



NEWSLETTER

EUROPE AIR SPORTS

DECEMBER 2023



Europe Air Sports Technical meeting delegates at the start of the tour of the Flieger Flab Museum

Welcome to the December issue of the Europe Air Sports Newsletter! In addition to reports on technical and regulatory developments, we have an emphasis towards the matter of climate change and actions that may be taken to reduce the impact of aviation. Abbreviations and their explanations are shown in full and in **green**, so that you can find the full meaning.

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A brief report from Diana King on the 2023 Technical Conference and plans for the 2024 Annual General Meeting

EUROPE AIR SPORTS TECHNICAL MEETING 2023

This year's Conference was hosted by the Swiss Aero Club at the Air Force base in Dübendorf. Proceedings started with a guided tour around the Flieger Flab Museum Dübendorf, which contains a large collection of fascinating aircraft of all periods, from early 20th century to the present day. This was followed by dinner, hosted by Europe Air Sports. The next day, after a welcome from EAS President Andrea Anesini, the business started with a video presentation named "GA Flightpath 2030+" by Vladimir Foltin, (GA Roadmap Project Manager at EASA), who gave a comprehensive update on the current work of EASA and some indications of things to come. This was followed by a wide range of topics, most of which are covered in this Newsletter.



President Andrea Anesini opening the meeting at Dübendorf

ANNUAL GENERAL MEETING 2024

During the Technical Conference, Marc Asquith (UK) presented details of plans to host the EAS 2024 AGM in the English Lake District, a scenically beautiful part of England. The European Hang-Gliding and Paragliding Union held their annual conference successfully at the same venue this year and similar arrangements are being made for EAS on 22nd to 24th March. More information will be available in the New Year.

EAS Senior Vice-president Rudolf Schuegraf reports on developments in the availability of fuels

AVGAS 100LL – HAPPY ENDING OR WORST CASE?

In the February Newsletter we provided information about the potential facts of banning **Tetraethyl lead (TEL)**. TEL is considered to be highly toxic with a high risk for causing cancer, especially for younger children. This statement was recently published and confirmed by the Environmental Protection Agency in cooperation with the US FAA and the stakeholder community, banning AVGAS 100 LL in the US by the year 2030.

In June we reported that no new information was available on this subject. The political institutions involved kept quiet although the deadline for the application of an authorisation was approaching fast. Now, in November 2023, the **European Chemical Agency (ECHA)** announced that one of the four suppliers in Europe, Netherlands based SHELL, has initially applied to **ECHA** to grant authorisation to continue the use of TEL to produce AVGAS 100LL in the European Union area. **ECHA** has started a consultation period which will end on 10th Jan 2024. After that date the Commission will make a political decision. No estimate or guess could predict the result. Europe Air Sports, our members, friends and partners will participate in the consultation process and will strongly support Shell's application, which is to our knowledge the only one delivered. Early 2024 we will get the political decision which we will communicate ASAP.

Click [here](#) for a link to detailed information concerning the **TEL** subject.

A second link is [this](#), connecting to the consultation page of the **ECHA**.

The third link [is here](#) which guides to a paper which the General Aviation community drafted and transmitted to the decision makers two years ago. It explains why AVGAS 100LL cannot be banned without a suitable alternative fuel available.

In the next newsletter we will inform you about technical alternatives which are already available and approved for use by EASA. These are other fuels like UL 91, UL 94, Hjelmc 96, Mogas or others.

THE CLOCK IS RUNNING: *Timo Schubert takes a quick look at the EU's ambitious climate agenda and the approach taken by Europe Air Sports*



Source: https://climate.ec.europa.eu/index_en , 23/11/23, 12:33 p.m.

With the five-year term of the current European Commission and European Parliament ending before summer 2024, it is worth taking of stock of the progress made on their ambitious climate policy and its implications for sports and recreational aviation.

To recall, one of the first pieces of legislation put forward was the European Climate Law, soon followed by the so-called Fit for 55 Package. The overall mission: achieving climate neutrality by 2050, with a mid-term goal of cutting **Greenhouse Gas Emissions (GHG)** by 55% by 2030, compared with the 1990 levels. Importantly, climate neutrality is not to be understood as requiring zero emissions. Rather, it means achieving net zero **GHG** by balancing those emissions so they are equal (or less than) the emissions that get removed through the planet's natural absorption (i.e. photosynthesis, carbon sequestration, ocean absorption).

Aviation – a hard-to-abate sector

Meeting these targets will require immense efforts by all sectors, including by aviation. Next to other carbon-intensive activities, such as parts of heavy industry and maritime transport, aviation has been identified as being hard-to-abate, i.e. decarbonisation will be extremely challenging. And even though aviation emits only approximately 3-4% of all **GHG** emissions, it is estimated that its share will increase, if no further measures are taken. In fact, the whole transport sector (all modes of transport) is unique in that its emissions keep increasing, whereas overall emission reductions are present in all other sectors of the economy. This may explain some of the attention that aviation has been receiving, including by climate activists.

