

Operations in the framework of model aircraft clubs and associations

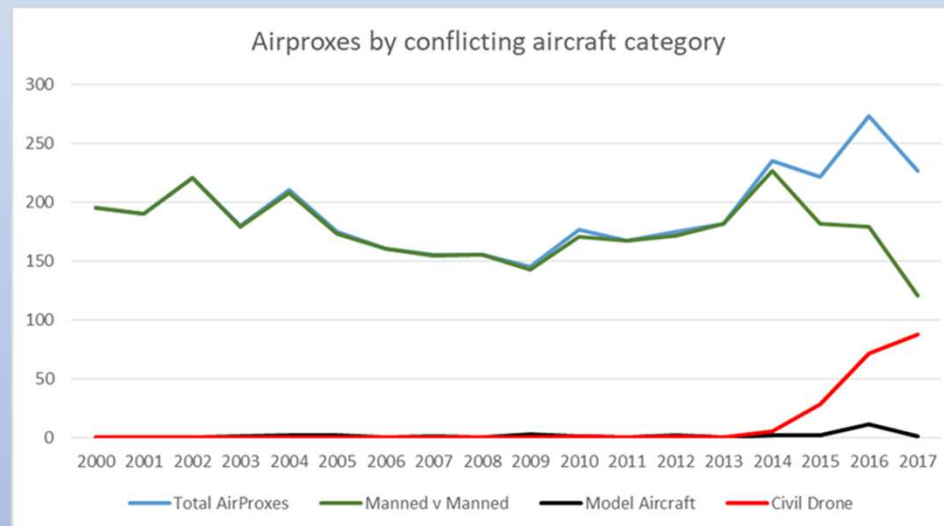
Challenges and best practices under Art. 16 of Regulation 947/2019

David Phipps (President)
Jürgen Lefevere (Board Member)



Model Flying:

- Oldest air sport, well over a century
- Many of the great aviation pioneers flew model aircraft
- Safest air sport, excellent safety record
- Largest air sport > 500'000 pilots in Europe
- Largest member of Europe Air Sports
- Around half of the 700+ FAI international air sport competitions



EMFU:



- Formed in 2017
- 24 member organisations in 15 countries
- More than 200'000 represented pilots

- Until 2019 all aircraft <150kg under national rules – usually ‘light touch’ Member State regulation, mostly planning rules for airfields

- Since 1 January 2023 fully under EU rules (Regulation 2019/947):
 - “Traumatic” – re-claiming pre-existing rights at national level
 - Disproportionate investment for a volunteer-driven sport
 - Massive impact on our ability to recruit and train new pilots



The Value of Model Flying



The importance of a thriving model aircraft community:

- “First contact” for Europe’s future aviation professionals and enthusiasts – nobody engages and trains as many future aviation professionals
- “Kindergarten” to “retirement home” and “everything in between”
- Pioneers in development and deployment of new aviation-related technologies:
 - Electrification (motor and battery technology)
 - Use of new materials & processes (carbon fibers, 3d printing...)
 - Experimenting with airfoils and aircraft designs

- **And: it's fun!**



David Phipps at age 14
'Soarcerer' Glider
Radio Control Balsa, 750gr

The value of model flying

Europe's future aviation professionals



- **Nobody engages and trains as many future aviation professionals**
- **Volunteer-driven, zero-cost to tax-payers**
- **Example:**
 - **DMFV (Germany):**
 - >1'350 volunteers supporting youth programmes
 - Range of activities to engage young pilots (camps, championships, etc.)
 - Engagement in career-platform skyfuture.de, close cooperation with Airbus, Liebherr, MTU, BavAIRia, Rolls Royce
 - Engagement in ZUKUNFTSFLIEGER programme with Association for German Aerospace Industry (BDLI)
 - Self-standing youth organisation JUMP! (see <https://www.jump-dmfv.aero/>)



The value of model flying

Europe's future aviation professionals



- Another example:

- BMFA (United Kingdom):

