



Reconnaissance drone

Version 3

FICTIONAL EXAMPLE

Declarant	Example Systems Oy (fictional), its authorised signatory, Authorised signatory. Lodemark does not sign.
Pack date	24 October 2026
Rulebooks as of	12 October 2026. Not yet expert reviewed.
Prepared by	Lodemark, method of 12 October 2026, calculator 2026.10.13
Language	English
Status	Issued
Input fingerprint	SHA-256 b49b5398 f01f824a e98a66f1 3af72569 97b52bad bc56f487 4afbdeef 7a455281

SUMMARY

RULEBOOK	STATE	SHARE OUTSIDE	GRADE
SAFE Article 16(10)	Meets the threshold on the data entered	27.5 to 30.9 %	D, Unknown
EDIP Article 10(3)	Needs review	30.8 to 34.2 %	D, Unknown
EU-Canada agreement Article 5(8)	Meets the threshold on the data entered	22.8 to 26.2 %	D, Unknown
Ukraine Support Loan Article 13(4)(g)	Meets the threshold on the data entered	27.5 to 30.9 %	D, Unknown

7 lines are grade D, unknown. See sections 3a and 12.

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.



2. Summary

SAFE Article 16(10)

Meets the threshold on the data entered

On the data entered, components originating outside the Union, EEA EFTA States and Ukraine make up between 27.5 % and 30.9 % of the estimated cost of the components of the end product. The limit in SAFE Article 16(10) is 35 %.

Grade	Share of component cost
A, Official document	22.9 %
B, Supplier declaration with proof	63.8 %
C, Statement only	9.9 %
D, Unknown	3.4 %

Main reasons

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

Rulebook: Council Regulation (EU) 2025/1106 (SAFE), Article 16(10), as of 12 October 2026. Not yet expert reviewed.

EDIP Article 10(3)

Needs review

On the data entered, components originating outside the Union and associated countries make up between 30.8 % and 34.2 % of the estimated cost of the components of the end product. The limit in EDIP Article 10(3) is 35 %.

Grade	Share of component cost
A, Official document	22.9 %
B, Supplier declaration with proof	63.8 %
C, Statement only	9.9 %
D, Unknown	3.4 %

Main reasons

- Origin unknown for 7 components (3.4 % of component cost).
- The association status of Norway, Iceland and Liechtenstein under EDIP is to verify.
- The result changes if Norway, Iceland and Liechtenstein do not count as associated countries.

Rulebook: Regulation (EU) 2025/2643 (EDIP), Article 10(3), as of 12 October 2026. Not yet expert reviewed.

EU-Canada agreement Article 5(8)

Test	State	Share
Limb 1: European share at least 20 %	Meets the threshold on the data entered	On the data entered, components originating either in the Union, an EEA EFTA State or Ukraine make up between 69.1 % and 72.5 % of the estimated cost of the components of the end product. The minimum in the EU-Canada agreement Article 5(8) is 20 %.

Test	State	Share
Limb 2: third countries not above the European share	Meets the threshold on the data entered	On the data entered, components from third countries make up between 22.8 % and 26.2 % and components originating in the Union, an EEA EFTA State, or Ukraine between 69.1 % and 72.5 % of the estimated cost of the components of the end product. Under the EU-Canada agreement Article 5(8) the first must not exceed the second.
Limb 3: third countries at most 35 %	Meets the threshold on the data entered	On the data entered, components from third countries make up between 22.8 % and 26.2 % of the cost of the components of the end product. The limit in the EU-Canada agreement Article 5(8) is 35 %.

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 %.

Grade	Share of component cost
A, Official document	22.9 %
B, Supplier declaration with proof	63.8 %
C, Statement only	9.9 %
D, Unknown	3.4 %

Main reasons

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

Rulebook: Agreement between the European Union and Canada on participation in the SAFE instrument (OJ L, 2026/445), Article 5(8), as of 12 October 2026. Not yet expert reviewed.

Ukraine Support Loan Article 13(4)(g)

Meets the threshold on the data entered

On the data entered, components originating outside the Union, EEA EFTA States and Ukraine make up between 27.5 % and 30.9 % of the estimated cost of the components of the defence product. The limit in Ukraine Support Loan Article 13(4)(g) is 35 %.

Grade	Share of component cost
A, Official document	22.9 %
B, Supplier declaration with proof	63.8 %
C, Statement only	9.9 %
D, Unknown	3.4 %

Main reasons

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

The Commission has granted derogations from this rule under Article 13(5).

Rulebook: Regulation (EU) 2026/467 (Ukraine Support Loan), Article 13(4)(g), as of 12 October 2026. Not yet expert reviewed.

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 of version 3. Cost in euros at the rate entered. Components only count in the share; other lines are listed and left out.

