



## NOVEMBER 2021



*Unmanned landing strip, Island of HVAR, Croatia*

*(Photo Manfred Kunschitz)*

Note - abbreviations and their explanations are shown in full and in **green**, so that you can more easily find the full meaning of the abbreviations.

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### **A MESSAGE FROM THE PRESIDENT**

At the General Conference of Europe Air Sports in October, our President Andrea Anesini, welcomed the delegates with this speech:

Dear friends,

It is my pleasure to welcome you, also on behalf of the whole board of Europe Air Sports, to this year's general conference. Thank again you for finding the time to meet online this Saturday morning. The pandemic evolution shows different degrees of severity from country to country which prevents us from meeting physically. However technology allows us to meet this year and your acceptance provided to the board last year gives us the chance to renew that mode for 2021 General Meeting. Hoping that you and your family remain in good health I look forward to having good discussions with you on sports and recreational aviation, the activity we all love, even using remote relationship technologies.

I can confirm that the burden of the pandemic and the many practical difficulties related to it didn't stop our work. I am pleased to report that Europe Air Sports has had an active and successful 2021 year in fighting for the interests of recreational flying at EU political and technical level. Our long-standing relationship with the European Commission, Parliament, Council and EASA gave to your board, technical officers and professional advisers the chance to continue to work efficiently with our regulatory counterparts, responding appropriately to regulatory threats and continuing to contribute to EU policy-making in a constructive and effective way.

During the current year we have dedicated particular attention and work to the threats related to the present and future rules of the use of U-space. They particularly affect the categories of our pilots who, flying with non-motorised and particularly light aircraft, cannot react to any orders to execute rapid or complex manoeuvres from ATM (Air Traffic Management) bodies.

Last December I informed you about a high-level meeting that took place with the European Commission's DG MOVE. During this meeting with Joachim Lücking, Head of Unit in charge of aviation safety, the key topic was U-Space, the EU's concept to allow for airspace that can be safely shared between manned aircraft and drones.

We insisted that access to such airspace must be safe, free, simple and technologically feasible. We alerted the Commission to the severe impact that drones could have on non-motorised sports, in particular hang and paragliding, which are not currently equipped with electronic conspicuity technology. The message was given to EASA, opening with them an ad hoc discussion table.

Our insistence on drawing the Regulators' attention to our good reasons for protecting the interests of those who use airspace in their free time has been successful, especially when they understood the numbers of our active pilots.

Two working groups have been created, one is at a technical level in which Vice President Michel Rocca participates. The other is at a political level, chaired by the Director General of DG Move of the European Commission, in which I participate. We work together with the top European experts, including the aviation industry; we will do our best to obtain a final regulation suitable for our pilots!

Once again I would like to recall the need for the contribution of aero clubs and air sports unions that are members of Europe Air Sports. It is up to us, board members and technical officers, to take care of the **NPAs (Notices of Proposed Amendment)**, of the implementation of the rules, of all the interface work with the European Regulators. But your collaboration in defining the guidelines and the positions to be taken is essential to make us understand the needs of each sport.

All the more so since the new so-called Green Deal theme appears this year, a continental initiative. We must pay the utmost attention, to avoid discovering bitter surprises of limitations of our future activities.

Finally, let me express my personal satisfaction with the re-election of the three outgoing Board Members, and in particular of our Senior Vice President Rudi Schuegraf. I thank Manfred Kunschitz and the team of the Österreichische Aero Club who hosted me and Rudi in Wien to coordinate the Meeting, and above all made possible the online management of the event.

Andrea Anesini

## **DEADLINE: FAA LICENCES MUST BE CONVERTED BY 20 JUNE 2022**

We would like to draw your attention to a fast-approaching deadline for converting FAA licences into European ones. As explained to Europe Air Sports by the European Commission and EASA this deadline will not be extended for another time.

Many, possibly thousands, of EU-based pilots fly with third country licences - primarily FAA licences. According to the EASA BR (Basic Regulation), persons who fly third country registered aircraft that are permanently based in the EU should carry EASA licences. However, the deadline for converting licences has repeatedly been postponed, because work was still ongoing between the EU and the US, regarding the licensing annex of the Bilateral Aviation Safety Agreement. This work has now been completed.

Thus, Member States may allow flying with FAA licences until, but **no further than 20 June 2022**.

Our experience is that these conversions take some time. This means that there is a danger of many applications arriving late and many people being left with no valid licence to fly with after 20 June 2022.

Europe Air Sports strongly recommends members to start the licence conversion process imminently.

