EUROPEAN MODEL FLYING UNION

Representing Model Flyers in Europe

Model Flying in Europe
Improving Regulatory Conditions

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EMFU Objectives today's meeting

- Understanding What/Where/How we fly:
  Model Aircraft ≠ Drones

- Improve Regulatory Framework:
  - Article 16
  - Open Category

  Implementation and amendments

- Drone Security Package
  Application to model flying

- Dialogue Model Flyers and Rule Makers
  Improve understanding and exchange



MODEL AIRCRAFT ARE NOT DRONES

About EMFU and Model Flying

- EMFU founded in 2017:
  - 24 member organisations, 15 countries
    - Applications 3 organisations in 2 additional countries
  - ~ 209.000 represented pilots

- Model Flying is:
  - Largest air sport: > 500.000 pilots in Europe (FAI estimate)
  - Oldest air sport: >100 years
  - Safest air sport

- ~ 50% of FAI international air sport competitions
  - Large share under the open category





The Value of Model Flying

- Many great aviators were model aircraft pilots first
- "First contact" for Europe's future aviation professionals and enthousiasts – **nobody engages and trains more future aviation professionals**
- Pioneers in development and deployment of new aviation-related technologies
  - *Electrification, airfoils, materials,…*
- Youngest and oldest pilots – and everything in-between
- **Should be the most accessible aviation activity with the lowest threshold for participation**
- **And: it's fun!**







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

Model Aircraft are not „Drones“

- ***What** we fly*:
  - “privately built”, at very least RC components and progr.
  - Pilots own multiple aircraft that can last decades
  - Mirror of all air sports and more!
- ***Where** we fly:*
  - Away from population centers and critical infrastructure
  - ~80% on model airfields (also manned aviation airfields)
  - “green field”
    - Public or private fields
    - Slope soaring
  - Usually multiple model aircraft flying in the same (limited radius) airspace
- ***How** we fly:*
  - **Visual line of sight (radius around pilot)**
  - Flying is the purpose, not a means
  - Frequent altitude, direction and speed changes
  - Often also without motor
  - Limited autonomous flight modes (stabilisation, fail safe), no autonomous navigation software





Regulatory Challenges
The broken promises

Basic Regulation 2018/1139 and Implementing Regulation 2019/947

"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."

Principle of Proportionality (Art. 5(4) TFEU)
Developing the European dimension in sport (Art. 165 TFEU)

Participation Threshold

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


11.6.2019 EN Official Journal of the European Union

COMMISSION IMPLEMENTING REGULATION (EU) 201

of 24 May 2019

on the rules and procedures for the operation of unmanne

(Text with EEA relevance)

Rules for Model Aircraft Operations

The current practice

- **Article 16 Authorisations:**
  - **“Activities in the framework of model flying clubs and associations”**

- Open Category:
  - Subcategory A3:
    - “no uninvolved person will be endangered within the range where the unmanned aircraft is flown during the entire time of the UAS operation”
    - “at least 150 metres from residential, commercial, industrial or recreational areas”
  - “privately built” (or Class C4 certified/legacy UAS (no autonomous flight))

- (Article 15: geographical zones)



Implementing Article 16
EASA promises:

- In 2022 EASA commissioned EMFU to write a guidance document to help all parties clarify the implementation of Article 16 (see: https://emfu.eu/wp-content/uploads/2022/11/2022_11_09-Guide-to-Article-16_FNL.pdf)

  Guidance never shared or published

- In 2024 (and subsequently) EASA promised to include some additional FAQS in their guidance to clarify the implementation of the regulations for model flyers

  Agreed FAQs still not published

- EASA promised to amend the regulation to clarify the status of model flying

  Proposed amendment not included in June NPA





Implementing Article 16
Common interpretation mistakes

- “in the framework of”:
  - Only members of clubs and associations
  - Only club airfields
  - ➢ Authorisation can also be given to club or association without own airfields and should not be restricted to specific areas
- Only clubs have sufficient “oversight” over activities, not associations
- “Relevant national rules” means prior national level legislation
- Article 16 Authorisations are an “exemption” from the open category
  - 120m
  - 12-16 years
  - A1/3 certificate
- Article 16 authorisations require a specific category risk assessment
- “Different minimum age” = >12 years