No.	Component	Supplier	Qty	Cost (EUR)	Origin	Basis	Grade	Evidence	Read with	Checked by	Flag
1	Thermal camera core	S01	1	5,200.00	Germany (DE)	Document	B			Customer	
2	Airframe, carbon	Northern Airframe Works Oy (fictional)	1	4,700.00	Finland (FI)	Document	B			Customer	
3	Radio datalink	S03	1	3,900.00	Norway (NO)	Document	B			Customer	
4	Battery pack	S04	1	3,300.00	Poland (PL)	Supplier statement	C			Customer	
5	Flight controller	S05	1	3,100.00	Germany (DE)	Document	B			Customer	
6	Gimbal assembly	S06	1	2,500.00	Switzerland (CH)	Document	A			Customer	
7	Mission computer	S07	1	2,400.00	Canada (CA)	Document	B			Customer	
8	Motors ×4	S08	4	2,200.00	China (CN)	Document	A			Customer	
9	Daylight camera optics	S09	1	1,900.00	Japan (JP)	Document	A			Customer	
10	Navigation module	S10	1	1,700.00	Ukraine (UA)	Document	B			Customer	
11	Encryption module	S11	1	1,500.00	Finland (FI)	Document	B			Customer	
12	Speed controllers ×4	Speedline Drives AB (fictional)	4	1,300.00	Unknown	None	D			Customer	
13	Antenna set	S13	1	1,200.00	Sweden (SE)	Document	B			Customer	
14	Ground link modem	S14	1	1,000.00	United Kingdom (GB)	Document	A			Customer	
15	Power distribution board	S05	1	1,000.00	Germany (DE)	Document	B			Customer	
16	GNSS receiver	S15	1	900.00	Taiwan (TW)	Document	A			Customer	
17	Wiring harness	S16	1	900.00	Czechia (CZ)	Document	B			Customer	
18	Parachute system	S17	1	800.00	France (FR)	Document	B			Customer	
19	Landing gear	S11	1	700.00	Finland (FI)	Document	B			Customer	
20	Propellers ×4	S08	4	400.00	China (CN)	Document	A			Customer	
21	Connector A10	S18	1	86.00	Italy (IT)	Document	B			Customer	
22	Fastener kit A11	S19	1	26.00	Japan (JP)	Document	B			Customer	
23	Voltage regulator A12	S20	1	95.00	Netherlands (NL)	Document	A			Customer	
24	Inertial sensor A13	S21	1	39.00	Sweden (SE)	Document	B			Customer	
25	Barometer A14	S22	1	46.00	Poland (PL)	Document	A			Customer	
26	Magnetometer A15	S23	1	83.00	Netherlands (NL)	Supplier statement	C			Customer	
27	Servo A16	S13	1	136.00	Sweden (SE)	Document	B			Customer	
28	LED module A10	Northern Airframe Works Oy (fictional)	1	21.00	Finland (FI)	Document	B			Customer	
29	Heat sink A11	S24	1	26.00	China (CN)	Document	B			Customer	

No.	Component	Supplier	Qty	Cost (EUR)	Origin	Basis	Grade	Evidence	Read with	Checked by	Flag
30	Shielding can A12	S08	1	79.00	China (CN)	Document	A			Customer	
31	Coax cable A13	S09	1	150.00	Japan (JP)	Document	A			Customer	
32	Carrier board A14	Northern Airframe Works Oy (fictional)	1	30.00	Finland (FI)	Supplier statement	C			Customer	
33	Capacitor set A15	S25	1	44.00	France (FR)	Document	B			Customer	
34	Resistor set A16	S08	1	24.00	China (CN)	Supplier statement	C			Customer	
35	MOSFET set A10	S25	1	98.00	France (FR)	Document	B			Customer	
36	Oscillator A11	S17	1	25.00	France (FR)	Document	A			Customer	
37	Memory module A12	S13	1	50.00	Sweden (SE)	Document	B			Customer	
38	Storage card A13	Northern Airframe Works Oy (fictional)	1	22.00	Finland (FI)	Document	B			Customer	
39	Cooling fan A14	S24	1	27.00	China (CN)	Document	B			Customer	
40	Gasket set A15	Northern Airframe Works Oy (fictional)	1	120.00	Finland (FI)	Document	B			Customer	
41	Bearing set A16	S13	1	67.00	Sweden (SE)	Document	B			Customer	
42	Bracket A10	Northern Airframe Works Oy (fictional)	1	19.00	Finland (FI)	Document	B			Customer	
43	Damper A11	S16	1	20.00	Czechia (CZ)	Document	A			Customer	
44	Lens filter A12	S08	1	28.00	China (CN)	Document	B			Customer	
45	Antenna cable A13	S20	1	180.00	Netherlands (NL)	Document	B			Customer	
46	Fuse set A14	S23	1	71.00	Netherlands (NL)	Document	B			Customer	
47	Switch A15	S05	1	141.00	Germany (DE)	Document	B			Customer	
48	Microcontroller A16	S08	1	35.00	China (CN)	Supplier statement	C			Customer	
49	Transceiver chip A10	S26	1	84.00	Unknown	None	D			Customer	
50	Pitot tube A11	S08	1	22.00	China (CN)	Document	B			Customer	
51	Connector B12	S24	1	45.00	China (CN)	Document	A			Customer	
52	Fastener kit B13	S08	1	28.00	China (CN)	Document	A			Customer	
53	Voltage regulator B14	S11	1	163.00	Finland (FI)	Document	A			Customer	
54	Inertial sensor B15	S08	1	88.00	China (CN)	Supplier statement	C			Customer	
55	Barometer B16	S20	1	18.00	Netherlands (NL)	Document	B			Customer	
56	Magnetometer B10	S17	1	43.00	France (FR)	Document	A			Customer	
57	Servo B11	S05	1	134.00	Germany (DE)	Supplier statement	C			Customer	
58	LED module B12	S08	1	189.00	China (CN)	Document	B			Customer	
59	Heat sink B13	S05	1	63.00	Germany (DE)	Document	A			Customer	

