



EMFU Position Paper on U-space and EASA NPA 2021-14

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U-space and Aeromodelling: Addressing the potential for conflict

There is a potential for conflict between U-space airspace and aeromodelling activities: both make a claim to open areas near population centers and concentrate their activities in the lower airspace, which is not usually frequented by manned aviation.

The EU's U-space Regulation (2021/664) appears to address this potential conflict by including in its Article 1(3)(a) a simple exemption of aeromodelling activities from the requirements of the U-space Regulation, when covered by an authorisation provided under Article 16 of Regulation 2019/947. The EMFU has on multiple occasions indicated that this 'solution' has no practical value and the exemption increases the risk of an exclusion of aeromodelling activities from newly created U-space areas. Instead, EMFU has sought to focus how aeromodelling and U-space can co-exist in areas where an overlap between U-space and aeromodelling activities cannot be avoided.

The EMFU has on multiple occasions underlined the need to find concrete solutions for how U-space and aeromodelling can co-exist. Various options for doing so are available for implementation today. These include permanently "carving out" (geo-fencing) of areas where aeromodelling activities take place, but can also include temporary airspace restrictions around aeromodelling areas and airfields during model aircraft operations (through the air traffic management system (including "apps"), electronic conspicuity of the airfield or, in special cases, individual models). Whereas the first can be addressed during the creation of a U-space area, the latter requires enabling a degree of integration (rather than exemption) of aeromodelling activities in the U-space services.

Comments on EASA NPA 2021-14

1) General comments

The following general points underpin the EMFU comments on EASA NPA 2021-14:

- **Participation in decision making:** in view of the potential conflicts between u-space areas and areas where aeromodelling activities take place, the aeromodelling community should be explicitly recognized as stakeholders that should be engaged in decision making on the establishment of and rules for u-space areas.
- **Integrate rather than exclude aeromodelling activities:** where an overlap in airspace cannot be avoided, the underlying approach of the EASA GM and AMC should be to enable a co-existence of U-space and aeromodelling activities.
- **Operation of aeromodelling activities in u-space areas should be free of charge:** aeromodelling activities are usually non-commercial, but provide a value for the aviation industry through their active youth engagement and the development and deployment of innovative technologies. Aeromodellers cannot be expected to carry the costs of their continued operation in u-space areas.

- **Aeromodelling is not just authorized club airfields:** In the majority of Member States aeromodelling also takes place (and is explicitly allowed) on sites and in areas without formal government site authorisations. For a number of Member States, activities outside registered airfields even constitutes the majority of aeromodelling activities. This includes non-registered club airfields, flying sites on private or public fields or slopes, or flying sites supporting commercial tourism activities and infrastructure in for instance mountainous areas.

The specific comments below should be understood in the context of these general points.

2) Specific comments

(Additions to EASA text are underlined, deleted text is ~~struck through~~)

a) *Recognising and engaging the broader aeromodelling community in decision making on U-space*

EMFU welcomes the explicit reference to model aircraft clubs and associations in the decision making on U-space. Unfortunately this reference is limited to operations taking place in the context of model aircraft clubs and associations or on registered airfields and fails to recognise the broader scope of aeromodelling activities as explained above. The GM and AMC should explicitly recognise and take into account activities outside officially registered airfields. The GM and AMC should also explicitly take into account aeromodelling activities taking place under the open category, outside the framework of clubs and associations.

Proposals:

- **GM1 Article 3 U-space airspace (p. 32):** (b)(1): “the type, density, and complexity of existing and planned unmanned traffic, including UAS operations taking place in the context of authorised model aircraft clubs and associations and other model aircraft operations;”
- **GM4 Article 3(1) U-space airspace, Checklist Template:**
 - **Air Risks (p. 40):** remove “~~Model aircraft club location, operating hours, and airspace dimensions~~” from “VFR Operations” and replace with the following new text under “Generic Operations”: “Model aircraft activities, including model aircraft club airfields” (Note: not all model aircraft club airfields have (or are required to have) a formal legal permit and not all permits have airspace dimensions and operating hours. It’s also not clear why model aircraft are under VFR operations, whereas activities such as parasailing are under “generic operations” – all should be placed under the same category).
 - **Communication, navigation and surveillance (CNS) (p.41):** EMFU welcomes and supports the reference to FLARM under “surveillance”. Active or passive FLARM is already in use at aeromodelling sites in a number of EASA countries and is an effective tool to improve safety for all airspace users. EMFU suggest adding further examples to this list, including online registration as well as on-board electronic conspicuity. EMFU also proposes to include a reference to the costs of devices and services and the need to keep any equipment costs as low as possible and ensure free of charge access to services for the aeromodelling community.
 - **List of possible stakeholders involved during the airspace risk assessment process, Aviation entities (p. 41):** EMFU urges the inclusion of “Model Aircraft clubs and associations” (Note: it’s not clear why UAS operators generally should be consulted, and no specific reference is included to model aircraft clubs and associations,

whereas aeromodelling activities are explicitly and separately referred to as a safety risk).

- GM1 Article 18(f) Tasks of the competent authorities: Coordination Mechanism – evolving and emerging roles and responsibilities (p.92): EMFU proposes to include under (b) ‘The term other authorities and entities, including at local level’ that need to be consulted an explicit reference to “current airspace users, including model aircraft operators, clubs and associations”.

b) The Aeromodelling community as providers of information

EMFU welcomes the explicit references to model aircraft clubs and associations as receivers or takers of information from various U-space related services. The integration of aeromodelling activities into U-space areas may on occasion however also require model aircraft clubs, associations or operators to be able to provide information into the system, to enable model aircraft to operate in U-space areas.

Proposals:

- **GM2 Article 5 Common Information Services (p.51):** Model Aircraft clubs and associations are currently only listed as “Stakeholders to retrieve information from the CIS”. EMFU urges that “Model Aircraft clubs and associations” are instead included under category of “Stakeholders to provide information to and retrieve information from the CIS”.
- GM1 Annex IV UAS flight authorisation request referred to in Article 6(4)) (p.101):
 - o **Information type (1):** this currently lists only the serial number of the unmanned aircraft or RID add-on. EMFU suggests that provision is made to also include electronic conspicuity of an active aeromodelling site (rather than just individual aircraft) – for instance through a ground-based transponder or online registration.
 - o **Information type (4a):** this currently lists ‘open’, ‘specific’, ‘certified’, but should also list ‘activities covered under an Article 16 authorisation’.
 - o **Information type (4b):** EMFU welcomes the reference to model aircraft, but suggests the following amendment: “Other: can be linked to model aircraft or ~~similar~~ special cases.”

c) Costs

An integration of aeromodelling activities into the U-space framework operated (at least in part) by commercial providers is likely to involve a payment for services. As a non-commercial recreational or sports activity, the aeromodelling community’s ability to pay for such services is very limited. Access to those services is however important, not only to enable aeromodelling activities to continue in U-space areas, but also in view of the central role of aeromodelling in engaging youth in aviation related activities and creating the aviation experts of the future.

Proposals:

- AMC1 Article 15(1)(h) Conditions for obtaining a certificate (p. 89): under ‘(b) The business plan should cover:’ EMFU proposed the addition of an additional bullet point “(5) the provision of free of charge services to non-commercial operators, including model aircraft operators, clubs and associations.”