Addressing the climate challenge

The EU hopes to address the aviation climate challenge with a combination of measures, including carbon pricing (emissions trading), funding for research, development and investment in “green” technologies”, and by mandating the use of increasing shares of so-called **Sustainable Aviation Fuels (SAF)**. The legislation adopted as part of the Fit for 55 Package focuses very strongly on **Commercial Air Transport (CAT)**. It tightens the emissions trading system, thus increasing the price of carbon emissions. Moreover, the ReFuel EU Aviation Regulation puts in place a mandatory supply and consumption of **SAFs** to gradually replace fossil-based kerosene (2% share in 2025 up to 70% share in 2050). According to the International Air Transport Association (IATA), **SAFs** are expected to be the most important tool to bring down emissions, accounting for an estimated 65% of all aviation emission reductions by 2050.

Implications for sports and recreational aviation

Even though Fit for 55 aims directly at **CAT**, it is clear that the pressure is on the sports and recreational aviation community to play its part in cutting **GHG** emissions. Efficiency gains alone cannot be a viable solution, for as long as propulsion is still based on fossil fuels. Moreover, any argument stressing the overall very small contribution of our community to global **GHG** is likely to be unacceptable: every sector must assume responsibility for its carbon footprint.

With its position paper “[flying for a better climate](#)”, Europe Air Sports has taken a proactive approach on this subject, underlining that many flying activities are non-motorised and pointing towards General Aviation as the cradle of innovation. The paper also calls for the following concrete measures to further accelerate the transformation of the sector:

- Intensify research, innovation and investment funding for low-carbon (or better, zero carbon) propulsion technologies, including sustainable alternative fuels;
- Adopt a fleet renewal programme for sports and recreational aviation, incentivising the purchase and operation of low-emission aircraft, including electric and hybrid-electric aircraft, possibly hydrogen powered aircraft in the future;
- Relax regulations for the use of generic simulators in training and regarding recency requirements for pilots;
- Review certification standards for light aircraft, allowing for the safe and unbureaucratic uptake of alternative propulsion technologies and an accelerated market availability of innovations;
- Intensify aspects of “eco-flying” in GA pilot training.

ELECTRIC AIRCRAFT – *The latest developments described by Vice President Jean-Pierre Delmas*

Since 2021, regulatory matters were rapidly drafted, but EASA produced its opinion with a two-year delay. Another year is expected before adoption by the Commission, but temporary regulation didn't impair rapid roll out by end users.

Impressive figures are to be noticed.

- Pipistrel sold 100 certified Velis Electro in 3.5 years, and thriving volume of flight hours is observed.
- For FFA, the 6-aeroplane fleet crossed the symbolic mark of 2,000 flight hours last summer (without accident or serious incident).
- European leaser Green Aerolease has tens of clients crossing all together the 7,000 flight-hour mark.
- In France, 13 aeroclubs and 7 commercial ATO integrate Velis electro in training programmes.

No certified competitor arrived on the market yet, but we are flooded with marketing notices by established manufacturers and unknown start-ups.

Joby Aviation is a market leader in developing military all-electric aircraft. See their April announcement at [this link](#)

U-SPACE AND MORE – *Different aspects described by Vice-President Michel Rocca*

During our Technical Meeting in Dübendorf, the participants were given three presentations on this topic.

The first presentation was classically dedicated to the regulatory framework on drones and U-space. We went deeper into the interactions between manned and unmanned aviation. The second and the third presentations brought some fresh air into the room with an introduction to hang/paragliding and gliding activities: Rodolfo Sacconi and Arild Solbakken explained how much their aircraft and related operations are amazingly special. They are actually closer to birds than to powered flying aircraft.

Paragliding Championships Brazil 2022



Norway wave flying



In the first presentation, after recalling that the airspace management falls under the national sovereignty as per ICAO Annex 2, Michel explained that the drones and U-space regulations are starting to be implemented by relevant national authorities. This means that the ongoing process should be monitored by each National Aero Club.

So each NAC is invited to liaise as much as possible with the parties leading the process:

- Inform your colleagues and representatives on the rules applicable to Geographical Zones and U-space airspaces;
- Be proactive in meetings dealing with airspace establishment and/or restructuring;
- Every morning, before you go flying, have a look at your national eAIP (i.e. Part-2 ENR, section 5 Navigation warnings);
- Be ready to participate in any public and/or focused consultation launched to designate new Geographical Zones and/or U-space airspaces; and
- Keep our Board updated to help us to ensure that the regulatory provisions are consistently applied across the EU.

