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Organised Crime and General Aviation in the UK and Benelux

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Methodology

Research for this paper was conducted between January and June 2026, using a mixed-methods approach. First, an in-depth review of existing literature on criminal misuse of general aviation in the region was conducted. Sources included government publications, law enforcement reporting, academic research, analyses by think tanks, private sector and intergovernmental organisations, and media reporting. Classified UK intelligence assessments relating to general aviation were also consulted.

Second, publicly identifiable cases involving light aircraft, helicopter, drone and other forms of general aviation-enabled trafficking were analysed, paying particular attention to recurring operational characteristics, including routing, concealment techniques and exploitation of legitimate infrastructure. While these cases are by no means a reliable measure of the scale of criminal activity, they describe known methods of exploitation.

Third, semi-structured interviews were held with 30 subject matter experts with experience across the UK, the Netherlands, Belgium and Luxembourg. Interviewees have been anonymised, given the sensitivity of the subject matter, and included representatives from law enforcement, transport departments, civil aviation authorities, border security agencies, intergovernmental organisations, think tanks and journalism. Additional interviews across Western Europe and Latin America explored transferable lessons and indicators of general aviation misuse elsewhere, with participants, also anonymous, ranging from frontline practitioners to senior policymakers.

Several limitations should be acknowledged. First, it is likely that available evidence is shaped by enforcement capacity, intelligence priorities and operational visibility, rather than being a reliable indicator of underlying prevalence. Second, given the public nature of this paper, the contents of classified assessments could not be conveyed directly, while much of the relevant intelligence remains inaccessible to researchers. Third, differences in regulation and reporting standards across jurisdictions limit meaningful quantitative comparison. Accordingly, the paper focuses on vulnerabilities, enabling conditions and analytical gaps rather than attempting precise threat quantification.

Further challenges relate to the breadth of the general aviation category and differences in how it is understood. While the International Civil Aviation Organization has defined general aviation as excluding commercial air transport,¹ other definitions encompass all aspects of private and commercial aviation outside scheduled air transport. In the UK, for example, the Department for Transport describes the sector as including ‘all non-scheduled commercial

1. International Council of Aircraft Owner and Pilot Associations Europe, ‘What is General Aviation?’, <<https://www.iaopa.eu/what-is-general-aviation>>, accessed 9 August 2026.

civil aviation', alongside activities ranging from emergency services to recreational flying.² This paper understands general aviation in these wider terms, covering all civil aviation activity beyond scheduled commercial services.

Whichever definition is used, general aviation is generally defined by what it is not. This understanding of general aviation by exception can conceal significant differences. Encompassing a wide range of aircraft, operators and operating environments, from flight training to business aviation, it does not describe a single type of activity, user or risk environment. Rather, it functions as an umbrella category under which substantially different forms of aviation are grouped.

This presents analytical challenges. In practice, general aviation is often treated as a coherent sector, despite encompassing activities with substantially different operational characteristics and risk profiles. Aircraft and operators may use different infrastructure, face different levels of scrutiny and generate different patterns of movement, creating distinct opportunities for criminal misuse. Vulnerabilities identified in one segment cannot necessarily be generalised across the wider sector. As such, the paper seeks to treat general aviation as a set of distinct operating environments where possible, and to avoid generalising findings beyond what the evidence supports.

Acknowledgements

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2. UK Government, 'General Aviation Handbook', 19 May 2023, p. 4, <<https://www.gov.uk/government/publications/general-aviation-handbook>>, accessed 9 August 2026; UK Government, 'Consultation Outcome: Impact Assessment (Accessible)', 22 November 2023, <<https://www.gov.uk/government/consultations/advance-information-requirements-for-international-general-aviation-flights/impact-assessment-accessible>>, accessed 21 August 2026.

Executive Summary

Criminals are exploiting a border security blind spot in the skies over the UK and Benelux – using private jets, light aircraft and helicopters to move people and commodities across borders on unscheduled flights beyond the commercial airline system that most of the public uses. In 2025, in the UK alone, 77,316 general aviation flights arrived from abroad, illustrating the sheer volume of legitimate traffic into which criminal activity can blend – and the acute monitoring challenge facing authorities.

Criminal exploitation of general aviation is proven. From the use of a small aircraft to drop cocaine into rural Dorset, to the smuggling of migrants into Northamptonshire by a pilot with previous convictions for aviation-enabled drug trafficking, previous cases reveal a range of tactics. They show criminals playing both sides of the rulebook: some operate entirely outside the system through ghost flights, while others follow required procedures to pass as ordinary traffic, creating a ‘needle in the haystack’ challenge.

Misuse of the sector has been linked by UK and European law enforcement to the trafficking of drugs, people, firearms, cash and diamonds, yet authorities cannot confidently determine the extent of criminal exploitation. This paper argues that uncertainty around the scale of criminality in the sector is a strategic problem. In the UK, the paper also points to a striking imbalance in visibility and attention. While scheduled commercial aviation operates through highly visible, concentrated border controls, and politically prominent small-boat crossings are closely monitored and debated, the risks around small planes are far less scrutinised.

The uncertainty around criminality in the sector is often structural. Speed, flexibility and a lack of mandatory electronic conspicuity for all aircraft limit authorities’ visibility. Geography compounds the challenge: the UK has 3,135 recorded aerodromes, airfields and helipads, with as many as 538 approved to handle international flights, even after a significant recent reduction. Advance passenger information is self-declared and cannot always be physically verified; inspecting every flight across this network is neither operationally nor financially feasible.

Vulnerabilities differ across the region. The UK benefits from advance reporting for all international flights but must manage this across a dispersed network, while Benelux countries have fewer external border crossing points but more limited visibility of Schengen Area flights. Recent reforms have reduced gaps: the UK’s General Aviation

Regulations 2024 introduced mandatory digital reporting, with recorded non-compliance among inspected flights falling; Benelux countries have strengthened intelligence sharing and operational cooperation. Yet structural visibility challenges persist – and rates of non-compliance remain unknown among flights that are never inspected.

Drones are the fastest-growing part of the wider general aviation ecosystem. Identified criminal use in the UK and Benelux has so far been mainly domestic, focused on prison deliveries – but elsewhere, drones have been used to move drug payloads considerable distances across borders, pointing to a plausible trajectory as range and capabilities expand. Institutional responses must adapt; responsibilities remain fragmented across agencies, while regulation has often struggled to keep pace.

The consequences of general aviation misuse may extend beyond organised crime to wider national security. The sector's flexibility, dispersed infrastructure and visibility gaps create vulnerabilities relevant to illicit finance, sanctions evasion and hostile-state activity. High-profile investigations – notably into Jeffrey Epstein's use of private jets through UK airports – raise questions about other forms of potential exploitation. Addressing these gaps must form an increasing part of national security planning.

Overall, the paper argues that the issue deserves greater strategic attention. In the UK, recognised vulnerabilities and considerable government activity in key areas have not translated into a clear, shared long-term approach to general aviation, based on defined objectives, priorities and measures of success. With finite resources and significant focus on other border security challenges, clearer strategic direction is needed to guide investment, trade-offs and coordinated action.

At the heart of that approach should be greater visibility and a stronger evidence base, enabling authorities to better assess and respond to the threat across this critical part of the border security landscape, while recognising the needs of legitimate operators. The paper makes 10 recommendations to support that goal, including mandatory electronic conspicuity, expanded risk testing, stronger cross-border information sharing, a centralised register of pilot licence revocations and a dedicated multi-agency structure for criminal drone misuse.

Introduction

The criminal use of non-scheduled aircraft is often associated with drug trafficking in Latin America, conjuring images of cocaine flights crossing the Caribbean towards the US. Since at least the 1970s, organised criminal networks in the region have used light aircraft to move illicit commodities, including prominent trafficking organisations such as the Sinaloa Cartel.³ Private aircraft have also featured in transatlantic operations, as seen in the September 2024 seizure in Guinea-Bissau of a Gulfstream IV carrying 2.6 tonnes of cocaine.⁴ In this context, illegal exploitation of general aviation is recognised as a significant security challenge.

Criminal misuse of non-scheduled aircraft within Europe features less prominently in the public imagination. Yet, the same characteristics that make general aviation attractive for trafficking elsewhere – speed, flexibility, access to remote locations and comparatively limited scrutiny – also create opportunities for criminal actors across regional European routes.⁵ Understood as encompassing all civil aviation activity outside scheduled commercial services, from corporate jets to recreational flying, general aviation can facilitate intra-continental movement of drugs, cash, weapons and people across borders in ways that can be difficult to detect and monitor.

Across northern Europe, the challenge is recognised by law enforcement. The National Crime Agency's (NCA) 2025 National Strategic Assessment highlights the threat posed by 'criminals who have access to light aircraft and/or helicopters, which are capable of making flights to numerous airfields and suitable landing areas in the UK'.⁶ Similar

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3. Martin Verrier, 'The Invisible Air Force: The Increasing Threat of Drug Flights', RUSI Strategic Hub for Organised Crime Research, *The Informer* blog, 1 May 2020, <<https://www.rusi.org/networks/shoc/informer/invisible-air-force-increasing-threat-drug-flights>>, accessed 21 August 2026; Robert Beckhusen, 'The Sinaloa Cartel Has More Planes Than Mexico's Biggest Airline', *Vice*, 9 May 2016, <<https://www.vice.com/en/article/the-sinaloa-cartel-has-more-planes-than-mexicos-biggest-airline/>>, accessed 21 August 2026.
 4. *Reuters*, 'Guinea-Bissau Police Seize Over 2 Tons of Cocaine on Plane from Venezuela', 9 September 2024.
 5. European Commission, 'International Operation Cracks Down on General Aviation Trafficking', 2 April 2025, <https://fpi.ec.europa.eu/news/international-operation-cracks-down-general-aviation-trafficking-2025-04-02_en>, accessed 7 August 2026.
 6. National Crime Agency (NCA), 'National Strategic Assessment 2025 of Serious and Organised Crime', 2025, p. 12, <<https://www.nationalcrimeagency.gov.uk/images/campaign/NSA/PDFs/NSA%202025%20Website%20-%20PDF%20Version%20v1.0.pdf>>, accessed 30 May 2026.

concerns have emerged from recent investigations in Belgium and the Netherlands.⁷ Yet, general aviation remains comparatively underexamined in terms of its vulnerability to criminal exploitation.⁸

This paper examines the risk associated with illicit movement of goods and people via general aviation across the UK and Benelux (Belgium, the Netherlands and Luxembourg). The focus on the Benelux region reflects its wider significance as a major transport and logistics hub within European trafficking networks,⁹ rather than any prior assessment that general aviation misuse is necessarily more prevalent there.

Adopting a poly-threat perspective, the paper examines current knowledge on the use of general aviation to transport drugs, firearms, people, cash and other illicit commodities across the region, recognising the interconnected nature of criminal infrastructures and the convergence of threat domains. It has three objectives:

1. Assess current knowledge of how general aviation is used to enable transnational criminal activity.
2. Identify vulnerabilities that allow criminals to exploit general aviation from regulatory, enforcement and intelligence perspectives.
3. Evaluate existing responses and develop prioritised recommendations spanning policy, regulation and operational practice.

The paper's analysis focuses on the use of general aviation to facilitate international illicit movements between the UK and Benelux region. It does not examine purely domestic general aviation activity or seek to provide a comprehensive assessment of general aviation misuse across Europe. However, the paper recognises that general aviation misuse across the UK–Benelux corridor may form part of wider transnational illicit flows.