## **CLIMATE CONFERENCE, CO 2 AVOIDANCE, GREEN DEAL AND A EUROPEAN AGENCY – A technical report from Senior Vice-President Rudi Schuegraf**

EASA was created in 2002 as the European Aviation Safety Agency. At that time Europe Air Sports faced a legislative future which nobody was able to predict or direct. After nearly 20 years of rulemaking, coordinating and lobbying, we must admit that recently we learned the difficult way that there is another European Agency whose work can and will impact all members of EAS. It is the European Chemicals Agency, located since 2007 in Helsinki with about 600 staff members. The [European Chemicals Agency \(ECHA\)](#) works for the safe use of chemicals. It implements the EU's ground-breaking chemicals legislation, benefiting human health, the environment and innovation and competitiveness in Europe.

The political procedures and decision making processes this Agency follows are more or less identical to the system we know through the long years of work with the European institutions and EASA.

In summer 2021 the European Commission started a consultation process. The result should be an amendment of Regulation 1907/2006 concerning the [Registration, Evaluation, Authorisation and Restriction of Chemicals \(REACH\)](#) and its Annex XIV. *Annex XIV is the list of chemical substances which will be banned at a certain date from the European Market, unless an authorisation or exemption is granted.*

The substance that interests EAS is a fuel additive for the fuel of high compression aviation piston engines called "[Tetraethyllead](#)" (TEL), which is needed to blend AVGAS 100 LL (Low Lead) to comply with ASTM (American Standard Test Method) 910, the norm which is required for nearly all traditional aviation piston engines. High octanes are required to prevent the engines from being damaged by knocking or faulty valve seats.

According to the [ECHA](#), TEL meets the criteria for classification as toxic and therefore for inclusion in Annex XIV of this Regulation. This question was discussed in September 2021 by the [REACH](#) Committee (a similar setup to the EASA Committee). The delegates of the Member States voted for the proposal to include [TEL](#) in Annex XIV.

So far, we have not learned enough about the progress of this legislative process to predict further consequences, but we must assume that the [REACH](#) register will be amended and [TEL](#) put in Annex XIV. Unless the producing company in the UK, Innospec, is granted an authorisation or exemption, [TEL](#) would be removed from the European Market. This would mean that AVGAS 100 LL could not be produced any more by a European refinery, but would need to be imported from outside. AVGAS 100LL itself is not banned, only the additive [TEL](#) might be banned.

IAOPA, EHA, EcoGAS, EBAA, ERAC, IAPPS, GAMA\* and Europe Air Sports have delivered their qualified comments to the European Commission and the ECHA with the aim of preventing the inclusion of TEL in Annex XIV. The document is available on the EAS website. We will keep you informed about the progress.

This subject and other climate and environmental issues will keep us very busy in the next few years. For questions VP Rudi Schuegraf can be addressed by e-mail (see page 9).

- \* IAOPA *European branch International Council of Aircraft Owners and Pilots Associations*
- \* EHA *European Helicopter Association*
- \* EcoGAS *European Council of General Aviation Support*
- \* EBAA *European Business Aviation Association*
- \* ERAC *European Regional Aerodromes Community*
- \* IAAPS *International Association of Aviation Personnel Schools*
- \* GAMA *General Aviation Manufacturers Association*

## VELIS ELECTRO FLEET AT FFA'S FABLAB *Jean Pierre Delmas reports*



In Nov. 2021, FFA (French Powered Flying Federation) FabLab's fleet of Velis Electro from Pipistrel reached 6 units since EASA certification was issued in June 2020. These Velis Electro are operated for LAPL/PPL flight instruction, FI (Flight Instructor) training, accompanied PPL pilot flights, participation in ANR competitions<sup>1</sup>, and lots of public relations flights.

The latest have raised much higher than expected interest, in numerous sectors, including Air Forces, commercial ATOs (Approved Training Organisations), politicians, the environment industry and French NAA's ATPL flying school. Some of these organisations rent Velis from FFA's FabLab, to evaluate real life operations of electric aeroplanes, in their professional training programmes. FabLab's FIs have been training NAA's senior FI/FEs (Flight Examiners). More than 500 flight hours have been logged, more than 25 FIs already trained, and there have been no accidents or incidents.

