



EUROPE AIR SPORTS

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European Aviation Safety Agency

Mr. Alain Leroy and Mr. Vladimir Foltin
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Dear Alain, dear Vladimir,

It was a pleasure to have you attending the Europe Air Sports Technical Meeting in Vienna, in October last year. Our members very much appreciated your interest in our well being and your dedication to support General Aviation and Air Sports.

During our meeting we dealt with various issues, one was the recent development triggered by the EU decision to put Tetraethyllead onto the REACH list with a deadline of May 2025.

We as organisation are in favour to ban this toxic component of AVGAS 100LL. But connected to our position is the clear statement that the General Aviation and airports community aircraft owners must be given an alternative to allow the use and operation of those aeroplanes, which are at present certified for the operation with AVGAS100LL. All projects and programmes which were initiated years ago failed to present a solution but therefore we consider last year's announcement of GAMI the major break through.

On behalf of the piston engine community, we kindly ask you and the Agency for support in accelerating the EASA process to evaluate and approve the GAMI100 UL fuel for the European aeroplane operation. This is particularly important at times of the Green Deal and more future challenges, which are in the pipeline.

After contacting them directly GAMI have informed us that at the moment they do not have the capacity to start measures, which are required to have their fuel ready for use in Europe by 05/2025. To avoid severe difficulties operating aeroplanes requiring high octane fuel, should this deadline become effective, we would suggest to have GAMI 100UL

- checked by the European Chemical Agency for its content,
- approved either in general or through the approval of the STCs and
- have the fuel available at airfields in the EU.

To prepare the introduction of GAMI100UL and/or other possible solutions like Swift we also recommend an EASA event in the second half of the year to invite stakeholders, airfield operators and representatives of fuel suppliers to meet and discuss existing problems during this early phase.

With the US-market banning AVGAS100LL by 2030 by law it is necessary to introduce an alternative fuel as soon as possible. Finally, we do not have any information if and how long Innospec intends to produce TEL in case the US piston fleet does not rely any more on this additive.

As it looks, this will happen at the latest in 2030. The US Congress and the President signed early this year the release of 12 Million Dollars to support the US GA to operate leadfree by the year 2030. Europe Air Sports, representing the European light aviation sector, would like to recommend a similar effort initiated by the EU and EASA for the benefit of the European citizens who would like to follow a similar programme like the EAGLE (Eliminate Aviation Gasoline Lead Emissions). The climate, society and the pilots will benefit from such activity.

We are more than willing to contribute our expertise, energy and manpower to make General Aviation leadfree by the year 2030 or even earlier, if possible. Please let us know if you have comments, questions or additional ideas and feel free to contact our Senior Vicepresident Rudi Schuegraf who is leading this issue in Europe Air Sports. We are also in good contact and information exchange with IAOPA and GAMA.

We hope to have triggered a fruitful discussion and are looking forward to the future proceedings.



Rudolf Schuegraf
Senior Vicepresident

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President