

To the attention of FAI Members concerned by EASA regulation on UA Operations

Dear NAC President,

As you know, European Aviation Safety Agency (EASA) has published in August a 'Prototype 'Commission Regulation on Unmanned Aircraft (UA) Operations.

As announced at the Workshop meeting organised by EASA the 24 October, an advisory Expert Group has been set up. This Expert Group will assist EASA in developing the rule making activity identified as RMT.0230. The main task to review the draft text for a Notice of Proposed Amendment (NPA) for the operation of UA in the 'open' and 'specific' categories. The NPA is planned to be published end of March 2017 for consultation and comments with a target of EASA regulations being implemented in 2018.

EASA has received 63 nominations for the Expert Group and has finally selected 21 experts as members of the Expert Group. I have been selected as FAI representative. On another side, Dave Phipps has been selected on behalf Europe Air Sports (EAS).

As I have been requested by FAI Secretary General, Susanne Schödel, , I will take into account the interests of the aeromodelling community in Europe as represented in CIAM, but also views from other participants in aviation and air sports if necessary.

The kick-off meeting of the EASA Experts Group was 21 November in Koln.

After receiving a lot of adverse comments regarding aeromodelling activity, EASA considered aeromodelling as one of the most contentious items. EASA intention is now to 'grandfather' the existing operation under the current conditions and limitations and so has proposed to amend article 15 of the 'Prototype 'Commission Regulation on UA Operations with the following wording in order to cover recreational operations conducted under the authority of National Organization (s):

"For recreational operations of UA, such as leisure flights, air displays, sport or competition activities, conducted under the authority of National Organization (s) with proven satisfactory safety records and performed under appropriate national system, the following provisions shall apply:

- 1. By [3 years after entry into force of this Regulation - estimate 2021], the competent authority shall issue an operational authorization to National Organization (s) and therefore applied to associations or clubs operating under the authority of it, for the operations which would otherwise require an authorisation according to Subpart B of Annex I to this Regulation.*
- 2. An operational authorisation issued under this article can be issued without the need to conduct the operational risk assessment referred to in UAS.SPEC.60.*
- 3. An operational authorisations issued under this Article shall define the conditions, limitations and deviations from the requirements of Annex I and Annex II to this Regulation."*

This article 15 amendment is directly based on the wording suggested by FAI and EAS in their 18 October respond to EASA rules for UA. Whilst it would not remove model flying from the EASA regulations, it does provide some reassurance that model flying will continue to be treated as now - not worse and not better - in every concerned country.

We have to consider if homebuilt/kits model aircraft up above 25 kg have to be covered under the same article 15 or have to be governed by a specific EASA regulation.

The case of individual model flying practitioners is not covered by article 15 as proposed which means modalities to cover that case must be defined. EASA has suggested the idea of a supplementary

sub-category in the 'open' category to cover the case of the homebuilt/kits model aircraft used by individual model flying practitioners.

Thank you very much in advance for your remarks and comments on those EASA proposals to send me before 14 December if possible (date of the next EASA Expert Group meeting).

I will also appreciate to get for your NAC a point of contact in order to facilitate exchanges on this regulation item. So, thank you in advance to transmit me names of this point of contact with an email address.

Waiting to read you, regards.

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1st CIAM Vice President

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