No.	Component	Supplier	Qty	Cost (EUR)	Origin	Basis	Grade	Evidence	Read with	Checked by	Flag
60	Shielding can B14	S21	1	19.00	Sweden (SE)	Document	B			Customer	
61	Coax cable B15	S25	1	76.00	France (FR)	Document	A			Customer	
62	Carrier board B16	S21	1	60.00	Sweden (SE)	Document	A			Customer	
63	Capacitor set B10	S26	1	39.00	Unknown	None	D			Customer	
64	Resistor set B11	S08	1	87.00	China (CN)	Document	A			Customer	
65	MOSFET set B12	S05	1	44.00	Germany (DE)	Supplier statement	C			Customer	
66	Oscillator B13	S27	1	41.00	Germany (DE)	Document	B			Customer	
67	Memory module B14	S28	1	33.00	Taiwan (TW)	Document	B			Customer	
68	Storage card B15	S27	1	23.00	Germany (DE)	Document	B			Customer	
69	Cooling fan B16	S11	1	125.00	Finland (FI)	Supplier statement	C			Customer	
70	Gasket set B10	S08	1	120.00	China (CN)	Document	B			Customer	
71	Bearing set B11	S11	1	27.00	Finland (FI)	Document	B			Customer	
72	Bracket B12	S27	1	19.00	Germany (DE)	Document	B			Customer	
73	Damper B13	S26	1	105.00	Unknown	None	D			Customer	
74	Lens filter B14	S27	1	55.00	Germany (DE)	Document	B			Customer	
75	Antenna cable B15	S26	1	97.00	Unknown	None	D			Customer	
76	Fuse set B16	S29	1	52.00	United States (US)	Document	B			Customer	
77	Switch B10	S25	1	21.00	France (FR)	Supplier statement	C			Customer	
78	Microcontroller B11	S27	1	78.00	Germany (DE)	Document	B			Customer	
79	Transceiver chip B12	S22	1	30.00	Poland (PL)	Document	B			Customer	
80	Pitot tube B13	S30	1	50.00	Czechia (CZ)	Supplier statement	C			Customer	
81	Connector C14	S05	1	40.00	Germany (DE)	Document	A			Customer	
82	Fastener kit C15	S23	1	84.00	Netherlands (NL)	Document	A			Customer	
83	Voltage regulator C16	S20	1	43.00	Netherlands (NL)	Document	B			Customer	
84	Inertial sensor C10	Speedline Drives AB (fictional)	1	55.00	Unknown	Documents disagree	D			Customer	Documents disagree
85	Barometer C11	S05	1	21.00	Germany (DE)	Document	A			Customer	
86	Magnetometer C12	S27	1	24.00	Germany (DE)	Document	B			Customer	
87	Servo C13	S13	1	87.00	Sweden (SE)	Document	B			Customer	
88	LED module C14	S08	1	151.00	China (CN)	Document	A			Customer	
89	Heat sink C15	S11	1	20.00	Finland (FI)	Document	B			Customer	
90	Shielding can C16	S31	1	35.00	Italy (IT)	Document	B			Customer	
91	Coax cable C10	S01	1	83.00	United States (US)	Supplier statement	C			Customer	
92	Carrier board C11	S08	1	162.00	China (CN)	Document	B			Customer	
93	Capacitor set C12	S25	1	62.00	France (FR)	Document	A			Customer	

No.	Component	Supplier	Qty	Cost (EUR)	Origin	Basis	Grade	Evidence	Read with	Checked by	Flag
94	Resistor set C13	S08	1	35.00	China (CN)	Supplier statement	C			Customer	
95	MOSFET set C14	S13	1	96.00	Sweden (SE)	Document	B			Customer	
96	Oscillator C15	S08	1	21.00	China (CN)	Supplier statement	C			Customer	
97	Memory module C16	S05	1	49.00	Germany (DE)	Document	B			Customer	
98	Storage card C10	S30	1	121.00	Czechia (CZ)	Document	A			Customer	
99	Cooling fan C11	S24	1	103.00	China (CN)	Document	B			Customer	
100	Gasket set C12	S23	1	67.00	Netherlands (NL)	Document	A			Customer	
101	Bearing set C13	S05	1	74.00	Germany (DE)	Document	B			Customer	
102	Bracket C14	S31	1	54.00	Italy (IT)	Document	A			Customer	
103	Damper C15	S16	1	85.00	Czechia (CZ)	Supplier statement	C			Customer	
104	Lens filter C16	S27	1	35.00	Germany (DE)	Document	B			Customer	
105	Antenna cable C10	S05	1	86.00	Germany (DE)	Supplier statement	C			Customer	
106	Fuse set C11	S21	1	41.00	Sweden (SE)	Document	B			Customer	
107	Switch C12	S24	1	57.00	China (CN)	Supplier statement	C			Customer	
108	Microcontroller C13	S15	1	132.00	Taiwan (TW)	Document	B			Customer	
109	Transceiver chip C14	S24	1	20.00	China (CN)	Document	A			Customer	
110	Pitot tube C15	S04	1	22.00	Poland (PL)	Document	B			Customer	
111	Connector D16	S05	1	21.00	Germany (DE)	Document	B			Customer	
112	Fastener kit D10	Northern Airframe Works Oy (fictional)	1	53.00	Finland (FI)	Supplier statement	C			Customer	
113	Voltage regulator D11	S25	1	18.00	France (FR)	Supplier statement	C			Customer	
114	Inertial sensor D12	Northern Airframe Works Oy (fictional)	1	21.00	Finland (FI)	Document	B			Customer	
115	Barometer D13	S01	1	25.00	United States (US)	Document	A			Customer	
116	Magnetometer D14	S04	1	78.00	Poland (PL)	Supplier statement	C			Customer	
117	Servo D15	S28	1	95.00	Taiwan (TW)	Document	A			Customer	
118	LED module D16	Northern Airframe Works Oy (fictional)	1	100.00	Finland (FI)	Document	B			Customer	
119	Heat sink D10	S13	1	54.00	Sweden (SE)	Document	B			Customer	
120	Shielding can D11	S21	1	55.00	Sweden (SE)	Document	B			Customer	
121	Coax cable D12	S05	1	33.00	Germany (DE)	Document	B			Customer	
122	Carrier board D13	S04	1	45.00	Poland (PL)	Document	B			Customer	
123	Capacitor set D14	S26	1	32.00	Unknown	None	D			Customer	

