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Title	Proposed AMC and GM to the UAS Regulations
NPA Number	NPA 2024-06(C)

European Model Flying Union (EMFU) (Jürgen Lefeverre) has placed **2** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
10	GM1 Article 2(1) Definitions	3	<p>European Model Flying Union (EMFU) proposed amendments: "Small balloons, often used during celebrations, and small free flight aircraft, often made of balsa, foam, cardboard or other very light material, that do not pose any risk to people or manned aircraft are not required to comply with Commission Implementing Regulation (EU) 2019/947."</p> <p>Reasoning: <i>The EMFU strongly supports the proposed addition of this new GM but would like to clarify that most of these small aircraft are made of balsa or foam, not of cardboard.</i></p>	
11	Proposed amendments	3	<p>1. GM1 Article 4(1)(f) Dropping of Materials</p> <p>In addition to the changes proposed in this NPA, the European Model Flying Union (EMFU) proposes the introduction of a new GM that provides guidance on the interpretation and application of the prohibition to "drop any material" in Article 4(1)(f) of Regulation 2019/947. this addition is <u>important to increase the safety of model aircraft operations.</u></p> <p>The EMFU proposes adding the following text:</p> <p><u>"GM1 Article 4(1)(f) Dropping of Materials</u> <u>The following actions are not considered as "dropping materials" under the open category rules and are thus allowed:</u></p> <ul style="list-style-type: none"> - <u>the releasing of parachutes, unmanned sailplanes (e.g. in aerotow) or other unmanned aircraft that are independently remotely controlled and considered as separate UAV after their release.</u> - <u>the safe releasing of elements of the unmanned aircraft setup directly related to the purpose of their operation, including in particular the releasing of</u> 	

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			<p><u>loose sand or water ballast, tow lines used for towing unmanned sailplanes as well as the releasing of banners prior to landing. Member States are free to decide which requirements (if any) apply to the dropping of materials under an Article 16 Authorisation.</u></p> <p>Reasoning: We are observing serious restrictions resulting from a false or overly strict interpretation of the prohibition to drop any materials for open category operations. This negatively affects the safety of model aircraft operations under the open category. Importantly, it also affects operations under Article 16 Authorisations (operations in the framework of model aircraft clubs and associations). The reason for this is that some Member States have opted to keep all or part of model aircraft operations under the open category, also when these take place in the context of model aircraft clubs and associations. Moreover, many Member States base their requirements for model aircraft operations under an Article 16 Authorisation on the restrictions for the open category.</p> <p>Aerotowing is a widely practised activity and generally considered one of the safest ways to start unmanned radio-controlled sailplanes, especially on maiden (first) flights of new aircraft. The prohibition to drop ballast (most commonly water) also significantly undermines the safety of model aircraft operations as this restricts the usual practice to release ballast from an aircraft before landing to help ensure a safer landing (landing a lighter aircraft is safer). The dropping of towlines and banners prevents these from getting stuck to obstacles (e.g. corn stubs, rocks or fences) during the final landing approach, which may result in a crash of the towplane.</p>	