



FEBRUARY 2025



*Meeting between EAS and EASA delegates: left to right Vladimir Foltin (EASA General Aviation Flightpath 2030+ project manager), Alain Leroy (EASA Chief Engineer and EASA GA Roadmap Champion), Michel Rocca (EAS Vice-President), Florian Guillermet (EASA Executive Director), Andrea Anesini (EAS President), Ralf Hubo (EAS Vice-President), Timo Schubert (EAS Political Adviser)*

Welcome to the February 2025 issue of the Europe Air Sports Newsletter! This issue aims to catch up on a few important topics. As usual, abbreviations and their explanations are shown in full and in **green**, so that you can quickly find the full meaning.

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## MEETING OF EAS LEADERS WITH NEW EASA EXECUTIVE DIRECTOR

Five members of the Europe Air Sports recently met Florian Guillermet, the new Executive Director (ED) of EASA.

Andrea introduced EAS and the diverse flying activities represented. He underlined the very significant number of up to 650,000 airspace users that are represented and some of the different challenges faced by the different type of operations. Our representatives were pleased to find common ground, as EASA's new ED has significant flying experience, including on GA aircraft.

We had the opportunity to present information about EAS and its members, also to explain EAS's key priorities for 2025:

- Drones and U-space
- Aviation fuels
- Part 66L
- Pilot Medical Declaration

This was a very positive and constructive meeting, underlining the importance of dialogue with EASA, both at working level and at the level of top management. EAS looks forward to continuing a fruitful collaboration and hopes to meet Florian Guillermet again at AERO Friedrichshafen.

## AERO 2025 – EAS PRESENTATIONS

As in previous years, Europe Air Sports will be present at AERO in Friedrichshafen, which runs from 9<sup>th</sup> to 12<sup>th</sup> April. EAS Board members will make presentations on a variety of topics:

Keeping European Airsports Legislation on the Level	President Andrea Anesini, Vice President Patrick Pauwels and Vice-President Ralf Hubo
Aviation Fuels – Problems solved?	Vice President Ralf Hubo
Aviation Fuels – Status and Future	Rudi Schuegraf
New Rules in European Aviation Legislation	Programme Manager Nils Røstedt
Electronic Conspicuity – Update on the ground infra structure by EAS-Avionix-SafeSky	Vice President Michel Rocca

## MEDICAL MATTERS – A precis of an article published in PPL/IR Magazine by Julian Scarfe, with acknowledgements to Dr. Andrea Lorenz

*This article explores the options of PMD – Pilot Medical Declaration.*



Medical certification of pilots became mandatory with the development of commercial aviation in the early 20th century. By the 1960s a requirement for pilots to meet certain health standards was well established. Aeromedical examiners played a crucial role in ensuring aviation safety by assessing pilots' physical and mental fitness to fly. Unfortunately, the very strict attitude has survived in the world of aviation regulation for too long, and for all the wrong reasons.

Recreational pilots have the option not to fly if they don't feel well or to head for a nearby aerodrome to cut a planned trip short. That's a question of *safety culture*. A medical examination aims to detect pilots whose risk of incapacitation is unacceptably high.

In 2015, a UK CAA consultation showed that *age* is not a useful parameter by which to discriminate pilot fitness. The mandatory medical examination tries to differentiate pilots with acceptable levels of incapacitation risk from those with an unacceptable level. The medical examination is limited by its reliance on the applicant's history, which is itself a declaration. If the patient

fails to declare a pre-existing condition, the odds of detecting that condition in the simple tests performed at a Class 2 medical examination are slim.

### **Potential harm to third parties**

Generally, light aircraft accidents cause minimal harm to uninvolved third parties. It is not possible to eliminate risk to third parties entirely, but even a sudden loss of control poses minimal risk to third parties on the ground.

The ability of licence-holders to execute a flight safely can be assessed in skill tests, proficiency checks and refresher training flights. Any physical or mental deficiency relevant to that performance is likely to be observed and Part-MED already recognises that some conditions such as hearing loss may still allow flight crew to be considered fit after a functional test. Risk posed to other aircraft occupants is not something that can be entirely ruled out in GA operations. It makes sense to propose **PMDs** by default for a maximum GA aircraft occupancy of 4 people.