Implementing Article 16
"bad practices" (1)

- Article 16 Authorisation for the association denied by the national authority
- 250 clubs with individual authorisations, 100 clubs without (open category)
- Operations outside authorised club(s) (airfields) are under the open category (~30%)
- 16 years minimum age, some at 12 years
- Many authorisations limited to 150m altitude (higher only possible with daily authorisations)
- Costs per authorisation € 618 to 1500
- Validity authorisations between 2 and 4 years, renewal same costs as initial application
- ~ 6 months processing time application
- Operator registration validity 3 years, costs EUR 47 (also renewal)
- Costs implementing EU drone rules for model flying community > € 1,120,000 since 2020
- 15-20% membership loss



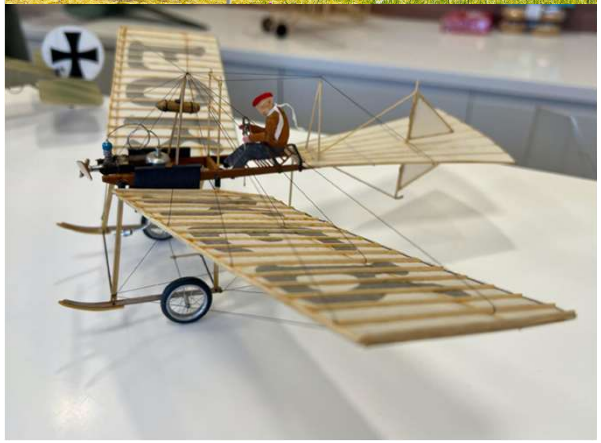


Implementing Article 16
“bad practices”(2)

- 1 out of 42 clubs with an authorisation:
  - Only for club airfield and members
  - Authorities unprepared to provide further authorisations
  - 97% of all operations under the open category
- 23% association membership loss since 2022
- Airshows almost impossible:
  - Visitors must sign formal risk waivers
  - Failure to secure signatures forces a strict 150m perimeter
- Legally incorrect interpretation prohibition “dropping materials”
  - Includes RC parachuting and towlines, prohibiting activities
- New flight bans for existing locations:
  - 5 air force bases and 7-10 civil airfields closed completely to the sport
  - Permanent shutdown of multiple dedicated model airfields
- Increasing share of pilots ignore restrictions rather than giving up sport







Implementing Article 16
"Best practices"

- **Article 16 authorisation process:**
  - Focus on association-level authorisations where possible
  - Free of charge or low-cost, renewal only when circumstances change
- **Scope of the Authorisation:**
  - Club/association members and guests
  - Everywhere except excluded areas rather than inclusive list
- **Training/competence and registration requirements:**
  - Pilot registration low-cost or free of charge
  - No A1/A3, leave to associations and clubs to define
- **Age limits/supervision requirements:**
  - Low age limits, leave to associations and clubs to train and supervise
  - Realistic, minimal and workable reporting and oversight requirements
- **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:**
  - Insurance requirement
  - No nonsensical restrictions (dropping towlines, complex paper guest contracts)

None of this requires changing current EU rules!!!

Open Category: Relevance for Model Aircraft Operations

Operation			Drone Operator / pilot			
C-Class	Max Take off mass	Subcategory	Operational restrictions	Drone Operator registration?	Remote pilot qualifications	Remote pilot minimum age
Privately build legacy < 250g C0	<250g 	**A1** **Not over assemblies of people** (can also fly in subcategory A3)		**Yes** No if toy or not fitted with camera/sensor 	**Read user's manual**	**No minimum age** (certain conditions apply)
C1	<900g 					
C2	<4kg 	**A2** **Fly close to people** (can also fly in subcategory A3)				
C3 C4 Privately build Legacy drones (art 20)	<25kg 	**A3** **Fly far from people**				

- **Fly far from people and infrastructure**
- **Visual Line of Sight (VLOS)**
- *No automated flight functionality (other than fail safe or stabilization)*
- Other possible identifiers:
  - Two or less lift-generating rotors?
  - No live video-link?
  - ?

