

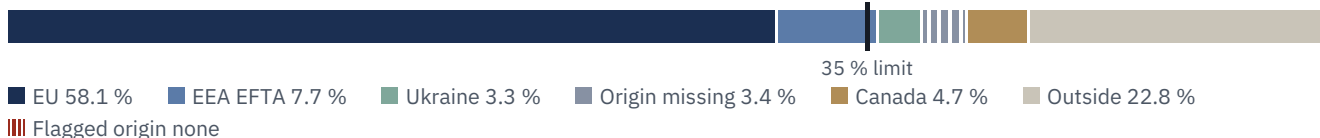
Reconnaissance drone, version 3

SAFE Article 16(10), rules as of 12 October 2026. Fictional data.



Meets the threshold on the data entered

27.5 to 30.9 % of component cost from outside the European set. Limit 35 %.



Worst case 30.9 % is 4.1 percentage points under the limit.

1. Cover

Item	
Product	Reconnaissance drone, version 3 (fictional): 186 lines from 31 suppliers
Rulebooks	SAFE Article 16(10); EDIP Article 10(3); EU-Canada agreement Article 5(8); Ukraine Support Loan Article 13(4)(g)
Pack date	12 October 2026
Rule texts as of	12 October 2026
Prepared by	Lodemark, method of 12 October 2026
Declarant	The maker of the drone (fictional), who signs its own declaration
Language	English

2. Summary

Rulebook	State	Share outside	Grade
SAFE Article 16(10)	Meets the threshold on the data entered	27.5 to 30.9 %	D
EDIP Article 10(3)	Needs review	30.8 to 34.2 %	D
Ukraine Support Loan Article 13(4)(g)	Meets the threshold on the data entered	27.5 to 30.9 %	D

EU-Canada agreement, Article 5(8)

Test	State	Share
Limb 1: European share at least 20 %	Meets the threshold on the data entered	69.1 to 72.5 %
Limb 2: third countries not above the European share	Meets the threshold on the data entered	22.8 to 26.2 %
Limb 3: third countries at most 35 %	Meets the threshold on the data entered	22.8 to 26.2 %

Components originating in Canada make up 4.7 % of the estimated cost of the components of the end product. The agreement allows this share to exceed 35 %.

- Origin unknown for 7 components (3.4 % of component cost).

This is not a decision on eligibility. Only the contracting authority or funding body decides that. You sign your own declaration. Lodemark shows the calculation and the evidence behind it.

3. Calculation table

186 lines, largest first. Cost base, components only: 50,911 EUR.

Component	Qty	Cost (EUR)	Origin	Basis	Evidence	Grade
Thermal camera core	1	5200.00	Germany	Document	Supplier declaration	B
Airframe, carbon	1	4700.00	Finland	Document	Supplier declaration	B
Radio datalink	1	3900.00	Norway	Document	Supplier declaration	B
Battery pack	1	3300.00	Poland	Supplier statement	Supplier statement	C
Flight controller	1	3100.00	Germany	Document	Supplier declaration	B
Gimbal assembly	1	2500.00	Switzerland	Document	Customs declaration	A
Mission computer	1	2400.00	Canada	Document	Supplier declaration	B
Motors ×4	4	2200.00	China	Document	Customs declaration	A
Daylight camera optics	1	1900.00	Japan	Document	Customs declaration	A
Navigation module	1	1700.00	Ukraine	Document	Supplier declaration	B
Encryption module	1	1500.00	Finland	Document	Supplier declaration	B
Speed controllers ×4	4	1300.00	Origin missing	None	No document	D
Antenna set	1	1200.00	Sweden	Document	Supplier declaration	B
Ground link modem	1	1000.00	United Kingdom	Document	Customs declaration	A
Power distribution board	1	1000.00	Germany	Document	Supplier declaration	B
GNSS receiver	1	900.00	Taiwan	Document	Customs declaration	A
Wiring harness	1	900.00	Czechia	Document	Supplier declaration	B
Parachute system	1	800.00	France	Document	Supplier declaration	B
Landing gear	1	700.00	Finland	Document	Supplier declaration	B
Propellers ×4	4	400.00	China	Document	Customs declaration	A