No.	Component	Supplier	Qty	Cost (EUR)	Origin	Basis	Grade	Evidence	Read with	Checked by	Flag
124	Resistor set D15	S27	1	31.00	Germany (DE)	Document	B			Customer	
125	MOSFET set D16	S09	1	44.00	Japan (JP)	Document	B			Customer	
126	Oscillator D10	S21	1	41.00	Sweden (SE)	Document	B			Customer	
127	Memory module D11	S05	1	21.00	Germany (DE)	Supplier statement	C			Customer	
128	Storage card D12	S30	1	40.00	Czechia (CZ)	Document	B			Customer	
129	Cooling fan D13	S18	1	152.00	Italy (IT)	Document	B			Customer	
130	Gasket set D14	S04	1	34.00	Poland (PL)	Document	A			Customer	
131	Bearing set D15	S11	1	50.00	Finland (FI)	Document	A			Customer	
132	Bracket D16	S04	1	27.00	Poland (PL)	Document	B			Customer	
133	Damper D10	S22	1	19.00	Poland (PL)	Supplier statement	C			Customer	
134	Lens filter D11	Northern Airframe Works Oy (fictional)	1	78.00	Finland (FI)	Document	B			Customer	
135	Antenna cable D12	S24	1	54.00	China (CN)	Document	B			Customer	
136	Fuse set D13	S21	1	75.00	Sweden (SE)	Document	B			Customer	
137	Switch D14	S22	1	69.00	Poland (PL)	Document	A			Customer	
138	Microcontroller D15	S27	1	60.00	Germany (DE)	Document	B			Customer	
139	Transceiver chip D16	S05	1	22.00	Germany (DE)	Document	A			Customer	
140	Pitot tube D10	S08	1	85.00	China (CN)	Document	B			Customer	
141	Connector E11	S22	1	137.00	Poland (PL)	Document	B			Customer	
142	Fastener kit E12	S27	1	48.00	Germany (DE)	Document	A			Customer	
143	Voltage regulator E13	S28	1	21.00	Taiwan (TW)	Document	B			Customer	
144	Inertial sensor E14	S21	1	71.00	Sweden (SE)	Document	B			Customer	
145	Barometer E15	S05	1	62.00	Germany (DE)	Document	B			Customer	
146	Magnetometer E16	S29	1	44.00	United States (US)	Document	A			Customer	
147	Servo E10	S22	1	66.00	Poland (PL)	Document	B			Customer	
148	LED module E11	S30	1	72.00	Czechia (CZ)	Supplier statement	C			Customer	
149	Heat sink E12	S01	1	54.00	United States (US)	Document	A			Customer	
150	Shielding can E13	S21	1	33.00	Sweden (SE)	Document	A			Customer	
151	Coax cable E14	S11	1	47.00	Finland (FI)	Document	A			Customer	
152	Carrier board E15	S27	1	18.00	Germany (DE)	Document	B			Customer	
153	Capacitor set E16	S28	1	40.00	Taiwan (TW)	Document	B			Customer	
154	Resistor set E10	S27	1	19.00	Germany (DE)	Supplier statement	C			Customer	
155	MOSFET set E11	S05	1	146.00	Germany (DE)	Document	B			Customer	
156	Oscillator E12	S08	1	56.00	China (CN)	Document	B			Customer	
157	Memory module E13	S05	1	24.00	Germany (DE)	Document	A			Customer	
158	Storage card E14	S21	1	39.00	Sweden (SE)	Document	A			Customer	

