



Consultation: Notice of Proposed Amendment 2026-103, Regular update of Regulations (EU) 2019/945 and (EU) 2019/947, Simplification and security, RMT.0729 — SUBTASK 2

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 respond to this consultation. 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. The majority of these activities is carried out according to the Visual Flight Rules. The community represented comprises approximately 700.000 active sport and recreational airspace users.

Safety as the number one priority for our membership

Safety is the number one priority for our membership and the introduction of new types of UAS into airspace commonly used by sports and recreational aviation is a major concern. Safe, free and simple access of our aircraft to U-Space Airspace has been a key demand of EAS and is becoming a reality amid the arrival of low-power, low-cost and low-weight electronic conspicuity technology, including the use of mobile phones as a means of compliance.

Europe Air Sports supports broader electronic conspicuity requirements for all unmanned aircraft operations. We have analysed the proposals set out in NPA 2026-103 and have the following comments on the current draft.

1. The need to offer alternative means of conspicuity:

NPA 2026-103 prescribes on-board direct or network-based remote identification (electronic conspicuity) for all unmanned aircraft operations over 100g; and this includes model aircraft. The proposed requirement poses serious challenges on model flying because on-board conspicuity devices cannot be added to a large share of model aircraft, for reasons including space, weight, power consumption and interference. Many of these model aircraft are homebuilt or assembled from a kit. Lack of space for electronic conspicuity modules in the fuselage would for instance make an important number of competition classes recognised by the World Air Sports Federation (FAI) illegal. An additional concern is the issue of costs. Add-on modules currently cost upward of EUR 100, which is a significant addition to the costs of a model aircraft kit for beginners.

Proposed solution:

We propose that the EU rules foresee a range of alternative means of electronic conspicuity to ensure a fit for purpose and proportionate approach.

These should include:

1. Ground-based transmitters (direct conspicuity), such as FLARM or ADS-L ground stations (of particular relevance for operations from dedicated model aircraft aerodromes, used by clubs);
2. Mobile phone app and web-based solutions (network-based conspicuity). Using such alternative means of conspicuity, the operator should be able to define an area (including maximum height) in which the unmanned aircraft operation takes place. This area (and identification) is communicated either directly or through the network to other pilots and operators.

Much work and effort have already been invested in these alternative means of conspicuity. They have been tested in practice and are proven to work. Important to note is that a broader set of conspicuity options will also address challenges with the application of the new rules to legacy unmanned aircraft, where a retro-fitting of modules is either expensive or may not be possible.

2) Simplification and reduced administrative workload (proposed new Article 16(5) of Regulation 2019/947):

We maintain that the specific nature of model flying justifies an individual assessment of conspicuity needs by each member state authority. For example, operations in mountainous regions often lack mobile phone network coverage and may need to use direct conspicuity options. Also worth noting, an important share of model aircraft operations takes place from club airfields (usually in remote locations), where a collective conspicuity (and identification) solution may be preferable over many separate conspicuity signals.

NPA 2026-103 foresees the automatic “standard” application of electronic conspicuity and geo-awareness requirements for all operations under an Article 16 Authorisation (“operations in the framework of model aircraft clubs and associations”), unless national authorities decide otherwise within 12 months after the entry into force of the legislation. Given the expected implementation workload for the national authorities, the 12-months deadline is too short for national authorities to determine conspicuity needs. Moreover, forcing national authorities to re-issue all Article 16 Authorisations limits their ability to prioritise and brings unnecessary extra work (not in line with the simplification objective of the proposals).

Proposed solution:

We advise that the current proposal be changed from an automatic full application after 12 months into a possibility for national authorities to elaborate electronic conspicuity and geo-awareness requirements for model flying under an Article 16 Authorisation, if and where appropriate (without deadline). This allows national authorities, which are competent to regulate airspace, to decide on their priorities and fully respects the principle of subsidiarity.

It ensures a realistic workload and timetable for model flying clubs and associations. At the same time, it empowers those authorities to decide on the application of appropriate electronic conspicuity requirements on their own time schedule.

3) A new category for model aircraft operations in the framework of model aircraft clubs and associations (separate from the specific and open category)

Europe Air Sports and the European Model Flying Union (EMFU) have on multiple occasions (most recently in our letter from 10 March 2026) proposed to separate activities under an Article 16 Authorisation (Activities in the framework of model aircraft clubs and associations) from the specific category, thus creating an additional and distinct category in Article 3 of regulation 2019/947¹. The purpose of these proposals is to simplify the current rules and to provide clarity on what rules apply to operation under an Article 16 Authorisation. EASA has consistently supported these proposals. The complexity of the changes to Regulation 2019/947 and Regulation 2019/945 proposed in the current NPA once again underline the need for more clarity. Moreover, our proposals will help achieve the simplification objective set by EASA and the European Commission. We kindly ask you to include our proposals in the next iteration of the draft amendment.


We are available for a meeting and pleased to provide any further information.


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8 June 2026

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¹ Concrete text for these proposals: https://emfu.eu/wp-content/uploads/2024/02/2024_01_16-EMFU-Amendments-to-947.pdf