LED module B12	1	189.00	China	Document	Supplier declaration	B
Antenna cable A13	1	180.00	Netherlands	Document	Supplier declaration	B
Voltage regulator B14	1	163.00	Finland	Document	Official origin document	A
Carrier board C11	1	162.00	China	Document	Supplier declaration	B
Cooling fan D13	1	152.00	Italy	Document	Supplier declaration	B
LED module C14	1	151.00	China	Document	Customs declaration	A
Coax cable A13	1	150.00	Japan	Document	Customs declaration	A
MOSFET set E11	1	146.00	Germany	Document	Supplier declaration	B
Coax cable F16	1	143.00	Germany	Document	Supplier declaration	B
Switch A15	1	141.00	Germany	Document	Supplier declaration	B
Connector E11	1	137.00	Poland	Document	Supplier declaration	B
Servo A16	1	136.00	Sweden	Document	Supplier declaration	B
Servo B11	1	134.00	Germany	Supplier statement	Supplier statement	C
Microcontroller C13	1	132.00	Taiwan	Document	Supplier declaration	B
Magnetometer F11	1	128.00	Taiwan	Supplier statement	Supplier statement	C
Cooling fan B16	1	125.00	Finland	Supplier statement	Supplier statement	C
Bracket E11	1	124.00	France	Document	Official origin document	A
Storage card C10	1	121.00	Czechia	Document	Official origin document	A
Gasket set A15	1	120.00	Finland	Document	Supplier declaration	B
Gasket set B10	1	120.00	China	Document	Supplier declaration	B
MOSFET set F13	1	113.00	Finland	Document	Official origin document	A
Resistor set F12	1	107.00	Germany	Document	Supplier declaration	B
Damper B13	1	105.00	Origin missing	None	No document	D
Connector F13	1	104.00	China	Document	Customs declaration	A

Cooling fan C11	1	103.00	China	Document	Supplier declaration	B
LED module D16	1	100.00	Finland	Document	Supplier declaration	B
MOSFET set A10	1	98.00	France	Document	Supplier declaration	B
Antenna cable B15	1	97.00	Origin missing	None	No document	D
MOSFET set C14	1	96.00	Sweden	Document	Supplier declaration	B
Voltage regulator A12	1	95.00	Netherlands	Document	Official origin document	A
Servo D15	1	95.00	Taiwan	Document	Customs declaration	A
Lens filter E13	1	95.00	Finland	Document	Supplier declaration	B
Barometer F10	1	90.00	Finland	Document	Supplier declaration	B
Inertial sensor B15	1	88.00	China	Supplier statement	Supplier statement	C
Resistor set B11	1	87.00	China	Document	Customs declaration	A
Servo C13	1	87.00	Sweden	Document	Supplier declaration	B
Connector A10	1	86.00	Italy	Document	Supplier declaration	B
Antenna cable C10	1	86.00	Germany	Supplier statement	Supplier statement	C
Damper C15	1	85.00	Czechia	Supplier statement	Supplier statement	C
Pitot tube D10	1	85.00	China	Document	Supplier declaration	B
Voltage regulator F15	1	85.00	Netherlands	Document	Supplier declaration	B
Transceiver chip A10	1	84.00	Origin missing	None	No document	D
Fastener kit C15	1	84.00	Netherlands	Document	Official origin document	A
Magnetometer A15	1	83.00	Netherlands	Supplier statement	Supplier statement	C
Coax cable C10	1	83.00	United States	Supplier statement	Supplier statement	C
Shielding can A12	1	79.00	China	Document	Customs declaration	A
Microcontroller B11	1	78.00	Germany	Document	Supplier declaration	B
Magnetometer D14	1	78.00	Poland	Supplier statement	Supplier statement	C

