

# Simplify EASA!

## Stakeholder Feedback on the Simplification of the EASA Legal Framework

Fields marked with \* are mandatory.

### Introduction to the EASA Rule Simplification Stakeholder Survey

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Over the past 20 years, European aviation has maintained an outstanding safety record, supported by a robust and comprehensive regulatory framework. However, as safety requirements have grown increasingly complex, stakeholders have expressed challenges in keeping pace with evolving regulations—and the risk of inconsistencies between rules has risen.

To address this, EASA has launched a Simplification Programme as part of the EU's Better Regulation policy. This initiative aims to make the regulatory framework easier to understand, implement, and manage, while preserving safety and supporting innovation, efficiency, and industry competitiveness.

#### Why your feedback matters

This Programme is a collaborative effort—your insights are critical to identifying areas for improvement. By sharing your perspective, you'll directly shape how EASA prioritizes and implements simplification actions. Together, we can ensure the regulatory framework remains effective, adaptable, and aligned with the needs of all stakeholders.

#### Programme Overview

- Objective: Streamline rules and processes to reduce administrative burdens, avoid duplication, and enhance compliance, all while maintaining a high uniform level of safety across the EU.
- Scope: Focus on rule development and implementation, including opportunities to simplify requirements and their application.
- Timeline: The Programme, endorsed by the EASA Management Board in December 2024, will run until 2028.
- Governance: A Joint MAB/SAB Simplification Board—comprising representatives from EASA member States, industry Stakeholders, DG MOVE, and Eurocontrol—will guide the Programme's priorities and progress.

#### How this survey supports the Programme

This survey is your opportunity to:

- Highlight areas of the regulatory framework where simplification could bring the most benefit.
- Share experiences with current rules and their implementation.
- Contribute to prioritizing actions that align with the Programme's goals.

Send us your feedback until 31 December 2025.

Your feedback will inform EASA's roadmap for simplification and ensure the Programme reflects the real-world needs of operators, regulators, and industry stakeholders. By working together, we can create a regulatory environment that is both safe and practical for all.

Thank you for your time and commitment to shaping the future of European aviation regulation.

### **Privacy Notice for Survey Participants**

In accordance with Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR), we inform you that the personal data you provide in this survey (including your name, email address, respondent category, organisation size, country principal place of business) will be processed exclusively for the purpose of contacting you for follow-up actions related to this survey (e.g., clarifying responses, or requesting additional information).

Your data will not be published, disclosed, or used for any other purpose beyond the scope of this survey. It will be stored securely and retained only for as long as necessary to fulfil the stated purpose, after which it will be deleted or anonymized.

You have the right to access, correct, or request deletion of your data at any time by contacting EASA. For further information on your rights or complaints regarding the processing of your data, you may also contact the relevant EU data protection authority.

Kindly note that your contribution may be processed by Artificial Intelligence tools available to the European Union institutions.

By submitting your responses, you consent to the processing of your data under these conditions.

## **Your Background and Personal Data**

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\* I am giving my suggestion:

- As an individual
- On behalf on an organisation / association

I am giving my suggestion on behalf of:

- Business Association
- Aviation Social Partner
- Company / Business
- Non-profit Organisation / Association
- Aviation Authority
- Other

\* Name of Organisation / Association / Authority

Swedish RC-Flying Association (RCFF)

\* First name

Kjell

\* Surname

Nllsson

\* Email

kjni@mac.com

\* Do you agree to be contacted for further information, if needed?

- Yes  
 No

## Identification of Topics for Simplification

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In this Section you can give us your suggestions for rule simplification. You will be able to provide up to 3 different concrete suggestions. Just indicate that you have additional suggestions at the end of the section, and a new set of questions will appear.

### Suggestion 1

\* Which area / Regulation should be simplified?

- EASA Basic Regulation - Regulation (EU) 2018/1139  
 Initial Airworthiness and Environmental Protection - Commission Regulation (EU) No 748/2012  
 Additional Airworthiness Specifications - Regulation (EU) 2015/640  
 Continuing Airworthiness - Regulation (EU) No 1321/2014  
 Aircrew - Regulation (EU) No 1178/2011  
 Air Operations - Regulation (EU) No 965/2012  
 Balloons - Regulation (EU) 2018/395  
 Sailplanes - Regulation (EU) 2018/1976  
 Third Country Operators (TCO) - Regulation (EU) No 452/2014  
 ATM/ANS Provision of Services - Regulation (EU) 2017/373  
 ATM/ANS Equipment - Regulation (EU) 2023/1768 & Regulation (EU) 2023/1769  
 Air Traffic Controllers (ATCO) - Regulation (EU) 2015/340  
 Airspace Usage Requirements - Regulation (EU) No 1332/2011 (ACAS II) & Regulation (EU) 2018/1048 (PBN) & Regulation (EU) 2023/1770 (AUR)  
 Standardised European Rules of the Air (SERA) - Regulation (EU) No 923/2012

- Aerodromes (ADR) - Regulation (EU) No 139/2014
- Unmanned Aircraft Systems (UAS) - Regulation (EU) 2019/947 & Regulation (EU) 2019/945
- U-space - Regulation (EU) 2021/664
- Information Security (IS) - Regulation (EU) 2022/1645 & Regulation (EU) 2023/203
- Repository of Information (REPIF) - Regulation (EU) 2023/2117
- Ground Handling - Regulation (EU) 2025/23 & Regulation (EU) 2025/20
- Multiple areas / Regulations

**\* Legal reference**

Indicate Part, Subpart, Article, Point, Paragraph, as applicable. If you chose multiple areas / Regulations, please specify the Regulations you believe are affected.

You can also indicate CS, AMC and GM.

