



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 **NPA's (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 competitions¹, 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

¹ 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 EAS responded. EAS 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.

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

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JUNE 2021



Paragliding over the chalk cliffs (photo Grant Oseland)

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A MESSAGE FROM THE PRESIDENT

During the earlier part of this year several of your representatives at Europe Air Sports attended a ‘**Season Opener**’ conference hosted by EASA and we were impressed by the event. We have been pleased to see that EASA and the European Commission have been attentive to the needs of General Aviation and particularly of sporting and recreational aviation. **EASA’s** GA team is supportive of our needs and we are very appreciative of this positive relationship. I wrote to the Executive Director of EASA, Patrick Ky, to express our appreciation and also to draw attention to our important agenda items for the future, namely the policies relating to U-space and the future sustainability of our sector in the context of the climate crisis.

I was pleased to receive a very positive reply from Patrick Ky, confirming the importance of the relationship between EASA and EAS and recognising the role of EAS on crucial issues for the future of sport flight. We have had similar expressions of support from **DG MOVE** (the **Directorate General for Transport**). These official acknowledgments of the role of EAS confirm the continuity of our role towards the regulatory authorities.

A copy of my letter to Patrick Ky follows and we also include in this newsletter a summary of our text to **DG MOVE** relating to drones and U-space.

Andrea Anesini



3 May 2021

Patrick Ky
Executive Director
European Aviation Safety Agency
In copy: Dominique Roland

Dear Patrick,

It has been a while since we last had the chance to meet and I hope you and your colleagues remain in good health. As the world continues to struggle with the pandemic I take this opportunity to thank you and your team at EASA for the great support for our sector all throughout the crisis. I also want to stress the great success of EASA in delivering a very professional and meaningful Season Opener last week. The format and content chosen was most appropriate and the best one could have hoped for in these challenging circumstances.

As the European regulatory framework for aviation continues to evolve it is wonderful to see the efforts made by EASA and the European Commission to ensure that GA, including the sports and recreational segment, are governed by a set of rules that is increasingly fit for purpose. Our members are noticing significant improvements in all relevant aspects, including licensing, certification and operations.

During the past year EASA's GA team has been very supportive and has stayed in close contact with Europe Air Sports, in order to assess the impact of the pandemic on recreational and sports flying. While the situation differs between countries and the type of flying activities, serious concerns persist in our community that members will be lost as pilots fail to meet their recency requirements or are forced out of the sport due to financial hardship.

Forward looking, we see at least two very important items on our agenda in the coming months:

Firstly, a key issue is the continuing policy-making regarding the U-Space and the conditions under which manned aircraft can safely and without further burden share airspace also used by drones. Against this background it is excellent that Europe Air Sports was admitted to the U-Space WG07 – iConspicuity. With the help and expertise of our Vice-President Michel Rocca we hope to make a valuable contribution to this work.

Secondly, the question of sustainability in view of the Green Deal will play a crucial role for our organisation. Europe Air Sports has formed a working group dedicated to this issue and will soon adopt a formal position. Already clear is that innovation and fleet renewal will have to be important pillars for the objective of flying for a greener future. We hope to present this paper to you and your team before the summer.

Thank you for your kind attention and we hope to have a chance to meet physically again soon.

Kind regards

Andrea Anesini, President

THE EASA GA VIRTUAL SEASON OPENER – *reported by Nils Rostedt*

It's midsummer and the flying season is well underway - at least it should be, however the Covid-19 pandemic has delayed the start of the season for many flyers. If you, like many, feel the need for a "refresher" on the latest new European rules and regulations, please head to <https://www.easa.europa.eu/newsroom-and-events/events/easa-general-aviation-season-opener-2021>.

Then pick your choice of topics from the extensive palette which EASA has published from its two-day event in late April, the "Virtual Season Opener".

The Season Opener event was very successful and informative according to several of my colleagues in the EAS team who watched it, and it shows EASA's continued support of the GA activity in Europe. So please make use of this wealth of fresh information to make this season a safe and enjoyable flying season!

BASIC INSTRUMENT RATING – '**BIR**' – *Julian Scarfe outlines some of the advantages of the new rating*



Julian Scarfe flying his Comanche (photo David Phipps)

In a previous newsletter I described the Basic Instrument Rating (BIR) after the relevant regulatory framework was introduced into Part-FCL, to take effect in September 2021. This article is intended to highlight some of the novel features of the BIR that training organisations, pilots and national authorities should be aware of in order to make the most of the BIR.

The fundamental difference between the BIR and all previous instrument qualifications is that it is entirely competence-based: there are no minimum hour requirements. While the direct impact of this might be to slightly shorten the total training time required to acquire the rating from scratch, it has two more important indirect effects. Competence can be developed outside the structure of a training organisation, and in ways that use cost effective training tools.

While a good fundamental instrument flying technique is very important, the key to achieving an acceptable standard of instrument flying is then practice: controlling the aircraft by reference only to instruments has to become engrained as a motor skill. While the supervision of an experienced instrument instructor is useful to avoid development of bad habits, most of us find simply that practice makes perfect. This means that instead of paying for an aircraft rented out at rates that support the business of a professional ATO, a pilot can develop much of the competence required by practising on, for example, the **pilot's** own aircraft. Where this takes place in real instrument conditions, the pilot must of course be accompanied by an instructor, but to simulate instrument conditions under VFR (e.g. under an instrument flying hood or using "foggles") requires only a suitably qualified safety pilot.

Similarly, modern flight simulators, even as implemented on desktop computers, allow for a pilot to learn much about how to fly instrument flight procedures without even boarding an aircraft. Since the BIR is entirely competence based, there is no basis for requiring such a simulator to be certified, as the competence is built outside a training course. Not

only does this offer a cost saving, but it significantly reduces the environmental impact of competence acquisition.

Regardless of how the instrument flight skills are acquired, competence in at least two modules (about flight handling skills and instrument flight procedures) must be demonstrated in an **ATO (Approved Training Organisation)** environment. **ATOs** should develop courses that are able to assess pre-existing skills and competences and fill gaps efficiently. Conversely, pilots should have a reasonable expectation of the time required in an **ATO** environment to pull together the skills and competences needs to approach a skill test with confidence.

If pilots, **ATOs** and national authorities approach the BIR innovatively and constructively, there is a great opportunity to improve GA safety, boost activity, and offer **ATOs** a new market in an environment where the demand for professional pilot training is quiet.

EUROPEAN COMMISSION ANNOUNCES DRONES STRATEGY 2.0 – *Timo Schubert brings us up to date on the developments*



DJI Phantom 2 Vision+ V3 hovering over Weissfluhjoch

Building on the recently adopted regulatory framework on drones, the European Commission is already starting its work on its Drones Strategy 2.0.

In a so called **Roadmap**, which has the purpose of allowing interested parties to comment early in the policy-making process, the Commission expects to publish this new strategy in the final quarter of 2022.

According to the Roadmap, the Drone Strategy 2.0 must be seen within the context of the Green Deal and the **EU's** Strategy for Sustainable and Smart Mobility. The use of drones for transportation or air work is described as one activity that can help to decarbonise aviation. Thus, the new strategy hopes to provide a "vision for the future holistic development of the sector, which can foster the uptake of this innovative technology in Europe while establishing the right balance between safety, security and other societal concerns, and a sustainable economic **environment**". Moreover, according to the roadmap, "the safety, security and privacy of people in the air and on the ground remains the priority. In addition, the future policy framework should provide an innovative, cost-efficient and market-led business environment for the development and take-up of new drone services and technologies within the **EU's** internal market. It should also guarantee their widest possible social acceptance. The Drone Strategy 2.0 should provide a comprehensive policy package and address obstacles to the development of new drone applications and transport services and to the competitiveness of this industry."

Europe Air Sports has made use of this opportunity to provide first input and has submitted the following statement to the European Commission:

*"Europe Air Sports, the European umbrella organisation of the National Aeroclubs and the Air Sports Unions has been closely following the **EU's** policy-making regarding drones and keeps contributing to the technical rulemaking at the level of EASA. As the European association representing sports and recreational aviation, Europe Air Sports represents a segment of aviation which is at risk of being negatively affected by the emergence of drones in airspace that is typically used also by our members.*

We commend the Commission and EASA for the thorough consultation processes around its drones policy and ask to be approached as part of the targeted stakeholder consultation pertaining to the study mentioned in the roadmap.

*Europe Air Sports agrees that - if regulated properly - drones have the potential to generate societal and environmental benefits. A fair and safe co-existence of manned and unmanned aviation will be an important prerequisite for this to work in the **future**."*

Nils Rostedt reports



1. New EASA NPAs (Notices of Proposed Amendments)

The stream of new regulation proposals from EASA, the European Aviation Safety Agency, continues. Since last newsletter, EASA has issued a total of 9 new [NPA \(Notice of Proposed Amendments\)](#) documents for public consultation. Of these, Europe Air Sports submitted its comments to 3 [NPAs](#) (see below) while the rest concerned commercial aviation, which is outside the scope of EAS.

NPA 2020-15 "Update of the flight simulation training device requirements", closing date 21 April

EAS placed 2 comments on this [NPA](#). We urged EASA to look for more ways of promoting the use of very advanced but non-certified simulator devices, both in basic training and also as a "refresher device" for flight planning and when returning to fly after a pause.

NPA 2021-05 "Standardised European rules of the air – Introduction of radiotelephony for the provision of aerodrome flight information service (AFIS)", closing date 13 May

EAS submitted 8 comments on various details in this [NPA](#), which is an update of the existing rules for AFIS services.

NPA 2021-06 "Regular update of the Certification Specifications for Standard Changes and Standard Repairs – CS-STAN Issue 4", closing date 18 June

EAS submitted 24 comments on various details in this 162-page [NPA](#). Generally the [NPA](#) is a positive development, enabling simpler installation of e.g. many additional electronic devices. We submitted some comments, for example suggesting to allow some items that are proposed in the [NPA](#) to be installed not only in VFR but also in IFR aircraft.

2. EASA-EAS Cooperation on Return to Normal Operations

When the Covid-19 pandemic started in 2020, a co-operation forum between EAS and EASA's General Aviation unit was set up, with EASA's Dominique Roland and EAS's Andrea Anesini presiding.