7. *Omroep Flevoland*, 'Cocaïnesmokkel via Lelystad Airport mislukt, drie verdachten veroordeeld' ['Cocaine Smuggling Via Lelystad Airport Fails, Three Suspects Convicted'], 23 May 2025, <<https://www.omroepflevoland.nl/nieuws/427993/cocainesmokkel-via-lelystad-airport-mislukt-drie-verdachten-veroordeeld>>, accessed 31 May 2026; Europol, 'Migrant Smugglers Using Private Aircraft Grounded in Belgium and Italy', 16 September 2022, <<https://www.europol.europa.eu/media-press/newsroom/news/migrant-smugglers-using-private-aircraft-grounded-in-belgium-and-italy>>, accessed 7 August 2026.

8. Author interview with representative of UK government agency, online, April 2026; author interview with representative of Dutch media outlet, online, June 2026.

9. Europol and the Security Steering Committee of the ports of Antwerp, Hamburg / Bremerhaven and Rotterdam, 'Criminal Networks in EU Ports: Risks and Challenges for Law Enforcement', 30 March 2023, <<https://www.europol.europa.eu/publications-events/publications/criminal-networks-in-eu-ports-risks-and-challenges-for-law-enforcement>>, accessed 30 May 2026.

The paper has three chapters. The first develops a picture of the compliant cohort in the general aviation sector across the UK and Benelux region, outlining the legitimate operating environment in which criminality occurs. The second chapter analyses evidence of criminal exploitation, key vulnerabilities and enabling conditions. The third chapter explores how far policy, regulatory and enforcement frameworks are equipped to detect and disrupt illicit activity. The paper concludes with recommendations for policymakers, regulators and operational partners to strengthen resilience against criminal misuse of general aviation. Throughout, risks linked to crewed general aviation and drones are considered separately, noting the distinct challenges and responses in each case.

Understanding the Compliant Cohort

To assess how organised crime exploits general aviation, an understanding of the legitimate operating environment in which illicit movements occur is required. It is likely that criminal misuse only accounts for a small part of a much larger ecosystem of lawful flights, operators and infrastructure. Appreciating the scale and diversity of this activity is central to understanding both the opportunities available to criminal actors and the challenges facing those seeking to disrupt them.

Operationally, the sector includes everything from light aircraft and helicopters to executive jets, alongside uncrewed aerial systems (drones), although the latter are analysed separately in this paper.¹⁰ Different aircraft and business models present distinct patterns of activity, while the profiles of those engaged in the sector are equally varied, ranging from private pilots, engineers and instructors to airfield staff, charter providers and fixed-base operators (FBOs).¹¹ The fundamental challenge for law enforcement is that of identifying illicit movements within a large volume of legitimate operations.

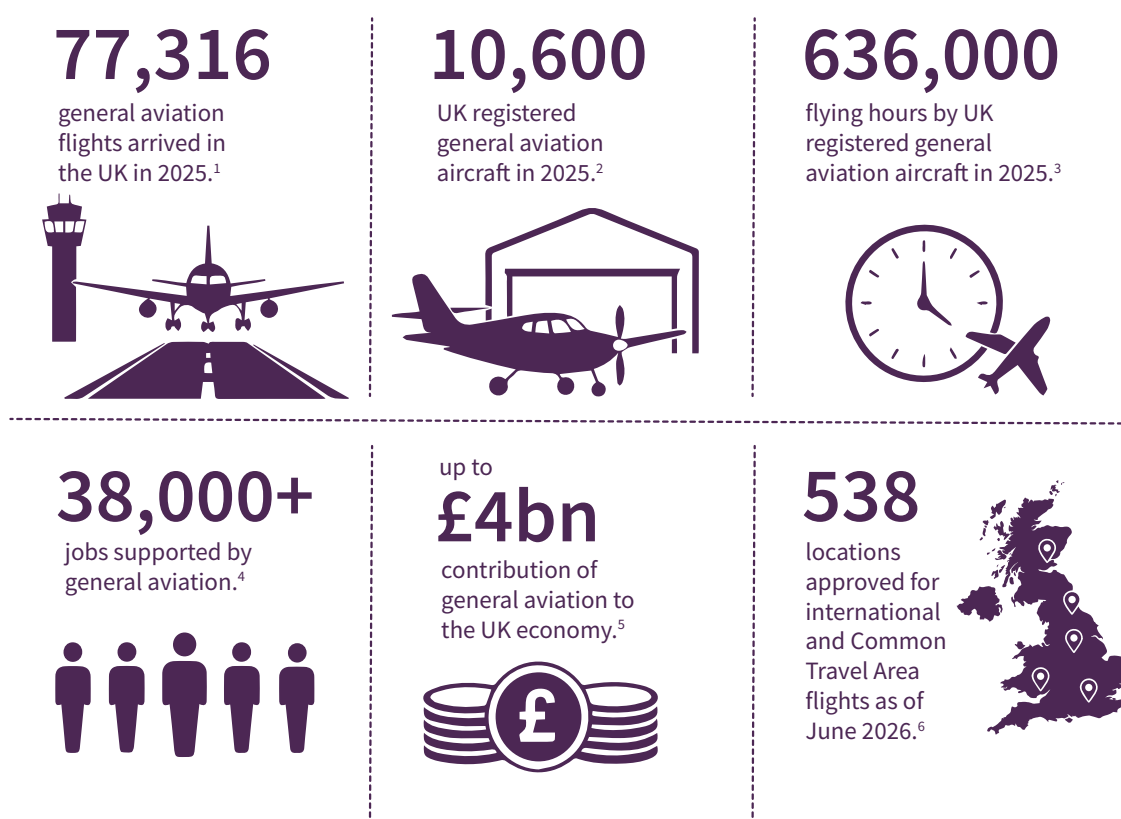
The regulatory and enforcement environment also varies across different segments. General aviation encompasses operations subject to different requirements depending on the type of aircraft, nature of the flight, operator and airfield involved. Business aviation, including private and charter jet operations, for example, generally operates within a more formalised environment, often using larger aerodromes and aircraft equipped with electronic conspicuity. By contrast, recreational and other segments may operate across a more diverse network of smaller landing sites, with different levels of infrastructure and enforcement presence.

10. European Commission, 'General Aviation', <https://transport.ec.europa.eu/transport-modes/air/internal-market/general-aviation_en>, accessed 30 May 2026.

11. UK Government, 'General Aviation Strategy', 26 March 2015, <<https://www.gov.uk/government/publications/general-aviation-strategy>>, accessed 21 August 2026; Paul Carroll et al., 'General Aviation Research', Department for Transport and Ipsos MORI, April 2021, <<https://assets.publishing.service.gov.uk/media/6116a4c18fa8f53dc5ce0f86/dft-general-aviation-research-report.odt>>, accessed 30 May 2026.

The scale of activity underscores the sector's relevance to border security. In 2019, Home Office estimates suggested that between 140,000 and 200,000 international general aviation flights operated to and from the UK annually.¹² More recently, Border Force reported 77,316 general aviation flights arriving in the UK in 2025 (although equivalent outbound figures were not provided).¹³ Comparable estimates could not be accessed in the Benelux countries, but the region maintains similarly advanced general aviation infrastructure. Combined with geographic proximity and strong transport connectivity, this results in a significant volume of routine cross-border activity.

Figure 1: General Aviation in the UK



Sources: 1 and 6. Official Border Force data provided to the author, June 2026; 2 and 3. UK Civil Aviation Authority (CAA), 'Annual Safety Review 2025', CAP 3297, 2026, <<https://www.caa.co.uk/publication/download/29548>>, accessed 17 August 2026; 4. UK Government, 'The Economic Value of General Aviation in the UK: Final Report', February 2015, <<https://www.gov.uk/government/publications/general-aviation-economic-value>>, accessed 30 May 2026; 5. UK Government, 'General Aviation Handbook', 2023, <<https://www.gov.uk/government/publications/general-aviation-handbook>>, accessed 9 August 2026. Generated by the author with AI.

12. UK Government, 'Consultation Outcome'.

13. Official data provided to the author by email by Border Force, June 2026.

General aviation is also a significant economic sector, encompassing flight training, maintenance, business aviation and leisure services. In the UK, it is estimated to contribute up to £4 billion to the economy, supporting over 38,000 jobs.¹⁴ In the EU, the European Business Aviation Association estimates that the sector supports approximately 450,000 jobs, contributing around €100 billion to European GDP in 2025.¹⁵ In this context, policymakers have generally sought to promote growth and streamline regulation in a bid to boost competitiveness and, in some cases, address the sector's perceived historical neglect.¹⁶

In the UK, successive strategies, including the 2015 General Aviation Strategy and 2021 General Aviation Roadmap, have prioritised deregulation and reduced administrative burden in a bid to make the country the 'best place in the world for general aviation'¹⁷ – an approach that has enjoyed strong ministerial backing.¹⁸ A broadly similar emphasis is evident in the EU, where EU Aviation Safety Agency and European Commission initiatives have consistently promoted 'better and lighter regulation',¹⁹ while encouraging greater consistency across member states. The result is a set of tensions between facilitating a competitive sector and managing the security risks posed by a highly mobile, decentralised and non-scheduled form of transport.²⁰

Although distinct from crewed general aviation, any contemporary assessment must consider drones as an increasingly significant part of the sector. Rapid advances in capability and affordability have transformed drones into a mainstream platform supporting a growing range of recreational and commercial applications.²¹ In January 2023, the UK's Civil Aviation Authority (CAA) reported around 500,000 registered operators and flyers under its Drone and Model Aircraft scheme, and said it processed 7,000 authorisation applications each year.²² The scale of this community is striking: the CAA estimated at the time that it was already '80% larger than the

14. UK Government, 'General Aviation Handbook'.

15. Róman Kok, 'Europe is Shaping its Aviation Future', European Business Aviation Association, 28 May 2026, <<https://www.ebaa.org/news/europe-is-shaping-its-aviation-future-business-aviation-cannot-afford-to-be-an-afterthought>>, accessed 21 August 2026.

16. Carroll et al., 'General Aviation Research'.

17. UK Government, 'General Aviation Strategy'; UK Government, 'General Aviation Roadmap', Spring 2021, p. 7, <<https://www.gov.uk/government/publications/general-aviation-roadmap>>, accessed 30 May 2026.

18. UK Government, 'General Aviation Strategy'; Grant Shapps, 'An Electric Revolution in the Skies', speech given at Cranfield University, 19 September 2019, <<https://www.gov.uk/government/speeches/an-electric-revolution-in-the-skies>>, accessed 30 May 2026.

19. EU Aviation Safety Agency, 'GA Roadmap: Moving Towards Implementation: 2018 Update', 2018, p. 2, <<https://www.easa.europa.eu/en/downloads/46282/en>>, accessed 30 May 2026.

20. Author interviews with representatives of UK government agencies, online, June 2026; author interview with liaison officer to a European agency, online, March 2026.

21. Anna Jackman and Louise Hooper, 'Drone Incidents and Misuse: Legal Considerations', University of Reading, December 2023, <https://research.reading.ac.uk/drone-geographies/wp-content/uploads/sites/271/2023/12/Drone-incidents_Jackman-Hooper.pdf>, accessed 7 August 2026.

22. *Ibid.*

General Aviation and commercial air sector added up'.²³ The change in this picture over time can be seen in Table 1.

Table 1: Drone Flyers and Operators Reported to be Registered With the CAA

	Number of drone flyers and operators
31 March 2023	513,860
30 June 2024	601,980
28 February 2025	720,000
30 May 2026	950,000

Sources: CAA, 'Annual Safety Review 2022', CAP 2590, September 2023, p. 18, <<https://www.caa.co.uk/publication/download/20660>>, accessed 17 August 2026; CAA, 'Annual Safety Review 2023', CAP 3035, September 2024, p. 22, <<https://www.caa.co.uk/publication/download/23012>>, accessed 17 August 2026; CAA 'Annual Safety Review 2024', CAP 3146, August 2025, p. 25, <<https://www.caa.co.uk/publication/download/25631>>, accessed 17 August 2026; CAA, 'Annual Safety Review 2025', CAP 3297, August 2026, p. 24, <<https://www.caa.co.uk/publication/download/29548>>, accessed 17 August 2026.