No.	Component	Supplier	Qty	Cost (EUR)	Origin	Basis	Grade	Evidence	Read with	Checked by	Flag
159	Cooling fan E15	S25	1	37.00	France (FR)	Document	B			Customer	
160	Gasket set E16	S31	1	19.00	Italy (IT)	Document	B			Customer	
161	Bearing set E10	S24	1	63.00	China (CN)	Document	B			Customer	
162	Bracket E11	S17	1	124.00	France (FR)	Document	A			Customer	
163	Damper E12	S22	1	48.00	Poland (PL)	Supplier statement	C			Customer	
164	Lens filter E13	Northern Airframe Works Oy (fictional)	1	95.00	Finland (FI)	Document	B			Customer	
165	Antenna cable E14	S11	1	76.00	Finland (FI)	Supplier statement	C			Customer	
166	Fuse set E15	S30	1	20.00	Czechia (CZ)	Supplier statement	C			Customer	
167	Switch E16	S22	1	78.00	Poland (PL)	Document	B			Customer	
168	Microcontroller E10	S19	1	45.00	Japan (JP)	Supplier statement	C			Customer	
169	Transceiver chip E11	S16	1	51.00	Czechia (CZ)	Document	A			Customer	
170	Pitot tube E12	S23	1	77.00	Netherlands (NL)	Supplier statement	C			Customer	
171	Connector F13	S24	1	104.00	China (CN)	Document	A			Customer	
172	Fastener kit F14	S27	1	78.00	Germany (DE)	Document	B			Customer	
173	Voltage regulator F15	S20	1	85.00	Netherlands (NL)	Document	B			Customer	
174	Inertial sensor F16	S27	1	72.00	Germany (DE)	Document	A			Customer	
175	Barometer F10	S11	1	90.00	Finland (FI)	Document	B			Customer	
176	Magnetometer F11	S15	1	128.00	Taiwan (TW)	Supplier statement	C			Customer	
177	Servo F12	S20	1	23.00	Netherlands (NL)	Document	B			Customer	
178	LED module F13	S31	1	52.00	Italy (IT)	Document	A			Customer	
179	Heat sink F14	S22	1	65.00	Poland (PL)	Supplier statement	C			Customer	
180	Shielding can F15	S08	1	22.00	China (CN)	Document	B			Customer	
181	Coax cable F16	S05	1	143.00	Germany (DE)	Document	B			Customer	
182	Carrier board F10	S04	1	26.00	Poland (PL)	Document	A			Customer	
183	Capacitor set F11	S25	1	59.00	France (FR)	Document	B			Customer	
184	Resistor set F12	S27	1	107.00	Germany (DE)	Document	B			Customer	
185	MOSFET set F13	S11	1	113.00	Finland (FI)	Document	A			Customer	
186	Oscillator F14	S04	1	51.00	Poland (PL)	Document	A			Customer	

Totals per rulebook

- SAFE Article 16(10): component cost 50,911.00 EUR, of which outside the set 14,003.00 to 15,715.00 EUR
- EDIP Article 10(3): component cost 50,911.00 EUR, of which outside the set 15,703.00 to 17,415.00 EUR
- EU-Canada agreement Article 5(8): component cost 50,911.00 EUR, of which outside the set 0 EUR
- Ukraine Support Loan Article 13(4)(g): component cost 50,911.00 EUR, of which outside the set 14,003.00 to

15,715.00 EUR

3a. Evidence grade summary

Result grade: D, Unknown, the weakest grade that carries cost.

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 %

Every line of grade C or D, with its cost:

No.	Component	Cost (EUR)	Grade
4	Battery pack	3,300.00	C
12	Speed controllers x4	1,300.00	D
26	Magnetometer A15	83.00	C
32	Carrier board A14	30.00	C
34	Resistor set A16	24.00	C
48	Microcontroller A16	35.00	C
49	Transceiver chip A10	84.00	D
54	Inertial sensor B15	88.00	C
57	Servo B11	134.00	C
63	Capacitor set B10	39.00	D
65	MOSFET set B12	44.00	C
69	Cooling fan B16	125.00	C
73	Damper B13	105.00	D
75	Antenna cable B15	97.00	D
77	Switch B10	21.00	C
80	Pitot tube B13	50.00	C
84	Inertial sensor C10	55.00	D
91	Coax cable C10	83.00	C
94	Resistor set C13	35.00	C
96	Oscillator C15	21.00	C
103	Damper C15	85.00	C
105	Antenna cable C10	86.00	C
107	Switch C12	57.00	C
112	Fastener kit D10	53.00	C
113	Voltage regulator D11	18.00	C

No.	Component	Cost (EUR)	Grade
116	Magnetometer D14	78.00	C
123	Capacitor set D14	32.00	D
127	Memory module D11	21.00	C
133	Damper D10	19.00	C
148	LED module E11	72.00	C
154	Resistor set E10	19.00	C
163	Damper E12	48.00	C
165	Antenna cable E14	76.00	C
166	Fuse set E15	20.00	C
168	Microcontroller E10	45.00	C
170	Pitot tube E12	77.00	C
176	Magnetometer F11	128.00	C
179	Heat sink F14	65.00	C

Counting only grades A and B as known, the SAFE share outside would be up to 39.8 %.

4. Method

- SAFE Article 16(10): Cost base: the estimated cost of the components of the end product.
- EDIP Article 10(3): Cost base: the estimated cost of the components of the end product.
- Ukraine Support Loan Article 13(4)(g): Cost base: the estimated cost of the components of the defence product.
- EDIP: the type of action of Article Article 10(3), as chosen for this product.
- Origin: the customs origin of each component bought directly, at tier 1, with its basis and the grade of its evidence.
- Left out of the share: raw materials, services and final assembly.
- 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.
- Documents are read by AI. A value read counts once a person has checked it, or once the rules engine has shown that the result stays the same even if it were wrong; the rules engine calculates, and the same lines give the same result every time.

5. What drives the result

SAFE Article 16(10)

The largest lines that do not count under SAFE Article 16(10). Lodemark shows them; the customer decides what, if anything, to change.

Component	Origin	Cost (EUR)	Share of cost
Gimbal assembly	Switzerland	2,500.00	4.9 %
Mission computer	Canada	2,400.00	4.7 %
Motors ×4	China	2,200.00	4.3 %

EDIP Article 10(3)

The largest lines that do not count under EDIP Article 10(3). Lodemark shows them; the customer decides what, if anything, to change.

Component	Origin	Cost (EUR)	Share of cost
Gimbal assembly	Switzerland	2,500.00	4.9 %
Mission computer	Canada	2,400.00	4.7 %
Motors ×4	China	2,200.00	4.3 %

EU-Canada agreement Article 5(8)

The largest lines that do not count under EU-Canada agreement Article 5(8). Lodemark shows them; the customer decides what, if anything, to change.