The more specific you are, the better your support identification of the issue.

You can also indicate more than one reference, if the issue affects several legal provisions.

The part on UAS (Unmanned Aircraft) and the parts covering exclusion of various types of aircrafts

**\* Why is this rule problematic and should be simplified?**

*500 character(s) maximum*

The regulation has led to several restrictions for model airplane flying and as a result a clear reduction in active aeromodellers. Aeromodelling is the largest air sport in Europe and counts around 0,5 million participants, It is a large area for innovation and development of new technical solutions in the air industry. Aeromodelling is a base for recruiting people to the aviation industry. It is also important as a social activity and for recruiting young people into technical professions.

**\* What solution do you propose to simplify?**

*500 character(s) maximum*

Separate aeromodelling from the UAS regulations and make it it´s own entity with rules agreed on national level in cooperation between the aeromodelling organisations and authorities.  
Remove restrictions like mandatory registration of pilots, age restrictions and height restrictions.  
Recognize aeromodelling as an important factor supporting the development in the european aviation industry

**\* What do you think will be the biggest positive impact if the rule is simplified?**

- Improvement in safety
- Lower costs / less economic burden / more efficiency for industry
- Lower costs / more efficiency for authorities
- Supporting innovation
- Improving level playing field / access to market / interoperability
- Positive social impact
- Positive environmental impact
- Other

Please provide details for the selection made above.

200 character(s) maximum

Liberal rules for aeromodelling will support Europe's competitiveness in aviation and engaging/training youth. It also has a positive social impact, allowing broader access to a popular air sport.

\* Do you have another suggestion?

- Yes
- No

## Suggestion 2

\* Which area / Regulation should be simplified?

- EASA Basic Regulation - Regulation (EU) 2018/1139
- Initial Airworthiness and Environmental Protection - Commission Regulation (EU) No 748/2012
- Additional Airworthiness Specifications - Regulation (EU) 2015/640
- Continuing Airworthiness - Regulation (EU) No 1321/2014
- Aircrew - Regulation (EU) No 1178/2011
- Air Operations - Regulation (EU) No 965/2012
- Balloons - Regulation (EU) 2018/395
- Sailplanes - Regulation (EU) 2018/1976
- Third Country Operators (TCO) - Regulation (EU) No 452/2014
- ATM/ANS Provision of Services - Regulation (EU) 2017/373
- ATM/ANS Equipment - Regulation (EU) 2023/1768 & Regulation (EU) 2023/1769
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- Airspace Usage Requirements - Regulation (EU) No 1332/2011 (ACAS II) & Regulation (EU) 2018/1048 (PBN) & Regulation (EU) 2023/1770 (AUR)
- Standardised European Rules of the Air (SERA) - Regulation (EU) No 923/2012
- Aerodromes (ADR) - Regulation (EU) No 139/2014
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- Repository of Information (REPIF) - Regulation (EU) 2023/2117
- Ground Handling - Regulation (EU) 2025/23 & Regulation (EU) 2025/20
- Multiple areas / Regulations

\* Legal reference

Indicate Part, Subpart, Article, Point, Paragraph, as applicable.

You can also indicate CS, AM and GM.

The more specific you are, the better you support identification of the issue.

You can also indicate more than one reference, if the issue affects several legal provisions.

Regulation 947, with focus on open category rules and rules for aeromodelling incl. Article 16

\* Why is this rule problematic and should be simplified?

500 character(s) maximum

The new restrictions on aeromodelling introduced by Regulation 947 have seriously impacted aeromodelling and caused a reduction in the number of pilots. Access to the sport for young pilots is restricted due to unnecessary restrictions such as age limits as well as restrictions "borrowed" from both the Open Category and the Specific Category. This has impacted the sport's ability to train and engage youth as well as to contribute to innovation in aviation. Membership numbers are decreasing,

\* What solution do you propose to simplify?

500 character(s) maximum

The European Model Flying Union has made concrete proposals to EASA to change the legal text of Regulation 947. This includes a clear separation of Aeromodelling activities under an Article 16 Authorization from the Specific Category, the explicit removal of age limits under Art 16 Authorizations, simpler Art 16 Authorizations and easier rules for flying gliders in mountainous areas. EASA has shown sympathy for these proposals, but no steps have been made to actually implement them.

\* What do you think will be the biggest positive impact if the rule is simplified?

- Improvement in safety
- Lower costs / less economic burden for industry
- Lower costs / more efficiency for authorities
- Supporting innovation
- Improving level playing field / access to market / interoperability
- Positive social impact
- Positive environmental impact
- Other

\* Please provide details for the selection made above.

200 character(s) maximum

Liberal rules for aeromodelling will support Europe's competitiveness in aviation and engaging youth. Moreover, it also has a positive social impact, allowing broader access to a popular air sport.

\* Do you have another suggestion?

- Yes
- No

## Final elements

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Do you have any additional comments or suggestions to simplify the EASA regulatory framework?

The work of the European Commission and EASA is very much industry-focussed. The interests of aeromodellers are usually seen as secondary. This is bad for Europe's innovation, as negatively affects Europe's largest airport and in particular also its vital role in engaging youth and innovation. Alleviating restrictions on aeromodelling is by far the cheapest and best value way to promote new talent in aviation as well as promoting aviation related innovation.

EASA and the Commission should also be more pro-active in communicating the benefits of a vibrant aeromodelling community for Europe's competitiveness in aviation and support a liberal interpretation /implementation of the EU rules by the Member States.

ALLOW US TO HELP TRAIN NEW TALENT AND INNOVATE. PLEASE TALK AND LISTEN TO US.

## **Contact**

[Contact Form](#)