Policymakers have sought to promote the economic benefits of drone technology while addressing security risks. In the UK, across a drone sector forecast to be worth up to £103 billion by 2050,²⁴ policy has focused on accelerating commercial adoption through advanced air mobility, drone deliveries and related applications, while strengthening regulatory and enforcement frameworks to counter misuse. In May 2026, the government announced a £50-million package supporting both objectives, investing in drone innovation alongside remote ID technology to help authorities identify unlawful operators.²⁵

EU policymakers have similarly sought to balance innovation with security. The European drone ecosystem counted more than 2.5 million registered operators by the end of November 2025, an increase of over 25% in a single year – and of over 260% in four years (see Figure 2).²⁶ Since 2003, the EU has invested almost €980 million in drone

23. Westminster Business Policy Forum, 'Next Steps for Drone Regulation and Use in the UK', 31 January 2023, <<https://www.scotlandpolicyconferences.co.uk/forums/agenda/Drones-23-agenda.pdf>>, accessed 2 July 2026; Jackman and Hooper, p. 6.

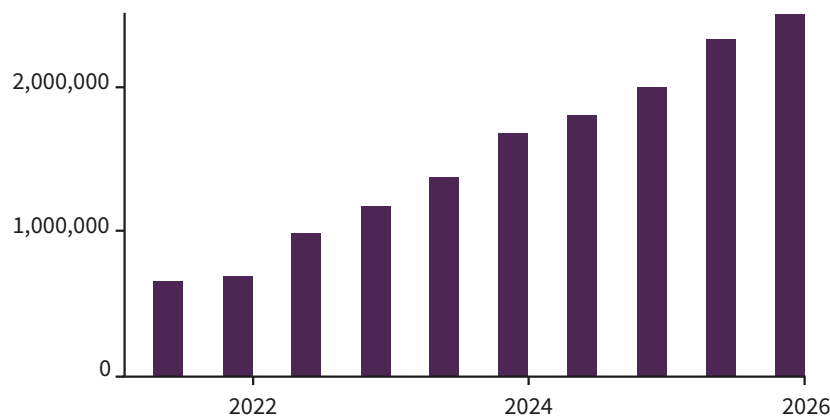
24. UK Government, 'Nearly £50 Million Government Backing to Power Up Drone and Flying Taxi Tech and Crack Down on Illegal Drones', press release, 5 May 2026, <<https://www.gov.uk/government/news/nearly-50-million-government-backing-to-power-up-drone-and-flying-taxi-tech-and-crack-down-on-illegal-drones>>, accessed 21 August 2026.

25. *Ibid.*

26. European Commission, 'Communication from the Commission to the European Parliament and the Council: Action Plan on Drone and Counter Drone Security', COM(2026) 81, 11 February 2026, <[https://ec.europa.eu/transparency/documents-register/detail?ref=COM\(2026\)81&lang=en](https://ec.europa.eu/transparency/documents-register/detail?ref=COM(2026)81&lang=en)>, accessed 7 August 2026.

innovation,²⁷ with the commercial airborne drone market projected to reach over €14 billion by 2030 and more than €50 billion by 2033.²⁸ Alongside market growth, the European Commission's 2026 Action Plan on Drone and Counter Drone Security established an updated framework of regulatory, operational and security measures to counter malicious drone use.²⁹

Figure 2: Registered Drone Operators in the EU



Source: EU Aviation Safety Agency, 'IAM Hub Drone Economy Dashboard: Registered Drone Operators', <<https://experience.arcgis.com/experience/d0ee9539dcae4b01b60532d757c97bc8>>, accessed 17 August 2026.

Legitimate cross-border drone operations remain uncommon. Most commercial applications remain domestic, although recent guidance³⁰ and regulatory approvals suggest gradual movement towards more routine, cross-border beyond-visual-line-of-sight operations. In 2025, UK and Norwegian authorities approved drone manufacturer Windracers to conduct the UK's first international civil drone operation between Shetland and Norway, marking a regulatory milestone for cross-border autonomous aviation.³¹

27. European Commission, 'Communication from the Commission to the European Parliament, the Council, the European Social and Economic Committee and the Committee of the Regions: 'A Drone Strategy 2.0 for a Smart and Sustainable Unmanned Aircraft Eco-System in Europe', COM(2022) 652, 29 November 2022, <<https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52022DC0652>>, accessed 3 September 2026.
28. European Commission, 'Communication from the Commission to the European Parliament and the Council: Action Plan on Drone and Counter Drone Security', p. 1.
29. *Ibid.*
30. EU Aviation Safety Agency, 'Drone Guidance Extended and Updated to Support Safe Drone Operations in EASA Member States', 9 February 2022, <<https://www.easa.europa.eu/en/newsroom-and-events/news/drone-guidance-extended-and-updated-support-safe-drone-operations-easa>>, accessed 7 August 2026.
31. Dominic Perry, 'Windracers Gains UK and Norwegian Approval for Ultra Mk2 Delivery Flight', *Flight Global*, 26 September 2025, <<https://www.flightglobal.com/civil-uavs/2025/09/windracers-gains-uk-and-norwegian-approval-for-ultra-mk2-delivery-flight/>>, accessed 7 August 2026.

Taken together, the features outlined in this chapter point to an economically significant and operationally complex ecosystem in which efforts to enable growth and innovation are increasingly intertwined with the need to anticipate, detect and mitigate evolving security risks.

Criminal Misuse of General Aviation: The Current Landscape

Concerns over criminal exploitation of general aviation are longstanding. Across the UK and Benelux, law enforcement agencies have regularly identified the sector as vulnerable to organised crime. This reflects key sectoral characteristics: non-scheduled flights can provide rapid point-to-point movement, access to a wide range of landing sites and the ability to operate outside fixed routes and timetables. For criminals seeking flexibility and discretion, these features can provide an attractive complement to other trafficking methods.

The UK and the Benelux region provide a useful case study given their interconnected transport networks. The Netherlands and Belgium also occupy central positions within European criminal economies, supported by major port, logistical and transport infrastructure. The UK, despite its geographic separation from continental Europe, remains closely connected through short-distance aviation and other links, creating opportunities for mode-switching and rapid illicit movement between jurisdictions.

Concerns over criminal misuse of general aviation have long been reflected in UK and European threat assessments. In 2017, the NCA highlighted the use of general aviation to traffic cocaine, heroin and MDMA.³² In 2018, the Agency pointed to criminal investment in aircraft acquisition and hire to move commodities and people, including migrant smuggling.³³ Its 2019 National Strategic Assessment referenced the largest seizure of cocaine then recorded through general aviation – 500 kg of cocaine from a

32. NCA, 'National Strategic Assessment of Serious and Organised Crime 2017', p. 7, <<https://www.nationalcrimeagency.gov.uk/who-we-are/publications/32-national-strategic-assessment-of-serious-and-organised-crime-2017/file>>, accessed 28 June 2026.

33. NCA, 'National Strategic Assessment of Serious and Organised Crime 2018', p. 20, <<https://www.nationalcrimeagency.gov.uk/who-we-are/publications/173-national-strategic-assessment-of-serious-and-organised-crime-2018/file>>, accessed 28 June 2026.

private jet at Farnborough Airport – with concerns over criminal exploitation of this mode repeated in the NCA’s 2025 assessment.³⁴

European authorities have raised similar issues. Europol and EU member state agencies have identified the risk of general aviation use to move goods and people illegally, amid high volumes of legitimate traffic transiting small airfields.³⁵ As early as 2011, Europol reported an expanding range of commodities trafficked by light aircraft – from bulk cash to diamonds – alongside increasing numbers of suspicious flights between EU member states.³⁶ Recent cases show that private aircraft continue to feature in criminal operations within and beyond the EU. In the Netherlands, a 2023 case involving an alleged plot to import two tonnes of cocaine by private jet through Lelystad Airport resulted in the conviction of three Dutch nationals in 2025.³⁷

Yet, known cases provide only a partial picture. Publicly identifiable incidents are shaped by intelligence priorities and the ability of authorities to detect offending. As such, it is not possible to determine whether identified cases represent isolated examples or a broader pattern of offending.

This uncertainty has contributed to calls for a stronger evidence base. In the UK, a 2015 inspection by the Independent Chief Inspector of Borders and Immigration found that ‘levels of knowledge and understanding of the threats and risks remained generally poor’, calling for greater efforts to improve the evidence base.³⁸ Knowledge gaps have similarly been reported in the Netherlands.³⁹ Although advances have been made across the UK and Benelux, accurately assessing the threat remains challenging: while random inspection regimes are in place, general aviation flights are not routinely met on arrival, with the sector’s decentralised infrastructure making anomalous activity difficult to identify.⁴⁰

34. NCA, ‘National Strategic Assessment of Serious and Organised Crime 2019’, p. 30, <<https://www.nationalcrimeagency.gov.uk/who-we-are/publications/296-national-strategic-assessment-of-serious-organised-crime-2019/file>>, accessed 28 June 2026; NCA, ‘National Strategic Assessment 2025 of Serious and Organised Crime’, p. 12.

35. Europol, ‘Migrant Smugglers Using Private Aircraft Grounded in Belgium and Italy’.

36. Europol, ‘Cash, Diamonds, Drugs, Firearms & People Smuggled in Small Airplanes’, 25 January 2011, <<https://www.europol.europa.eu/media-press/newsroom/news/cash-diamonds-drugs-firearms-people-smuggled-in-small-airplanes>>, accessed 7 August 2026.

37. Netherlands Public Prosecution Service, ‘Tot 80 maanden cel na procesafspraken met verdachten van cocaïnehandel’ [‘Up to 80 Months in Prison After Trial Agreements with Cocaine Trafficking Suspects’], 23 May 2025, <<https://www.om.nl/actueel/nieuws/2025/05/23/tot-80-maanden-cel-na-procesafspraken-met-verdachten-van-cocainehandel>>, accessed 28 June 2026.

38. Independent Chief Inspector of Borders and Immigration, ‘An Inspection of General Aviation and General Maritime: February–July 2015’, January 2016, <<https://www.gov.uk/government/news/an-inspection-of-general-aviation-and-general-maritime-february-to-july-2015>>, accessed 28 June 2026.

39. L de Veen et al., ‘Je ziet ze (niet) vliegen: Actieonderzoek naar ondermijning op en rondom kleine vliegvelden in Nederland’ [‘You (Don’t) See Them Flying: Action Research into Criminal Activity at and Around Small Airfields in the Netherlands’], 4 April 2024, <<https://acvresearch.nl/pdfviewer/je-ziet-ze-niet-vliegen/>>, accessed 7 August 2026.

40. Author interviews with liaison officers to a European agency, online, March 2026.

This lack of visibility limits the ability to assess whether general aviation presents a greater or lesser threat than other transport modes. Much criminal activity is clandestine, and trafficking takes place through multiple channels – including general maritime,⁴¹ scheduled aviation and maritime – but the scale of criminal activity is difficult to compare across them. In areas such as irregular small-boat migration, criminal use is more visible. In the case of general aviation, however, interviewees highlighted that the scale and nature of criminal exploitation is still poorly understood.⁴²

Structural Characteristics that Limit Visibility

Several characteristics of general aviation contribute to the visibility challenge. Chief among them is its non-scheduled and flexible nature. Operators can arrange movements at short notice and select from a wide range of departure and arrival locations. Flight plans may be amended after take-off for operational, meteorological or safety reasons.⁴³ And while such changes can be legitimate – as for scheduled aviation – the lack of routine assurance of flight plan compliance can allow unauthorised deviations or false declarations to go undetected.⁴⁴

Speed compounds the challenge. Modern light aircraft and helicopters can complete short international journeys rapidly. Flights between the UK and Benelux countries, for example, can be completed in under an hour, compressing the time for intelligence to be assessed, risks evaluated and operational responses coordinated before aircraft land.⁴⁵

The challenge is deepened by incomplete electronic visibility. Although electronic conspicuity is increasingly encouraged and is mandatory in some operational contexts, no universal requirement exists for all general aviation aircraft to carry transponders or continuously broadcast their position outside controlled airspace.⁴⁶ This means that authorities may have limited awareness of some movements, reducing their ability to identify anomalous activity or unauthorised route deviations – while also making wholly non-compliant activity harder to identify.