UPDATE ON AEROMEDICAL ISSUES by Marja Osinga, MD, AME



As one of the EAS representatives in the EASA **Medical Expert Group (MEG)** I would like to share some present activities at EASA.

The aim of the **MEG** meetings (2x/year) is to promote harmonisation among Competent Authorities and Industry in the implementation of the medical requirements of Aircrew Regulation. The "Industry" is EAS, FAI (World Air Sport Federation), pilots, air transport and

ATCO organisations, Eurocontrol, European Society of Aerospace Medicine. The **MEG** meetings report to the Aircrew TeB (Technical Evaluation Board). It facilitates the exchange of information regarding Part-MED and addresses issues pertaining to medical certification of aeronautical personnel, as well as other medical topics relevant for aviation medicine. Group members are welcome to suggest topics and participate actively in the presentations and discussions.

Representation of sport aviation (FAI and EAS) is formed by 4 members of the **MEG**. They all generally attend the **MEG** meetings in Cologne. It is important to actively participate in the meetings, out of a total of 75 participants.

Important topics for air sports:

- Diabetes: for diabetic pilots using insulin, new regulation is being developed. In a research protocol, funded from the European Union's *Horizon* Europe research and innovation programme, new insights in the treatment of diabetes in the aviation environment are under investigation.
- Mental Health: this research protocol focusses on Mental Health issues and proposals for an update in the applicable regulation.
- Colour vision requirements: testing of colour vision is a long-term issue, new methods are under construction. A tender for the Research Protocol on colour vision regulation and methods is being prepared.
- Deletion of ARA.MED.330 (Special Medical Circumstances, where for certain medical conditions pilots could be declared fit, with a waiver), because it is considered unethical and allows for unequal treatment and unsafe practices. For pilots with diabetes who still fly under ARA.MED.330, this will be continued considering the Research Protocol on diabetes.

In EASA Opinion No 05/2023 a number of issues on medical certification is being addressed. Several safety requirements are laid down in the EPAS 2023-2025, like SMS,

oversight systems, Human Factors, competence of personnel, civil-military coordination and cooperation and safety promotion in GA in a proportionate and effective manner.

For LAPL, at the moment no plans exist at EASA to introduce a new class of medical requirements for light or non-complex aircraft. The present requirements will be updated in RMT.0424, also based on the outcome of the research protocols.

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

Welcome to this edition's update of EASA rulemaking projects and other topics of interest for the light aviation community.



1. Recent Rulemaking

There are 2 new recent EASA items of interest to EAS members.

1.1 EASA Opinion 2023-05 dated 13/10/2023:

"Cruise relief for co-pilots; Regular update of FCL and Medical requirements; Better FCL requirements for General Aviation"

This Opinion contains EASA's proposals for a fairly diverse "cocktail" of various new provisions under the headings you see above. Of interest to our community are new requirements for e.g.

- Pilot privileges for electric aeroplanes
- Credits for LAPL-to-PPL licence applicants.

The Opinion is now at the Commission's EASA committee for final approval and adoption.

1.2 ED Decision 2023/019/R 31/10/2023

"Review of Part-66; New training methods and new teaching technologies"

This *EASA Executive Director's Decision* contains detailed level **AMC/GM (Acceptable Means of Compliance and Guidance Material)** following on to the Implementation Regulation EU 2023/989 "Review of Part-66" adopted in May 2023. It is a result of EASA Rulemaking Task RMT.0255.

The amendments concern Implementation Regulation 1321/2014 as well as its Annex III (Part-66); Annex IV (Part-147) and Annex Vd (Part-CAO), relating to **continuing airworthiness** (i.e. maintenance) of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks.

You may remember that EAS was quite active in the consultation phase of this rulemaking task, with comments both on the new training and teaching provisions and particularly on the "Part-66 recency" issue. Soon we will see how the final rules work in practice and if any new amendments are required in the next rulemaking round.

2. Rulemaking in Progress

Active **NPA's (Notices of Proposed Amendments)**

2.1 NPA 2023-08 consultation published 09/11/2023, deadline 09/02/2024

"Regular update of the air traffic management/air navigation services rules"

Some highlights from the contents of this proposal:

- New requirement on States to publish en-route **obstacle data** for obstacles higher than 60m (a change from today's 100m) and terrain data;
- Amendments to **wake separation distances** as well as **rules for intersection take-offs** (these affect light aircraft only in very rare situations);

- Many minor amendments to the requirements on structure and contents of the **AIP (Aeronautical Information Publication)**.
- One of the proposed AIP-related amendments, to **AMC1** SERA.3145(a), addresses a situation which has been discussed in recent EAS meetings and pointed out to EASA. It has arisen when restricted airspaces have been established e.g. for nature preservation purposes. Sometimes the restricted areas are only published in the environmental agency's publication, and thus remain unknown to pilots. The amendment clarifies that only restricted and prohibited airspaces published in the **AIP** (section 5.1) and on aeronautical charts are "duly published" and legally valid.