Component	Origin	Cost (EUR)	Share of cost
Gimbal assembly	Switzerland	2,500.00	4.9 %
Motors ×4	China	2,200.00	4.3 %
Daylight camera optics	Japan	1,900.00	3.7 %

Ukraine Support Loan Article 13(4)(g)

The largest lines that do not count under Ukraine Support Loan Article 13(4)(g). Lodemark shows them; the customer decides what, if anything, to change.

Component	Origin	Cost (EUR)	Share of cost
Gimbal assembly	Switzerland	2,500.00	4.9 %
Mission computer	Canada	2,400.00	4.7 %
Motors ×4	China	2,200.00	4.3 %

6. Control and establishment

The customer's answers for this product, as given. They are the customer's statements, signed on the declaration page.

Rulebook	Question	Answer
SAFE Article 16(10)	Common procurement	Yes (Lead, 23 October 2026)
SAFE Article 16(10)	Establishment and management	the EU (Lead, 23 October 2026)
SAFE Article 16(10)	Control	the EU (Lead, 23 October 2026)
SAFE Article 16(10)	Product category	Category two (Lead, 23 October 2026)
EDIP Article 10(3)	Actions not funded	Yes (Lead, 23 October 2026)
EDIP Article 10(3)	Establishment and management	the EU (Lead, 23 October 2026)
EDIP Article 10(3)	Control	the EU (Lead, 23 October 2026)
EDIP Article 10(3)	Whole action	Yes (Lead, 23 October 2026)
EU-Canada agreement Article 5(8)	Contract under the agreement	Yes (Lead, 23 October 2026)

Rulebook	Question	Answer
EU-Canada agreement Article 5(8)	Establishment and management	the EU (Lead, 23 October 2026)
EU-Canada agreement Article 5(8)	Control	the EU (Lead, 23 October 2026)
EU-Canada agreement Article 5(8)	Product category	Category two (Lead, 23 October 2026)
Ukraine Support Loan Article 13(4)(g)	Product schedule	Yes (Lead, 23 October 2026)
Ukraine Support Loan Article 13(4)(g)	Establishment and management	the EU (Lead, 23 October 2026)
Ukraine Support Loan Article 13(4)(g)	Control	the EU (Lead, 23 October 2026)
Ukraine Support Loan Article 13(4)(g)	Product category	Category two (Lead, 23 October 2026)

7. Subcontractor derogation

The rulebook's derogation for subcontractors established outside the accepted places, as the customer answered it under the question on establishment.

The customer's answers for this product, as given. They are the customer's statements, signed on the declaration page.

Rulebook	Question	Answer
SAFE Article 16(10)	Establishment and management	the EU (Lead, 23 October 2026)
EDIP Article 10(3)	Establishment and management	the EU (Lead, 23 October 2026)
EU-Canada agreement Article 5(8)	Establishment and management	the EU (Lead, 23 October 2026)
Ukraine Support Loan Article 13(4)(g)	Establishment and management	the EU (Lead, 23 October 2026)

8. Design authority

The maker's statement on design rights and on replacing restricted components, as answered.

The customer's answers for this product, as given. They are the customer's statements, signed on the declaration page.

Rulebook	Question	Answer
SAFE Article 16(10)	Design authority	the EU (Lead, 23 October 2026)
EDIP Article 10(3)	Design authority	the EU (Lead, 23 October 2026)
EU-Canada agreement Article 5(8)	Design authority	the EU (Lead, 23 October 2026)
Ukraine Support Loan Article 13(4)(g)	Design authority	the EU (Lead, 23 October 2026)

9. Infrastructure location

Production and test sites with their country, as answered.

The customer's answers for this product, as given. They are the customer's statements, signed on the declaration page.

Rulebook	Question	Answer
SAFE Article 16(10)	Sites	the EU (Lead, 23 October 2026)
EDIP Article 10(3)	Sites	the EU (Lead, 23 October 2026)
EU-Canada agreement Article 5(8)	Sites	the EU (Lead, 23 October 2026)
Ukraine Support Loan Article 13(4)(g)	Sites	the EU (Lead, 23 October 2026)

10. Security-interest sentence

No component comes from a country on the configured list.

The customer makes this assessment.

Rulebook	Question	Answer
SAFE Article 16(10)	Security and defence interests	Yes (Lead, 23 October 2026)
EDIP Article 10(3)	Security and defence interests	Yes (Lead, 23 October 2026)
EU-Canada agreement Article 5(8)	Security and defence interests	Yes (Lead, 23 October 2026)
Ukraine Support Loan Article 13(4)(g)	Security and defence interests	Yes (Lead, 23 October 2026)

11. Equivalence

None claimed.

12. Open issues

Every point that keeps a result open, with its owner and due date.