The forum has met around six times virtually and discussed the current situation as well as various topics related to enabling the smooth return to normal operations among EAS's member organisations in light and general aviation.

The pandemic situation has now stabilised to such an extent that the need for regular meetings has subsided, with further topics taken up on a case by case basis. As Programme Manager I thank EASA for a fruitful co-operation!

EUROPE AIR SPORTS GENERAL CONFERENCE 2021



Strasbourg panorama from the Barrage Vauban with the medieval bridge Ponts Couverts in the foreground and the cathedral in the distance

We still hope that our 2021 General Meeting will take place on 22- 24 October in Strasbourg. We will be guided by the COVID situation and the rules that are in place at the time.

More information will be made available as soon as possible!

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

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APRIL 2021



*The view from Sergio and Livia **Calabresi's** house in Gravere, close to the border between Northern Italy and France*

(Photo by David Roberts)

See obituary on page 6

After a rather irregular production of the Newsletters during last year, I hope to return to more frequent but shorter issues. This one comes out as some people are beginning to return to flying. I hope that by the time the next one is due in May/June, many more of us will be back in the air. Diana King

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

Dear readers, dear pilot friends,

Once again I have to postpone the comment that we have come out of the pandemic tunnel to better times. But at the same time I can write that the impact of it on flight activities across Europe, for all categories of users of the airspace we represent, seem to have suffered to a lesser extent from the limitations imposed, with different impact, by most of the European countries.

According to the information received from EAS's Member Organisations, we must finalise an average 20% reduction in activities, less than expected, but with good news that comes from many countries of the continent: flying school activities have continued with the support of EASA and the National Civil Aviation Authorities, and above all it seems that the demand for education to obtain new licences, coming from young people interested in training for leisure flight but also for professional one, is growing almost everywhere.

If confirmed in the near future, it will represent a strong sign of resilience of our world, of our passions.

In this issue of our Newsletter you will have the opportunity to follow the uninterrupted activity that remote contact technologies have made possible for the Board and the experts of Europe Air Sports.

We have not reduced the pace of our activity in support of your EAS Member Associations, strengthening in particular those, relatively more recent, relating to ecological issues (the Green Deal) and the defence of the use of airspace by all leisure flight users (U-space regulation).

Naturally, the other activities which have already been underway for some time continued.

I hope to be able to celebrate the turnaround of the pandemic with you all in the first months of next summer.

For now, happy reading.

Andrea Anesini
Europe Air Sports President

NPA 2020-14 "SIMPLER, LIGHTER AND BETTER PART-FCL REQUIREMENTS FOR GENERAL AVIATION" – *Jean-Pierre Delmas assesses the proposed changes*

In general, most updates proposed in this NPA are correct and improve clarity.

In particular, it is the first attempt to create a regulatory framework for **FIs (Flight Instructors)** and pilots flying aeroplanes with electric engines and batteries.

The NPA drives in the right direction = keep on track towards more **competency-based training (CBT)**.

But the devil could be in the detail, and it still contains proposals that add complexity to complexity, or shift far away from **CBT**, for example for **FI** qualification and for pilot recency requirements on electric engine aeroplanes (although the recent return of two-year long experience in real conditions have demonstrated easy adaptation of both).

By the way, EAS is proposing to get rid of arbitrary quantitative requirements in Aerobatic and Night-VFR ratings.

EAS has prepared comments and proposals with sound rationale to bring the FCL Up-date proposal back on track towards more competency-based training. It also proposes that

less counterproductive quantitative provisions should be put in hard law, in order to ease rapid adaptation of the regulatory framework, to innovations delivered by the new technology industry.

NPA 2020-15 ON FLIGHT SIMULATION TRAINING DEVICES – *text by Michel Rocca*

The objective of this NPA is to introduce in the EU regulatory framework an innovative approach to the capabilities of future **flight simulation training devices (FSTD)**. This will ensure harmonisation with the '**Manual** of criteria for the qualification of **FSTDs**' published by the International Civil Aviation Organisation.

Currently, about 1,400 **FSTDs** for aeroplanes are operated in EASA Member States and in third countries where EASA acts as the competent authority. They include 110 **Basic Instrument Training Devices (BITD)**, which represent the first level of **FSTDs**.

The NPA proposes to remove all the provisions related to **BITDs** in the Certification Specification - **FSTD(A)** as they will be no longer valid for initial evaluation. However, the existing **BITD** qualifications will remain valid as long as they are subjected to regular evaluation for compliance with the applicable requirements. As for the other **FSTDs**, their technical capabilities will be assessed on the basis of 12 features and 4 fidelity levels.

Our readers can learn more on this very specific topic thanks to the '**Introduction** to EASA NPA 2020-15' video developed by TRAFICOM, the Finnish Transport and Communications Agency. See [Flight simulators and other FSTDs | Traficom](#)

PART 66-L – *Patrick Pauwels presents the latest situation*

The detected problem with the Part 66-L recency requirements was presented by EAS during the GA Task Force meeting in February.

A proposal of an adapted AMC (Acceptable Means of Compliance) was already drafted by EASA. This item will be further discussed during the upcoming GA Committee Technical Body meeting, where EAS is represented by Julian Scarfe, Jean-Pierre Delmas and Henrik Svensson.

U-SPACE UPDATE - *a report from Timo Schubert and Michel Rocca*

On 22 and 23 February the EASA Committee adopted the U-space regulatory package. The final versions of the documents were subsequently presented at the U-space informal expert group on 3 March 2021.

The legislation will be published in spring and will be applied from 26 January 2023.

The documents mostly deal with U-space operators, U-space service providers and other newcomer(s) - the Common Information Service provider(s).

With regard to manned aviation, you may remember that two situations are considered:

- Situation 1: You intend to enter a U-space airspace designated in an airspace of A to D class;
- Situation 2: You intend to enter a U-space airspace designated in an airspace of E to G class.

In situation 1, you will be allowed to proceed along your route provided that a '**dynamic airspace reconfiguration**' is performed.

In situation 2, you will be allowed to proceed along your route provided that you make your aircraft electronically conspicuous to the U-space services provider(s).

After the adoption of a regulation comes the drafting of **Acceptable Means of Compliance (AMC)** and **Guidance Material (GM)**. Aware that '**the devil might be in the details**', Europe Air Sports strived to get access to the relevant expert group. As explained during our General Meeting, our first attempt made last year was unsuccessful. Fortunately, we did better with our second attempt.



A key requirement for aircraft to fly in U-Space airspace is that they make themselves visible to the U-space services provider(s). The requirements regarding the electronic conspicuity technologies they must carry will be defined in the above-mentioned [AMC/GM](#).

Paragliders at a competition

Michel, Julian, Marc Asquith of the [European Hang Gliding and Paragliding Union \(EHPU\)](#) and Timo are pleased to report our very successful participation in **EASA's** Work Package 07 regarding electronic conspicuity.

This window of opportunity had opened up with the support of DG MOVE (European Commission) and EASA. The initial commitment was for EAS to have a single opportunity to present to this group of experts on electronic conspicuity, in order to brief them on the requirements of sports and recreational aviation. Shortly before the meeting, EASA was given the go ahead to accept EAS formally as a member. Thus, Michel has kindly agreed to be our representative.

The meeting went very well and included presentations by EAS and IAOPA (International Aircraft Owners and Pilots Association). Both GA organisations "sang from the same song sheet" asking for light, low-cost requirements. Our sector really made a very united and positive impression. The purpose of the WPO7 expert group is to make recommendations to the U-space Steering Group, regarding guidance and [AMC](#) on electronic conspicuity. It's absolutely key for EAS to be represented here.

It was good to have [EHPU](#) on board as well, in order to demonstrate the specific needs of this air sports community.

Marc Asquith from [EHPU](#) concludes 'The [EHPU](#) Management Committee has expressed their satisfaction for the support received from EAS. As we have discovered over this year of pandemic, Government Departments of all Nations and Communities tend to overlook our disciplines and forget our 110,000 active aircraft, we were very pleased to have the opportunity to participate in this meeting and look forward to continuing to work closely with EAS on this issue in the **future**'.

We will keep you updated on the work in progress, mainly on the '**ways and means**' to comply with the electronic conspicuity requirement.

FROM THE PROGRAMME **MANAGER'S** DESK

Nils Rostedt in an Aero L-39C Albatros jet trainer, made in Czech, an ex-Soviet air force trainer

Nils reports a busy month!

EAS-EASA cooperation: Return to Normal Operations

Highlights from the recent regular meeting of the EAS-EASA project group, chaired by Dominique Roland (EASA) and Andrea Anesini (EAS):

This was already the fifth meeting discussing the impact of COVID and how to enable a smooth return to operations. Unfortunately the COVID pandemic shows few signs of abating.

An EAS members' questionnaire confirmed that activity levels, while generally down, are not nearly so badly affected as commercial aviation. However, most associations do not expect a return to normal before 2022.

EAS brought up the problem of expiration of existing pilots' and technicians' privileges and ratings, and how to "keep them alive" by temporarily extending validity times and by other means.



NPA Consultations (Notices of Proposed Amendments)

NPA 2020-13, regular update of CS-22, deadline 14 March

EASA is modernising its certification specifications for sailplanes. This NPA was developed in close cooperation with the sailplane industry. Consequently the proposed reforms are positive, and this was also EAS's main message in its response. Thanks to Werner Scholz from the Sailplane Manufacturers Association, who provided many good comments.

NPA 2020-12, Review of Part-66, deadline 31 March

This NPA is about reforming the licensing requirements for Part-66 maintenance technicians. The analysis resulted in a significant number of pertinent comments on **EASA's** proposals, on several important topics related to the L (light) category licence:

- additional requirements on the practical assessment of Part-66L applicants
- need for improved modularity of the contents of the theoretical examination for the L licences
- impractical licence recency requirements for technicians working in traditional club-based maintenance environments.

Last but not least, we demand that a representative from the GA light aviation sector shall be included in the rulemaking group, which has not been the case so far.

The EAS NPA response was developed in a project group with several representatives from the powered flying and gliding sectors, including the European Gliding Union. Thanks for all the help and encouragement.

NPA 2020-14, Simpler, lighter, better FCL for General Aviation, deadline 31 March

This NPA proposes several significant reforms to **EASA's** flight crew licensing (FCL) requirements. In our response EAS placed 16 comments on the NPA, the main points of which are described in J-P **Delmas's** article elsewhere in this newsletter.

