the identification and geographic position of the SUA to allow SUA in the skies to be identified.

8.3. The operator shall record and store operational information, including information related to the flights and associated systems (operational data, crew coordination, meteorological conditions, etc.), SUA and/or systems failures, inspections, repairs and maintenance, personnel training, assessments, shift handover records, accident / incidents, etc. The above-mentioned information shall be provided to the CAD upon request.

9. Application Procedures

9.1. Apart from the requirements prescribed in this document, the operator who is selected under regulatory sandbox X for conducting cross-boundary operations shall also submit the following documents/ information specific to the cross-boundary operations to the CAD by email to sua@cad.gov.hk:

a) Technical specifications of the SUA including its maximum characteristic dimension and maximum take-off weight taking into account everything installed in, carried by, or attached to the SUA;
b) An operations manual;
c) A risk assessment identifying hazards specific to the cross-boundary operations and the corresponding risk mitigating measures;
d) A flight plan (See **paragraph 9.2**);
e) Documentary evidence showing approval from relevant authorities outside Hong Kong and comments of local airspace users on the proposed operations (See **paragraphs 4.1 and 4.2**);
f) Coordination mechanism with local airspace users (See **paragraph 4.5**); and
g) Any other information/ documents required in the regulatory sandbox X application form.

Subject to the risks and complexity of the proposed operations, the CAD may require the operator to submit additional information/ documents for assessment.

Flight Plan

9.2. The flight plan shall at least include the following details:
a) Take-off/ landing point
b) Flight route/ area
c) Geo-fencing boundary
d) Altitude and speed
e) How is surveillance maintained
f) Position of remote pilot and other crew members
g) The method of maintaining minimum separation from uninvolved persons and vehicle, vessel or structure not under control of remote pilot

9.3. Subject to the risks and complexity of the proposed operations, the CAD may also require a flight demonstration to be performed to assess the operator's capabilities and safety of the proposed operations.

10. Others

10.1. The operator shall follow technical requirements stipulated in all applicable ACs. For instance, if BVLOS SUA operations are involved in the proposed cross-boundary operations, No. AC-013 "Permission for Small Unmanned Aircraft Beyond Visual Line of Sight Operations within the Context of Regulatory Sandbox" shall also be observed in addition to this AC.

10.2. The remote pilot, responsible person of SUA or any other person who knowingly causes or permits the aircraft to be operated for the flight shall take note that apart from the SUA Order, other regulations, bylaws, requirements, etc. may also govern the usage of SUA. Applicable rules shall be observed and consent from relevant land or property

owner, management, authority or agency shall be obtained if deemed necessary or appropriate for the intended operations.

11. Enquiries

11.1. This AC will be subject to review and update from time to time in the light of the advancement of technology and increasing popular use of SUA in different professional applications. It shall also be noted that the safety requirements provided above are not meant to be exhaustive. It shall be the responsibility of the operator to comply with all applicable regulatory requirements, put in place appropriate safety precautions and risk mitigating measures for the subject SUA operations, as well as to follow the requirements and guidelines set out by any authorities, Government bureaux / departments, land owners or other stakeholders where necessary to ensure the safe operations of the SUA at all times.

11.2. This AC shall be read in conjunction with the SUA Order, Safety Requirements Document (SRD) and other SUA related documents published by the CAD.

11.3. For enquiries, please contact the Unmanned Aircraft Office of the CAD at sua@cad.gov.hk.

12. Notes

12.1. This AC supersedes the version dated 30 January 2026.