The consultation is now open and comments from EAS members are welcome!

2.2 NPA 2023-09 consultation published 15/11/2023, deadline 15/02/2024

"Implementation of the latest CAEP amendments to ICAO Annex 16 Volumes I, II and III"

This **NPA** proposes to update the applicable **environmental protection requirements** for the certification of products in Regulations (EU) 2018/1139 and (EU) No 748/2012, and the associated acceptable means of compliance and guidance material.

The update is basically a transposition of new ICAO SARPs (Standards and Recommended Practices) on noise, engine emissions and CO² emissions into the EU rules. These amendments do not modify the noise limits or emissions maximum levels that a product shall comply with for certification. However, my understanding is that when e.g. a manufacturer wants to modify an aircraft's Type Certificate, these new rules will need to be complied with. But to the average aircraft owner these rules will presumably not be of big concern.

The consultation is ongoing - comments from EAS members are welcome!

3. Upcoming Rulemaking

You may remember that there are several postponements by EASA in the publication of new rulemaking consultations. I repeat the headings of the major tasks of interest where we are awaiting EASA's proposals:

- FCL: Simpler, lighter GA (waiting for NPA – Notice of Proposed Amendment)
- FCL: Instructor requirements + CPL Learning Objectives (waiting for NPA)
- EPL: Electronic personnel licences (concerns FCL, ATCO, Part-66 licences) (waiting for NPA)
- Parachuting operations: In addition, an EASA BIS (best intervention strategy) for parachuting operations is expected.

4. Other

EASA Management System Assessment Tool published

EASA has published an updated revision of its **Management System Assessment Tool**. This can be used e.g. by Competent Authorities when assessing or auditing organisations or their management systems. But the tool may also be useful to key persons in aviation clubs and organisations as an unofficial guidance how to build your Safety Management System (although its 103 pages may be quite daunting for many volunteer safety managers to plow through).

In my quick scan I found this piece of wisdom:

"Being compliant" does not necessarily mean "being safe"

The tool also includes some useful text on **Just Culture**, one of the main foundations of aviation safety.

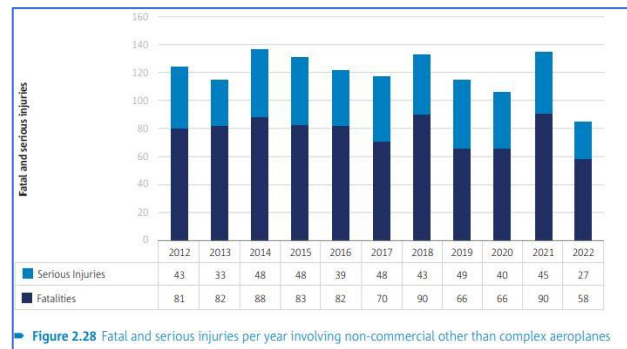
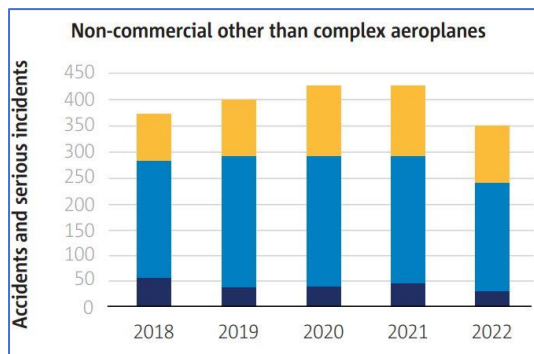
Feel free to have a look, and comments by members with real experience as Safety Managers or similar are welcome! The tool is found at [this address](#).

EASA Annual Aviation Safety Review published

Last summer, EASA published its annual Aviation Safety Review for 2023.

Quick numbers: For the General Aviation segment, the fatal accidents in 2022 decreased by 23%, non-fatal accidents by 13% and serious incidents increased by 44% compared to the 10-year average.

The number of fatalities in 2022 was significantly lower compared to the 10-year average.



It is EASA's assumption that the drop in number of GA accidents in 2022 can be attributed to less flying being performed due to the increased inflation rate in Europe.

The report now includes also separate sections about the safety of sailplanes and microlights.

I highly recommend reading this review, not the least because it is one of the main inputs to EASA's rulemaking priority-setting process. It means that the more accidents happen in a certain area of aviation, the more likely it is to make EASA consider stricter regulation in that area (and vice versa if the trend is positive).

The report is available [here](#)

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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

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