NPA 2020-10, regular update of Aerodrome rules, deadline 10 March

We placed 9 comments on this NPA in our response. Thanks to René Meier of the European Power Flying Union, who provided his expertise on this topic.

NPA 2020-15, Update of the flight simulation training device requirements, deadline 21 April

This is at the time of writing still Work in Progress, however, as the NPA may impact flight training activities, EAS intends to submit comments to this NPA. For details please see Michel Rocca's article on page 3.

EUROPE AIR SPORTS GENERAL CONFERENCE 2021

The EAS General Secretary Pierre Léonard says:

Our 2021 General Meeting will take place in Strasbourg on 22- 24 October 2021, pending of course the COVID situation. The proposed schedule is:

1. Friday 22 October 2021:
 - a. The EAS Board members will meet from 09:00hrs till 12:00hrs
 - b. A social programme will be organised in accordance with the COVID eventual restrictions on Friday afternoon (information will be transmitted in due time).
2. Saturday 23 October 2021:

The agenda will include several subjects. A more detailed agenda, when available, will be transmitted.
3. Sunday 24 October 2021:

The standard statutory meeting will take place, ending by noon

More information will be made available as soon as possible!

I was distressed to hear from **Sergio's** wife, Livia, in early February that Sergio had died. Sergio was an EAS board member from 2006 to 2014, nominated by the Aero Club of Italy.



Sergio and his wife Livia
(photo by David Roberts)

Sergio and Livia became very good friends of my wife and myself. We visited them many times at their beautiful home at Gravera above the town of Susa in NW Italy with a panoramic view of mountains and the valley towards Torino. Sergio introduced us to the delights of Piemonte Nebbiolo wines which I formed a habit of buying in large quantities to take home, from his favourite vineyard.

Sergio was a modern 'Renaissance Man'; his activities, interests and expertise were so diverse. I have many stories about his adventures, whether on his 850cc motorbike, his skiing (he was a fully qualified ski instructor), his hang-gliding off the local hill in the valley below his house and ending up some 150 km away near Annecy in France. He and Livia had several horses, made exquisite Génépi, he skippered ocean racing yachts, was a mountaineer including climbing ice fields, flew microlights, instructed on small and large **GA aircraft, and he was still flying a friend's Executive Jet to and from the USA until not** that many years ago.

His career as a pilot started in the Italian Air Force. He flew the F104 and other fast jets, spending three years test flying in the USA. He flew in the Italian aerobatic team (the **"Frecce Tricolori"**) and in later years was a B747 captain for Alitalia, based in Tokyo and Australia much of the time. After retirement he built their own magnificent house on the family land near Susa. Sergio was even a local politician, being a successful mayor of Gravera until fairly recently.

On the EAS board Sergio took great interest in pilot education and safety matters as well as airspace. He made significant contributions to discussions on EAS positions proposed on a variety of regulatory matters. With his high level contacts in Italy, he was also instrumental in obtaining a reversal of an Italian Government tax proposal that would have heavily penalised GA airborne visitors to Italy who stayed more than 48 hours.

Above all though he was wonderful company. Although a man of slight build one could never miss Sergio, his presence always noticed. His warmth and character were infectious. His experience of so many facets of an adventurous life never came to the top in conversation unless one cajoled him to talk about some of it. But my enduring memory **of Sergio, apart from lots of very pleasant days and evenings spent in his and Livia's** company, was when flying with him in my Duo Discus glider in the Southern French Alps in April 2011. We had turned at the head of the Glacier Blanc at about 12,000 feet ASL and were gliding out of the cauldron of the adjacent glacier beside Mont Pelvoux when I **said to Sergio "if you look up to your right in a minute you will see a spectacular "hanging ice field". As we flew past this awe-inspiring sight Sergio calmly announced from the front seat that he and Livia had been climbing that, roped together, only the previous year. He was aged 73 at that time!**

Rest in peace, my dear friend. We shall miss you.

David Roberts

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

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JANUARY 2021



Image supplied by Austrian Aero Club

For several reasons it has been a long time since the last Newsletter and so there is a lot of information to share this time. As editor, I hope to produce the next issue without so much delay! Diana King

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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Crediting of flight hours now legally binding in all EASA Member States

Rudi Schuegraf gives the regulatory background to this significant break-through

Last spring we presented the information that the Agency had published a decision which was long awaited; it was the

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

The AMC (Acceptable Means of Compliance) clarified 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/her EASA licence – LAPL A, PPL A and associated class ratings. Unfortunately, the AMC was only soft law, not binding law. This meant that the different Member States could make individual decisions about whether and how to put this into practice.

To change that situation it was necessary to amend the EC Regulation with additional paragraphs, to transfer the AMC text into the FCL Implementing Rule 1178/2011. This was published 15 December 2020 as amendment No. 14 to this regulation.

On behalf of Europe Air Sports we are proud to inform you that, with this amendment, the crediting of aircraft and aeroplane hours becomes now binding law for all EU Member States. Second, a pilot applying to transfer from a LAPL to a PPL or BPL or SPL will also be given full credit for their LAPL theoretical knowledge.

This is something that your representatives at Europe Air Sports had worked for many years to achieve.

The EC Regulation 2020/2193 is a 16 page document which you find under the following link in all EU languages

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32020R2193&from=EN>

The main para is found in Annex I of the Regulation and reads as follows:

(c) in point FCL.035(a), the following point (4) is added:

(4) All hours flown in aeroplanes or TMGs that are subject to a decision of a Member State taken in accordance with points (a) or (c) of Article 2(8) of Regulation (EU) 2018/1139 or that fall within the scope of Annex I to that Regulation shall be credited in full towards fulfilling the flight time requirements of point FCL.140.A(a)(1) and point FCL.740.A(b)(1)(ii) of this Annex, provided that the following conditions are met:

(i) the aeroplane or TMG concerned is of the same category and class as the Part-FCL aircraft in respect of which the hours flown are to be credited;

This means that all hours flown with national licences in aircraft, aeroplanes, sailplanes and balloons have to be counted by the authorities to validate privileges and ratings of an EASA LAPL, SPL, BPL or PPL.

UPDATE ON EU UNMANNED AIRCRAFT AND U-SPACE REGULATIONS – David Phipps

The proliferation of unmanned aircraft over recent years and the increasing requirement to extend their operation **beyond visual line of sight (BVLOS)** has led to the creation of regulations at an unprecedented pace.

The regulatory process began with the publication A-NPA 2015-10 – Introduction of a regulatory framework for the operation of drones. This work concluded with Regulation (EU) 2019/947 which became fully applicable on 31 December 2020.

Regulation (EU) 2019/947 provides a regulatory framework for the risk-based operation of unmanned aircraft, with operations falling into one of three categories, dependent on risk, which has been covered in previous editions of the Newsletter.

The biggest single community affected by Regulation (EU) 2019/947 is the model flying community. Although the rules have now come into effect, they do allow a period of transition for model flying associations. These groups can continue to operate under their existing arrangements until they have agreed the terms of their Article 16 Authorisation, which they must have in place by 1 July 2022.

The UK model flyers were the first to finalise their Article 16 Authorisation, which came into effect on 31 December (just 12 hours before the **UK's** departure from the EU after the end of the transition period). The Article 16 Authorisation agreed in the UK has been shared with EMFU members, who are using it as a template for their own negotiations.



BVLOS Drone delivery service from the UK mainland to the Isle of Wight

Having finalised the regulatory framework for the operation of unmanned aircraft, the next phase of the regulatory pathway is to find ways in which unmanned aircraft can be operated beyond visual line of sight of the operator. This is the only way in which the true economic potential of unmanned aircraft can be fully exploited.

The existing aviation communities and institutions have established ways of operating which have kept conflicts and risks at acceptable levels, but widespread integration of unmanned aircraft into the airspace presents major challenges and impacts on all established airspace users.

In 2017, the U-space concept was defined as a set of services and procedures relying on a high level of digitalisation to create an '**ecosystem**' to facilitate the safe and secure integration of drones into the airspace and to unlock their full economic potential.

To facilitate **BVLOS** operation of drones, there are really only two realistic options:

1. Segregation. The safest way to avoid conflict is to only operate drones within airspace volumes which can be assured to be free from manned aircraft. In the short term, this is probably the only way in which safety of **BVLOS** operations can be assured.
2. Integration. This would require all other airspace users to be electronically conspicuous, as this would be the only reliable means for unmanned aircraft to apply the '**detect & avoid**' principle with manned aircraft.

EASA published their Opinion 01-2020 on a High-level regulatory framework for the U-space in March 2020, along with a Draft Regulation. This sets out the requirements for the services and procedures needed for the deployment of U-space, but the designation of U-Space airspace would remain within the competency of individual Member States.

The Draft Regulation assumes that a Member State may designate a U-space airspace either within controlled airspace or within uncontrolled airspace.

Where a U-space airspace would be established within controlled airspace, manned aircraft would be provided with air traffic control service. The operational concept of dynamic reconfiguration of the U-space airspace would apply with the objective to ensure segregation of manned and unmanned traffic.

Where a U-space airspace would be established within uncontrolled airspace, manned aircraft would be required to "*continuously make themselves electronically conspicuous to the U-space service providers*". This places obligations on manned aircraft to provide information about their position to the U-Space service providers "*at regular intervals*" and "*with a level of accuracy, integrity, legitimacy of source and continuity as determined by the Agency*".

For the model flying community, the Draft Regulation also referenced an exemption from the requirements, for operations of unmanned aircraft that are conducted in the framework of model aircraft clubs and associations that receive an Article 16 authorisation as described above. Taken at face value, the intent of the Regulators was consistent with the protections for model flying within the Basic Regulation to "*allow model aircraft to continue*

to operate as they do today". However, there has been evidence that some Member States have interpreted the 'exemption' as an 'exclusion' instead, meaning that model aircraft would be precluded from operating within U-Space with no mechanism defined to gain access.

