

NEWSLETTER

EUROPE AIR SPORTS

JUNE 2023



Paragliders flying near Marostica, Vicenza province in Italy (photo by Damiano Zanocco)

Welcome to the June issue of the Europe Air Sports Newsletter! Abbreviations and their explanations are shown in full and in green, so that you can find the full meaning.

News in this issue:

GA Flightpath 2030+	1
Challenges in complying with Electronic Conspicuity requirements for paragliders a hang-gliders	
U-space workshop – From concept to implementation	3
AVGAS Facts - Figures - Forecasts	. 4
From the Programme Manager's desk	. 5
Plans for EAS's new website	. 6
Sign up for the newsletter and send us your thoughts and ideas!	. 6
Key contacts	6

GA FLIGHTPATH 2030+ News from Julian Scarfe

At AERO in Friedrichshafen in April 2023, EASA launched its GA Flightpath 2030+ initiative. The initiative follows on from the GA Roadmap and Roadmap 2.0. Regardless of the content of the initiative, the name is certainly more fitting for an aviation project!

GA Flightpath 2030+ is intended to continue the improvements to EASA regulation for sports and recreational aviation within the EASA system, by building on successes like:

- Part-M Light;
- the introduction of DTOs (Declared Training Organisations) as a lighter alternative to ATOs (Approved Training Organisations);
- the glider rulebook; and
- the Basic Instrument Rating

It also builds on the Safety Promotion work that EASA is engaged in, as well as the EASA Community Network online.

The vision of Flightpath 2020+ is to "enhance safety culture, enable sustainable growth

and embrace a digital future [to] maximize the benefits of technology and encourage wider diversity and accessibility"

It identifies a number of opportunities, threats and trends, many of which Europe Air Sports has been well aware of for many years, for example:

- An ageing demographic and a lack of attractiveness of aviation for the younger generations
- > The rise of drones and urban air mobility
- New technologies and innovations, particularly in avionics and increased automation
- Social acceptance of aviation and its relationship with CO2 emissions and climate change.

The four pillars of the vision are important. They are:

- > **Safety**, recognising in particular that this comes from safety culture, not just (perhaps, much more than) from rules.
- > **Sustainability**, which is a key challenge for us, as we are often operating ageing aircraft and equipment which was not designed with sustainability in mind.
- ➤ **Digitisation**, which offers great opportunities to reduce unnecessary paperwork and provide benefits in safety and efficiency
- Diversity and Accessibility, to remove unnecessary barriers to those who aspire to participate in sports and recreational aviation.

The launch of Flightpath 2030+ comes a year after the changing of the guard in the GA team, with Vladimir Foltin skilfully fitting Flightpath 2030+ together as Project Manager, and Alain Leroy, who also serves as EASA's Chief Engineer, as GA Champion, providing a much needed bridge to senior management and the Executive Director.

The EASA GA team needs our support, and we should give it to them. There will be ups and downs along the way, disappointments as well as successes, and disagreements and well as harmony. But Flightpath 2030+ represents our best hope of securing a strong future for sports and recreational aviation in Europe.

CHALLENGES IN COMPLYING WITH ELECTRONIC CONSPICUITY REQUIREMENTS FOR PARAGLIDERS AND HANG-GLIDERS - Rodolfo Saccani explains

EHPU (European Hang-gliding and Paragliding Union) represents over 110,000 hang-glider and paraglider pilots across 21 member states. In many countries it is not mandatory for a pilot to be a member of the National Organisation represented within the EHPU and so the number of active pilots in Europe can be estimated to be in excess of 200,000. In most countries they represent the largest group of crewed aircraft by a significant margin.

The sport of paragliding accounts for roughly 90% these pilots. The market offers a variety of gliders designed for different specialisms: cross-country flight, competition, ultralight equipment for hiking, tandem gliders, acrobatic flight, speed gliding/miniwings.

Unlike other forms of General Aviation, where syndicate ownership of a single aircraft by a number of pilots is common, each of these pilots owns at least one aircraft, often more than one. On any given weekend with good weather, you can expect to find many of these pilots to be in the air at the same time. EASA calculates that on any single day, they account for more than 50% of the GA traffic in Alpine regions of Europe.

They can independently foot-launch from hills and mountains; in flat-land areas they can be towed into the air by ground-based winches or microlights. You may find them anywhere from ground level to cloud base, in gaggles sharing the same lift or engaged in solitary flight. Despite being gliders, they can recover from extremely low altitudes (less than 50m) back to cloudbase and flights of hundreds of kilometres are routinely performed.

It is not unusual to find 50 gliders sharing the same thermal, their own separation being managed through see-and-avoid. Electronic conspicuity devices are ineffective for managing separation between the gliders in this type of flight. Flights are constrained by general weather, geography, topography, wind strength and availability of landing locations.

Considering all of this and bearing in mind their extremely low airspeed compared to any other aircraft, it is unlikely that a hang-glider or paraglider pilot could take any action to manage his or her separation with a faster moving aircraft.