- Outreach and Education programme (see <https://bmfa.club/education>)
 - Offers a range of educational model aircraft kits
 - Annual 'Payload Challenge' for European Universities (see <https://payloadchallenge.bmfa.uk/>)
 - Engagement with Rolls Royce, BAE Systems and the Royal Air Force



- **Similar programmes in every EMFU member organisation**

Concrete Regulatory Challenges

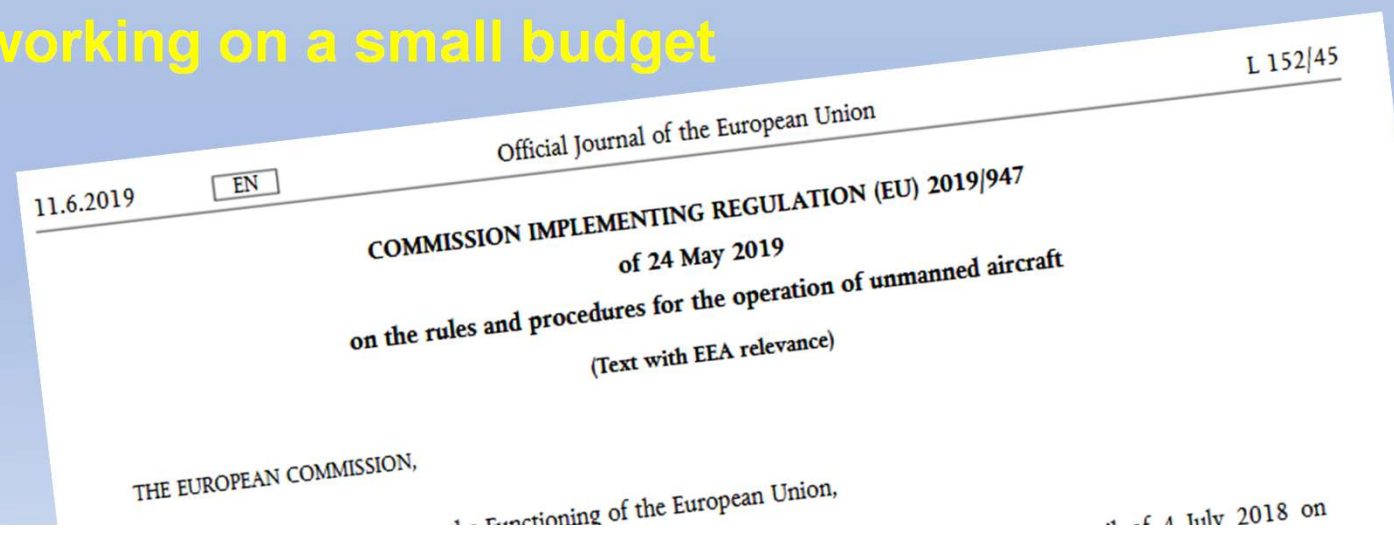
A broken promise?



Regulation 2019/947

(27) Since model aircraft are considered as UAS and given the **good safety level** demonstrated by model aircraft operations in clubs and associations, there should be a **seamless transition** from the different national systems to the new Union regulatory framework, **so that model aircraft clubs and associations can continue to operate as they do today**, as well as taking into account existing best practices in the Member States.”

Model aircraft clubs and associations are volunteer-driven working on a small budget



Central Challenge: The Participation Threshold



Jürgen Lefevere at age 11
Graupner Uhu
Free Flight Balsa, 280gr

“Open Category”

- Minimum Age 16 (12) years or under supervision
- Registration of pilot, registration number on aircraft
- Online theoretical knowledge training course and examination (A1/A3)
- (Max. 120m above ground)

“In the framework of model aircraft clubs and associations”

- “club membership” (access, costs)
- Registration of pilot, registration number on aircraft
- National requirements (age, training, ...)