Forty-five minutes of flight (from T/O to landing) are available, which is sufficient for training flights (*Half of the 550,000 hours flown in FFA are less than 1 hour long*). The regulation on energy reserve is identical for piston or electric powered aeroplanes, namely 10 min. for A-to-A flights. The easy management of the remaining energy in an electric powered plane can be seen as favourable for training skilled pilots & FIs in this essential discipline, or as a disadvantage, as it is an additional repetitive task which may not need such frequent attention. Opinions are split.

Social acceptance is high in the non-aviation sector. Neighbours are happier, some politicians are interested in subsidising electric aeroplane purchase by local aero clubs, to improve the quality of life of their citizens. But disproportionate expectations are raised too, as people start to expect "immediate" conversion of all fossil-energy fleets, which is unrealistic and cannot be achieved so soon (FFA aero clubs operate at least 2000 aeroplanes).

Inside the aviation sector, some legacy habits are being challenged, especially in domains of operation and maintenance regulation, insurance, flight training programmes, instruction, etc. The French NAA (DGAC) has been a continuous and efficient supporter and sponsor, since the early time of FFA's FabLab in 2010. There have been high points

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<sup>1</sup> ANR : Air Navigation Race is the latest discipline developed by FAI (World Air Sports Federation) for GA aeroplanes. A test is about 20 minute-long navigation.

such as FFA's Alpha Electro flying demonstrations under permit to fly, at the International Paris Air Show in 2019.

Our short-term topics are about more proportionate (to evidence-based risks!) maintenance regulation & insurance premium. On the other side, FFA's FabLab keeps in close contact with the developers of the next-step energy solutions such as Hybrid/Hydrogen.

### **THE EUROPEAN MICROLIGHT FEDERATION ANNUAL GENERAL MEETING - EMF** *Treasurer Rieteke Van Luijt reports*

Unfortunately the meeting was not in Paris. Due to Covid, it was decided to hold the meeting virtually. However, 3 board members were present in Paris. They were guests of the French organization FFPLUM (Fédération Française d'ULM).



*Left to right:*

*Rieteke van Luijt, Treasurer EMF*

*Louis Collardeau, President EMF*

*Hans Havsager, Vice President EMF*

*Pierre-Yves Huerre, DGAC*

*Sébastien Perrot, President FFPLUM*

EMF welcomed a new member, namely Iceland.

In general, the Covid measures have not created many obstacles for flying **MLA (microlight aircraft)**, except, of course, during the strict lockdowns.

An important item on the agenda was the application of the opt-out 600 kg rule. Here too, Covid played an important role, because many meetings, consultations and negotiations were canceled or delayed.

Still progress was made in some countries. In the UK, flying with 600 kg MTOM for light airplanes is no problem. Because of Brexit, consultation with EASA is not necessary any more.

Another situation is going on in Switzerland. Actually **MLA** flying is not permitted. That's why Swiss **MLA** pilots are flying in neighbouring countries, like France, Germany and Italy. Flying airplanes of 600kg is no problem, but you need an European licence (LAPL).

In Denmark the negotiations with the CAA are still going on and probably in Q1 2022 there will be a result.

After 20 years the informative brochure "Microlight Flying in Europe" is not managed by Rieteke van Luijt any more but by Hans Palsson. He is also in charge of the new website.

Next year the Mondial ULM fair and airshow will take place from September 2-4 in Blois le Breuil. The board will investigate if it is possible to have our next General Meeting there.

### **HIGHLIGHTS ON U-SPACE DEVELOPMENT** *by Michel Rocca*

As an observer or an expert working with the EASA and with the EU Commission, I would like to draw your attention to two points. These are how **diverse** the new drone community is and how **intense** are the efforts made by these two EU bodies to get views from the stakeholders and the citizens all across Europe.

Regarding the diversity of the players in the drone industry **landscape**, I must say that the time when our member EMFU (European Model Flying Union) was the only drone

operator is gone. Today, every month we can count a newcomer, including SME, association, agency or organisation.

Imagine my surprise to see how ignorant I was in this domain at the last meeting of the **Informal Drone Experts Group!** Let me give you a flavour of this phenomenon:

**ACI** Europe for Airports Council International Europe  
**ADIF** for Association du Drone de l'Industrie Française  
**Aerospace Valley** - Régions Occitanie et Nouvelle Aquitaine en France  
**AGORIA** representing Belgian Industries  
**Alliance for UAV Industry**  
**ASSORPAS** for Associazione Italiana per i RPAS  
**ASD** for AeroSpace and Defence industries association in Europe  
**BAIA** for Bulgaria Aviation Industry Association  
**CER** for Communauté Européenne du Rail  
**CIVATAglobal** for Civic Air Transport Association  
**CoESS** for Confederation of European Security Services  
**DMAE** for Drone Manufacturer Alliance Europe  
**Dronea Lithuania**  
**Drones4Sec** for European Federation of Security Drones  
**EACP** for European Aerospace Cluster Partnership  
**EAQE** for European Association of Qualified Entities  
**EAS** for Europe Air Sports  
**ECA** for European Cockpit Association  
**EEA** for European Environment Agency  
**EMSA** for European Maritime Safety Agency  
**EREA** for Association of European Research Establishments in Aeronautics  
**ETF** for European Transport workers Federation  
**EU-Robotics**  
**FRONTEX** for European agency for border and coast guards  
**GAMA** for General Aviation Manufacturers Association  
**GUTMA** for Global UAV Traffic Management Association  
**GSMA** for Global System for Mobile Communications Association  
**IATA** for International Air Transport Association  
**IFATCA** for International Federation of Air Traffic Controller Associations  
**PTBN** for Polish Association for National Security  
**UAV Alliance Czech Republic**  
**UAV DACH e.v.**

Let us understand that our lobbying actions are not so easy to carry out.

Regarding the ongoing actions for collecting the views expressed by EU citizens and stakeholders, it is worth mentioning the following:

Firstly, the Commission has announced its "plan to adopt a **Drone Strategy 2.0** in 2022 to develop drones into a vector for the smart and sustainable mobility of the future. This initiative aims at enabling drones to contribute, **through digitalisation and automation**, to a new offer of services and transport while accounting for possible civil/military technology synergies".

From 8 October 2021 until 31 December 2021, a public consultation is open. Our input as EAS and your input as members are sought via the Commission consultation website '**Have your say**' at [this link](#).

***Take this opportunity to convey your views on this forward-looking vision and on its possible effects on safety, security, privacy and economy.***

Secondly, the drafting of **AMC/GM (Acceptable Means of Compliance and Guidance Material)** pertaining to **the U-space regulatory package** published last spring is about to be completed by EASA. As a result, a **NPA** is planned to be issued soon and to be subject to a consultation.

This will give all of us an additional opportunity to express more specific views on the acceptable means of compliance to be implemented from January 2023 alongside the U-space regulatory package.

***Andrea Anesini adds these comments***

1) that the U Space/Drones theme has become of primary importance for our community. We must avoid the risk that the enormous economic interests, that claim to govern it, create damage to our freedom to use the airspace;

2) that the long list of organisations listed by Michel is proof of the many interests behind the topic under discussion.

I think it can be affirmed that we immediately understood the danger and that we are doing everything possible to manage it in the best possible way. This importance is also recognised by EASA and DG Move, with the nomination of Michel and me at the highest level of discussion in both Organisations.

**EUROPE AIR SPORTS RESPONDS TO EASA'S EPAS CONSULTATION** *from Nils Rostedt*

EAS was invited to comment on EASA's draft **EPAS (European Plan for Aviation Safety)** for the period 2022-2026.

In this edition of the draft **EPAS** (240 pages), the focus of EASA's planned actions is still very much related to the handling of Covid-19 and its effects on the European aviation sector. In particular, "Safe Return to Normal Operations" is a major topic of this year's **EPAS** update.

This shift of focus means that some planned EASA activities related to General Aviation will be slightly postponed; however, it looks like the most important topics from EAS's viewpoint are not much affected.

While Covid-19 will continue to be a main topic for EASA for some time, there are also other topics rising in importance. Noteworthy this year is the focus on sustainability and "green" issues, driven by the EU "Green Deal" agenda. So far this has not affected rulemaking much, but EASA is starting several studies and actions to address this upcoming area. This is an area where Europe Air Sports has recently also become more active.

**FROM THE PROGRAMME MANAGER'S DESK - Nils Rostedt reports**

While the Covid-19 epidemic does not seem likely to stop affecting our lives anytime soon, in the aviation rulemaking area it seems that the need for special restrictions is slowly subsiding.

So it is sort of back to normal with new rulemaking proposals from EASA.

After the summer hiatus, September and October have seen a considerable number of rulemaking topics of interest to EAS:

**NPA 2021-09:** Regular update of the **AMC and GM (Acceptable Means of Compliance and Guidance Material)** to Regulation (EU) 2019/947 on the rules and procedures for the operation of unmanned aircraft.

EAS is also involved in the Working group 07 which develops **AMC/GM** material for the new U-Space related regulations 2021/664, 665 and 666 which were published in April.