Paragliders flying near Marostica, Vicenza province in Italy (photo by Damiano Zanocco)

These gliders, without any cabin or cockpit, can be made electronically visible to other aircraft but given the level of "see and avoid" activity in which they are already engaged, they cannot be expected or required to monitor surrounding traffic on a screen. Any time spent "head down" monitoring a screen will lead to a reduction in safety and separation between the gliders themselves.

These passive EC (Electronic Conspicuity) devices must be battery-powered and light, they must also be affordable. It is important to bear in mind that a paraglider on the second-hand market can be bought for about ≤ 1000 .

Where independent foot-launched flight is undertaken without the need of any infrastructure, enforcement and control are challenging. The adoption of EC must therefore be consensual, low-cost and frictionless. It is worth noting that EC smartphone-based apps have been proven to be reliable and it would appear that of all the options, they offer the most obvious route to the universal adoption of EC within hang gliding and paragliding.

"U-SPACE WORKSHOP - FROM CONCEPT TO IMPLEMENTATION" - MICHEL ROCCA

This two-day workshop was organised both online and in Cologne. More than 410 people worldwide attended, from Luxembourg to Japan. It was managed by Maria Algar-Ruiz and Stéphane Vaubourg from EASA. The information provided in the agenda items and in the Q&A sessions was dense. The presentation will soon be made available on the EASA website.

Later this year, additional webinars will be organised to help all the U-space actors to implement the so-called 664, 665 and 666 regulations alongside the AMC/GM (Acceptable Means of Compliance/Guidance Material) published last December. We will be consulted on some new AMC/GM, which are intended to correct some loopholes and to bring some missing provisions, including some missing procedures.

Let me underline that the targeted audience was broadly speaking the drone industry. Not to the manned aviation, though we were not forgotten. We should be aware that there are thousands of persons interested in the various facets of the emerging drone industry.

The purpose of the U-space concept was recalled: enabling BVLOS (Beyond Visual Line of Sight) flights and more complex drone operations, e.g. in an urban environment, close to an airport. The air risk is often mitigated by a temporary airspace restriction, while the U-

space concept aims at offering fair access to other airspace users. This will be a harmonised co-existence, which is not still full integration.

Basically, the components of the U-space concept are: a portion/volume of airspace, a set of services for UAS (Unmanned Aerial Systems) operators, an automated exchange of information and electronic conspicuity required from drones and manned aviation.

The U-space architecture was presented by EASA, confirming that most of the actors will be certified entities: the common information service provider (CISP), the U-space service providers (USSPs), the air traffic service provider (ATSP).

More importantly for us, was highlighted the topic on safety and separation between drones and manned aircraft. Detailed information was given on:

- 1) The mitigation layers (strategic, pre-tactical, tactical);
- 2) The priority rules (manned aircraft will have priority over drones, but not on some special operations); and
- 3) The drone operations based on the principle that their ultimate responsibility will be to avoid manned aviation.

It was clarified how and where the dynamic airspace reconfiguration (DAR) mechanism will apply:

- 1) DAR will be applied by the ATSP to the benefit of controlled manned aircraft (i.e. in a class D, C or B airspace, for a VFR flight)
- 2) DAR will not apply to uncontrolled aircraft (i.e. in a class G, F or E airspace, for a VFR flight).

In other words, the prevention of collision in case 1 will be carried out by the ATSP while in case 2, the VFR flight will have to be made e-conspicuous to USSPs to allow drone operators to avoid it.

EASA detailed the U-space airspace designation process, beginning with the identification of needs and ending with a State decision to designate or not a new U-space airspace.

But it is worthwhile mentioning that a crucial stage along the critical path will be the public hearing. Plenty of people will be invited to express their concerns. It is already clear that a wide range of views and opinions will be voiced, within a wide range of uncertainty about the final say, since manned aviation representatives will be few.

Then the roles and responsibilities in the U-space concept were detailed through nine presentations, from the States to manned aviation.

In summary, this very informative and interactive EASA workshop confirms what we EAS Board are explaining through our technical and general meetings and our newsletters.

- 1) We should prepare local GA colleagues to intervene at public hearings when a U-space is expected to be designated somewhere within their local playing field.
- 2) We should also prepare our GA aircraft to be electronically conspicuous remember the three alternatives ADS-B Out, ADS-L SRD860 and ADS-L mobile telephony.

AVGAS FACTS - FIGURES - FORECASTS - from Rudi Schuegraf

In the February edition of this Newsletter we provided information about the potential facts of banning Tetraethylead (TEL) to be imported and used in the European Union to produce high octane AVGAS 100 LL. The subject and its associated problems and impacts will accompany General Aviation for a longer time than is possible to predict.

For the moment there are no new hard facts which could be reported. Collecting information is difficult because of the different international players, governments, companies, refineries and, last but not least, political decision makers involved.

In February Europe Air Sports wrote to EASA to ask for support for GA and the industry in developing and finding alternative solutions for replacing high octane AVGAS 100 LL by less toxic fuels and for accelerating the process of checking the suitability of GAMI 100 unleaded fuel for operational use in Europe. Unfortunately GAMI is still very busy building

its necessary logistic preconditions and distribution in the US, giving them at the moment no time to cooperate with the European market, hopefully this will change in the next year.