Lens filter D11	1	78.00	Finland	Document	Supplier declaration	B
Switch E16	1	78.00	Poland	Document	Supplier declaration	B
Fastener kit F14	1	78.00	Germany	Document	Supplier declaration	B
Pitot tube E12	1	77.00	Netherlands	Supplier statement	Supplier statement	C
Coax cable B15	1	76.00	France	Document	Official origin document	A
Antenna cable E14	1	76.00	Finland	Supplier statement	Supplier statement	C
Fuse set D13	1	75.00	Sweden	Document	Supplier declaration	B
Bearing set C13	1	74.00	Germany	Document	Supplier declaration	B
LED module E11	1	72.00	Czechia	Supplier statement	Supplier statement	C
Inertial sensor F16	1	72.00	Germany	Document	Official origin document	A
Fuse set A14	1	71.00	Netherlands	Document	Supplier declaration	B
Inertial sensor E14	1	71.00	Sweden	Document	Supplier declaration	B
Switch D14	1	69.00	Poland	Document	Official origin document	A
Bearing set A16	1	67.00	Sweden	Document	Supplier declaration	B
Gasket set C12	1	67.00	Netherlands	Document	Official origin document	A
Servo E10	1	66.00	Poland	Document	Supplier declaration	B
Heat sink F14	1	65.00	Poland	Supplier statement	Supplier statement	C
Heat sink B13	1	63.00	Germany	Document	Official origin document	A
Bearing set E10	1	63.00	China	Document	Supplier declaration	B
Capacitor set C12	1	62.00	France	Document	Official origin document	A
Barometer E15	1	62.00	Germany	Document	Supplier declaration	B
Carrier board B16	1	60.00	Sweden	Document	Official origin document	A
Microcontroller D15	1	60.00	Germany	Document	Supplier declaration	B

Capacitor set F11	1	59.00	France	Document	Supplier declaration	B
Switch C12	1	57.00	China	Supplier statement	Supplier statement	C
Oscillator E12	1	56.00	China	Document	Supplier declaration	B
Lens filter B14	1	55.00	Germany	Document	Supplier declaration	B
Inertial sensor C10	1	55.00	Origin missing	Documents disagree	Two documents disagree	D
Shielding can D11	1	55.00	Sweden	Document	Supplier declaration	B
Bracket C14	1	54.00	Italy	Document	Official origin document	A
Heat sink D10	1	54.00	Sweden	Document	Supplier declaration	B
Antenna cable D12	1	54.00	China	Document	Supplier declaration	B
Heat sink E12	1	54.00	United States	Document	Customs declaration	A
Fastener kit D10	1	53.00	Finland	Supplier statement	Supplier statement	C
Fuse set B16	1	52.00	United States	Document	Supplier declaration	B
LED module F13	1	52.00	Italy	Document	Official origin document	A
Transceiver chip E11	1	51.00	Czechia	Document	Official origin document	A
Oscillator F14	1	51.00	Poland	Document	Official origin document	A
Memory module A12	1	50.00	Sweden	Document	Supplier declaration	B
Pitot tube B13	1	50.00	Czechia	Supplier statement	Supplier statement	C
Bearing set D15	1	50.00	Finland	Document	Official origin document	A
Memory module C16	1	49.00	Germany	Document	Supplier declaration	B
Fastener kit E12	1	48.00	Germany	Document	Official origin document	A
Damper E12	1	48.00	Poland	Supplier statement	Supplier statement	C
Coax cable E14	1	47.00	Finland	Document	Official origin document	A
Barometer A14	1	46.00	Poland	Document	Official origin document	A

Connector B12	1	45.00	China	Document	Customs declaration	A
Carrier board D13	1	45.00	Poland	Document	Supplier declaration	B
Microcontroller E10	1	45.00	Japan	Supplier statement	Supplier statement	C
Capacitor set A15	1	44.00	France	Document	Supplier declaration	B
MOSFET set B12	1	44.00	Germany	Supplier statement	Supplier statement	C
MOSFET set D16	1	44.00	Japan	Document	Supplier declaration	B
Magnetometer E16	1	44.00	United States	Document	Customs declaration	A
Magnetometer B10	1	43.00	France	Document	Official origin document	A
Voltage regulator C16	1	43.00	Netherlands	Document	Supplier declaration	B
Oscillator B13	1	41.00	Germany	Document	Supplier declaration	B
Fuse set C11	1	41.00	Sweden	Document	Supplier declaration	B
Oscillator D10	1	41.00	Sweden	Document	Supplier declaration	B
Connector C14	1	40.00	Germany	Document	Official origin document	A
Storage card D12	1	40.00	Czechia	Document	Supplier declaration	B
Capacitor set E16	1	40.00	Taiwan	Document	Supplier declaration	B
Inertial sensor A13	1	39.00	Sweden	Document	Supplier declaration	B
Capacitor set B10	1	39.00	Origin missing	None	No document	D
Storage card E14	1	39.00	Sweden	Document	Official origin document	A
Cooling fan E15	1	37.00	France	Document	Supplier declaration	B
Microcontroller A16	1	35.00	China	Supplier statement	Supplier statement	C
Shielding can C16	1	35.00	Italy	Document	Supplier declaration	B
Resistor set C13	1	35.00	China	Supplier statement	Supplier statement	C
Lens filter C16	1	35.00	Germany	Document	Supplier declaration	B
Gasket set D14	1	34.00	Poland	Document	Official origin document	A