### **Why campaign for PMDs by default (again) now?**

For the last 5 years Basic Regulation (EU) 2018/1139 has offered more flexibility than its predecessor. EASA chooses to allow flexibility in other requirements, for example in the introduction of Part-21 Light, which allows an aircraft type design to be declared, not certified. Building on Part-21 Light, Declared Training Organisations and Part-ML, it now proposes "Declared as Default" for private flying as one of its key projects. It can introduce a similar innovation in allowing pilot medical fitness to be declared.

In 2023, EASA adopted Flightpath 2030+ strategy for General Aviation. Part of Flightpath 2030+ is "Inclusiveness" (Encouraging wider participation and accessibility). This demands a different standard, to include interested parties in the activity of aviation, unless there is very good reason to suppose that the *risk to others* is intolerable. So this is a good time to revisit **PMDs** with renewed vigour.

### **Precedents for successful PMD regimes**

#### ➤ *Precedent in the USA*

In the USA the FAA introduced BasicMed in 2016. This system of pilot medical fitness requires pilots to hold a driver's licence, have held at some stage an FAA medical certificate, and to complete a comprehensive Medical Examination Checklist with a physical examination every 4 years by a family doctor or similar. The FAA reported in 2023 that there were *no significant differences* between BasicMed registrants and private pilot medical certificate holders in any risk of accident, severity of accident or autopsy findings.

#### ➤ *Precedent in the UK*

In 2016 the UK CAA introduced a **PMD** system, which enabled pilots to declare their medical fitness against standards required to drive a passenger car. In 2022, the UK CAA reviewed the **PMD** system, followed in 2023 by a further consultation. The UK CAA is clearly generally satisfied that the system provides an acceptable level of safety. Proposed revisions include a reduction in the maximum MTOM (currently 5700 kg) of aeroplane a **PMD** holder is permitted to fly, a reduction in the period of validity and a proposal to remove the previous restriction on medication for psychiatric illnesses.

PPL/IR Europe proposes EU introduction of pilot medical declarations as follows:

- A licence-holder conducting non-commercial operations in an aeroplane of 2730 kg MTOM (Maximum Take-off Mass) or less with no more than 4 occupants (including the pilot) may declare medical fitness (instead of holding a medical certificate).
- A Pilot Medical Declaration is made online by declaring medical fitness based on the minimum standards of physical and mental fitness for driving a power-driven vehicle Group 1
- A pilot medical declaration must have been made:
  - Within the last 5 years for licence-holders under the age of 60 years
  - Within the last 2 years for licence-holders aged 60 years or older

AMC (Acceptable Means of Compliance) should set out medical fitness standards designed to achieve a maximum 20% per annum likelihood of incapacitation. There are medical conditions or situations where there is a significant documented risk of these types of impairment leading to incapacitation. These would also make you ineligible to drive. Regulators should be able to exclude those medical outliers where and when appropriate. It provides a level of safety for participants that is equivalent to the acceptable level of safety in non-commercial operations in light GA, and creates negligible risk to third parties.

### **FROM THE PROGRAMME MANAGER'S DESK - *Nils Rostedt reports on news about new and ongoing rulemaking activities by EASA and EU***



A brief summary of recent EASA consultations (NPAs) of interest to EAS members, as well as some other topics that have passed the Programme Manager's desk recently.

#### ***New and recent EASA rulemaking proposals***

<https://www.easa.europa.eu/en/document-library/notices-of-proposed-amendment>

MMEL	Master Minimum Equipment List
CS	Certification Specification
NPA	Notice of Proposed Amendment
CS	Certification Specification

#### ***NPA 2024-07 Regular update of CS-MMEL and CS-GEN-MMEL***

This NPA is mostly an update to the MMEL rules concerning large aircraft and their equipment. But there is one proposal touching light aircraft, which gives an alternative way of producing an MMEL item list:

- (b) For aeroplanes that meet the definition of ELA 1 or ELA 2 (European Light Aircraft), when the applicant elects to comply with this CS-GEN-MMEL, the MMEL item list may be generated, alternatively to the methodology in point (a), using the list of required equipment included in the Type Certificate Data Sheet (TCDS) and/or AFM (Aircraft Flight Manual) as a baseline.

***The NPA consultation closes on the 17<sup>th</sup> March. EAS members are welcome to contribute to EAS's response to the NPA – please let me know!***

#### ***NPA 2024-08 Enabling electronic personnel licensing (EPL) in Europe***

This NPA, which stems from an ICAO requirement, proposes to introduce an electronic pilots licence (EPL) in Europe, suitable for all kinds of pilot licences including LAPL, PPL and SPL licences, as well as Air Traffic Control Officers' licences and Part-66 maintenance licences.

