



## **Call for evidence: EU Aviation Strategy**

### **Response by Europe Air Sports, Transparency Register No. 83743954330-47**

Europe Air Sports, the association representing sports and recreational aviation at EU level, appreciates the opportunity to contribute to this call for evidence regarding the EU Aviation Strategy. The activities represented by Europe Air Sports are very wide-ranging and include many non-powered flying activities. They comprise, gliding, hang and paragliding, aeromodelling, microlight aircraft, powered flying, ballooning, as well as light experimental and vintage aircraft. Almost all of these activities are carried out according to the Visual Flight Rules, but a very small proportion of our pilots is also instrument rated. The community represented comprises approximately 700.000 active sport and recreational airspace users.

While the 2015 EU Aviation Strategy touches upon many different aspects of aviation, we have noticed the absence of references to General Aviation, not to mention sports and recreational aviation. We invite the Commission to correct and improve this when working towards an update of this strategy.

According to the consultation document the Commission intends to address the following key topics:

- 1) Unfair competition,
- 2) Support fleet renewal and infrastructure modernisation,
- 3) Research and Innovation policy,
- 4) Boost the use of unmanned aircraft,
- 5) Increase the resilience of aviation against security threats,
- 6) Unlock the potential of the Single European Sky,
- 7) Provide a “service oriented” transport services,
- 8) Address labour challenges – boost the attractiveness of aviation for the next generation of staff.

Addressing these topics is very ambitious but would be an excellent step forward for the aviation sector. Europe Air Sports is fully supportive of these activities, and wishes to continue its contribution to advance in the areas of particular relevance to our community. While not

of direct relevance to our segment of aviation, we do support the objectives voiced regarding topics 1, 6, and 7.

Of direct relevance are policies aiming to support fleet renewal and infrastructure modernisation (topic 2), in particular if they also benefit General Aviation and air sports. For our sector to grow we need modern, new light aircraft and well-equipped airfields, just as much as in commercial aviation. Research and Innovation (topic 3) is also highly needed in our segment for better and “greener” light aircraft. Our sector acts as a vital testbed for innovation, leading the way towards decarbonisation and contributing to the development of new technologies that benefit the broader aviation landscape.

Unmanned aircraft (topic 4) have been used since many decades by our aeromodelling community. There are strong differences between our recreational activities and the commercial and military drone activities (UAS). These differences should be taken into account in European regulation. In addition, the safe, free and easy access of manned aircraft to airspace also used by unmanned aircraft must always be guaranteed.

Regarding security threats (topic 5) Europe Air Sports is involved in the ongoing discussions at the level of DG HOME, DG MOVE and EASA aimed at avoiding criminal and illegal acts using airspace and GA aircraft (Advance Passenger Information, API). We support an approach that is effective while at the same time ensuring a minimal bureaucratic burden.

With respect to the attractiveness of aviation (topic 8) we would like to point out that our sector is already helping to address this challenge. We would like to stress that sports and recreational aviation is indeed the essential foundational ecosystem for the entire European aerospace industry. As the primary gateway where young people first experience aviation, the sector sparks the passion required to pursue future careers as commercial pilots, engineers, and air traffic controllers.

There has been clear progress in the past decades regarding the Commission’s and EASA’s approach to regulating the light end of General Aviation, leading currently to the implementation of EASA’S Flightpath 2030+ policy. Regulations have become more fit for purpose, reflecting the lower complexities and nature of GA operations. Improvements have been noticed in many aspects of flying and have included improvements to the licensing, maintenance and operational requirements for non-commercial flying activities. A risk-based approach and a high level of proportionality are the underlying principles of these new European regulations.

Aviation has progressed and grown in giant leaps, from flight pioneer Otto Lilienthal’s first successful attempts flying a glider in 1891, into a highly sophisticated and complex system of interdependencies, allowing fast and convenient mobility for the world population across borders and continents.

By supporting an accessible recreational flying sector, the EU can ensure a steady talent pipeline of skilled personnel, working effectively towards the goals of addressing labour challenges and increasing the attractiveness of aviation.

However, disproportionate and unjustified regulation risks choking this pipeline and leads to long-term staff shortages in the professional aviation sector. It also undermines the EU's competitiveness.

There is furthermore a strong contribution of sports and recreational aviation to increasing Europe's security. As vividly illustrated by the tragic wars in Ukraine and the Middle-East, in which drones and manned aviation play a critical role, it is important to acknowledge that nobody trains more pilots, including drone pilots, than the sports and recreational aviation sector; and this at zero cost to the public purse.

Europe Air Sports calls upon the Commission to recognise in its revised aviation strategy the important role of sports and recreational aviation in the aviation ecosystem and to include measures to support the sector.

Other regions, including the US are currently implementing measures to support the sector by reducing its administrative burden and by making it more accessible. The US FAA's MOSAIC rule is a prime example of where the EU is currently falling behind in competitiveness. This should be corrected as soon as possible.

In order for sports and recreational aviation – and the wider General Aviation sector - to prosper, the future EU aviation strategy should be bold in encouraging a swift implementation of EASA's Flightpath 2030+, pursuing a strict simplification agenda and the introduction of declaration by default, rather than certification. This should include all aspects of non-commercial flying, including importantly the introduction of self-declared medical fitness for recreational pilots. Moreover, the sector's safe coexistence with the fast-growing market for UAS should be ensured, while at the same time facilitating its transition to alternative propulsion systems, including electrification and the uptake of renewable fuels.

We are pleased to provide any further information.

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