



APRIL 2020



The Alps near Asiago in February

(Andrea Anesini)

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A MESSAGE FROM THE PRESIDENT OF EUROPE AIR SPORTS

Dear readers of our newsletter,



Only at the end of February I managed to fly for the last time over my Alps, photographing my Asiago-LIDA airport in the snow in flight. I never thought then that only a few weeks later I should have written to you in this way to introduce the newsletter you will read.

With unexpected speed, COVID 19 has decided to visit all European countries, now all over the world.

Of course our flight activities are suffering, and will suffer, I fear, for a long time.

We are holding Board meetings by Skype, and we have been forced to postpone the 2020 General Conference until autumn.

We just have to wait, respecting the strict provisions of the Health Authorities of each country; those who can do it will continue to fly, but I think the most reasonable wish is ... stay healthy, and good maintenance on your flying vehicles!

With my best regards.

Andrea Anesini, EAS President
Asiago March 18, 2020

COVID-19 – NEWS OF EXEMPTIONS FOR LICENCES AND MAINTENANCE *reported by Michel Rocca*

To help pilots deal with the current crisis, the European Commission has invited Member States to grant exemptions using a template prepared by EASA.

In respect of aviation safety, Regulation (EU) 2018/1139 (Basic Regulation) applies. Article 71(1) and (2) provides to Member States the possibility of a derogation from implementing rules for up to eight months, subject to compliance with the criteria and procedures set out.

In order to facilitate the submission of notifications under these provisions in the context of the COVID-19 outbreak, the European Aviation Safety Agency (EASA), in coordination with the Commission, has developed a corresponding template. All Member States have used this template in order to grant exemptions. These allow aircrews, maintenance engineers and air traffic control officers to extend their licence for four to six months, subject to mitigating measures designed to ensure safety. Similar notifications have been made in respect of airworthiness review certificates.

ALL-WEATHER OPERATIONS – *an update from Julian Scarfe*

In February 2020, EASA published Notice of Proposed Amendment (NPA) 2020-02. Although its title is the unwieldy "All-weather operations: Non-commercial operations with other than complex motor-powered aircraft", it is part of the EASA initiative to improve access to IFR for GA pilots. It proposes a tidy-up of the Part-NCO (Non-Commercial Operations) requirements for IFR flight. The proposals include:

- simplifying the requirements for establishing aerodrome operating minima for NCO;
- introducing planning minima for alternate airports;
- simplifying the "approach ban" that prohibits an approach continuing when the runway visual range (RVR) is below a required value;
- accepting substitution of GNSS navigation for conventional nav aids (other than in the final approach segment);
- removing the requirement for a specific approval for low visibility take-offs with an RVR between 150 and 400 m.

Comments, including those of Europe Air Sports, are being reviewed, and it is proposed that the changes be incorporated in an EASA Opinion on All Weather Operations for all operators (including CAT, NCC and SPO) to be published in the third quarter of 2020.

CAT - Commercial Air Transport

NCC - Non-commercial operations with complex-motor-powered aircraft

SPO - Specialised Operations

NEWS OF REGULATIONS FOR CREDITING OF FLYING HOURS

EASA PUBLICATION OF ANNEX I TO EXECUTIVE DIRECTOR DECISION 2020/005/R AMC AND GM TO PART FCL, ISSUE 1 AMENDMENT 9

Rudi Schuegraf, Senior Vice President of Europe Air Sports, explains the significance of this amendment

AMC – Acceptable Means of Compliance

GM – Guidance Material

FCL – Flight crew licensing

The following complex text is hidden under this headline.

This requires explanation, which you can read below.

AMC1 FCL.140.A; FCL.140.S; FCL.740.A(b)(1)(ii) Recency and revalidation requirements

All hours flown on aeroplanes or sailplanes that are subject to a decision as per Article 2(8) of the Basic Regulation or that are specified in **Annex I to the Basic Regulation** should count in full towards fulfilling the hourly requirements of points FCL.140.A, FCL.140.S, and FCL.740.A(b)(1)(ii) under the following conditions:

(a) the aircraft matches the definition and criteria of the respective Part-FCL aircraft category, class, and type ratings; and

(b) the aircraft that is used for training flights with an instructor is an Annex-I aircraft of type (a), (b), (c), or (d) that is subject to an authorisation specified in points ORA.ATO.135 or DTO.GEN.240

ORA.ATO - Organisation requirements for air operations at Approved Training Organisation
DTO – Declared Training Organisation

We will explain why we are very grateful to EASA for this AMC which we think is quite an achievement. It is a huge opportunity for the future development of General Aviation and our airports community, especially nowadays in the world where global warming receives top attention. It is interesting or maybe somewhat boring to go back to the start of EASA in 2003 and the regulatory transition from JAA FCL to EASA FCL. At that time the microlight movement was about to become a grown up player in airports and GA. The aeroplanes had reached high quality and safety standards, but the authorities of the EASA Member States did not yet want to face and accept the reality of the technical progress of three axis microlight aeroplanes.