We note that the proposal limits the EU-harmonised aspects to those which define the data structure and software functions of the electronic licence. (This may in practice be an app running on the licence holder's smartphone). The Member States are given large freedom as to which functions to implement in each country. For example, the EPL might be introduced only for commercial pilots. The administrative system used to manage the licences is also a Member State responsibility. The traditional physical licences (on paper or a plastic card) remain in any case.

It will take some time until this proposal becomes European law, but we advise those EAS members which are National Aero Clubs to keep a look out to see how your National

Competent Authority (NCA/CAA) plans to implement this new rule. If necessary, talk to your NCA in order to achieve a result your pilots are happy with.

**The NPA consultation closes on 19th March. EAS members are welcome to contribute to EAS's response to the NPA – please let me know!**

### **New EU regulations in force**

Implementing Regulation (EU) 2025/111 on the continuing airworthiness for electric- and hybrid-propulsion aircraft and other non-conventional aircraft was published in the EU Official Journal on 24 January 2025.

This new regulation brings a number of amendments to the Continuing Airworthiness Regulation (1321/2014) and in particular to the Annexes:

- Annex I (Part-M)
- Annex II (Part-145)
- Annex III (Part-66)
- Annex IV (Part-147)
- Annex Vb (Part-ML)
- Annex Vd (Part-CAO)

It remains to be seen what the impact of this regulation will be on the maintenance of our light aircraft. So far, only a few of them are electrically powered but that number will surely grow. If you spot any problems with the new regulation, please let us know! The regulation applies from 13<sup>th</sup> February 2026.

Link to the regulation: [click here](#)

### **EPAS update 2025 published**



In January, EASA published its annual update of the EPAS (European Plan for Aviation Safety) which is EASA's overall planning document. The 2025 edition comprises 150 ongoing safety tasks, 6 of which are new. In 2025, EASA plans to publish 10 new NPAs (notice of proposed amendments) for consultation, as well as 4 new ToRs (Terms of Reference) documents.

The General Aviation section of the EPAS 2025 includes the following actions, which are likely to touch the light aviation community and EAS's members:

#### **MST Member Safety Task (for national authorities)**

- MST.0025 Improvement in the dissemination of safety messages
- MST.0027 Promotion of safety culture in GA
- MST.0038 Airspace complexity and traffic congestion

#### **SPT Safety Promotion Task**

- SPT.0119 Promoting iConspicuity
- SPT.0120 Promoting good practices in airspace design
- SPT.0125 Promotion of the most important safety issues for General Aviation
- SPT.0088 Promote instrument flying for GA pilots

**RMT** Rulemaking Task (typically with NPA consultation)

- RMT.0230 Introduction of a regulatory framework for the operation of drones
- RMT.0287 Regular update of Part-MED of the Aircrew Regulation
- RMT.0587 Regular update of regulations regarding pilot training, testing and checking and the related oversight
- RMT.0678 Simpler, lighter and better flight crew licensing requirements for general aviation
- RMT.0727 Alignment of Part 21 with Regulation (EU) 2018/1139 (including simple and proportionate rules for General Aviation)
- RMT.0424 Regular update of Part-MED Section 1.3.3
- RMT.0687 Regular update of CS-23

If you are interested in the EPAS, please go to [here](#)

**2025 GENERAL CONFERENCE AND ANNUAL GENERAL MEETING – A REMINDER**

The 2025 General Conference and Annual General Meeting will take place on 14 to 16 March in Oslo. Accommodation arrangements have been made with the Clarion Collection Hotel Gabelshus. Social activities and meetings will take place there and at the Norwegian Airsports Association. Please book your accommodation and participation without delay if you have not already done so.

**SIGN UP FOR THE NEWSLETTER AND SEND US YOUR THOUGHTS AND IDEAS!**

If you would like to receive future issues of the Newsletter direct to your inbox, please sign up on the Europe Air Sports website at <http://www.europe-air-sports.org/> If you would like to make any comments, ask questions, send ideas or suggest a topic that you'd like to know about, contact me at [d.king@europe-air-sports.org](mailto:d.king@europe-air-sports.org)

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