41. The Home Office describes general maritime as ‘all unscheduled, uncanalised international maritime traffic, and scheduled uncanalised international non-passenger services, whether operated commercially or for pleasure and leisure’, including cargo ships, tankers, fishing boats, yachts and rigid hull inflatable boats. See Independent Chief Inspector of Borders and Immigration, ‘An Inspection of General Maritime: October 2024 – February 2025’, October 2025, p. 17, <<https://www.gov.uk/government/publications/an-inspection-of-general-maritime-october-2024-february-2025>>, accessed 24 August 2026.

42. Author interview with representative of UK government agency, online, April 2026.

43. UK Government, ‘General Aviation Guidance (Accessible)’, June 2026, <<https://www.gov.uk/government/publications/general-aviation-operators-and-pilots-notification-of-flights/general-aviation-report-guidance-accessible>>, accessed 28 June 2026.

44. Author interview with representative of UK government agency, online, April 2026.

45. Author interview with representative of international organisation, online, May 2026; author interviews with representatives of UK government agencies, online, April 2026.

46. *Ibid.*

The dispersed nature of general aviation infrastructure further complicates oversight. The UK illustrates the scale of this challenge, with 3,135 recorded aerodromes, airfields and helipads – ranging from major regional airports and business aviation facilities to former military airfields and privately owned farm strips – used by different general aviation segments.⁴⁷ This extensive network benefits legitimate users but creates practical issues for agencies charged with overseeing it.⁴⁸ Historically, many flights arrive at, or depart from, airfields with no permanent border control or police presence. As the Home Office observed in 2023, this has long posed ‘a significant challenge in securing complete physical coverage of the border’.⁴⁹

Recognising the issues, Border Force substantially reduced the number of aerodromes authorised to handle international and Common Travel Area (CTA) flights from January 2024.⁵⁰ Around 16% of recorded sites remained designated for international arrivals at that point, representing a significant strengthening of the border control framework.⁵¹

Even so, the remaining network remains extensive. As of June 2026, 538 locations were approved to receive international and CTA flights.⁵² This contrasts with the Benelux countries. For example, Belgium – although not directly comparable because of its smaller size – designates only six of a reported 117 general aviation airfields as border crossing points for flights to and from countries outside the Schengen Area.⁵³ While UK airfield operators must undergo a range of processes to become regulated and to be approved to receive international flights,⁵⁴ for border agencies, maintaining operational presence across hundreds of airfields continues to present significant resource and assurance challenges.

47. UK Parliament, ‘Aviation: Facilities. Question for Home Office’, UIN 17809, tabled on 11 March 2024, <<https://questions-statements.parliament.uk/written-questions/detail/2024-03-11/17809>>, accessed 5 July 2026.

48. UK Government, ‘General Aviation Airfields Study: Resilience Test 2021’, March 2021, <<https://www.gov.uk/government/publications/general-aviation-sector-and-airfields-studies>>, accessed 7 August 2026.

49. UK Government, ‘General Aviation: Advance Information Requirements for International Flights: Government Consultation’, 22 November 2023, <<https://www.gov.uk/government/consultations/advance-information-requirements-for-international-general-aviation-flights/general-aviation-consultation-on-advance-information-requirements-for-international-flights-accessible>>, accessed 28 June 2026.

50. UK Parliament, ‘Aviation’.

51. UK Government, ‘The Home Office Response to the Independent Chief Inspector of Borders and Immigration’s Report: An Inspection of Border Force’s Operational Response to General Aviation Flights at London City Airport’, 26 March 2024, <<https://www.gov.uk/government/publications/response-to-a-spot-check-inspection-of-operations-at-london-city-airport/the-home-office-response-to-the-independent-chief-inspector-of-borders-and-immigrations-report-an-inspection-of-border-forces-operational-respo>>, accessed 28 June 2026.

52. Official data provided to the author by email by Border Force, June 2026.

53. Federal Police, ‘General Declaration’, <<https://www.police.be/bordercontrol/en/general-declaration>>, accessed 28 June 2026. In the Netherlands, a limited number of official border crossing points that can be used for general aviation flights to and from non-Schengen countries is set out in Royal Netherlands Marechaussee, ‘Border Crossing Points’, <<https://english.marechaussee.nl/topics/b/border-crossing-points>>, accessed 17 August 2026.

54. UK Government, ‘General Aviation Guidance (Accessible)’.

Figure 3: Structural Characteristics of General Aviation that Limit Visibility

	Non-scheduled and flexible movements	Flights can be arranged at short notice, outside scheduled timetables, and to and from a wide range of arrival and departure locations.
	Speed of travel	UK–Benelux journeys can take under an hour, leaving authorities limited time to assess intelligence and coordinate operational responses.
	Incomplete visibility	Electronic conspicuity is mandatory in some operational contexts, but no universal requirement exists for all aircraft to carry transponders.
	Dispersed infrastructure	Different general aviation types use a range of sites; 538 UK locations are approved to handle international and Common Travel Area flights.
	Resourcing and border presence	For border agencies, sustaining effective coverage across hundreds of airfields places significant demands on resources and operational capacity.
	Gaps in advance reporting assurance	Advance reporting relies on self-declared information that cannot always be verified, allowing non-compliance to go undetected.

Source: The author.

Advance Passenger Information and Residual Vulnerabilities

Advance passenger information (API) represents one of the principal mechanisms available to improve visibility of general aviation movements. By requiring operators to submit passenger details before arrival or departure, authorities can identify individuals of interest, assess risk and determine whether operational intervention is required. However, the extent of this visibility varies between the UK and Benelux countries, creating different patterns of criminal opportunity.

All international general aviation movements to and from the UK are required to submit General Aviation Reports (GAR),⁵⁵ providing Border Force with relevant passenger information before arrival. Belgium, the Netherlands and Luxembourg similarly require General Declarations for flights crossing the external Schengen border, including to and from the UK.⁵⁶ However, intra-Schengen movements are generally not subject to equivalent reporting requirements,⁵⁷ with less pre-arrival information available to authorities to support risk assessment.⁵⁸

These arrangements create distinct issues. The UK benefits from advance reporting for all international arrivals but must manage this across a large network of authorised airfields. By contrast, Benelux countries operate with fewer external border crossing points but have limited visibility over flights moving between Schengen states.

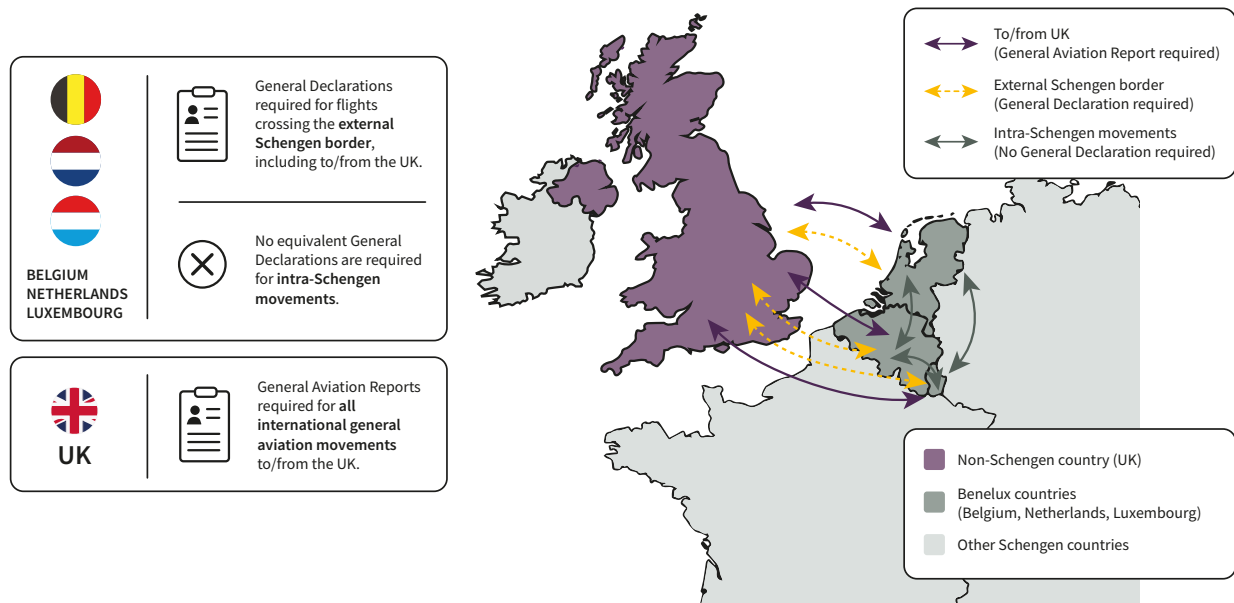
55. UK Government, 'General Aviation Guidance (Accessible)'. UK Government, 'Submit a General Aviation Report (GAR)', <<https://www.submit-general-aviation-report.service.gov.uk/welcome/index>>, accessed 13 July 2026.

56. See, for example, Federal Police, 'General Declaration'.

57. See European Parliament and European Council, 'Regulation (EU) 2016/399 of the European Parliament and of the Council of 9 March 2016 on a Union Code on the Rules Governing the Movement of Persons Across Borders (Schengen Borders Code) (Codification)', *Official Journal of the European Union* (L 77/1, 23 March 2016). This regulation states that private flights from third countries must transmit to the border guards of the member state of destination (or of first entry), prior to take-off, a general declaration comprising a flight plan in accordance with Annex 2 to the Convention on International Civil Aviation and information concerning the passengers' identity.

58. Author interview with representative of international organisation, online, May 2026.

Figure 4: Advance Passenger Information Reporting Requirements by Country



Sources: UK Government, 'General Aviation Guidance (Accessible)', June 2026, <<https://www.gov.uk/government/publications/general-aviation-operators-and-pilots-notification-of-flights/general-aviation-report-guidance-accessible>>, accessed 28 June 2026; Federal Police, 'General Declaration', <<https://www.police.be/bordercontrol/en/general-declaration>>, accessed 28 June 2026; Royal Netherlands Marechaussee, 'Reporting Requirements for General Aviation', <<https://english.marechaussee.nl/topics/r/reporting-requirements-for-general-aviation>>, accessed 17 August 2026; Police Lëtzebuerg, 'General Declaration', <<https://police.public.lu/content/dam/police/fr/police-se-presente/poste-unites-police/service-centraux/upa/general-declaration-lux-v3.pdf>>, accessed 17 August 2026. Generated by the author with AI.

Ultimately, API is crucial for managing risk, allowing authorities to assess flights and direct resources to meet those raising greatest concern. However, the system relies on timely and accurate self-declared information. Unless reports are verified through physical intervention or other means, inaccurate passenger details or other forms of non-compliance may go undetected.

This reflects the operational realities of general aviation. Given the scale and dispersed nature of the sector, it is neither operationally nor financially feasible for authorities to meet and inspect every flight. As interviewees observed, even a well-functioning system cannot provide complete assurance where universal verification is impossible, leaving residual vulnerabilities that must be managed.⁵⁹

59. Author interviews with representatives of UK government agencies, online, April 2026; author interviews with liaison officers to European agency, online, March 2026.