Hopefully, someone that is entitled to ask the European Union and Commission for a formal authorisation to allow the import of TEL will approach the European Chemical Agency and will deliver such a request. We hope that we will soon get a positive answer to this burning question. Of course we will inform you as soon as possible after we get the answer.

FROM THE PROGRAMME MANAGER'S DESK - Nils Rostedt reports on news about new and ongoing rulemaking activities by EASA and EU

NPA - Notice of Proposed Amendment

AMC & GM - Acceptable Means of Compliance/Guidance Materials

Recent Rulemaking

There are two recent EASA items of possible interest to EAS members.

Consultation of Noise limits for eVTOL / air taxi: "Environmental Protection Technical Specifications applicable to eVTOL" (Electric Vertical Take-off and landing)

The short summary of this proposal is that permitted noise levels for eVTOL/air taxi aircraft are similar to those in force for helicopters today.

AMC & GM to Part 21 Light (Subparts D, E, F, M & N): Focused consultation on NPA 2023-101(#3) (draft Decision)

Quick analysis: the draft mainly describes the administrative procedures for e.g. changes to a type certificate, and does not go into the actual technical requirements.

Rulemaking in Progress

There are 5 open NPA consultations, of which one (highlighted) is regarded as interesting for EAS members.

NPA 2023-01: Training requirements for flight operations officers and flight dispatchers.

02/05/2023: Training the next generation of ATCOs.

NPA 2023-02, Active; Deadline: 02/08/2023

EAS will take a closer look at this, since ATCOs (Air Traffic Control Officers) are those that our members talk with when flying in controlled airspace. If you have opinions or suggestions regarding this proposal, please let us know!

NPA 2023-03: Extended diversion time operations (EDTO).

NPA 2023-04: Introduction of ACAS Xa (Airborne Collision Avoidance System) for operations in the Single European Sky (SES) airspace & Performance Based Navigation (PBN) specifications for oceanic operations.

NPA 2023-05: Acceptable means of compliance, guidance material and detailed specifications supporting the new regulatory framework on the conformity assessment of ATM/ANS (Air Traffic Management/Air Navigation Service) systems and ATM/ANS constituents.

Upcoming Rulemaking

We are still awaiting EASA's publication of a number of interesting rulemaking consultations. See below.

Regular update of the Initial Airworthiness Regulation and associated AMC and GM: The objective of this rulemaking task is to regularly address "miscellaneous issues of non-controversial nature" in the Initial Airworthiness Regulation ("Part-21") and associated AMC and GM. EASA is expected to issue an NPA consultation on this topic in Q3 2023.

FCL: Simpler, lighter GA: An NPA consultation on this topic is expected during the beginning of 2023 with an EASA Opinion planned for Q2/2023.

FCL: Instructor requirements + CPL Learning Objectives: An NPA-consultation is expected Q4/2023 with an Opinion planned for Q4/2024.

EPL: Electronic personnel licences (concerns FCL, ATCO, Part-66 licences): An NPA-consultation is expected Q4/2023 with an Opinion planned for Q4/2024.

UAS + FCL subtask VTOL + Remote Pilot licences: An NPA-consultation is expected around 2022-06 (!) for the VTOL type rating, with an Opinion planned for Q1/2023. In addition, an NPA-consultation is expected for ab initio training for VPL (VTOL pilot licence) with an Opinion planned for 2024.

Parachute operation: In addition, an EASA BIS (best intervention strategy) for parachuting operations is expected around 5/2023.

Other

EASA publishes List of Focused Consultations

Another newsworthy item is that EASA now have a webpage with a listing of all **Focused Consultations**.

www.easa.europa.eu/en/document-library/notices-of-proposed-amendment/focused-consultations

From this page you can keep track of those consultations that are addressed to smaller groups of stakeholders. I think we can say that this page is a direct result of our insistence in 2021 for more transparency in the new EASA rulemaking process!

Updates of Easy Access Rules

EASA continues to **publish its rules and regulations in the "Easy Access" format,** which includes AMC&GM material as well as contents lists in a single document. Since last newsletter, the following updates have been published:

- ➤ Easy Access Rules for Aerodromes (Regulation (EU) No 139/2014)
 Revision from June 2023
- ➤ Easy Access Rules for Third Country Operators (Regulation (EU) No 452/2014)
 Revision from April 2023

To access these documents, click here.

In addition to the pdf format, the Easy Access rules are nowadays available also in XML.

PLANS FOR EAS's NEW WEBSITE - An Update from Rieteke van Luijt

We now have a small team working on developing a new website for Europe Air Sports. We have selected a company with plenty of experience in designing and managing websites and they will start very soon to create our new image. We are aiming to achieve a better, more modern and more informative website which we hope will keep you up to date regularly. It will be ready to launch in the autumn. We will keep you in touch with our progress and of course will tell you when it is live!

SIGN UP FOR THE NEWSLETTER AND SEND US YOUR THOUGHTS AND IDEAS!

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/

If you would like to make any comments, ask questions, send ideas or suggest a topic that you'd like to know about, please do get in touch at d.king@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