Model flyers generally operate within a definable airspace volume around fixed known points. Therefore the model flyers made representations to DG-MOVE and EASA with some suggestions as to how access to U-Space could be facilitated in several different ways, including:



1. Ground based notification to the U-Space Service Provider (USSP), possibly via the use of an app. This would be the model flyers' preferred option.
2. Ground based broadcast (possible ADS-B). This has been trialled in the UK.
3. On board conspicuity device - perhaps only appropriate for larger model aircraft or those operating away from established model flying locations.

There has been a great deal of feedback from Member States to the Draft Regulation, which has added some delay to EASA's original timeline which would originally have seen the Implementing Rule adopted by the European Commission by the end of 2020.

Clearly, the widespread integration of unmanned aircraft into the skies represents challenges to all the activities under the Europe Air Sports umbrella.

Clearly there is also political will to expedite the measures required to allow the economic potential of drones to be fully unlocked by facilitating BVLOS operations. For our communities, ultimately it will perhaps come down to a simple choice - either accepting the creation of more segregated/restricted airspace to allow drones to operate safely, or accepting that we are probably all faced with the prospect of having to embrace electronic conspicuity sooner rather than later, as the price for retaining maximum access to the airspace.

BASIC INSTRUMENT RATING 2021

Julian Scarfe sets out the essential details of the new rating

In the February-March 2019 newsletter we discussed the EASA Opinion 01/2019 introducing the [Basic Instrument Rating \(BIR\)](#). The rating was introduced by Regulation (EU) 2020/359 and is applicable from 8 Sep 2021, with [AMC/GM \(Acceptable Means of Compliance/Guidance Material\)](#) introduced by Executive Director Decision 2020/018/R in Nov 2020.

The BIR provides a purely competence-based (no minimum hours), modern and practical instrument qualification, tailored to GA aeroplanes. It has slightly higher operating and planning minima than the [IR \(Instrument Rating\)](#), requiring that the pilot reaches visual conditions 200 ft. higher on the approach and has a minimum visibility of 1500 m.

The implementing rule is in FCL.835 with associated [AMC/GM](#), including a detailed description of the 3 modules in which the BIR is taught. Additionally, for the [theoretical knowledge \(TK\)](#) the [BIR Learning Objectives \(LOs\)](#) have been introduced (see the Appendix to the Decision) as a subset of the [IR LOs](#) and combined into 3 exams, broadly aligned with the modules. The skill test is essentially the same as for the [IR](#), but with approaches flown to the higher minima.

There is a straightforward upgrade path to the full [IR](#) available after 50 hours of IFR pilot-in-command time, requiring some training in flying approaches to lower minima, but no further [TK](#) ground study, simply an oral examination of [TK](#) by the examiner before a skill test for the [IR](#), just as for the conversion of an [IR](#) from a third country.

Despite the best efforts of Europe Air Sports, other parts of the GA community and even some member states to require simply a [DTO \(Declared Training Organisation\)](#) for [BIR](#) training, EASA decided that an [ATO \(Approved Training Organisation\)](#) must be involved.

However, because the **BIR** is entirely competence-based a pilot can initially build the skills and competences needed *outside* the framework of a training organisation (perhaps even on an uncertified simulator). This means that the training required when the pilot attends the **ATO** for training leading to a skill test is minimised.

We believe that the **BIR** will provide a safe and effective tool for improving safety for the next generation of GA aeroplane pilots.

EAS PART-21 LIGHT 2021 *Julian Scarfe reports on developments*

One of the key problems for sports and recreational aviation in the first decade of the EASA system was the effect of the disproportionate regulation ("**Part-21**") for design and production at the lighter end of the range of aircraft falling within the scope of the **Basic Regulation (BR)**. This resulted in an absurd situation of European manufacturers of **Light Sports Aircraft (LSA)** doing business mostly by exporting their aircraft to the US market with its more proportionate regulation.

During the negotiation of the **New Basic Regulation (NBR, 2018/1139)**, Europe Air Sports tackled this issue from both directions. We lobbied for an opt-out for aircraft up to 600 kg (which fall into the **LSA** category), to enable more proportionate national regulation to be applied, by taking those aircraft outside the scope of the **NBR**.

*Pipistrel Sinus –
an example of a Light Sports Aircraft*



We also supported changes to the substantive requirements to the **NBR**, to enable a more proportionate regulation within its scope, and a requirement for EASA to develop that new proportionate regulation within a 2-year timeframe.

The additional freedom from the constraints of the old **BR** would for example allow derogation from the requirement that all aircraft and design/production organisations must be certified. This was seized with enthusiasm by the EASA GA team (who had strongly supported the changes). This has resulted in rapid and constructive progress towards an alternative certification regime called "**Part-21 Light**". An Opinion on this is expected in the first half of 2021.

Part-21 Light proposes two new certification regimes:

- A Light-Certified process, proposed for fixed-wing aircraft up to an MTOM of 2000 kg with a maximum capacity of 4 persons, rotorcraft up to 1200 kg and 4 persons, as well as balloons, airships and gyroplanes. Using this process, design organisations and production organisations may declare their *capabilities* (rather than having them certified as was necessary under Part-21). They can then design and produce aircraft with fully ICAO-compliant Type Certificates and Certificates of Airworthiness.
- A Light-Declared process, proposed for fixed-wing aircraft up to an MTOM of 1200 kg with a maximum capacity of 2 persons, rotorcraft up to 1200 kg and 4 persons, as well as balloons and airships with a capacity up to 4 persons, without novel or unusual design features. Using this process, organisations may design aircraft by declaring the *compliance of the design* with the relevant technical requirements. They can then declare the conformity of individual aircraft and parts with that design, resulting in a Restricted Certificate of Airworthiness.

In both cases, close collaboration between the design/production organisation, EASA and NAAs is expected. The details of the regulation are necessarily quite complex, as they have to consider the need for design changes in each regime. More detail, including draft regulatory text, is available at:

<https://www.easa.europa.eu/newsroom-and-events/events/part-21-light-workshop-no4>

We believe this initiative has the potential to transform light aircraft design and manufacture in Europe.

IMPACT OF BREXIT *Some explanation from Nils Rostedt*

Brexit is now a reality and you may want to know how it affects private flying to and from the UK. Here are a few pieces of information (Sorry Brits, this is more from the EU viewpoint) copied from an excellent Q&A article published by *Flyer* magazine and available at https://issuu.com/flyerdigital/docs/flyer_february_2021/s/11521101

Licensing

- Generally, UK is now regarded as a "third country" (non-EU) and rules for flying to such countries apply.
- From 1 January 2021, holders of a LAPL issued by an EASA Member State may not fly an aircraft registered in an EASA Member State in UK airspace.
- From 1 January 2021, holders of a LAPL issued by an EASA Member State may fly a UK (G) registered aircraft in UK airspace for a period of two years.
- The LAPL does not conform to the standard PPL in ICAO Annex 1 – this is referred to as a sub-ICAO licence. The UK is currently not expecting any mutual recognition of pilot licences with EASA/ EU.

Airworthiness

UK GA aircraft that were previously EASA controlled will be known as Part 21 aircraft and their design, production and maintenance will continue under the same regulatory framework but with CAA approval.

Flight conditions issued by EASA will be accepted for a period of up to two years after 31 December 2020, providing they remain valid.

For more information here are a few useful links:

The main EU-UK Withdrawal Agreement from 17 October 2019:

https://ec.europa.eu/info/relations-united-kingdom/eu-uk-withdrawal-agreement_en

The recent EU-UK Trade and Cooperation Agreement from 24 December 2020:

<https://www.easa.europa.eu/document-library/bilateral-agreements/eu-uk-trade-and-cooperation-agreement>.

A 34-page summary can be found here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/948093/TCA_SUMMARY_PDF.pdf

Aviation safety related provisions are found in Part Two, Heading Two, Title II of this Agreement.

Brexit related stuff on the EASA and UK CAA websites:

<https://www.easa.europa.eu/brexit>

<https://info.caa.co.uk/uk-eu-transition/>

<https://info.caa.co.uk/uk-eu-transition/general-aviation/>

*Nils Rostedt reports from the Programme **Manager's** Desk*

FROM THE "RETURN TO NORMAL OPERATIONS" EAS-EASA TASKFORCE

This joint "RNO" task force is trying to establish the impact on sports and recreational aviation caused by the COVID-19 pandemic and to propose supporting remedies. The task force meets next time on 11 March. In preparation, we will shortly send a questionnaire on this topic to our Members and hope to receive meaningful data. This can then be the basis of actions that may enable a speedy return towards a more normal activity level. So please watch your inbox and try to respond - every data point is helpful!

Generally, as you are surely aware, the pandemic is still severe and the wait for "normalisation" seems to grow ever longer. Hopefully vaccinations will start to have an effect soon! In the meantime, stay safe!

OPEN EASA CONSULTATIONS

NPA 2020-12: Review of Part-66, the EASA maintenance licensing system. The NPA's topics are outside EASA's main business, but we do have several issues related to the Implementation Regulation 1321/2014 which is the subject of this NPA. A working team is established. Deadline: 31 March 2021

NPA 2020-13 'Regular update of CS-22'

This concerns certification standards for sailplanes and powered sailplanes and includes a number of safety related amendments. A working team is looking at this NPA. Deadline: 14 March 2021

NPA 2020-14 'Simpler, lighter and better Part-FCL requirements for general aviation (Subtask 2)'

This topic is of major importance to EASA and we will look at it in detail. Deadline: 31 March 2021

NPA 2020-15 'Update of the flight simulation training device requirements'

This initiative could enable increased use of simulators in training also for light aircraft, especially IFR. Deadline: 31 March 2021

EPAS 2021-2025 PUBLISHED

On January 15, EASA published the final version of the [European Plan for Aviation Safety \(EPAS\)](#) for the period 2021-2025. EPAS is EASA's main planning document and contains both a description of EASA's strategy, summaries of its planned key actions, and individual descriptions of all active rulemaking tasks. It is revised annually.

The COVID-19 pandemic has had major impact on this year's EPAS. EASA was forced to put many new strategic actions "on hold" while focusing on urgent measures, as commercial aviation decreased by 90% because of COVID-19. Nevertheless, here's a selection of planned EASA key actions affecting General Aviation and therefore of interest to Europe Air Sports:

- Improve the dissemination of safety promotion and training material by authorities, associations, flying clubs and insurance companies, targeting flight instructors and/or pilots.
- Support the introduction of new business models (i.e. cost-sharing platforms).
- **Adapt design and production rules ('Part 21 Light') to become more proportionate to the risks.**
- Bring data into GA cockpits: weather, flight information services (FIS) and traffic information data should progressively be made available in all GA cockpits.
- One key EASA action is the planned "regulatory framework for the U-space", which appears to include new requirements on electronic conspicuity for manned aircraft wanting to fly in U-space airspace.
- EASA plans a number of new and amended regulations to support the introduction of electric and hybrid powered aircraft including eVTOL (electric vertical take-off and landing) aircraft.