The reality today is quite clear, EC Reg 1178 defines aeroplanes in compliance with ICAO as:

'Aeroplane' means an engine-driven fixed-wing aircraft heavier than air which is supported in flight by the dynamic reaction of the air against its wings.

The AMC clarifies that a pilot flying any aeroplane or sailplane listed in Annex I can credit the hours to his/her personal account for the validation of his EASA license – LAPL A, PPL A and associated class ratings. This simply means that also hours flown on single engine piston aeroplanes below the mass thresholds of (e) in Annex I can be used to validate an EASA FCL based PPL A or LAPL A and its ratings.

It took many years to convince the regulatory system that hours flown on aeroplanes that are generally called microlights require the identical skills and airmanship as traditional SEP aeroplanes. With this AMC the regulator and the Authorities of the Member States have acknowledged the contribution of the microlight movement and development to the improvement of Aviation safety.

GA SURVEY

EASA has asked Europe Air Sports to promote a survey, run by the General Aviation Manufacturers Association (GAMA) and the International Council of Aircraft Owners and Pilots Associations (IAOPA). They aim to reach as many aircraft owners and operators as possible in the 32 EASA Member States. They are looking for accurate and representative estimates to be made about General Aviation aircraft operation in Europe, to support safety and economic analysis of the sector. This will enable us all to argue the case for appropriate and proportional regulation of GA activities. Please take part if you can.

The survey is at <https://survey.sogosurvey.com/survey.aspx?k=SsQVTTWQsQsPsPsP>

MODEL FLYING AND EUROPE AIR SPORTS' COMMITMENT TO SUPPORT THE ACTIVITY

The President of Europe Air Sports, Andrea Anesini, confirms EAS's commitment to support model flying and the European Model Flying Union (EMFU)

Andrea says: "we recognise the size of the model flying community, which with over 250,000 model flyers in Europe is the largest group of members of EAS. EAS is engaged with EASA and DG Move (Directorate of Transport), with an action taken mid 2019 in Brussels by me together with a task force of EAS Board Members, meeting the Directorate's top managers. We will continue to listen to EMFU needs and strategies and work alongside them and will if needed support the national Federations requiring our support when dealing with local CAAs.

Dave Phipps, the EAS Technical Officer for Model Flying and also the President of the European Model Flying Union, replies

In terms of the regulations for UAS (Unmanned Aircraft Systems), we collectively achieved a positive outcome which stemmed from EAS's success, through Timo Schubert's work, in securing recognition for model flying within the Basic Regulation. This achieved what we wanted in that much of our activity remains within national regulation. However, this has largely shifted the battlefield to individual Member States rather than EU level.

The big challenges that we face at present are:

1. Agreeing Article 16 Authorisations in individual Member States within the intended spirit of the EU regulations.
2. Protecting our use of 2.4GHz on the radio spectrum and work to increase the permitted power output (from 100mW to 1W).
3. Ensuring that model flying retains existing access to the airspace, especially with the development of U-Space.
4. Ensuring that model flying is exempted from I.D./conspicuity requirements when conducted within the framework of Clubs/Associations or that any measures which are mandated are proportionate/sensible.
5. Ensuring that the model flying community is represented within the process for developing any regulations which may impact us.

We believe that EAS may be well placed to help us with priorities 3, 4 & 5.

Pete McDermott and Alex Kennedy

(Photo – Robin Gowler)



EAS Board member Patrick Pauwels updates us on two developments

SAILPLANE LICENSING REQUIREMENTS (PART-FCL)



LS Sailplane

(Photo supplied by the British Gliding Association)

Details of the progress were explained in the December newsletter. Finally the Commission Implementing Regulation (EU) 2020/358 was completed on 4 March 2020 and published on 5 March. This amends Implementing Regulation

(EU) 2018/1976 as regards sailplane pilot licences.

The related **AMC/GC** (**Acceptable Means of Compliance** and **Guidance Material**) was published on 18 March. This means that the users now have a full set of documents in hand. As mentioned before these new rules become active as from 08 April. The full details of the Implementing Regulation can be found [here](#) and the **AMC/GM** are [here](#).

PART M LIGHT

The long awaited **AMC/GM** for Part M-L, Part CAMO (Continuing Airworthiness Management Organisation) and Part CAO (Combined Airworthiness Organisation) were also published on 18 March. They can be seen [here](#).

All maintenance and airworthiness organisations now have all documents available to adapt their structures and procedures according to these new rules.

BIS AIRBORNE COLLISION RISK *reported by Michel Rocca*

During the Christmas period, among other tasks, EAS was invited to comment on a **Best Intervention Strategy (BIS)** on 'Airborne Collision Risk'.