Extent of Exploitation

The extent to which these vulnerabilities are exploited is unclear. In the absence of a fuller evidential picture, there is limited consensus on the true scale of criminal abuse of the sector. Nor is there any reliable estimate of the proportion of general aviation movements that involve criminal activity, with relevant stakeholders differing in their assessment of the threat.

Some interviewees viewed general aviation as a potentially widely exploited mode, highlighting the characteristics outlined above as attractive features for high-value trafficking. Others caution against overstating the problem: in the UK, interviewees noted that documented cases are limited relative to the volume of legitimate activity.⁶⁰ In the Netherlands, experts have similarly pointed to relatively low numbers of detected incidents at small airports.⁶¹ However, given the visibility challenges outlined above, absence of evidence cannot be interpreted as evidence of absence.

Uncertainty extends across the two principal serious and organised crime cohorts discussed in operational terms (see Figure 5). The first involves wholly non-compliant activity – which takes place outside normal regulatory and surveillance frameworks – including ghost flights, for which no flight plan, GAR or other relevant documentation is submitted and whose transponders are inactive.⁶² The second involves actors operating ostensibly in line with required procedures, presenting a ‘needle in the haystack’ challenge.⁶³ Neither cohort can currently be quantified with confidence.

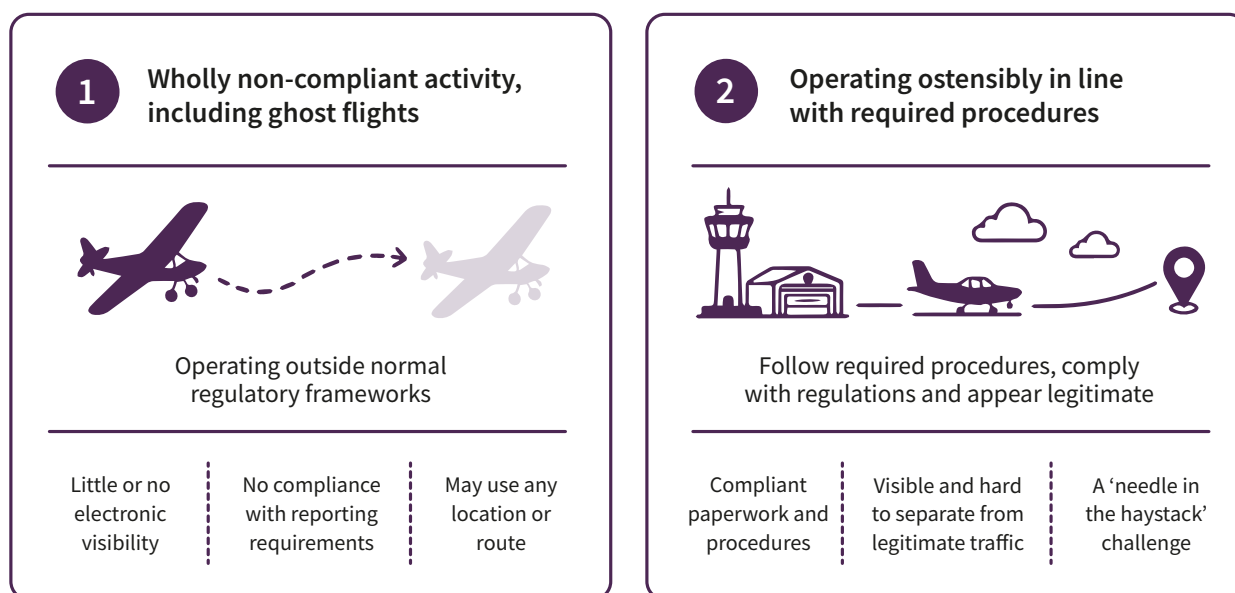
60. *Ibid.*

61. de Veen et al., ‘Je ziet ze (niet) vliegen’ [‘You (Don’t) See Them Flying’].

62. Ghost flights should not be confused with cloned flights, which use identifiers belonging to other aircraft, potentially including the aircraft registration, and may therefore appear compliant.

63. Author interview with representative of UK government agency, online, April 2026.

Figure 5: Principal Organised Crime Cohorts Exploiting General Aviation



Source: The author. Generated with AI.

In this context, limited insights can be gleaned from known cases, some of which have culminated in successful prosecutions. They span a range of criminal methodologies across both cohorts outlined above. At one end of the spectrum are operations that sit largely outside the regulatory framework. In a case resulting in convictions in 2025, a criminal group allegedly used a small aircraft to transport cocaine by dropping packages into a rural area in Dorset. The aircraft was reported to have disabled its transponder, avoided normal surveillance and entered UK airspace without the required documentation.⁶⁴

At the other end are operations designed to blend into legitimate general aviation activity. The 2018 Farnborough Airport cocaine seizure involved a private jet arriving through one of the UK's largest business aviation facilities. The investigation identified substantial financial backing and organised logistics, including a convoy of vehicles waiting on the ground to receive the drugs.⁶⁵

Further examples demonstrate how legitimate aviation processes can be abused. One case involved two individuals who were convicted in 2025 after attempting to import 30 kg of cocaine, worth £2.4 million, using a light aircraft from Belgium to North Weald in Essex. The drugs were concealed beneath passenger seating. Unlike the Dorset case,

64. Andy Jones, 'Gang Use Small Aircraft to Drop Cocaine into Dorset', *Daily Echo*, 18 March 2025, <<https://www.bournemouthcho.co.uk/news/25015635.gang-use-small-aircraft-drop-cocaine-dorset/>>, accessed 28 June 2026.

65. *BBC News*, 'Farnborough Airport Cocaine: Four Guilty of Smuggling', 23 August 2018.

the aircraft operated with its transponder active and followed expected cross-border procedures.⁶⁶

The UK–Benelux corridor has featured in other cases. In 2016, authorities disrupted a criminal group that had hired a helicopter to transport around £12 million of cocaine and heroin from Belgium to the UK. The aircraft descended below radar coverage to make a non-scheduled stop in Kent before continuing to Redhill Aerodrome.⁶⁷ The two Dutch and one British national involved received combined sentences of 52 years.⁶⁸

General aviation has also been used for migrant smuggling. In 2023, three men were convicted after attempting to transport four Albanian migrants from Belgium to Deenethorpe Airfield in Northamptonshire by twin-engine plane. The pilot had previous convictions for aviation-enabled drug trafficking, including transporting ecstasy from Belgium and dropping cannabis into Jersey.⁶⁹ However, interviewees assessed that general aviation is unlikely to be used to facilitate immigration crime at scale, given the limited carrying capacity of most aircraft, the high cost involved, and the specialist skills and equipment required.⁷⁰

Together, these cases demonstrate that flights across the UK–Benelux corridor have been exploited for criminal movement, but do not allow conclusions about the relative prevalence of routes, methods or commodities. Publicly reported cases are dominated by cocaine trafficking, but reflect detected and prosecuted activity rather than necessarily the full scale of exploitation. Nor it is possible to compare prevalence with other transport modes, with interviewees differing on this point. Some emphasised the lower passenger volumes in general aviation relative to those passing through major scheduled aviation and maritime entry and exit points such as Heathrow and Dover,⁷¹ while others pointed to the greater enforcement presence at those locations, cautioning against drawing conclusions from raw numbers alone.⁷²

66. Aimee Dexter, 'Pilot Jailed After £2.4m Worth of Cocaine Found', *BBC News*, 24 September 2025.

67. William Watkinson, 'Helicopter Drug Smugglers Who Brought £12m of Cocaine and Heroin, Jailed After 100mph Chase', *International Business Times*, 9 September 2016, <<https://www.ibtimes.co.uk/helicopter-drug-smugglers-who-brought-12m-cocaine-heroin-jailed-after-100mph-chase-1580612>>, accessed 7 August 2026.

68. VRT News, 'Gangsters Who Used Helicopter to Fly Drugs into the UK from Belgium Jailed', 10 September 2016, <https://www.vrt.be/vrtnws/en/2016/09/10/gangsters_who_used_helicopter_to_fly_drugs_into_the_uk_from_belgium_jailed-1-2763949/>, accessed 7 August 2026.

69. NCA, '“I Normally Get Arrested for Drugs” – Pilot Joked With Officers After Arrest Over Botched People Smuggling Attempt', 28 April 2023, <<https://nca-newsroom.prgloo.com/news/i-normally-get-arrested-for-drugs-pilot-joked-with-officers-after-arrest-over-botched-people-smuggling-attempt>>, accessed 7 August 2026; Caroline Lowbridge, 'Pilots and Taxi Driver Jailed for Smuggling Migrants', *BBC News*, 28 April 2023.

70. Author interview with representative of UK government agency, online, April 2026.

71. Author interview with representative of European member state government agency, telephone, May 2026.

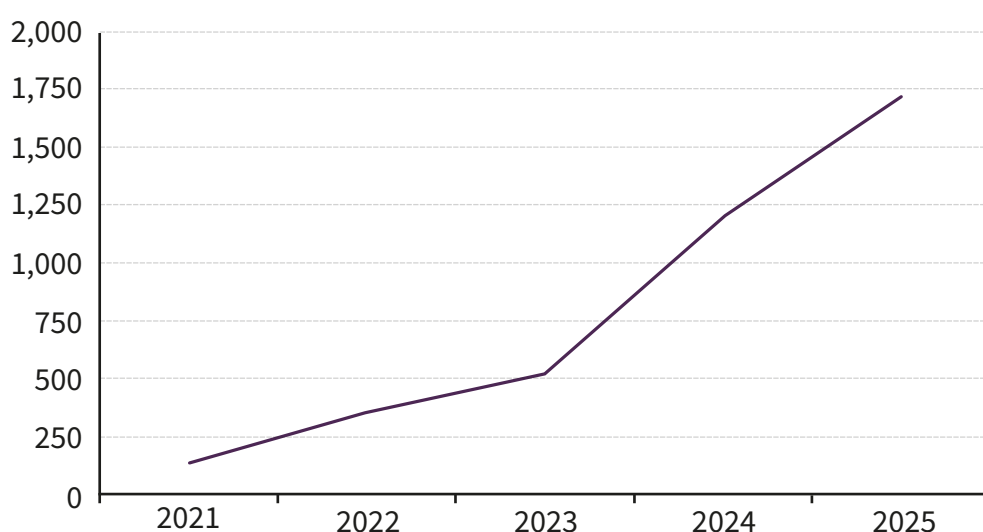
72. Author interview with representative of UK government agency, online, April 2026.

Drones: An Emerging Challenge

Criminal use of drones represents a distinct challenge. Whereas identified cases in crewed general aviation have involved cross-border movement, documented criminal drone use across the UK and Benelux has primarily been domestic.

In the UK, incidents are primarily associated with prisons, where drones have been used to deliver drugs, mobile phones and weapons. HM Prison and Probation Service recorded 1,712 drone incidents in prisons in the year to March 2025 – a 43% increase on the previous year (see Figure 6).⁷³ One case involved two individuals convicted after using drones to deliver illicit items to prisons on more than 100 occasions.⁷⁴

Figure 6: Number of Drone Incidents in Prisons in England and Wales, 12 Months Ending March 2021 to 12 Months Ending March 2025



Source: UK Government, 'HMPPS Annual Digest 2024–25', 27 June 2026, <<https://www.gov.uk/government/statistics/hmpps-annual-digest-april-2024-to-march-2025/hmpps-annual-digest-2024-to-2025--2>>, accessed 28 August 2026.

73. UK Government, 'Counter-Drone Efforts Rise as Prison Sightings Revealed', press release, 31 July 2025, <<https://www.gov.uk/government/news/counter-drone-efforts-rise-as-prison-sightings-revealed>>, accessed 6 July 2026.