Point	Owner	Due
Two documents give different origins for VS-IMU-9.	Lodemark reviewer	22 October 2026
The reading of COMMERCIAL INVOICE (CI-2026-0331) is not yet checked by a person.	Lodemark reviewer	23 October 2026
The reading of WZ - Wydanie zewnetrzne (Nr WZ 1187/09/2026) is not yet checked by a person.	Lodemark reviewer	25 October 2026
The reading of SWIADECTWO POCHODZENIA / CERTIFICATE OF ORIGIN (Nr PL/2026/IG/03317) is not yet checked by a person.	Lodemark reviewer	25 October 2026
The reading of OB-TC640 - Modulo termico radiometrico 640 × 512 · LWIR 8–14 µm (datasheet, Rev. C) is not yet checked by a person.	Lodemark reviewer	26 October 2026
Origin or cost missing on 7 lines.	Lead	29 October 2026

Point	Owner	Due
An answer from supplier S02 is waiting to be accepted or sent back.	Lead	30 October 2026
SAFE Article 16(10): Two documents give different origins for Inertial sensor C10.	Lead	No date
EDIP Article 10(3): Origin unknown for 7 components (3.4 % of component cost).	Lead	No date
EDIP Article 10(3): The association status of Norway, Iceland and Liechtenstein under EDIP is to verify.	Lead	No date
EDIP Article 10(3): The result changes if Norway, Iceland and Liechtenstein do not count as associated countries.	Lead	No date
EDIP Article 10(3): Two documents give different origins for Inertial sensor C10.	Lead	No date
EU-Canada agreement Article 5(8): Two documents give different origins for Inertial sensor C10.	Lead	No date
Ukraine Support Loan Article 13(4)(g): Two documents give different origins for Inertial sensor C10.	Lead	No date

13. Country annex

No Member State annex was added for this pack. Where a buyer's Member State asks for evidence that is not public, it is listed here as reported by the customer.

14. Evidence index

Every document this pack rests on, by reference: name, issuer, date and fingerprint. Copies are not part of the pack unless the customer chose to include them.

ID	Title	Issuer	Date	Language	Class and grade	Lines	Read
E01	INVOICE (Invoice no. INV-2026-08817) SHA-256 ca71200d5b9e7385	Brandt Components B.V.	18 August 2026	English	OTHER		Recorded reading, checked by a person
E02	Langzeit-Lieferantenerklärung für Waren mit nichtpräferenziellem Ursprung SHA-256 b199394cc33a29d3	Kessler Antriebstechnik GmbH	14 January 2026	German	SUPPLIER_DECLARATION, C		Recorded reading, checked by a person
E03	Rechnung (Rechnungsnummer RE-26-04172) SHA-256 4368dd22a68bfe34	Vogt Sensorik GmbH	2 September 2026	German	STATEMENT, C		Recorded reading, checked by a person
E04	CUSTOMS DECLARATION - IMPORT (H1) SHA-256 0c684a7712871d04	DE007209 Zollamt Reutlingen-Nord (print of accepted declaration; copy provided by Vogt Sensorik GmbH, Logistik)	21 July 2026	English	OFFICIAL, A		Recorded reading, checked by a person
E05	FACTURE (N° de facture F2026-0912) SHA-256 f1622907fe0a81b0	Atelier Mécanique Durand-Laval SAS	9 September 2026	French	STATEMENT, C		Recorded reading, checked by a person
E06	CERTIFICAT D'ORIGINE / CERTIFICATE OF ORIGIN (N° CO 2026/118 204) SHA-256 33fd941300a90ea5	Chambre de commerce et d'industrie du Jura-Lac, Service des certificats d'origine, Bienne	31 August 2026	French	OFFICIAL, A		Recorded reading, checked by a person
E07	LÄHETE (Nro 551204) SHA-256 a4ffe3f813c24bca	Kuusela Komposiitti Oy	15 September 2026	Finnish	STATEMENT, C		Recorded reading, checked by a person
E08	SWIADECTWO POCHODZENIA / CERTIFICATE OF ORIGIN (Nr PL/2026/IG/03317) SHA-256 124466c7698e73ab	Izba Gospodarcza Pogórze Sudeckiego, Jelenia Góra	7 September 2026	Polish	OFFICIAL, A		Recorded reading, not yet checked



ID	Title	Issuer	Date	Language	Class and grade	Lines	Read
E09	WZ - Wydanie zewnętrzne (Nr WZ 1187/09/2026) SHA-256 35238a74e3479829	Elektro-Mazur Sp. z o.o.	10 September 2026	Polish	STATEMENT, C		Recorded reading, not yet checked
E10	OB-TC640 - Modulo termico radiometrico 640 × 512 · LWIR 8–14 µm (datasheet, Rev. C) SHA-256 ec75bbea0ebbee0d	Ottica Benedetti S.r.l.		Italian	STATEMENT, C		Recorded reading, not yet checked
E11	DICHIARAZIONE DEL FORNITORE DI ORIGINE NON PREFERENZIALE SHA-256 8b6582607b1c4242	Meccanica Ferraris S.p.A.	20 August 2026	Italian	SUPPLIER_DECLARATION B		Recorded reading, checked by a person
E12	COMMERCIAL INVOICE (CI-2026-0331) SHA-256 7a35489c951bf343	Caspian Gate Trading FZE	26 August 2026	English	STATEMENT, C		Recorded reading, not yet checked
E13	KM-24R - 24 GHz FMCW radar altimeter module for unmanned aircraft (Product datasheet KM-DS-024 v2.3) SHA-256 045898259bb0cf33	Kestrel Microwave AB		English	OTHER		Recorded reading, checked by a person
E14	Supplier's declaration of non-preferential origin SHA-256 0e08c1a7c31b71da	Fjordline Cells AS	3 June 2026	English	SUPPLIER_DECLARATION B		Recorded reading, checked by a person

15. Audit trail

This is the first pack of this product: the changes since its first version.

No change was recorded.



16. Rule citations

The articles this pack applies, in their own words.

Council Regulation (EU) 2025/1106 (SAFE), Article 16(10)

10. The cost of components originating outside the Union, EEA EFTA States and Ukraine shall not be higher than 35 % of the estimated cost of the components of the end product. For the purpose of procurements supported by the SAFE instrument, no component shall be sourced from a third country that contravenes the security and defence interests of the Union and its Member States.