The EPAS can be found [here](#) and is highly recommended for anyone interested in "the big picture" of EU aviation safety rulemaking and EASA's next steps.

PART 66-LIGHT *Patrick Pauwels reports on the gliding situation*

Reg. 2018/1142 for the Part 66-Light maintenance licences was published on 14 August 2018 and applies from 5 March 2019. The conversion period of the existing national maintenance licences started from 1 October 2019. As from 1 October 2020 all certifying staff must hold a Part 66 certificate to continue working and to deliver the so-called 'CRS' (Certificate of Release to Service).

The training and examination of future engineers are still important topics and practical solutions will have to be worked out with respect to the rules. Licensed staff members also have to comply with some recency requirements. While handling the conversion, it

was noticed by key staff persons of the gliding federations of BE and NL that these requirements are oriented to fulltime employed staff. They do not fit our volunteers working in a club environment. M. Luc Beerts and Egbert Veldhuizen posted an extensive note to Howard Torode, [EGU \(European Gliding Union\)](#) Technical Officer for Maintenance & Airworthiness.



After cross checking and fine tuning, a final EGU position paper, with proposals for redefinition of the qualification criteria, was composed. This paper was passed to EAS for support and transmission to EASA. EASA's GA point of contact, D. Roland, has confirmed that the paper is in the hands of the GA Task Force for further processing. A resolution of this issue is urgent, **as existing engineers' recency within their current licence may require justification in the near future.** This being the case, this issue is not amenable to resolution in the timescale of the current NPA/CRD initiative under EASA RMT0255. Nevertheless EGU and EAS fully intend to contribute this to this NPA because of the serious concern it creates. Although the 'AltMoC' ([Alternative Means of Compliance](#)) procedure by the member states might bring a solution, a redefinition of the related IR-article/AMC is preferred as a long-term solution.

FAA-EASA AVIATION SAFETY CONFERENCE

The Federal Aviation Administration (FAA) and the European Union Aviation Safety Agency (EASA) have announced that, due to the pandemic, they have postponed the in-person 2021 FAA-EASA Aviation Safety Conference until 2022. They are working to secure dates and a location for the 2022 event and will make further announcements when they can.

EAS GENERAL CONFERENCE 12 DECEMBER 2020 *reported by Diana King*

Due to the Covid pandemic, the 2020 Annual General Meeting was postponed last year and eventually held by video link in December.

The President, Andrea Anesini, in a snapshot of the **year's** work, reported that EAS had an active and successful year fighting for the interests of recreational flying at EU political and technical level. Technical rule-making in key areas continued to be covered, including Part M, the crediting of hours flown on Annex I aircraft and the basic instrument rating. High level meetings discussed U-Space, including the needs of all recreational pilots relating to electronic technology conspicuity.

Andrea reminded delegates that EAS keeps all flying activities, powered and non-powered, on the agenda and mentioned the importance of **members'** contributions to the various rule-making tasks. EAS Technical Officers act as a link to the air sports unions, provide valuable expertise, and ensure a seamless channel for communications. Other TOs would be welcome for specialities not now represented.

Manfred Kunschitz presented the accounts for the financial year to December 2019, also a forecast for the current year and a budget and subscription proposals for 2021. Largely due to the lack of travel, a **€7,000** surplus had exceeded the budgeted surplus of **€3,000**. There was some discussion of the possibility of reducing member subscriptions for 2021.

Michel Rocca discussed U-space and the drone industry. Questions about rights of way between drones and other airspace users have not yet been resolved, but Timo Schubert reported that we had been assured that U-space would be accessible to all manned aviation without having to ask permission. Marc Asquith, representing the European Hang and Paragliding Union, strongly advocated that the electronic conspicuity requirements being proposed in some areas would be inappropriate and difficult for hang and paragliders to adopt. Responding to **Marc's** comments, Michel suggested that a supporting paper should be prepared.

The EAS Programme Manager Nils Rostedt explained the new EASA Consultation Accelerated Procedure, introduced to improve speed and efficiency in the rule-making process. There is concern that this may reduce transparency and enable EASA to avoid difficult conversations with stake-holders. Patrick Naegeli and Julian Scarfe commented

that the new process had worked well for the introduction of Sailplane FCL, but some other topics have not worked so well.

Nils also talked of the review of Return to Normal Operations. Different mechanisms had been used to review the impact of airfields being closed and their re-opening. Nils encouraged members to contribute more to the future work.

Rudi Schuegraf reviewed thirteen Flight Crew Licensing (FCL) regulatory amendments that he had overseen for EAS, referring in particular to the Acceptable Means of Compliance to allow testing and training on Annex I aircraft, though this excluded microlights, except for flight time being credited. Julian Scarfe would now be covering responsibility for FCL.

The Green Deal was introduced by Timo Schubert. Political change in Europe has brought environmental concerns into higher profile and created a greater emphasis on the need for action plans and specific targets. There may be EU funding at national level to assist with this work. Delegates agreed that EAS should develop a position on the Green Deal.

In brief reports, Julian Scarfe outlined the new regulations for light aircraft design and manufacture under Part 21 Light. He also mentioned that the Basic Instrument Rating would not be available immediately, to allow flying schools to develop the training methods. Rieteke showed the list of countries that have adopted the 600kg opt out for microlights. This project has been a big success for Europe Air Sports.

EUROPE AIR SPORTS GENERAL CONFERENCE 2021

Following Pierre **Léonard's** report in the last Newsletter, in setting the revised date of our next Conference, we are of course still very much dependent on the progress in defeating the COVID 19 virus. We hope that we will be able to arrange it later this year in Strasburg, but we will not be able to confirm this for some time. A face to face meeting would of course be preferred because of the importance of personal contacts. The Board will make a decision based on legal advice as soon as possible. We will keep you informed.

PETER SAUNDBY *a tribute from David Roberts and others*

Dr Peter Saundby MB ChB MFCM MFOM, former FRAeS and former medical adviser to Europe Air Sports



Peter Saundby (FAI photo)

One of the true greats in defending the rights of light aviation pilots, especially glider pilots, has flown his final thermal. After a long severe illness, which he bore with typical stoicism and complete lack of self-pity, Dr. Peter Saundby passed away peacefully in November 2020 aged 88. His Austrian-born wife Edith, who came to the UK just before the Second World War, survives him with daughter Diana and son Robert.

Peter qualified as a doctor in 1956 and learnt to fly on Tiger Moths and Harvards. He joined the RAF and became a pilot/surgeon, flying the Hawker Hunter and Canberras. After retiring from the RAF as Air Commodore (one star officer), Peter devoted much of his life to analysing and presenting the case for proportionate medical standards and processes for civilian light aircraft pilots. The many positions to which he was elected were member of the **British Gliding Association (BGA)** Council, Chairman of the UK Royal Aero Club (RAeC), advisor to the UK National Pilot Licensing group and to Europe Air Sports on medical matters and President of the **FAI's** Medico-Physiological Commission (CIMP). He received many honours including the **BGA's medal**, the **RAeC's Silver Medal** and Companion of Honour, and finally **the FAI's** top-level Companion of Honour in 2012.

Dr. Marja Osinga-Meek, current President of CIMP, **acknowledges Peter’s massive contribution to influencing the thinking in Europe on medical standards and a simpler process of validation through self-declaration. “His goal was to introduce the simple and safe system of the UK National Private Pilot Licence for several air sports, but this was not acceptable to the authorities. However, Peter was an unstoppable campaigner, and in the end, the Light Aircraft Pilot Licence (LAPL) medical certificate was accepted in Europe. In CIMP, we are now launching a proposal to introduce a new class of medical examinations, based on the evidence Peter published. Just a few weeks before Peter died, I sent him our proposal. He was happy to read it, and he had no comments!”**

Dr. Sally Evans, past Chief Medical Officer of **the UK CAA and chair of EASA’s FCL.001 working group that developed the common EU rules for pilot medical certification**, writes **“Peter was an acknowledged aviation medicine expert with vast experience of evaluating medical risks in recreational aviation and personally I valued Peter’s counsel and advice. He was a staunch supporter of the BGA and its community and the gliding community globally. He was also a valued colleague, great friend and a true gentleman, exemplified by him bringing small gifts to meetings such as jars of home-made jam for his fellow committee members. Peter continued to argue strongly to keep medical requirements for gliding and light aviation generally proportionate in the context of an increasing regulatory environment. His advocacy of a risk-based approach for recreational medical standards and support of light touch regulatory rules is undoubtedly his legacy”.**

Pete Stratten, **BGA CEO, comments: “He ensured that the recreational air sport community was equipped with watertight evidence that pilot medical declarations based on driving standards are proportionate and effective. It was only a matter of time before the UK CAA adopted a similarly informed view. Although EASA appeared to be unmoving on the topic, it is not that well known that in recent years EASA proposed a pilot medical self-declaration trial, which unfortunately was not supported by a vote of member states’ representatives advised by their national aviation authorities”.**

Bob Henderson, immediate past President of **FAI writes “Peter made a tremendous contribution to air sports in general over many years and to gliding in particular..... always an outstanding example of the aeromedical community private aeronautical activities in Europe owe him a debt for being instrumental in reducing the impact of the bureaucracy surrounding recreational aviation, without which it would be so much more difficult and expensive for regular pilots to enjoy their sport.”**

Peter's legacy will live on, throughout Europe and beyond.

