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## European Strategy for Remotely Piloted Aircraft Systems (RPAS)

### The perspective of sports and recreational aviation

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January 2013

The European Commission is working towards a “strategy for the development of civil applications of Remotely Piloted Aircraft Systems” (Staff Working Document, SWD(2012)259 final). A key objective is to facilitate the gradual integration of RPAS in non-segregated airspace of any class.

Europe Air Sports (EAS), the organisation representing sports and recreational aviation at the European level, would like to take this opportunity to express its position. The European Commission and the RPAS Steering Group are invited to consider this paper carefully, in their endeavour to develop the RPAS Road Map, including specifically the insertion of RPAS in non-segregated airspace.

EAS and its members are a segment of civil aviation, which will be negatively affected by the insertion of RPAS into non-segregated airspace, where traffic separation is based on the principle of “see and avoid”, and where the responsibility of traffic avoidance solely rests upon the pilot.

The vast majority of our flying activities, many of which are undertaken in non-powered aircraft, take place in non-controlled airspace (Classes F and G) and controlled airspace (Class E), according to the Visual Flight Rules (VFR) in Visual Meteorological Conditions (VMC). Unfortunately, the impacts of RPAS operation on our members’ activities will vary from state to state due to the different national airspace structures.

In view of the above EAS calls up on the Commission to respect four guiding principles, which will help to maintain safe operations and are of fundamental importance to our organisation:

1. Safety of flight must not be impaired and the low level of mid-air collisions must be maintained.
2. There should be no additional equipment requirements for manned aircraft.
3. Detect and avoid systems used by RPAS must work with uncooperative aircraft.
4. RPAS should be marked to improve their visual detectability.

Secondly, EAS is also the representative body of aeromodelling at the European level. Against this background we would like to stress some of the fundamental differences between an aeromodel and a RPAS. EAS insists, that any regulation applicable to RPAS must - by definition - not apply to aeromodels.

EAS suggests that the fundamental characteristics of an aeromodel are:

1. It is operated for sport and recreational purposes and in a non-commercial environment.
2. It is operated within visual line of sight (VLOS) of the operator.
3. The primary purpose of a flight is to fly the aeromodel, whereas with an RPAS the primary purpose of the flight is the achievement of the task (aerial work) with the control of a flight being a secondary or automated function.

EAS would like to offer its technical assistance in guiding the Commission and the Steering Group towards the deployment of RPAS in a non-conflicting way with recreational aviation. As a highly affected airspace user group we request to be continuously informed and consulted by the RPAS Steering Group about its activities. We are also available to participate in relevant meetings of the RPAS Steering Group. Finally, we would be pleased to work with the Commission and the RPAS Steering group towards a solid definition of an RPAS and aeromodel respectively, which should then be taken up in future legislation.

On behalf of Europe Air Sports

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