



Date: September 30, 2025

Executive Summary

Remote Pilots and Aerial Applicators System (RPAAS) are increasingly being used for agricultural purposes, including seeding and spraying pesticides. However, few Southern states have made special exceptions for RPAAS use related to agriculture.

In most cases, Southern states require that RPAAS operators (especially those working in agriculture) be licensed or certified with the state, in addition to being licensed by the FAA, which is a federal requirement. The only states that appear not to have this requirement are Alabama, Florida, North Carolina, and Virginia. However, in the case of Florida, registration is still required, whereas in Virginia, it is not.

Findings and Analysis

Federal Requirements

The U.S. Federal Aviation Administration (FAA) and the Environmental Protection Agency (EPA) oversee the use of RPAASs for spraying agricultural chemicals primarily, according to two key regulations:

- [14 CFR Part 107](#): Requires RPAAS pilots to obtain a Remote Pilot Certificate, which involves passing an aeronautical knowledge test and security screening
- [14 CFR Part 137](#): Specifically regulates the dispensing of chemicals (including pesticides and fertilizers) from aircraft, including RPAASs. Operators must obtain a Part 137 Agricultural Aircraft Operator Certificate, which involves additional documentation, exemptions (especially for RPAASs weighing more than 55 pounds), and compliance with operational safety standards.

Under the FAA, individuals using RPAASs for commercial purposes must pass [FAA part 107 aeronautical knowledge test](#). RPAAS pilots must also be [certified](#) by the FAA under Part 137 in order to dispense chemicals and agricultural products.

Pesticide/Herbicide Requirements

For RPAAS use that involves aerial pesticide/herbicide application, all 15 Southern states require operators to be registered or licensed to apply pesticides/herbicides. Some states have reciprocal pesticide license agreements. For example, Oklahoma [appears to recognize](#) Arkansas, Indiana, Kansas, Louisiana, Minnesota, Nebraska, New Mexico, and Texas.



State License Requirements

State	Requirement	Corresponding Links
Alabama	Alabama doesn't appear to have any specific state laws on RPAASs related to agriculture (beyond FAA requirements)	N/A
Arkansas	Requires state applicator license	AR Dept of Ag
Florida	Requires RPAAS operators to register with the state and follow usage guidelines	FL Dept of Ag and Consumer Services
Georgia	Requires state applicator license	GA Dept of Ag
Kentucky	Requires RPAAS operators to register with the state and follow usage guidelines	KY Dept of Ag
	Kentucky prohibits unauthorized filming / audio / recording of food production operations and animal feeding operations, and it includes an explicit prohibition on the use of RPAASs to record these facilities without written consent. Violations would be a Class B misdemeanor for first offenses.	KY Rev Stat § 511.100
Louisiana	Requires state applicator license	LA Dept of Ag & Forestry
	Louisiana law criminalizes using a an RPAA to conduct surveillance, gather evidence, or photograph/record "targeted facilities" without written consent. However, the law specifically exempts RPAASs being used for agricultural purposes	LA Rev Stat § 14:337
Mississippi	Requires state applicator license	MS Dept of Ag and Commerce
Missouri	Though slightly vague, it is likely that Missouri requires a state applicator license	MO Dept of Ag
North Carolina	North Carolina previously had laws (NC Gen Stat § 63-94 to § 63-96) related to RPAASs, including a licensing process for operators, but these were repealed during the 2024 legislative session	NC Code
Oklahoma	Requires state applicator license	OK Dept of Ag, Food, and Forestry
South Carolina	Requires state applicator license	SC Code § 46-13-60
Tennessee	Requires state applicator license	TN Code § 43-8-304
Texas	Requires state applicator license	TX Agric Code § 76.108
Virginia	Requires state applicator license, but RPAASs are exempt from registration requirements	VA Dept of Ag and Consumer Services
West Virginia	Requires state applicator license	WV Dept of Ag



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