74. *Inside Time*, 'Pair Flew Drugs and Knives Via Drone into 17 Prisons', 19 September 2025, <<https://insidetime.org/newsround/pair-flew-drugs-and-knives-via-drone-into-17-prisons/>>, accessed 7 August 2026.

Similar patterns have been observed in the Benelux countries. In the Netherlands, one operator sentenced in 2026 was found to have conducted around 70 drone flights supplying drugs and phones into prisons.⁷⁵ Belgium has experienced persistent drone incursions at facilities such as Haren and Turnhout prisons, prompting investment in counter-drone technology.⁷⁶ The Netherlands has also expanded detection capabilities and legal powers to disrupt hostile drone activity.⁷⁷

These incidents suggest that criminal drone use is currently focused on overcoming physical security at fixed domestic sites rather than facilitating cross-border trafficking. However, developments elsewhere show how quickly this could change. Around the Strait of Gibraltar, drone-enabled trafficking is well documented, with criminal groups using increasingly capable platforms. In 2024 and 2025, Spanish investigations highlighted the growing sophistication of criminal operations, ranging from drones capable of carrying around 10 kg over distances of 50 km, to modified fixed-wing platforms able to cover over 200 km.⁷⁸ In one case, authorities identified the coordinated use of multiple drones, with one criminal group reportedly able to transport around 200 kg of hashish in a single night.⁷⁹

The Gibraltar corridor differs materially from the UK–Benelux environment. However, these developments suggest that today’s apparently domestic pattern of organised criminal drone use should not be viewed as permanent. Rather, they illustrate a plausible trajectory through which improvements in range, payload and autonomy

75. NOS Nieuws, ‘Taakstraf en boete voor man die met drones drugs dropte in gevangenissen’ [‘Community Service and Fine for Man Who Dropped Drugs in Prisons with Drones’], 22 April 2026, <<https://nos.nl/artikel/2611582-taakstraf-en-boete-voor-man-die-met-drones-drugs-dropte-in-gevangenissen>>, accessed 29 July 2026.

76. Brussels Times, ‘Drones Used to Deliver Mobile Phones into Prison’, 7 April 2026, <<https://www.brusselstimes.com/belgium/2065733/drones-used-to-deliver-mobile-phones-into-prison>>, 29 July 2026; VRT Nws, ‘Gevangenis van Haren kan voortaan dronepakketjes met drugs en gsm’s detecteren’ [‘Haren Prison Can Now Detect Drone Packages with Drugs and Mobile Phones’], 10 December 2024, <<https://www.vrt.be/vrtnws/nl/2024/12/10/gevangenis-van-haren-voortaan-beschermd-tegen-illegale-dronepakketjes>>, accessed 29 July 2026.

77. Rijksoverheid, ‘Extra bevoegdheid om drones te bestrijden rondom zwaar beveiligde gevangenissen’ [‘Extra Powers to Combat Drones Around High-Security Prisons’], 29 June 2026, <<https://www.rijksoverheid.nl/actueel/nieuws/2026/06/29/extra-bevoegdheid-om-drones-te-bestrijden-rondom-zwaar-beveiligde-gevangenissen>>, accessed 29 July 2026.

78. Ministerio del Interior (Spain), ‘La Policía Nacional desmantela una red de “narcodrones” que operaba entre España y Marruecos’ [‘The National Police Take Down a “Drug Drone” Network Operating Between Spain and Morocco’], press release, 28 November 2024, <<https://www.interior.gob.es/opencms/va/detalle/articulo/La-Policia-Nacional-desmantela-una-red-de-narcodrones-que-operaba-entre-Espana-y-Marruecos/>>, accessed 7 August 2026; Ministerio del Interior, ‘Detenida una organización criminal que utilizaba drones de ala fija para el tráfico de drogas en el Estrecho’ [‘A Criminal Organisation that Used Fixed-Wing Drones to Traffic Drugs in the Strait of Gibraltar has been Arrested’], press release, 12 November 2025, <<https://www.interior.gob.es/opencms/en/detail-pages/article/Detenida-una-organizacion-criminal-que-utilizaba-drones-de-ala-fija-para-el-trafico-de-drogas-en-el-Estrecho/>>, accessed 7 August 2026.

79. Ministerio del Interior, ‘Detenida una organización criminal que utilizaba drones de ala fija para el tráfico de drogas en el Estrecho’ [‘A Criminal Organisation that Used Fixed-Wing Drones to Traffic Drugs in the Strait of Gibraltar has been Arrested’].

could make cross-border drone-enabled trafficking more viable, underlining the need to carefully monitor technological developments alongside established forms of general aviation misuse.⁸⁰

Taken together, the evidence points to a threat that is both credible and difficult to quantify. Known cases demonstrate exploitation of general aviation, but the scale of this activity remains uncertain. The result is a risk environment in which authorities must develop proportionate responses, despite operating with an incomplete understanding of the threat or its future trajectory.

80. Author interview with representative of UK think tank, online, March 2026.

Policy, Regulatory and Operational Responses

Recognition of the vulnerabilities set out in the previous chapter has prompted a range of regulatory and operational measures across the UK and Europe aimed at reducing opportunities for criminal misuse of general aviation. Many represent genuine progress: in the UK, some interviewees described Brexit as allowing the development of a stronger framework, with further reforms since 2024 strengthening compliance and contributing to improved situational awareness.⁸¹ Yet, the impact of these measures remains constrained by key features of the operating environment, and the inability to assure every general aviation movement means that existing interventions are best understood as mechanisms for managing risk.

This chapter assesses some of the principal policy, regulatory and operational responses adopted across the UK and Benelux. It considers where efforts to strengthen resilience against criminal misuse of general aviation have focused to date, before examining the needs that remain and the implications for future policy development.

Improving Pre-Arrival Visibility

Responsibility for general aviation is dispersed across a range of government departments. In the UK, this includes, among others, the Department for Transport, the CAA, the Home Office, Border Force, the NCA and structures such as the General Aviation Multi-Agency Hub (GAMAH). Key agencies in Belgium include, among others, the Federal Police and General Administration of Customs and Excise; in the Netherlands, the Royal Netherlands Marechaussee, Dutch Customs and Netherlands Police; and in Luxembourg, the Police Lëtzebuerg and Customs and Excise Administration.

81. Author interview with representative of UK government agency, online, June 2026.

As outlined in the second chapter, much focus has been placed on authorities' ability to identify and assess risk before aircraft land. In the UK, as noted, the principal mechanism is the GAR system, whereby owners, agents or captains of general aviation aircraft making international flights are required to submit passenger information to Border Force before arrival or departure.⁸² In a sector featuring high volumes of activity and decentralised infrastructure, interviewees identified API as one of the most important tools to assess risk and direct operational resources.⁸³ Supporting this, the government has cited cases where advance information from GARs allowed the identification of individuals subject to exclusion orders and otherwise of interest to law enforcement.⁸⁴

The UK framework has been strengthened through the General Aviation Regulations 2024.⁸⁵ These introduced mandatory digital GAR submission and reporting timeframes, replacing a fragmented system reliant on email, fax and post.⁸⁶ They also extended the pre-existing civil penalty regime to non-compliance with the 2024 Regulations, with fines of up to £10,000 available. Interviewees viewed these changes positively, pointing to improved compliance with GAR requirements.⁸⁷ With compliance estimated at 90% in 2023,⁸⁸ only 3% of GARs are reportedly now identified as non-compliant.⁸⁹

Equivalent changes have not been introduced in the Benelux countries to the author's knowledge. As noted, each country maintains advance reporting requirements for general aviation flights crossing the external Schengen border, but internal movements generally operate without equivalent obligations. While this reflects the wider Schengen Area framework, interviewees identified reduced advance information for intra-Schengen movements as a limitation facing law enforcement agencies when seeking to assess risk.⁹⁰

Advance reporting provides only a partial picture, with its utility dependent on the accuracy and completeness of the information submitted. Without full verification, inaccurate declarations and undeclared passengers may go undetected. Notably, GAR compliance figures apply only to flights that are met; they do not eliminate the

82. UK Government, 'Submit a General Aviation Report (GAR)'.

83. Author interview with representative of UK government agency, online, April 2026.

84. UK Government, 'General Aviation: Advance Information Requirements for International Flights'.

85. UK Government, The General Aviation (Persons on Board, Flight Information and Civil Penalties) Regulations 2024, 6 April 2024, <<https://www.legislation.gov.uk/ukxi/2024/470/contents/made>>, accessed 29 July 2026.

86. The regulations mandated that information be submitted no earlier than 48 hours and no later than two hours prior to expected time of departure. At the time of consultation in 2023, the government reported that only 51% of GARs were submitted online directly into government systems, with the remaining 49% sent via email, post and fax. See UK Government, 'General Aviation: Advance Information Requirements for International Flights'.

87. Author interview with representative of UK government agency, online, April 2026.

88. UK Government, 'General Aviation: Advance Information Requirements for International Flights'.

89. Author interview with representative of UK government agency, online, April 2026.

90. Author interview with liaison officers to European agency, online, March 2026; author interviews with representatives of UK government agencies, online, April 2026.

possibility of false or incomplete declarations, undeclared passengers or other forms of non-compliance among those that are unmet. As several interviewees noted, unless every aircraft is inspected – which is neither operationally nor financially feasible – a residual risk of undetected exploitation remains.⁹¹

This has informed consideration of whether additional passenger information requirements could further strengthen pre-arrival risk assessment. This includes the potential extension of passenger name record (PNR) requirements to some types of commercial general aviation.⁹² Unlike API, which provides basic passenger and flight information, PNR can provide additional contextual information relating to bookings and travel arrangements, and is an established tool for identifying crime and terrorism risks in scheduled commercial aviation. In the case of general aviation, it would only apply to those operators with booking systems and would be limited to what they collect.⁹³

In the UK, this issue was considered in the consultation preceding the introduction of the General Aviation Regulations 2024. While the government introduced mandatory digital GAR submission and reporting timeframes, it did not extend PNR requirements to commercial general aviation operators.⁹⁴ Despite describing PNR as ‘a unique and invaluable law enforcement tool’, the government cited concerns over submission processes, operator liability and the impact on small businesses, while leaving open the possibility of revisiting the issue in future.⁹⁵

Other factors have shaped the European approach. The EU PNR Directive requires member states to collect relevant data from air carriers operating scheduled and non-scheduled flights.⁹⁶ However, its application to general aviation is not straightforward: the obligations apply to ‘air carriers’ operating commercially operated scheduled and non-scheduled flights that process PNR data, rather than explicitly to all forms of general aviation, including private flights for which no bookings are made. Questions have also arisen over some EU member states’ implementation of the Directive.⁹⁷ Practical constraints emerge where operators lack the centralised reservation systems through which PNR data is typically generated. In effect, while the

91. Author interview with representative of UK government agency, online, April 2026; author interview with representative of European member state government agency, telephone, May 2026.

92. ‘General Aviation: Advance Information Requirements for International Flights’.

93. Author interview with representative of UK government agency, online, April 2026.

94. UK Government, ‘General Aviation: Advance Information Requirements for International Flights’.

95. *Ibid.*

96. European Parliament and European Council, ‘Directive (EU) 2016/681 of the European Parliament and of the Council of 27 April 2016 on the Use of Passenger Name Record (PNR) Data for the Prevention, Detection, Investigation and Prosecution of Terrorist Offences and Serious Crime’, *Official Journal of the European Union* (L 119/132, 4 May 2016).

97. Charles Alcock, ‘EBAA Cheers Polish Court Ruling on Pax Name Enforcement’, AIN, 26 May 2024, <<https://www.ainonline.com/aviation-news/business-aviation/2024-05-26/ebaa-cheers-polish-court-ruling-pax-name-enforcement>>, accessed 29 July 2026.