Memory module B14	1	33.00	Taiwan	Document	Supplier declaration	B
Coax cable D12	1	33.00	Germany	Document	Supplier declaration	B
Shielding can E13	1	33.00	Sweden	Document	Official origin document	A
Capacitor set D14	1	32.00	Origin missing	None	No document	D
Resistor set D15	1	31.00	Germany	Document	Supplier declaration	B
Carrier board A14	1	30.00	Finland	Supplier statement	Supplier statement	C
Transceiver chip B12	1	30.00	Poland	Document	Supplier declaration	B
Lens filter A12	1	28.00	China	Document	Supplier declaration	B
Fastener kit B13	1	28.00	China	Document	Customs declaration	A
Cooling fan A14	1	27.00	China	Document	Supplier declaration	B
Bearing set B11	1	27.00	Finland	Document	Supplier declaration	B
Bracket D16	1	27.00	Poland	Document	Supplier declaration	B
Fastener kit A11	1	26.00	Japan	Document	Supplier declaration	B
Heat sink A11	1	26.00	China	Document	Supplier declaration	B
Carrier board F10	1	26.00	Poland	Document	Official origin document	A
Oscillator A11	1	25.00	France	Document	Official origin document	A
Barometer D13	1	25.00	United States	Document	Customs declaration	A
Resistor set A16	1	24.00	China	Supplier statement	Supplier statement	C
Magnetometer C12	1	24.00	Germany	Document	Supplier declaration	B
Memory module E13	1	24.00	Germany	Document	Official origin document	A
Storage card B15	1	23.00	Germany	Document	Supplier declaration	B
Servo F12	1	23.00	Netherlands	Document	Supplier declaration	B
Storage card A13	1	22.00	Finland	Document	Supplier declaration	B
Pitot tube A11	1	22.00	China	Document	Supplier declaration	B

Pitot tube C15	1	22.00	Poland	Document	Supplier declaration	B
Transceiver chip D16	1	22.00	Germany	Document	Official origin document	A
Shielding can F15	1	22.00	China	Document	Supplier declaration	B
LED module A10	1	21.00	Finland	Document	Supplier declaration	B
Switch B10	1	21.00	France	Supplier statement	Supplier statement	C
Barometer C11	1	21.00	Germany	Document	Official origin document	A
Oscillator C15	1	21.00	China	Supplier statement	Supplier statement	C
Connector D16	1	21.00	Germany	Document	Supplier declaration	B
Inertial sensor D12	1	21.00	Finland	Document	Supplier declaration	B
Memory module D11	1	21.00	Germany	Supplier statement	Supplier statement	C
Voltage regulator E13	1	21.00	Taiwan	Document	Supplier declaration	B
Damper A11	1	20.00	Czechia	Document	Official origin document	A
Heat sink C15	1	20.00	Finland	Document	Supplier declaration	B
Transceiver chip C14	1	20.00	China	Document	Customs declaration	A
Fuse set E15	1	20.00	Czechia	Supplier statement	Supplier statement	C
Bracket A10	1	19.00	Finland	Document	Supplier declaration	B
Shielding can B14	1	19.00	Sweden	Document	Supplier declaration	B
Bracket B12	1	19.00	Germany	Document	Supplier declaration	B
Damper D10	1	19.00	Poland	Supplier statement	Supplier statement	C
Resistor set E10	1	19.00	Germany	Supplier statement	Supplier statement	C
Gasket set E16	1	19.00	Italy	Document	Supplier declaration	B
Barometer B16	1	18.00	Netherlands	Document	Supplier declaration	B
Voltage regulator D11	1	18.00	France	Supplier statement	Supplier statement	C

Carrier board E15	1	18.00	Germany	Document	Supplier declaration	B
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4. Evidence grade summary

Grade	Share of component cost
A, official document	22.9 %
B, supplier declaration with a document	63.8 %
C, statement only	9.9 %
D, unknown: no origin basis, or two documents that disagree	3.4 %

Counting only grades A and B as known, the SAFE share would be up to 39.8 %. 31 lines rest on a statement only.