For more tributes to Peter, see [Contributions to obit & tribute for P Saundby Dec 2020 Edited DGR \(bga-sg-uploads.s3.amazonaws.com\)](https://www.amazonaws.com/s3/uploads/bga-sg-uploads/Contributions%20to%20obit%20&%20tribute%20for%20P%20Saundby%20Dec%202020.pdf)

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

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OCTOBER 2020



Celebrating some of your **'Guards'**

Top row left to right:

Jean-Pierre Delmas, Patrick Pauwels, Michel Rocca

Second row, left to right:

Torkell Saetervadet, Julian Scarfe, Werner **'micro'** Scholz

Bottom row: Henrik Svensson

See pages 3 and 4 for some of the work these volunteers do on behalf of us all

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 OF EUROPE AIR SPORTS

Dear readers,

This newsletter is the third of this year, the third therefore in the era of the Covid 19 pandemic.

When we started talking about the disease all over Europe the hope was that everything would be resolved in a few months, without too much damage to the population. In March, as I told you in April, we decided for the first time to hold the Board Meeting of our organisation via the web, postponing direct contact to a later time. I feared, proposing it, that it would be difficult to switch from the traditional "**person** to person" mode to the "remote" solution, but the discipline of your Board Members has made the work absolutely profitable (an effect of the mental training of a pilot that distinguishes us all?).

In recent months, thanks also to the summer weather which seemed to have reduced the dynamics of the contagion throughout Europe, the flying activity of all of you has resumed from May onwards, with a partial reduction of 20 to 50% depending on each country.

At the same time, the activities of our regulatory counterparties continued, which were also managed with remote contact tools. In particular, EASA proved to be very present and attentive to the evolving situation of Leisure Aviation. They launched a discussion with us, on the initiative of Dominique Roland, EASA Director for General Aviation, on the preparation of an activity plan. We are now discussing this plan, whose initials are self-explanatory: RNO - Return to Normal Operations.

We monitored the progress of the virus until early September, and I secretly hoped to be able to hold our General Meeting during the autumn. It is absolutely not possible.

So in this newsletter you will find the Secretary General's report, which will inform you about the GM 2020. We also have reports from our "Guards" who continue their voluntary activities with the spirit of "business as usual" to ensure the success of Europe Air Sports again this year.

As for me, I can only wish you good reading, in the hope of being able to say as soon as possible that ... we are truly Returned to Normal Operations.

Andrea Anesini

President, Europe Air Sports

EUROPE AIR SPORTS GENERAL CONFERENCE 2020

Pierre Léonard reports:

COVID 19 has very much affected the calendar for our General Meeting in 2020. Initially organised for March 2020, it was delayed and scheduled for October 2020, in the same location in Strasbourg, France. But this was without counting on the tenacity of the virus and the preventive measures taken by the governmental authorities. We will not have a General Meeting with physical presence in 2020. As we agreed a contract with the Hotel Mercure and made some advance payments, the only way for us not to lose the committed funds is to stay with the same location for 2021. The dates that have been reserved are 18 to 21 March 2021, with the same timing and events as initially envisaged. EAS Members will receive an invitation and joining instructions at the beginning of 2021.

EASA ANNUAL SAFETY CONFERENCE

This year, the event will take place virtually and there is no registration fee. The theme is "focusing on the road to a safe and sustainable recovery". EASA says it will publish the detailed agenda shortly, and then we will know how much of the event concerns GA and sports aviation.

Registration for this year's conference is open on the EASA website [here](#). If you are interested in attending we recommend that you register as soon as convenient.

SURVEY ON THE STRATEGIC RESEARCH AND INNOVATION AGENDA FOR THE DIGITAL EUROPEAN SKY *by Michel Rocca and Nils Rostedt*

In July, [SESAR* JU \(Joint Undertaking\)](#), the Commission's research unit for [Air Traffic Management \(ATM\)](#), issued to stakeholders a survey on their "Strategic Research and Innovation Agenda" for the "Digital European Sky" project. This project is proposed to include the following research topics, some of which are relevant for general and sports aviation:

- Connected and Automated ATM (Air Traffic Management)
- Air-ground integration and autonomy
- Capacity-on-demand and dynamic airspace
- U-space and urban air mobility
- Virtualisation and cyber-secure data sharing
- Multimodality and passenger experience
- Aviation green deal
- Artificial Intelligence (AI) for aviation
- Civil/military interoperability and coordination

In Europe Air Sports' response, we highlighted that although an efficient and well-functioning [ATM](#) system is important for the European transportation system and the well-being of the European economy, free access to airspace for general and sports aviation must remain. This especially concerns uncontrolled airspace, where much of general and sports aviation operations take place, and which may easily get overlooked in this type of research project.

* [SESAR - Single European Sky ATM Research \(European air traffic management system\)](#)

EASA CONSULTING BODIES: EUROPE AIR SPORTS REPRESENTATIVES CHANGING OF THE GUARD *Reported by Rudi Schuegraf, EAS Senior Vice President*

The main functions of the Stakeholder Advisory Board ([SAB](#)) are set out in the [MB](#) (Management Board) Decision 20-2015 and in its Rules of Procedure. The Group composition of the [SAB](#) plenary is defined in [MB](#) Decision 1-2016. Those of its Technical Committees ([TECs](#)) and (overarching) Committees ([COMs](#)) are set-out in Annex I to the Rules of Procedure. To date, ten [TECs](#) and [COMs](#) are mentioned in the Rules of Procedure.

Details on structure, membership and working methods of the [SAB](#), [TECS](#) and [COMS](#) are also provided in the [SAB](#) Rules of Procedure.

Since the early days of Europe Air Sports, the interests of our members were defended ('guarded') by expert representatives, in all the consulting bodies established by the European aviation regulatory bodies. EASA has over the years changed and amended the existing consulting system. As time goes by, the EAS representation must be updated. In the following chart you find the change of your guards in the EASA **TECs** and **COMs**.

First, your guard in the **SAB** Plenary is Michel Rocca, replacing Rudi Schuegraf. Other roles are

Aerodromes (ADR.TEC)	Michel Rocca
Air Traffic Management / Air Navigation Services (ATM/ANS.TEC)	Michel Rocca
Design & Manufacturing (DM.TEC)	Werner "micro" Scholz
Engineering & Maintenance (EM.TEC)	Torkell Saetervadet Alternate: Patrick Pauwels
Flight Standards (FS.TEC)	Jean-Pierre Delmas, replacing Rudi Schuegraf
Certification (C.COM)	Werner "micro" Scholz
Commercial Aeroplane Safety Committee (CAS.COM)	Not applicable to EAS
Drones (D.COM), not yet set up	
General Aviation (GA.COM)	Julian Scarfe, vice-chair, J-P. Delmas, Henrik Svensson
Rotorcraft (R.COM)	Not applicable

Michel Rocca reports on two further topics:

EXPERT GROUPS

During this period of time, expert groups are flourishing in the European Union institutions. Some are related to the COVID-19 sanitary crisis, others to the Return-to-Normal-Operations amongst the General Aviation community.

For those of our specialist readers, it is worthwhile mentioning that on drones the following bodies are active and should not be confused:

➤ One expert group is named the '**Commission expert group on aviation safety**'

They met on 2 July to further discuss topics on the table of the EASA Committee. These were



- the common European risk classification scheme
- runway safety and aeronautical data
- the introduction of alleviations that permit the production of certain parts and appliances to be used during maintenance without the need for an EASA Form 1
- the introduction of new requirements on ageing aircraft.

Jodel DR1050 (photo Ad Meskens Wikimedia)

➤ Another expert group is named the **'Informal expert group on drones'**

They met on 3 July to present the state of play for this specific field of aviation. This includes UAS (Unmanned Aircraft Systems) regulatory framework as regards standard scenarios for operations executed in or beyond the visual line of sight (BVLOS). They also discussed the draft U-space regulatory framework for which the drafting of the AMC/GM (Acceptable Means of Compliance/Guidance Material) will start in October.

We will keep you informed of the outcome of these groups as well.

SURVEILLANCE PERFORMANCE AND INTEROPERABILITY (SPI) REGULATION

We have been consulted by EASA on the draft AMC/GM to the so-called SPI regulation. This deals with requirements on secondary surveillance radar transponders (SSR) and requirements on Automatic Dependent Surveillance-Broadcast (ADS-B).

Five comments have been sent to EASA, including one regarding the need to undertake an aircraft check before the next flight, whenever an anomaly is detected or reported on a specific aircraft.

We feel that it is not reasonable that a single detection or report of an **'anomaly'** grounds an aircraft until it can be checked. Some pragmatic guidance is required.

Nils Rostedt reports from the Programme Manager's Desk

EASA PROPOSED SPECIAL CONDITIONS FOR GYROPLANE COMBINED WITH ROAD VEHICLE USE

In July, EASA published draft "Special Condition (SC)" pan-European airworthiness requirements for a new type of aircraft, a combined gyroplane and road vehicle (car/motorcycle) with maximum mass up to 1000 kg. Europe Air Sports studied the draft and concluded that this proposed new regulation should not directly affect today's rules for gyroplanes up to a maximum weight of 600 kg, as these aircraft are successfully regulated by national regulations, unless the manufacturer chooses to "opt-in" to the EU rules.



Notably, this SC does not address pilot licensing of these aircraft. This is a topic where EAS needs to be vigilant in the future.

(Photo: haulnride.com)

EASA GUIDANCE ON CLASSROOM TRAINING IN COVID-19 TIMES

In August, EASA published a guidance paper on virtual classroom instruction and distance learning in relation to the COVID-19 pandemic. This is of interest to organisations providing training towards LAPL, PPL, SPL and BPL licences as well as maintenance ratings. This guidance paper, as well as other useful COVID-19 related EASA information, can be found here: <https://www.easa.europa.eu/the-agency/coronavirus-covid-19>.

EAS MEMBER SURVEY: HOW HAS COVID-19 IMPACTED GENERAL AND SPORTS AVIATION?

As part of the ongoing COVID-19 Task Force cooperation between EASA and EAS, we surveyed the impact of the pandemic on our members by means of a questionnaire in early September. A good number of our member associations replied, with special thanks to European Gliding Union who obtained replies from many of its members.

The outcome is more a collection of "best effort" estimates by the respondents rather than a set of statistical figures, as numbers on e.g. flight hours are typically only collected on an annual basis. Nevertheless, here is a summary:

- Activity levels are definitely down from last year, but the amount varies from 20-30% to 50% for the year to date.
- In some countries the activity has now bounced back almost to last year's level, while in others where restrictions remain, flying is still limited.
- Variations in activity are due to many factors, but mainly a direct result of the different flying restrictions imposed by authorities in each country.
- Competitions, public flying events, and club-level social events are hit especially hard due to social distancing restrictions.
- The recent "second wave" of COVID-19 threatens to undermine any hopes of a normalisation before the end of this year's season.