Directive permits member states to extend PNR requirements to relevant flight categories, many continue to rely primarily on API for general aviation.⁹⁸

Strengthening Operational Capability

Regardless of the reporting framework in place, advance information only creates value when it can be translated into effective operational decisions. The challenge is therefore not simply obtaining and assessing information but also ensuring that this leads to appropriate intervention where necessary.

The UK system offers an example of how this has been addressed to date, with the General Aviation Resource Allocation Tool (GARAT) providing Border Force with a structured framework for managing its response to general aviation flights.⁹⁹ The tool supports decisions as to whether flights are met on arrival or remotely cleared,¹⁰⁰ enabling frontline resources to be directed towards movements presenting the greatest risk.

Interviewees generally regarded this system to be working effectively.¹⁰¹ Previous reports by the Independent Chief Inspector of Borders and Immigration similarly found the GARAT to provide an 'efficient and effective' framework for managing the Border Force response to general aviation, albeit with concerns raised at the time around consistency of application across immigration and customs risks.¹⁰² Continued effectiveness nonetheless depends on both the quality of information available and the consistency with which authorities intervene when concerns are identified.

A number of initiatives have sought to strengthen the capability of personnel applying these processes. Recent assessments have identified gaps in Border Force officers' understanding of general aviation risks, with a 2024 Independent Chief Inspector of Borders and Immigration inspection at London City Airport finding shortcomings in the completion of risk assessments, recording of operational decisions and compliance with

98. Jeroen de Preter, 'Vrijgesteld van Security Checks: de discrete charme van de privejet' ['Exempt from Security Checks: The Discreet Charm of the Private Jet'], *Knack*, 24 July 2018, <<https://www.knack.be/nieuws/vrijgesteld-van-security-checks-de-discrete-charme-van-de-privejet/>>, accessed 12 July 2026.

99. Independent Chief Inspector of Borders and Immigration, 'A Spot Check Inspection of Border Force's Operational Response to General Aviation Flights at London City Airport: January–February 2024', March 2024, <<https://www.gov.uk/government/publications/a-spot-check-inspection-of-border-forces-operational-response-to-general-aviation-flights-at-london-city-airport-january-to-february-2024>>, accessed 7 August 2026.

100. Existing guidance requires high-risk flights to be met by Border Force, with a proportion of lower-risk flights also subject to physical intervention. See *ibid*.

101. Author interview with representative of UK government agency, online, April 2026.

102. Independent Chief Inspector of Borders and Immigration, 'An Inspection of General Aviation and General Maritime', p. 2.

national guidance on meeting high-risk flights.¹⁰³ While challenging aspects of these findings, the government acknowledged the importance of continued improvement.¹⁰⁴

Border Force has since supplemented existing initiatives with a General Aviation Awareness Course, providing frontline officers with enhanced training on sector characteristics, relevant regulations and indicators of misuse. Interviewees viewed this as a significant step forward, particularly in its practical engagement with different types of airfield. Visits to smaller aerodromes were considered particularly valuable in helping officers with limited prior exposure understand operational realities and develop confidence in identifying unusual activity in key parts of the sector.¹⁰⁵

These efforts come alongside longer-standing attempts to drive coordination across agencies. In the UK, the GAMAH provides a crucial model bringing together government and law enforcement partners to share information, coordinate activity and strengthen understanding of general aviation risks.¹⁰⁶ While public details of its operation remain limited, its existence reflects recognition of the importance of multi-agency approaches, rather than individual border, policing and aviation bodies acting independently.

UK authorities have also sought to extend operational reach by engaging with the general aviation community. Project Pegasus encourages those operating within or around the sector to recognise and report activity indicative of criminal misuse.¹⁰⁷ The multi-agency initiative reflects the reality that those operating at and around aerodromes are well placed to identify unusual behaviour, acting as additional eyes and ears for law enforcement.¹⁰⁸ Interviewees stressed that such engagement cannot replace intelligence or enforcement capabilities, but can provide an additional source of information where routine monitoring is limited.¹⁰⁹

Comparable challenges exist across the Benelux region, although responses have developed within a different legal and geographic context. These countries' position

103. Independent Chief Inspector of Borders and Immigration, 'A Spot Check Inspection of Border Force's Operational Response to General Aviation Flights at London City Airport'.

104. UK Government, 'Response to a Spot Check Inspection of Operations at London City Airport', 26 March 2024, <<https://www.gov.uk/government/publications/response-to-a-spot-check-inspection-of-operations-at-london-city-airport>>, accessed 13 July 2026.

105. Author interviews with representatives of UK government agency, online, June 2026.

106. HM Government of Gibraltar, 'HM Customs Gibraltar Strengthens International Cooperation at General Aviation Conference in London – 522/2026', press release, 2 July 2026, <<https://www.gibraltar.gov.gi/press-releases/hm-customs-gibraltar-strengthens-international-cooperation-at-general-aviation-conference-in-london-5222026-12162>>, accessed 13 July 2026.

107. UK Government, 'Report Suspicious Behaviour at a Small UK Airfield and Airports: Project Pegasus', 21 March 2025, <<https://www.gov.uk/government/publications/report-suspicious-behaviour-at-small-airfields-project-pegasus/report-suspicious-behaviour-at-a-small-airfield-project-pegasus>>, accessed 11 July 2026.

108. *Kent Online*, 'Project Pegasus Launched by Police', 27 June 2011, <<https://www.kentononline.co.uk/kent/news/project-pegasus-launched-by-poli-a73889/>>, accessed 11 July 2026.

109. Author interview with representative of UK government agency, online, April 2026.

within the Schengen Area arguably places even greater importance on intelligence sharing, operational cooperation and shared situational awareness.

A range of initiatives have sought to support this, including the Benelux General Aviation project, a cross-border initiative aimed at combatting trafficking via general aviation.¹¹⁰ The initiative represents an effort by the Benelux countries to develop stronger operational responses to criminal misuse of private aircraft. Launched in 2024, it involved initial work on the development of a barrier model to identify vulnerabilities in the sector and establish potential countermeasures.¹¹¹

The model was tested in 2025 during the international operation *Silent Skies*. Coordinated from the headquarters of the Dutch Police Unit Limburg in Maastricht, the four-day operation monitored general aviation flights between eight countries: the Benelux countries plus the UK, Germany, France, Denmark and Ireland.¹¹² Data sources included flight plans, General Declarations, national databases and open source information, with support provided by Europol, Frontex, the Maritime Analysis and Operations Centre (MAOC),¹¹³ and the World Customs Organization.¹¹⁴ The wider project has since taken on a broader strategic ambition, with the Benelux countries seeking to scale the approach to European level.¹¹⁵ In parallel, the Council of Europe's Pompidou Group is engaged in efforts to reduce general aviation-enabled trafficking through 'improved control, risk management, profiling, and detection and investigative measures'.¹¹⁶

These initiatives are much needed. While valuable support is provided by bodies such as MAOC, a number of interviewees described international cooperation on general aviation risks as sometimes ad hoc and dependent on the strength of bilateral relationships.¹¹⁷ Ultimately, the approaches outlined above reflect different responses to the same underlying challenge, demonstrating a strong emphasis on intelligence,

110. Benelux, 'Benelux Draws European Attention with a New Approach Against the Criminal Misuse of Private Aircrafts', 5 February 2026, <<https://www.benelux.int/en/post/benelux-draws-european-attention-with-a-new-approach-against-the-criminal-misuse-of-private-aircrafts/>>, accessed 13 July 2026.

111. *Ibid.*

112. Benelux, 'Operation Silent Skies: International Operation Targeting General Aviation', 8 September 2025, <<https://www.benelux.int/en/post/operation-silent-skies-international-operation-targeting-general-aviation/>>, accessed 13 July 2026.

113. The Maritime Analysis and Operations Centre provides a forum for multilateral cooperation on drug trafficking by air and sea, as an initiative by eight EU member states (Belgium, France, Germany, Ireland, Italy, the Netherlands, Portugal and Spain) and the UK, co-funded by the Internal Security Fund of the EU. See Maritime Analysis and Operations Centre (Narcotics), 'Mission Statement and Values', <<https://maoc.eu/our-mission/>>, accessed 3 September 2026.

114. Benelux, 'Operation Silent Skies'; Arthur Hubers, 'Police Target Sports Planes from Maastricht', 8 September 2025, <<https://www.11nieuws.nl/nieuws/2989245/politie-neemt-sportvliegtuigjes-op-de-korrel-vanuit-maastricht>>, accessed 13 July 2026.

115. Benelux, 'Operation Silent Skies'.

116. Pompidou Group, 'Airports – General Aviation – Controlled Deliveries', <<https://www.coe.int/en/web/pompidou/activities/airports>>, accessed 13 July 2026.

117. Author interviews with representatives of UK government agencies, online, April 2026.

cooperation and targeted intervention. However, these initiatives do not fully overcome the limitations identified in the second chapter, or the fact that authorities cannot continuously monitor, verify or intervene across the full spectrum of general aviation activity.

Strategic Prioritisation

While the measures outlined above demonstrate significant progress, some interviewees identified a broader challenge: the absence of a coherent long-term strategy for managing general aviation risks.¹¹⁸ This was cited in the UK, where stakeholders described the need for a more explicit strategic conversation on the place general aviation vulnerabilities should occupy within wider border and national security priorities.¹¹⁹

Part of the challenge is competition for attention and resources. In the UK, the political salience of irregular migration, particularly small boat crossings in the English Channel, has seen significant operational and policy focus – and a substantial proportion of finite border security resources – directed to general maritime.¹²⁰ General aviation misuse is less visible and harder to quantify, making sustained prioritisation more difficult, despite the potentially significant consequences.

Several interviewees suggested this has left the system recognising the vulnerability without fully resolving the strategic choices needed to address it.¹²¹ While considerable work is undertaken across government, some held that these activities do not sit within a shared framework defining long-term objectives or metrics. In particular, they pointed to limited agreement on what success should look like over a five- or 10-year horizon. Without clearer strategic ambition – whether focused on improving visibility, strengthening intelligence, reducing vulnerabilities or enhancing enforcement – it becomes harder to prioritise investment, make strategic trade-offs and align the efforts of different stakeholders.

Importantly, these issues extend beyond organised crime. The flexibility, dispersed infrastructure and comparatively limited visibility that can facilitate criminal misuse of general aviation may also create vulnerabilities of wider national security concern. Notably, interviewees flagged that existing gaps could equally be exploited for sanctions evasion, illicit finance, hostile state activity or other national security threats.¹²²

118. Author interview with representative of UK government agency, online, March 2026.

119. *Ibid.*

120. John Simpson, 'People Smuggling Replaces Drugs at Top of NCA Caseload', *The Observer*, 21 June 2025.

121. Author interviews with representative of UK government agencies, online, March and April 2026.

122. Author interview with representative of UK government agency, online, June 2026; author interview with representative of UK think tank, online, March 2026.

These concerns extend across business aviation. FBOs, which provide handling and passenger services for private aircraft, are essential to legitimate aviation,¹²³ but also represent important security touchpoints. The discretion, flexibility and type of customer service that define business aviation are commercially valuable but can complicate identification of suspicious activity. High-profile investigations, including those concerning Jeffrey Epstein's use of private jets through UK airports, have brought wider attention to the range of ways in which private aviation infrastructure might be exploited.¹²⁴

At the strategic level, the challenge lies in developing a coherent approach to general aviation risk, with a clear articulation of ambition, priorities and measures of success essential to guide investment, coordinate activity and inform wider border security decisions.