EAS responded to an Advisory Body Consultation on Language Proficiency Assessment which seeks to address some deficiencies in the Language Proficiency Regulation which was enacted in around 2005.

A more unusual kind of consultation arrived in October and concerned a proposal for new EASA Rules of Procedure to follow when "developing regulatory material". In short, it is proposed that BIS (Best Intervention Strategy) documents would be used more, largely replacing today's formal ToR (Terms of Reference) documents. We placed several comments to this proposal.

So it was a mixed bag of new topics to follow and try to respond to, making sure the voice of Sports and Recreational Aviation is heard in EASA!

### **EASA PUBLISHED OPINION 05/2021 ON PART-21 LIGHT** *from Nils Rostedt*

On the 22nd October, EASA issued its "Opinion No. 05/2021" on the initial airworthiness rules of aircraft intended primarily for sports and recreational use, the so-called "Part-21 Light". This was preceded by an Advisory Body Consultation during the summer, to which EASA responded. EASA has also been actively involved in the earlier phases of this rulemaking task.

The "Part 21 Light" provides a lighter approach to the certification of light general aviation aircraft, compared to Part 21, and introduces the possibility for a declaration of design compliance to be submitted as an alternative to certification. The proposed Part 21 Light also provides for the possibility to demonstrate design and production capabilities through a declaration, instead of an approval.

The Opinion next goes to the EU Commission to be approved and published as a Commission Implementing Regulation.

### **EASA PUBLISHED ITS AVIATION SAFETY REVIEW** *from Nils Rostedt*



In August, EASA published its Annual Safety Review about aviation safety in Europe. Last year was a special year as the aviation system came under considerable pressure from Covid-19. However, it proved resilient and the safety level remained good.

In the Sports and Recreational aviation domain, both powered flight and gliding showed similar safety trends: The number of accidents and fatalities are slightly down, while the number of serious incidents is trending up.

The landing is, for both disciplines, by far the most dangerous part of each flight. This and many more detailed facts are available in the chapters on "Non-commercially Operated Small Aeroplanes" (16 pages) and Sailplanes (14 pages) of the 186-page review. I recommend anyone interested in safety matters to browse at least these sections of the review, and why not make use of this material in your organisation's upcoming safety seminars!

Link: <https://www.easa.europa.eu/document-library/general-publications/annual-safety-review-2021>

### **EUROPE AIR SPORTS GENERAL CONFERENCE 2021** *Reported by Diana King*

The General Conference took place in October on line, replacing the hoped-for face to face meeting in Strasbourg.

Patrick Ky (Chief Executive of EASA) sent a video presentation. He was very positive about the contribution of Sport and Recreational Aviation, for example the leadership in developing electric aircraft. He recognises the concerns of General Aviation about drones

and U-space and mentioned that EAS representatives have been invited onto the high level drones group and the technical committees discussing drones.

Many of the presentations have been summarised in this newsletter. Some additional brief reports can be given:

- *E-conspicuity* – there are various options for pilots to use, including ADSB, non-certified solutions such as Flarm and Pilot Aware, or mobile phones. The aircraft operator will have to decide which technology to adopt.
- *Potential risks relating to drones* – some countries are trying to introduce significant new airspace for drones. It is likely that each country will establish their own regulations and airspace. Environmental concerns are growing – the question was asked, whether regulators are identifying the noise implications of drones. Social acceptance was discussed at the Drone Leaders group meeting.
- *Green deal* – the Green and Liberal parties have greater influence than before at the European Parliament and the European Council, where the legislation is created. Many legislative proposals have been made in all areas of economic activity, including the transport sector, which is seen as including **sport and recreational aviation (S&RA)**. Financial aid is becoming available for research and development. It was thought that grants might become available for club aircraft environment, but **S&RA** would want to avoid being caught up in unwelcome regulations.
- *Fuel* – there are plans to ban tetraethyl lead (added to fuel to make 100LL). This carries a number of risks. There are no plans to ban Avgas.
- *Basic Instrument Rating (BIR)* – Members are asked to pass information on to EAS about any difficulties in implementing the BIR, especially whether any supporting material is needed. Members’ feedback is vital!
- *Part 21 Light* – Feedback would also be helpful here, to help EAS understand how well the new opportunities on aircraft design are working.
- *600 kg opt out* – Not much progress has been made, because of Covid. Further updates will be given in the newsletter.
- *Technical Officers* – there is a shortage of well qualified EAS technical officers.

**Annual General Meeting** – the members approved all the formal matters, including the 25% subscription for 2021.

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