Against this background, the Task Force in a recent Webex meeting agreed to continue drafting a "Return to Normal" roadmap. This should provide guidance on how the General and sports aviation community can continue to thrive and keep aviation as popular as today. The EAS Task Force team is headed by J-P. Delmas.

PS: The Task Force plans to build a more accurate view of the situation after year's end, when the fiscal year of most associations end and the annual numbers are counted. So dear EAS members, we hope that you can then again help us with data!

EASA CONSULTATION FOR "PROPOSED SPECIAL CONDITION FOR LIGHT UAS".

On 20 July, EASA issued a consultation on the "Proposed Special Condition for Light UAS" which contains airworthiness requirements for unmanned aircraft with a maximum weight of 600 kg. While Europe Air Sports is not itself involved in the design of these aircraft, we will most probably need to fly in nearby airspace at some point in the future. Therefore it is good to monitor this new regulation at an early stage.

The consultation closed on 30 September. We studied the draft and it appears the requirements are on a pretty high level in terms of safety, and consistent with EASA's policy that unmanned aviation shall be at least equally safe as today's commercial air transport. However, it seems that some topics (such as noise and birdstrike protection) are either not addressed yet or will need to be included somewhere in the future regulation of these aircraft.

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

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LOUIS BERGER

Louis Berger died aged 90 in August 2020 in Brussels. EAS Senior Vice-President Rudi Schuegraf writes:

Europe Air Sports was founded in 1988 on the initiative of Fred Marsh. One of his accompanying fellow pioneers was Louis Berger, at that time a retired Colonel of the Belgian Air Force.

Louis joined the Europe Air Sports board as vice-president from the first General Conference and served with unlimited dedication until he retired from his office in 2012. His dedication, his engagement helped in the early days of EAS. His profound knowledge of the European theatre and his expertise with the parliamentary environment and members of parliament successfully started the effective EAS cooperation with the Brussels based European institutions.

But Louis Berger and his heart, his main dedication was about microlight aircraft. He wanted them to develop into the European standard for leisure airplanes. In the mid-nineties he was pushing the microlight definition to and through FAI and the Joint Aviation Authorities in Hoofddorp. His engagement in EAS was extremely successful. The definition was and still is the base for the steady technical progress of the worldwide microlight theatre. Louis second achievement led to the foundation of the European Microlight Federation, an association to ensure the optimum operation with microlights in the European theatre.

The whole European aviation community would like to thank Louis Berger for his dedicated work over 30 years. Europe Air Sports thanks him for more than 20 years effective cooperation and contributions to our work. We will all not forget him.

Rieteke van Luijt, EAS Vice President and recently retired President of the European Microlight Federation adds this personal tribute

In Memoriam Louis Berger

"Les passionnés de l'air décollent un jour pour un voyage sans retour."

(Air enthusiasts take off one day for a journey of no return)

With these words we regret to inform you that Louis Berger started his last flight at the age of 90.

In 1988 Louis was one of the founders of Europe Air Sports and for many years he also represented Belgium in the European Microlight Federation. He was "our man in Brussels". Louis introduced and guided us through the complicated EU rules system. His knowledge and ability to get the latest important news from the rule makers was impressive. We had many interesting discussions, although we did not always agree.

Flying was his passion. Professionally, he was a high-ranking pilot in the Belgian Royal Air Force. He wanted more people to share the joy of flying, but in an accessible, affordable, and uncomplicated way. So at the end of the 1970s, along with some others, he developed ultra-light flying. He was one of the very active lobbyists for our sport.

We keep many good memories of this inspiring person who has meant so much to recreational aviation.

Our sincere condolences to Josette, his children and grandchildren.





JULY 2020



A perfect summer day, off the coast of Southern England in a Duo Discus glider
(Photo Diana King)

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EUROPE AIR SPORTS GENERAL CONFERENCE 2020

As you will no doubt be aware, the General Conference of Europe Air Sports, which was planned for April 2020, had to be postponed due to the coronavirus. The Board had hoped that we might be able to re-schedule it for the autumn, but we have decided that the uncertainty is still too great to commit to a physical meeting so soon.

The Board has therefore decided to hold two events in place of the 2020 Conference.

In October 2020, there will be a webinar with a limited agenda. This will include presentation of the audited financial results for 2019, which will be circulated in advance to allow members to consider them and ask any questions. The Board will propose to the members that the normal rotation of Board members, which requires them to stand for

re-election after three years, will be 'slipped' by one year until 2021. We also plan to invite a guest speaker and we hope that we will be able to announce the details before too long.

The next physical conference will be in March or April 2021 in Strasbourg. That conference will include the usual technical discussions and presentations and also the formal process of an Annual General Meeting. Board members who were due to retire or stand for re-election in 2020 will do so at the 2021 meeting.

We hope that you will understand the necessity of making these unusual plans and we will be in touch with further details as soon as we can.

Andrea Anesini
President, Europe Air Sports

DRONES: WORK ON THE U-SPACE REGULATION ADVANCES

News from Europe Air Sports' Political Adviser Timo Schubert

Following the publication of EASA Opinion 01/2020 the European Commission is advancing with its policy for the safe integration of drones into airspace. Based on the EASA Opinion it has developed a Draft Implementing Regulation on a regulatory framework for the U-Space, which will first be discussed with Member State experts at the end of June. Two to three additional meetings with Member States are foreseen before a vote on the regulation, approximately in the first half of 2021.

Europe Air Sports has been involved in the regulatory process from the beginning and has recently had the chance to discuss remaining issues with DG MOVE, the European Commission's Directorate General in charge of transport and mobility.

This exchange was positive and provided an opportunity to reiterate the four key principles that should be applied in order to ensure a fair and collaborative co-existence of sports and recreational aviation with commercial drones in U-Space airspace. These principles demand that access must be:

- **Safe**, according to the principle of the Basic Regulation (2018/1139/EU) that "a high and uniform level of civil aviation safety should be ensured at all times".
- **Free**, as the only beneficiary of the provided services are commercial drones. Europe Air Sports is unaware of any manned aircraft operations that have any need for U-Space.
- **Simple**, by ensuring that the administrative and operational requirements for access do not add a layer of complexity to planning and conducting a flight.
- **Technologically feasible**, considering the very limited resources of light aircraft, in particular non-motorised ones, such as gliders and hang-/paragliders or even aeromodels.

During the meeting Europe Air Sports underlined the great importance of safe access to airspace and the large number of approximately 640,000 airspace users who could be affected by the designation of U-Space airspace.

Andrea Anesini, President of Europe Air Sports, stressed that the non-motorised sports, such as hang/paragliding and gliding, are likely to be the most impacted by U-Space airspace, unless the necessary precautions are being taken. This was well noted by the Commission, who reassured us that it was well aware of these needs and willing to accommodate them, as long as the objective of developing a drones market could also be met.

A DJI Phantom quadcopter UAV for commercial and recreational aerial photography, hovering over Weissfluhjoch in Switzerland

(photo Lino Schmid & Moira Prati - Capricorn 4049)



There was general agreement that safety must be the number one priority. The Commission stressed furthermore that the latest draft of the regulation ensures free access to U-Space airspace by manned aviation, such that flying activities could continue to take place as they are today.

However, it stressed the need for electronic conspicuity, i.e. the requirement for all airspace users to communicate their position electronically and with a technology still to be defined in [AMC/GC \(Acceptable Means of Compliance and Guidance Material\)](#). On this basis U-Space airspace should be understood not as a restricted area but rather being similar to a Transponder Mandatory Zone. According to the Commission, only drone flights shall require flight authorisation and it will ultimately be the responsibility of drones operators and the U-Space service provider to ensure they avoid manned air traffic.

In summary, it would appear that tangible improvements have been made between the first drafts of the U-Space concept and the latest versions of the draft regulation. While changes can still be expected as the file reaches Member State Experts, Europe Air Sports is generally positive that our needs are being taken on board.

We will continue to follow developments closely and approach decision-makers as and when the needs arise in the further process.

REVISION OF BALLOON LICENSING REQUIREMENTS (PART-FCL)

Balloons in Jura region
(supplied by Patricia Lamy)



During the EASA Committee Meeting of last October, the revision of balloon licensing requirements (Part-FCL) was finally approved. ([FCL – Flight Crew Licensing](#))

The review of the [FCL](#) Regulation started a few years ago. Thanks to the effort of a dedicated group of volunteers from EAS and European Balloon Federation, in cooperation with EASA staff and some member states representatives, a final EASA Opinion was published and the final version of the new Implementing Rules on [FCL](#) for balloons (Part B-FCL) was adopted in October.

These new rules came into force on 8 April 2020 with a transition period of 12 months to full compliance by all Member States on 8 April 2021.

These regulations include provisions for the transfer of existing national licences and medicals, credits for training started under the old rules and for training organisations. The Commission Implementing Regulation (EU) 2020/357 was completed and published in March. The related [AMC/GC](#) were published on 18 March. This means that the users now have a full set of documents in hand. The full details of the Implementing Regulation can be found [here](#) and the [AMC/GM](#) are [here](#).

This is another big step to bring the rules back to our working level.

OCCURRENCE REPORTING QUESTIONNAIRE

EAS Board member Jean-Pierre Delmas brings us up to date

Europe Air Sports has responded to a Commission questionnaire on Occurrence Reporting regulations for GA. After 5 years without any significant step forward on private **operation's** side, these regulations have failed to deliver.

Occurrence Data that have been gathered have not resulted in visible safety improvements.

It has not created a safety culture in which learning and improvement results from willingness to report. Instead, most of our members tell of reluctance to report, even on a voluntary basis, due to complexity and fear of legal action.

EAS remains convinced that the objective to collect occurrence data related to private operations remains absolutely valid. We suggest dedicating Reg. 376/2014 to commercial operations, as it was in the preceding regulation, and transferring the very promising safety topics of *Just Culture* and *Occurrence Reporting* to EASA.

There is an understanding at EASA of the distinct safety culture of GA, and how to influence it. EASA has already developed a structure (the GA Road Map), staff and tools, to target the non-commercial GA community; EASA runs collaborative analysis groups who are best placed to extract value from the occurrence data.