**increased threshold for participation
= reduced participation**

Concrete Regulatory Challenges

Examples of “bad practices”(1)



- **Open Category as “starting point” Article 16 Authorisation**
 - Not “continue to operate as they do today”but negotiate exemptions
 - “Unsafe” open category rules such as prohibition to drop any materials (includes towlines and candy drops)
- **Complexity and costs Article 16 process:**
 - Club-level authorisations (rather than associations)
 - Often smaller clubs, 30-40 members with tiny budget
 - **Complex/bureaucratic application procedures**
 - **High fees and regular renewal of authorisation**
 - Complex risk-assessments and oversight/reporting/review requirements (incl. specific category)



Concrete Regulatory Challenges

Examples of “bad practices”(2)



- **Competence certificates and registration requirements**
 - A1/A3 training mostly irrelevant
 - Costs and validity
 - Complexity (e.g. paper “contracts” for guest pilots)
- **Height restrictions:**
 - 120m height restriction rules out most competitive sports and the use of entire classes of model aircraft;
 - Some height restrictions are unsafe (large models, slope soaring, ...)
- **Age limits/supervision requirements**
 - 16 years is way too old, even 12 years is counter-productive
- **Other issues:**
 - Flight/pilot logs, general requirement airspace observers, ...
 - General prohibition for operations on/near aerodromes (manned aircraft)
 - Long history of co-existence
 - Survival small aerodromes

Concrete Regulatory Challenges

“Best practices”



- **Article 16 authorisation process:**
 - Focus on association-level authorisations where possible
 - Free of charge or low-cost, renewal only when circumstances change
 - Realistic and workable reporting and oversight requirements
- **Training/competence and registration requirements:**
 - No A1/A3, leave to associations and clubs to define
 - Registration low-cost or free of charge
- **Age limits/supervision requirements:**
 - No age limits, leave to associations and clubs to train and supervise new members
- **Height restrictions:**
 - Only when/where required, depending on airspace organisation
- **Airspace restrictions:**
 - Provide flexibility to operate in/near aerodromes (cooperation between interested parties)
- **Other issues:**
 - Remove nonsensical restrictions (dropping towlines and candy, complex paper guest contracts, ...)

None of this requires changing current EU rules!!!

Regulatory Challenges

Changing Regulation 2019/947



- **Simplify “Open Category” as important point of entrance**
- **EMFU proposals:**
 - Explicit separation of activities under an Article 16 Authorisation from the specific category and open category
 - Align the definition and requirements for flying unmanned sailplanes with their operation in practice (improving the definition and increasing the open category weight limit to 12kg or more);
 - Clarify the optional nature of setting competency requirements and age limitations in Article 16 Authorisations;
 - Clarify the need for proportionality for requirements in an Authorisation under Article 16(2)(b).
- **Text of the full proposal:** [EMFU and Europe Air Sports Proposals for Amending Regulation 2019/947](#)
(<https://emfu.eu/work-of-emfu>)



Regulatory Challenges

Other issues

- **Reducing the regulatory burden in upcoming EU rules:**
 - Model aircraft are not “drones”: stop automatic inclusion in new rules, no repeated fight for exemptions
- **Electronic conspicuity and U-Space:**
 - Exempted!?
 - Electronic conspicuity options that are compatible with the requirements of our sport (financially, technologically and practically)
- **Improving awareness and dialogue with regulators (EU & national level)**
 - Low awareness of our sport, its importance and its needs



Conclusion



- **Reduce the participation threshold: Workable rules for the model aircraft community are a cheap way to improve Europe's competitiveness in the aviation sector**
- **Aeromodelling community is run by volunteers with very limited resources – adjust implementation requirements to capabilities and risks**
- **Implementation: use flexibility provided by Regulation 2019/947**
- **Upcoming review: proposals to amend Regulation 2019/947**
- **Model aircraft are not “drones” – keep us in mind when developing new rules – no more unintended “by-catch”**
- **Constructive solutions through awareness, engagement and regular dialogue – talk to us!**





Contacts:

www.emfu.eu