Open Category: importance

- Result of scope Article 16 Authorisations
- ~30% of Model flying in EMFU member countries under the open category
- Key entry point new pilots
- “Green Field” & Slope soaring!
- Art. 16 Authorisations formulated as exemptions to open category
- Art. 15 areas

Estimated share of Model Aircraft Operations under the Open Category (and not under an Article 16 Authorisation)		
Member country	**% OC**	**Comments**
Austria	30%	
Denmark	10%	
Finland	95%	With alleviations under Article 15
France	10%	
Germany	35%	
Italy	70%	90% for slope soaring
Luxemburg	10%	
Malta	10%	
Netherlands	15%	
Norway	25%	
Portugal	97%	
Spain	10%	
Sweden	10%	

Estimates, provided by EMFU member organisations

Drone Security Proposals
EASA Opinion 06-2026

New Art. 16(5) and new requirements Open Category (A3: C4, privately built)

- New 19m/s (68.4km/h) speed limit for privately built under A3 **bans most fixed-wing aircraft from the open category**
- On-board direct remote identification (DRI):
  - **no added security value for vast majority of model aircraft operations (location, height, …)**
  - impossible or difficult to add to smaller airframes (space, antenna placement, …)
  - costs: >€ 88 (doubling price of small airframes)
  - Is there a **safety risk** at major events/competitions (risk of 2.4GhZ “frequency overload”, latency, antenna interference)?
- Take-off inhibition:
  - **Technically impossible or very difficult to implement**
  - Significant **safety risk** (control loss)
- Technology neutrality:
  - Where DRI is required, other options than on-board only (e.g. app-based – identify location with one beacon)

- **<u>Why</u> DRI for flights <u>away from critical infrastructure</u>?**
- **EMFU Position Paper & Proposals: <u>https://emfu.eu</u>**







Pictures:
Antonis Papadopoulos
and Izabela Krawczyk

Drone Security Proposals
EASA Opinion 06-2026

EUROPEAN MODEL FLYING UNION

Incompatibility with model aircraft electronics and safety concerns

Questions to EASA:

2.4 GHz remote identification devices:

- What research has EASA done on the safety implications of the use of 2.4 GHz direct remote identification in combination with 2.4 GHz transmission technologies (in particular with protocols used by model aircraft transmission systems) and can you share this research with us?

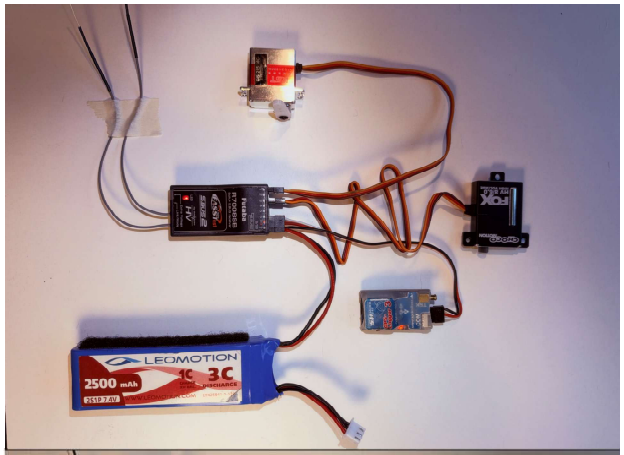
- Can EASA reassure us that an on-board direct remote identification device located in close vicinity to a model aircraft receiver (in small model aircraft) does not interfere with the safe operation of such aircraft?