EAS is ready to work in close cooperation with experts of the Commission and EASA.

PROPOSAL TO ADAPT THE REGULATIONS FOR THE USE OF INSULIN IN PILOTS WITH DIABETES MELLITUS.

Marja Osinga, EAS Representative at the EASA Medical Expert Group provides an update. Marja also chairs the Netherlands scientific working group NVvLG and is President of the FAI International Medical-Physiological Commission.

Diabetes Mellitus (DM) is a widespread disease, including among pilots. DM type 2, a situation where a relative shortness of insulin exists, arises with increasing age and can be treated by oral medication (tablets) or insulin alone, or by a combination of these medicines. The aim of the treatment is to lower the elevated blood sugar levels, in order to prevent micro- and macrovascular complications. Patients with DM type 1 have an absolute shortness of insulin. The only possible treatment is the prescription of insulin.

As the use of insulin is known to have possibly dangerous effects, which means hypoglycaemia or a low blood sugar level, this is a controversial treatment for pilots. The symptoms of hypoglycaemia can be a decrease of concentration, sweating, tremor, dizziness, decrease of judgment and, without intervention, loss of consciousness. Not every patient is aware of these symptoms of warning, so suddenly an absolute incapacitation can occur. The necessary intervention must be ingestion of carbohydrates (sugar).

For sport pilots with DM, treated with oral medication, the regulations permit flying under some conditions. For pilots needing insulin the requirements are different among the several regulations. Some authorities permit the use of insulin, even for commercial pilots (medical class 1). In other cases, it is allowed to fly only under strict conditions, for a very limited category of pilots.

For a better prevention of complications, nowadays specialists more often prescribe insulin, rather than oral medication.

In the past years much evidence has been obtained in aviation, in commercial as well as general aviation, that treatment with insulin can be safe for pilots, with a very low risk for hypoglycaemia. Pilots need to follow a protocol, but this has proved to be effective, reliable and safe. The scientific working group of the Netherlands Association of Aviation Medicine performed research and discussed the issue thoroughly. We are preparing a proposal for more appropriate regulation for the use of insulin for pilots, of which sport pilots are the largest group.

We found that authorities are hesitating to implement the use of insulin. Now we have sufficient evidence that flight safety can be maintained in a selected group of diabetic pilots using insulin, under a defined protocol.

The board of EAS has been requested to support this proposal. The preparations will continue in cooperation with international experts. It was planned to present the proposal at the International Conference of Aerospace Medicine in September 2020, but due to the COVID-19 pandemic the conference has been postponed. It is scheduled to be submitted to the aeromedical authorities shortly.



Now we have a number of reports from our Programme Manager Nils Rostedt

RESTART OF NORMAL OPERATIONS POST-CORONA

EASA has initiated a Task Force named "Return to Normal Operations" (RNO) after the COVID-19 pandemic. EAS has participated in several webex meetings and also collected "state of the art" information about how the current situation affects GA in individual Member countries. The aim of EASA is to support the quick resurrection of GA activities, including border-crossing flights. EAS contacts for this activity are Andrea Anesini, Jean-Pierre Delmas and Nils Rostedt.

The FAI has published some guidance for several air sports. It is a "living" document, so changes can be included easily, as the situation worldwide is changing continuously. See [this link](#) for details. Thank you to Marja Osinga for this information.

EPAS RE-PRIORISATION – ADVICE FROM EAS

The COVID-19 situation has forced EASA to re-prioritise some of its rulemaking activities in order to handle the extraordinary workload caused by the pandemic. The process has been delayed by at least one month. This meant that some of the rulemaking tasks scheduled for 2020 in the European Plan for Aviation Safety (EPAS) needed to be de-prioritised. EAS took part in the quick consultation issued by the EASA [Stakeholder Advisory Board \(SAB\)](#) and gave its comments. In short, EAS called for de-prioritised FCL rulemaking activities to be in the first wave of "restarted" tasks, once the COVID situation allows.

EASA's consultation attracted 116 comments, both supportive and with differences. Other General Aviation topics, where the consulted stakeholders expressed disagreement with EASA's proposal, were:

- the delivery of Acceptable Means of Compliance and Guidance Material for the Basic Instrument Rating;
- the need to ensure timely delivery of Part-21 'light'.

EASA continues to participate in the development of the 2021-2025 EPAS.

FROM THE PROGRAMME **MANAGER'S** DESK

The last two months have been quite busy, with COVID-19 and Drones being focus areas. Here is a list of ongoing and recent EASA rulemaking activities of interest to Sports and General Aviation as well as some other news:

New Opinions

13/3/2020: Opinion 01/2020: High-level regulatory framework for the U-space.

New NPA

16/04/2020: NPA (Notice of Proposed Amendment) 2020-07 Unmanned aircraft system beyond visual line operations over populated areas or assemblies of people in the 'specific' category.

New EASA Easy Access publications

15 Jun 2020: EASA updated the Easy Access Rules for Aircrew (Regulation (EU) No 1178/2011) including AMC/GM material.

The whole package is 1697 pages - talk about simplified regulation!

The Part-FCL (Flight Crew Licensing) including AMC/GM can be downloaded separately, but even that is 1280 pages.

Other

- 28 May 2020: Proposed Special Conditions for Gyroplane combined with Road Vehicle use issued by EASA.
- 8 May 2020: EASA NPA 2020-04 "Regular update of AMC/GM to Part-21" - consultation closed.

- 10 Jun 2020: EASA certifies the Pipistrel Velis Electro aircraft, first type certification for fully electric airplane world-wide.

(Photo courtesy of Pipistrel / A4Aviation)



- 25 May 2020: Special Condition for VTOL (Vertical Take-off and Landing) and Means of Compliance issued by EASA.
- 27 Jan 2020: Proposed Special Condition: Electric / Hybrid Propulsion System issued by EASA.
- Several EASA information bulletins related to the COVID-19 pandemic were distributed to EAS members.
- Two letters were also sent to EAS members, asking for the national COVID-19 restrictions affecting sports and general aviation. Thanks to all who responded!

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

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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=SsQVTTWQsOsPsPsP>

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

SAI LPLANE 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.

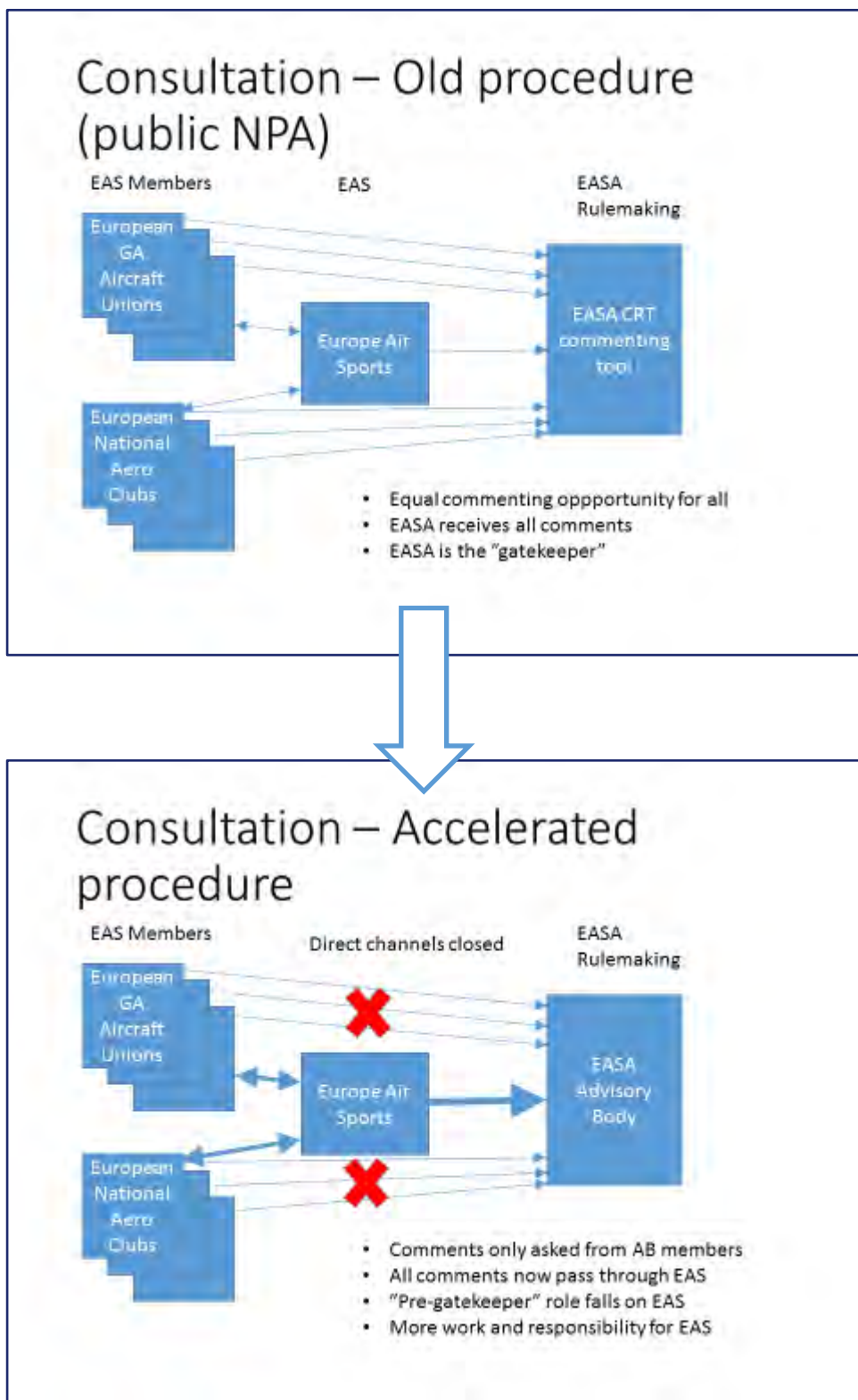
It follows on from a previous **RMT** on instructor and examiner requirements, which did not deliver a Notice of proposed Amendment (NPA), and a taskforce addressing the shortage of instructors, particularly for GA. It is based on **EASA's** Best Intervention Strategy for Flight Instructors, mentioned 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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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