5. Method

- Cost base: the estimated cost of the components of the end product (SAFE); the same words in EDIP Article 10(3); the Canada limbs on the same base; the Ukraine Support Loan names the defence product.
- Origin: customs origin of each component bought directly, at tier 1, with its basis and the grade of its evidence (A official document, B supplier declaration with a document, C statement only, D unknown: no origin basis, or two documents that disagree).
- In a pilot, documents are read by AI and, by default, checked by a person, and the rules engine calculates: the same lines give the same result every time.
- Left out of the share: raw materials, services and final assembly (none in this list).
- Unknown origin: counted outside the set for Meets, inside for Above; between the two the state is Needs review.
- Rounding: one decimal, half up; comparisons on exact amounts.

6. What drives the result

The largest lines that do not count under SAFE, on version 3. Lodemark shows them; the customer decides what, if anything, to change.

Component	Origin	Cost (EUR)
Gimbal assembly	Switzerland	2500.00
Mission computer	Canada	2400.00
Motors x4	China	2200.00
Daylight camera optics	Japan	1900.00
Ground link modem	United Kingdom	1000.00
GNSS receiver	Taiwan	900.00
Propellers x4	China	400.00
LED module B12	China	189.00

7. Control and establishment

Per contractor and subcontractor: establishment, management, the control chain found, the registers used and their coverage.

8. Subcontractor derogation

Not used here: no subcontractor holds 15 % or more of the contract value.

9. Design authority

The maker's statement on design rights and on replacing restricted components. SAFE Article 16(11) covers category two only; the maker states which category the drone is in.

10. Infrastructure location

Production and test sites with their country.

11. Security-interest sentence

No component comes from a country on the configured list. The customer makes this assessment.

12. Equivalence

None claimed.

13. Country annex

The evidence the buyer's Member State asks for, as reported; operational arrangements are not public.

14. Open issues

- Speed controllers x4: origin not stated. Request to supplier S12 drafted for the customer to send.
- Transceiver chip A10: origin not stated. Request to supplier S26 drafted for the customer to send.
- Capacitor set B10: origin not stated. Request to supplier S26 drafted for the customer to send.
- Damper B13: origin not stated. Request to supplier S26 drafted for the customer to send.
- Antenna cable B15: origin not stated. Request to supplier S26 drafted for the customer to send.
- Inertial sensor C10: two documents disagree on the origin. Request to supplier S12 drafted for the customer to send.
- Capacitor set D14: origin not stated. Request to supplier S26 drafted for the customer to send.

15. Evidence index

ID	Document	Lang.	Status
E-014	Customs declaration, motors	DE	Read by AI, checked by a person
E-015	Supplier declaration, radio datalink	EN	Read by AI, checked by a person
E-016	Invoice, flight controller	DE	Read by AI, checked by a person
E-017	Purchase contract, navigation module	EN	Read by AI, checked by a person
E-018	Supplier declaration, battery pack	PL	Asked for, not received yet

A customer's pack lists all 58 documents with a fingerprint each; this sample shows five.

16. Audit trail

Version 3. One line differs from version 2: the thermal camera core, now from a European maker (supplier declaration, grade B), where version 2 had it from United States. The customer tested the change in the calculator before making it.

17. Rule citations

Council Regulation (EU) 2025/1106 (SAFE), Article 16(10); Regulation (EU) 2025/2643 (EDIP), Article 10(3); Agreement between the European Union and Canada on participation in the SAFE instrument (OJ L, 2026/445), Article 5(8); Regulation (EU) 2026/467 (Ukraine Support Loan), Article 13(4)(g). Texts as of 12 October 2026. Not yet expert reviewed.

18. Limitations

Not a decision on eligibility and not legal advice. Based on data the customer supplied and warrants. Documents checked



only as marked in the index. No classified or export-controlled data processed.



19. Declaration page

A template for the maker's own declaration. Lodemark does not sign.

I declare that, on the data set out in this pack, the cost of components originating outside the Union, EEA EFTA States and Ukraine is 27.5 to 30.9 % of the estimated cost of the components of the end product.

Name, role, company, date

Declarant, signed by you

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