The Board and the Programme Manager were not alone in working during the break. We actually received valuable contributions from several members (German Hang-gliding and Paragliding Association, British Hang-Gliding and Paragliding Association, European Hang-Gliding and Paragliding Union, Deutsche Aero Club, Norwegian Air Sports Federation, Finnish Aeronautical Association, Light Aircraft Association of UK, Swiss Model Flyers' Association).

The document deals with electronic conspicuity and more precisely with in-flight electronic conspicuity.

May I remind some of our readers that this topic is about the use of an electronic device on-board your aircraft to detect, electronically and then visually, possible conflicting traffic.

Do not be confused: this is not about collision avoidance. The device that you operate is not designed to provide you with collision avoidance manoeuvres.

Basically, EAS supports the overarching strategy proposed by EASA which consists of making best use of the non-certified products available on the market, while ensuring interoperability through air-to-air or ground-to-air links.

This strategy is supported because our glider community has developed their own solution based on the Flarm technology and Open Glider Network (OGN). Also our power flying community has begun to use the PilotAware solution, because other communities of airspace users are showing interest for the latest uAvionix offer.

In addition, we made the connection with the **BIS** on Weather Information to GA pilots insofar as both require connectivity or, in other words, a data link for uploading the data

available on the ground. UAT (Universal Access Transceiver) 978 MHz is also an interesting option that is currently considered in some countries.

We took this opportunity to renew our main viewpoints on airspace matters: airspace classification, airspace design, service provision.

As airspace users, "Free access to airspace" is more than ever our guiding principle.

FROM THE PROGRAMME MANAGER'S DESK by *Nils Rostedt*



EASA BIS CONSULTATION ON FLIGHT INSTRUCTORS

In February, EASA issued a focused "Best Intervention Strategy" (BIS) consultation on the topic of Flight Instructors. Because of our representation in the EASA Flight Standards group, EAS was able to respond to this consultation.

Broadly, the BIS proposes several improvement areas in Flight Instructor training:

- Enabling a growth in the number of Flight Instructors, to meet the growth in Commercial Aviation;
- A reform of the CPL (Commercial Pilot licence) to adapt it to today's requirements;
- A change from *hour-based* requirements to more *competency-based* requirements for Flight Instructor training (CBT), i.e. from "minimum xx hours required" to "must demonstrate full proficiency in topic x".

The consultation was open for only 24 days, so there was little time for a detailed response, but in its response EAS generally welcomed the new proposals. One area of concern is the implementation of the CBT concept, which in some respect differs quite a lot from the traditional way of measuring a student's progress. We support the ICAO recommendation to consider a phased implementation of the concept, during which both methods of Flight Instructor training will be open to Approved Training Organisations (ATOs).

This consultation is "linked" to the start of the new Rulemaking Task RMT.0194 Issue 1.

Julian Scarfe describes the new task:

EASA has initiated a new **rulemaking task** (RMT.0194) with two objectives:

- the revision of the regulatory framework concerning instructor certification with the aim of increasing the availability of flight instructors and improving their competence; and
- the modernisation of the process of pilot training, primarily by making increasing use of the concept of the competence-based training and assessment system.