Text as of 12 October 2026. Not yet expert reviewed.

Regulation (EU) 2025/2643 (EDIP), Article 10(3)

3. For procurement carried out pursuant to Articles 11, 13 and 35 which is supported by Union funding, the cost of components originating outside the Union and associated countries shall not be higher than 35 % of the estimated cost of the components of the end product. No component shall be sourced from third countries that contravene the security and defence interests of the Union and its Member States.

Text as of 12 October 2026. Not yet expert reviewed.

Agreement between the European Union and Canada on participation in the SAFE instrument (OJ L, 2026/445), Article 5(8)

8. The cost of components originating in Canada may exceed 35 % of the estimated cost of the components of the end product. The cost of components originating either in the Union, an EEA EFTA State or Ukraine must not be lower than 20 % of the estimated cost of the components of the end product. The cost of the components from third countries must not exceed the cost of components originating in the Union, an EEA EFTA State, or Ukraine, and in any case may not exceed 35 % of the cost of the components of the end product.

Text as of 12 October 2026. Not yet expert reviewed.

Regulation (EU) 2026/467 (Ukraine Support Loan), Article 13(4)(g)

(g)

the cost of components originating outside the Union, EEA EFTA States and Ukraine shall not be higher than 35 % of the estimated cost of the components of the defence product. No component shall be sourced from a third country that contravenes the security and defence interests of the Union and its Member States;

Text as of 12 October 2026. Not yet expert reviewed.

Council Regulation (EU) 2025/1106 (SAFE), Article 16(4)

4. By way of derogation from paragraph 3, in order to take into account industrial cooperation with non-EU partners, common procurements that involve a subcontractor which is allocated between 15 % and 35 % of the value of the contract, and that is not established or doesn't have its executive management structures in the Union, EEA EFTA State or Ukraine, shall be eligible for support under the SAFE instrument providing that at least one of the following conditions are met:

(a)

a direct contractual relationship related to the defence product has been established between the contractor and that subcontractor prior to the date of entry into force of this Regulation;

(b)

the contractor commits to studying, within two years, the feasibility of replacing the input provided by that subcontractor with an alternative, restriction-free input originating in the Union, EEA EFTA States or Ukraine, and meeting technical and time requirements.

Text as of 12 October 2026. Not yet expert reviewed.

Council Regulation (EU) 2025/1106 (SAFE), Article 16(11)

11. For defence products related to category two as referred to in Article 1, second subparagraph, point (b), contractors shall have the ability to decide, without restrictions imposed by third countries or by third-country entities, on the definition, adaptation and evolution of the design of the defence product procured, including the legal authority to substitute or remove components that are subject to restrictions imposed by third countries or by third-country entities.

Text as of 12 October 2026. Not yet expert reviewed.

Regulation (EU) 2025/2643 (EDIP), Article 10(5)

5. Recipients of Union funding or, where relevant, contractors, shall have the ability to decide, without restrictions imposed by non-associated third countries or by non-associated third-country entities, on the definition, adaptation and evolution of the design of the defence products concerned, including the legal authority to substitute or remove components that are subject to restrictions imposed by non-associated third countries or by non-associated third-country entities.

Text as of 12 October 2026. Not yet expert reviewed.

Regulation (EU) 2025/2643 (EDIP), Article 12(4)

4. For the production of ammunition and missiles, recipients of Union funding or relevant governmental authorities of the Member States concerned shall have the ability to decide, without restrictions imposed by non-associated third countries or by non-associated third-country entities, on the definition, adaptation and evolution of the design of the defence product concerned, including the legal authority to substitute or remove components that are subject to restrictions imposed by non-associated third countries or by non-associated third-country entities, or alternatively, by way of derogation from Article 10(5), shall have obtained a legally binding commitment from the non-associated third country or the non-associated third-country entity concerned that they will obtain such ability to decide within a reasonable timeframe commensurate with the complexity of the action concerned, and in any event no later than 31 December 2033.

Text as of 12 October 2026. Not yet expert reviewed.

17. Declaration page

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

- The share outside the set under SAFE Article 16(10): 27.5 to 30.9 %.
- The share outside the set under EDIP Article 10(3): 30.8 to 34.2 %.
- The share outside the set under Ukraine Support Loan Article 13(4)(g): 27.5 to 30.9 %.

The declarant states, as answered Yes in this pack:

- SAFE Article 16(10): Answered Yes, for you to sign in the evidence pack: Common procurement, Establishment and management: the EU, Control: the EU, Sites: the EU, Product category: category two, Design authority: the EU, Security and defence interests.
- EDIP Article 10(3): Answered Yes, for you to sign in the evidence pack: Actions not funded, Establishment and management: the EU, Control: the EU, Sites: the EU, Design authority: the EU, Whole action, Security and defence interests.
- EU-Canada agreement Article 5(8): Answered Yes, for you to sign in the evidence pack: Contract under the agreement, Establishment and management: the EU, Control: the EU, Sites: the EU, Product category: category two, Design authority: the EU, Security and defence interests.
- Ukraine Support Loan Article 13(4)(g): Answered Yes, for you to sign in the evidence pack: Product schedule, Establishment and management: the EU, Control: the EU, Sites: the EU, Product category: category two, Design authority: the EU, Security and defence interests.

No tender condition was set.

Name, role, company, date

Declarant, signature

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.

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.

The same data as CSV and JSON files, in the data model's words, come with this pack.