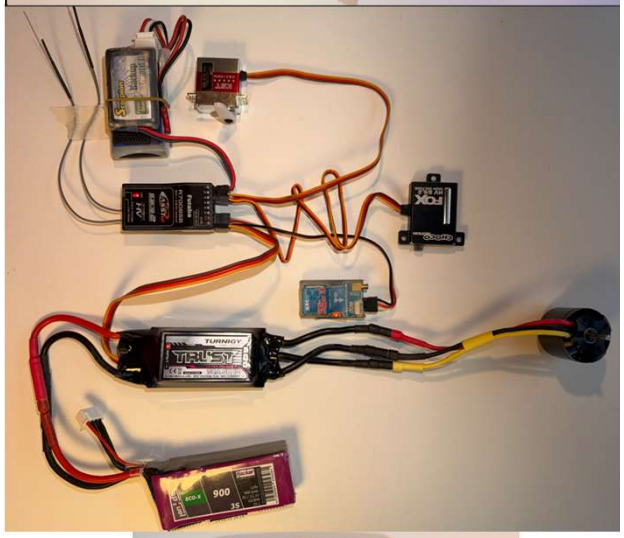
- Can EASA reassure us that the safety of model aircraft competitions, with a larger (>30) number of model aircraft, on-board DRI, as well as a public with multiple devices operating on the 2.4 GHz range, is not affected by the addition of on-board remote identification devices

Take-off inhibition:

- How to implement in common model aircraft systems?

- How to avoid additional safety risks caused by such implementation?







Fédération Aéronautique Internationale (FAI)
Aeromodelling Commission (CIAM)

- **FAI is an International Sport Federation established back in 1905**
- **Recognised by IOC**
- **105 members from all over the world**
  - 48 from Europe
- **750 Events per year**
- **45 CAT1 events (World or Continental Championships)**
  - 18 in Aeromodelling
- **800 CAT2 events (Open International)**
  - 400 in Aeromodelling
- **2.800 competitors in Aeromodelling CAT1 events**
- **18.500 competitors in Aeromodelling CAT2 events**









Importance of the Open Category

Fédération Aéronautique Internationale (FAI)
Aeromodelling Commission (CIAM)
Letter to DG MOVE on 21 October 2026:

- **A major part of international air sports:** Model flying accounts for approximately half of all international air sports competitions, including World, Continental Championships and Open International events.
- **Europe is the principal host region** for these competitions.
- **The Open Category provides a practical, harmonised framework** for organising competitions across Europe under common rules.
- **Proposed security requirements risk making Open Category competition impossible** for many model aircraft due to speed limits, Direct Remote Identification (DRI), potential radio interference and take-off inhibition requirements.
- **Article 16 authorisations are not a viable blanket solution:** They would impose significant additional administrative and organisational burdens.
- **Model flying competitions depend on volunteers** and have limited financial and administrative resources.

Our message:
Protect security without jeopardising a long-established international sport.

“Quick wins”
Simplifying Regulation 2019/947

- **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

- **Reduce the regulatory burden in upcoming EU rules:**
  - Model aircraft are not “drones”: stop automatic inclusion in new rules, no repeated fight for exemptions

- **Improving awareness and dialogue with regulators (EU & national level)**
  - Awareness characteristics, importance and needs of our sport
  - Platform for dialogue?





Conclusion: the problems

- Transition to the new regulatory framework has not been “seamless”
- Many Model flyers have been unable to “continue to operate as they do today”
- Treatment of model flyers has not been in accordance with EU’s Better Regulation Agenda: Regulations are not simpler, lighter or faster for our community
- Current and proposed regulations are not proportionate, coherent or technology neutral for our activity
- Unnecessary administrative burdens (and costs) have been increased for us
- We have demonstrated over a century of safe operations, so policy making for our community has not been evidence based and represents EU overregulation

We try hard to work with legislators and regulators
but often face lack of meaningful cooperation!

Conclusion: what we need

- 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
- Drone Security Proposals: accommodate model flying
- Quick win proposals to amend Regulation 2019/947 (simplification)
- 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**!



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Contact:

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https://www.facebook.com/togetherEMFU