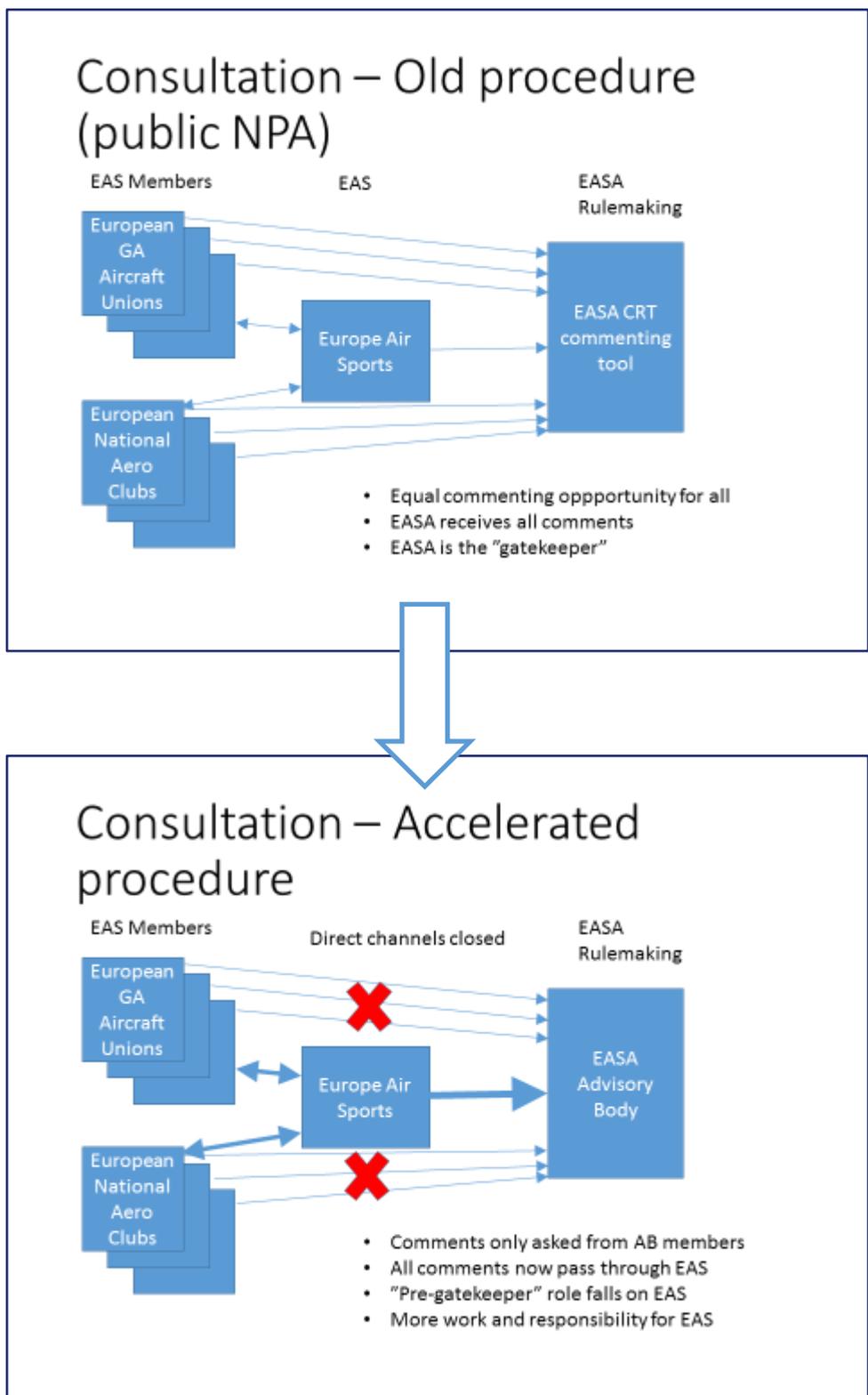
It follows on from a previous **RMT** on instructor and examiner requirements, which did not deliver a Notice of proposed Amendment (NPA), and a taskforce addressing the shortage of instructors, particularly for GA. It is based on EASA's Best Intervention Strategy for Flight Instructors, mentioned above. Michel Rocca and Julian Scarfe have been nominated for the rulemaking group and are participating in the new RMT.

The initial focus is on instructors and the introduction of competence-based training. The mood amongst the group is constructive and ambitious, and this may be an opportunity to develop some of the concepts for FCL that EAS has been proposing in recent years.

NEW EASA CONSULTATION PROCESS

Some of you will have noticed a change in EASA's rulemaking policy, away from broad public "NPA" (Notice of Proposed Amendment) consultations towards "Accelerated Consultation Process" (AC), "Focused Consultations" (FC) and "Best Intervention Strategy" (BIS) consultations. These are open only for a limited group of stakeholders. The result is a smaller number of opportunities for public influence.

Fortunately, due to the far-sighted work of the EAS Board and especially its former Presidents, EAS now has several Board Members and Technical Officers selected to the various EASA Advisory Bodies which are involved in the narrower AC/FC/BIS consultations. This ensures that the voice of GA and Sports Aviation continues to be heard in EASA rulemaking.



But what of the voice of EAS's Members, i.e. the National Aeroclubs and Unions, who may have lost their "influencing channel"? As a remedy, EAS has recently reacted and has stepped up its interaction with its members. As far as practicable, we now send most non-NPA Consultation requests also to our membership for their views, and try to include their views in the EAS response. By this service, we hope that the voice of GA and Sports Aviation remains both broad and knowledgeable in its interaction with EASA.

2020 EUROPE AIR SPORTS GENERAL MEETING

The General Meeting has been postponed. The new provisional dates are 9 to 11 Oct 2020. The location for the meeting and proposed accommodation remains the Hôtel Mercure, Strasbourg, Palais des Congrès.

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If you would like to receive future issues of the Newsletter direct to your inbox, please sign up on the Europe Air Sports website at <http://www.europe-air-sports.org/>

KEY CONTACTS

President	Andrea Anesini	andrea.anesini@europe-air-sports.org
Senior Vice-President	Rudi Schuegraf	r.schuegraf@europe-air-sports.org
General Secretary – central EAS management & administration	Pierre Leonard	p.leonard@europe-air-sports.org
Programme Manager and regulatory work	Nils Rostedt	n.rostedt@europe-air-sports.org
Newsletter Editor	Diana King	d.king@europe-air-sports.org