Managing the Drone Threat

Drones present an evolving challenge. The speed of technological development and market growth require regulatory and operational measures to adapt at pace. As such, a key issue lies in ensuring a coherent, up-to-date framework for understanding and responding to criminal activity across a rapidly evolving drone ecosystem.¹²⁵

The UK's 2019 Counter-Unmanned Aircraft Strategy adopted a 'full spectrum' approach to deterring, detecting and disrupting drone misuse while recognising the challenge of distinguishing it from rapidly expanding legitimate activity.¹²⁶ Since then, the operating environment has shifted significantly. As discussed in the second chapter, prison-related drone offending has expanded, while improvements in range and payload have increased potential criminal applications. A new national strategy is being developed to reflect this changing landscape.¹²⁷

Responsibility for drones cuts across multiple government functions. While the CAA regulates drone operations, effective responses require coordination between policing and other security agencies. Some interviewees argued that responses have also been shaped by institutional culture: historically, aspects of aviation policy were developed largely within the European framework, with the CAA focused on implementing established rules rather than setting policy.¹²⁸ Following Brexit, they

123. C Daniel Prather, *FBO Management: Operating, Marketing, and Managing as a Fixed-Base Operator* (Kalamazoo, MI: Aviation Supplies & Academics, Inc., 2024).

124. Chi Chi Izundu, Olivia Davies and Will Dahlgreen, 'Epstein's UK Flights had Alleged British Abuse Victims on Board – BBC Investigation', *BBC News*, 15 December 2025.

125. Author interview with representative of UK think tank, online, March 2026.

126. UK Government, *UK Counter-Unmanned Aircraft Strategy*, CP 187 (London: The Stationery Office, 2019), p. 5.

127. Author interview with representative of UK government agency, online, June 2026.

128. *Ibid.*

maintained, institutional roles have taken time to mature as policymakers have adjusted to their expanded role.

This has coincided with fundamental shifts in the drone market. As with crewed general aviation, some interviewees argued that regulatory approaches have traditionally reflected assumptions of benign use, prioritising safety over deliberate criminal exploitation.¹²⁹ The rapid democratisation of increasingly capable drone technology has challenged this approach, requiring greater emphasis on security and hostile use. While the case for comprehensive regulation of larger commercial drone operations was seen as clearer, some interviewees argued that policymakers are still adapting to drones as an emerging technological domain requiring proactive governance.¹³⁰

Ultimately, it is clear that the regulatory framework has developed incrementally around specific risks, but a more integrated approach is now needed. In the UK, the development of Remote ID represents an important step towards improving transparency by linking compliant drones to registered operators,¹³¹ but technology alone cannot provide a complete solution.

Interviewees highlighted the potential value of an integrated model in which monitoring and detection systems, counter-drone operations and law enforcement responses are connected more closely. The UK's experience with multi-agency structures in the wider general aviation space demonstrates the potential value of bringing relevant agencies together in this way. While drone threats differ in terms of scale, operating altitude and accessibility, the underlying principle of shared intelligence and coordinated response remains applicable.

The international dimension presents further challenges. Although documented cross-border drone trafficking appears to remain limited in the UK context, criminal groups elsewhere have adapted drone technology for transnational trafficking, surveillance and logistical support, while advances in conflict environments continue to expand capability.¹³² The challenge for authorities is therefore one of anticipation: ensuring regulatory systems and detection capabilities develop before such activity becomes established.

129. *Ibid.*; author interview with general aviation expert and representative of Latin American government, online, June 2026.

130. Author interview with representative of UK government agency, online, June 2026.

131. Author interview with representative of UK think tank, online, March 2026; UK Government, 'Nearly £50 Million Government Backing to Power Up Drone and Flying Taxi Tech and Crack Down on Illegal Drones'.

132. Mirko Niederkofler, 'Drones Win Battles, Components Win Wars', *RUSI Commentary*, 17 December 2025, <<https://www.rusi.org/explore-our-research/publications/commentary/drones-win-battles-components-win-wars>>, accessed 7 August 2026; Michael C Horowitz, Erin D Dumbacher and Lauren Kahn, 'How Ukraine's Drone Innovation Reversed Russia's Momentum', Council on Foreign Relations, 12 June 2026, <<https://www.cfr.org/articles/how-ukraines-drone-innovation-reversed-russias-momentum>>, accessed 7 August 2026.

These challenges exist across the EU. The European Commission has recognised the security implications of drone proliferation and has sought to develop a more coordinated approach to drone policy. Notably, the 2026 Action Plan on Drone and Counter Drone Security aims to support member states in areas from enhancing preparedness to boosting detection capabilities and coordinating responses at the EU level.¹³³

For their part, Benelux countries have been considering options to strengthen cooperation in response to drone-related security concerns. Following incidents involving unidentified drones over strategic sites, authorities have emphasised the importance of faster information exchange to improve detection of suspicious activity and strengthen resilience. In parallel, discussions have focused on potential alignment, including across procedures for issuing drone pilot licences, to facilitate cross-border operations.¹³⁴

The evidence base itself remains limited. Current understanding of criminal drone use is drawn largely from individual incidents, with more systematic assessment of the scale, methods and trajectories of misuse needed. While prison deliveries remain the dominant concern, future threats may include support to maritime smuggling operations, surveillance of law enforcement or criminal exploitation of emerging commercial applications, from drone deliveries to flying taxis and drone-enabled emergency services.¹³⁵ Maintaining an adaptive approach, investing in horizon scanning and working closely with industry will be central to the ability of authorities to anticipate future criminal innovations.

133. European Commission, 'Communication from the Commission to the European Parliament and the Council: Action Plan on Drone and Counter Drone Security'.

134. Benelux, 'Benelux Countries Exchange Views on Drone Detection', 2 February 2026, <<https://www.benelux.int/en/post/benelux-countries-exchange-views-on-drone-detection>>, accessed 13 July 2026.

135. Author interview with general aviation expert and representative of Latin American government, online, June 2026; author interview with representative of UK think tank, online, March 2026; author interview with representative of UK government agency, online, June 2026.

Conclusion and Recommendations

This paper has identified clear vulnerabilities across general aviation that organised criminal groups can leverage to transport commodities and people illegally across the UK and the Benelux region. Known cases demonstrate that these vulnerabilities have been exploited, but do not allow the scale of criminal misuse to be assessed with confidence. The most prominent finding, therefore, is the uncertainty surrounding the extent of this activity: given the dispersed geography of general aviation, finite border security resources and the practical impossibility of assuring every flight, only a partial picture of criminal exploitation exists.

This uncertainty represents a strategic vulnerability. The characteristics that make key parts of the general aviation sector economically valuable are the same features that can facilitate criminal misuse. The inability to confidently determine the extent of the exploitation makes it difficult to accurately assess risk, target resources or judge whether existing interventions are effective.

The research for this paper nevertheless highlights important progress. In the UK, the General Aviation Regulations 2024 have modernised advance reporting and improved compliance, while the reduction in aerodromes authorised to receive international flights represents a further significant advance. Developments in the Benelux countries demonstrate a clear focus on strengthening intelligence sharing and operational cooperation. Together, these initiatives provide a stronger foundation than was previously in place.

However, they do not remove the fundamental challenge. Geography and resource constraints mean that no authority can maintain comprehensive oversight across hundreds of dispersed airfields. Simultaneously, the rapid expansion of drones risks widening the gap between technological change and the pace of governance. Waiting until criminal exploitation becomes fully visible risks regulatory and operational responses trailing, rather than anticipating, criminal innovation.

Fundamentally, this paper argues that criminal misuse of general aviation deserves greater strategic attention than it has received. Addressing this requires moving beyond incremental measures, recognising that vulnerabilities in key parts of the sector are potentially relevant to hostile state activity and other national security threats. It may also mean revisiting traditional policy approaches to deregulation, balancing security measures with the sector's economic importance and the needs of legitimate operators. Improving understanding of exploitation should become a policy priority. A stronger evidence base is needed to test and refine existing assessments, identify emerging risks and inform decisions about an increasingly important part of the border environment.

Drawing on the findings, this paper offers a series of recommendations for policymakers, regulators and operational partners to strengthen responses to criminal exploitation of general aviation.

Recommendations

1. **Develop a clear strategic framework:** General aviation should be afforded greater strategic attention within wider security planning. While progress has been made in strengthening key elements of the response, there is often little in the way of a shared framework defining the longer-term ambition and priorities for managing general aviation risks. A more coherent approach, recognising potential exploitation across threat areas (including growing risks from drones) would support resource allocation and help identify and address emerging risks proactively.
2. **Make intelligence assessment of general aviation misuse a sustained priority:** Addressing persistent knowledge gaps requires sustained analytical focus, bringing together intelligence from law enforcement, border agencies, international partners and industry. A stronger intelligence picture would help authorities identify key threats, prioritise risks and allocate operational resources. Given the potential links between general aviation misuse, organised crime and wider security threats, this should be embedded within broader strategic assessment processes rather than treated as a niche aviation issue.
3. **Strengthen Europol's coordinating role in general aviation:** Criminal exploitation of general aviation often involves cross-border activity, yet intelligence sharing can remain fragmented and dependent on bilateral relationships. Europol should be supported to play a stronger coordinating role, making full use of existing intelligence-sharing mechanisms, improving analytical capability and providing a clearer focal point for cross-border investigations involving general aviation misuse.

4. **Explore options to further consolidate airfields licensed to handle international flights:** The UK's 2024 consolidation of airfields authorised to receive international general aviation flights has had a positive impact on Border Force operations. Authorities should prioritise options to pursue further consolidation, while balancing this with the commercial, financial and logistical needs of the sector. A more focused network, centred on locations with baseline levels of international activity and those designated for commercial use, would support efficient deployment of operational resources and assurance of general aviation movements.
5. **Establish mandatory electronic conspicuity:** Improving authorities' ability to detect, monitor and assess aircraft movements should be a strategic priority. Mandatory electronic conspicuity requirements would provide a more reliable picture of the spectrum of general aviation activity, supporting risk assessment and operational decision-making. While implementation should account for technical, financial and operational issues, reducing gaps in aircraft visibility would improve authorities' ability to identify and respond to emerging threats.
6. **Explore options to extend PNR requirements more consistently across general aviation:** Probable limitations in data availability notwithstanding, UK and European authorities should examine whether elements of the intelligence value provided by scheduled commercial aviation PNR systems can be gained across commercial general aviation more consistently. While any model would need to reflect the distinct characteristics of general aviation, access to more detailed passenger information – insofar as available – would strengthen detection of high-risk movements and intervention where concerns are identified.
7. **Expand risk-testing initiatives across general aviation:** Where universal inspection of general aviation movements is not feasible, authorities should regularly risk-test different parts of the sector, including commercial and non-commercial operations, different aircraft types and operating environments. This should be multi-agency and intelligence-led, testing perceived vulnerabilities, challenging assumptions and improving understanding of how general aviation may be exploited in evolving ways.
8. **Develop a centralised register of pilot licence revocations:** Better information sharing is needed to identify individuals whose licences have been revoked and who may look to continue flying on licences obtained elsewhere. Options should be explored to develop a central repository or register, potentially through existing international structures such as Europol, providing up-to-date information on licence revocations. This would improve visibility of repeat or cross-border concerns and supplement national records.

9. **Establish a multi-agency coordination structure for criminal drone misuse:** In the UK, the development of a new counter-uncrewed aircraft strategy, anticipated in autumn 2026, offers an opportunity to establish an updated model to manage the security implications of drone proliferation. Drawing on structures developed for wider general aviation, the strategy should establish a dedicated multi-agency hub bringing together relevant law enforcement, border, security and industry stakeholders, to improve information sharing, strengthen collective understanding of emerging risks and coordinate responses to criminal drone use.
10. **Establish a cross-sector steering group to drive implementation:** Responsibility for general aviation is dispersed across a range of UK government departments and agencies. A dedicated steering group should be established – or existing structures used – to consider the recommendations set out in this paper, develop a prioritised implementation plan, allocate responsibilities and monitor progress over a defined timeframe. Convened by the Home Office, it should include relevant public authorities and, where appropriate, industry representatives, recognising that effective responses depend on sustained cooperation.

About the Author

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