SMF

SWISS MICROLIGHT FEDERATION

AERO CLUB

SAFE AFFORDABLE SIMPLE

ROAD SHOW SMF

- ***We are trying to constantly update these informations, it could be that some of them are outdated at the time of your reading***

- ***Wir sind bestrebt, diese Informationen kontinuierlich zu aktualisieren. Einige davon könnten aber zum Zeitpunkt Ihrer Lekture möglicherweise veraltet sein.***

- ***Nous essayons de mettre à jour continuellement ces informations, certaines pourraient être périmées au moment de votre lecture***
- ***Feb 2020 created***
- ***02.08.2020 part updated***

.AéCS / S M F
Targets

SAFE

AFFORDABLE

SIMPLE

Qualities to be pushed

Know how – Progress – Future – Ecology – Voluntary work
Communication – Exchanges – Transmission of Know-How
C O M M O N AND CRITICAL S E N S E
BASIC TRAINING / TEACHING

.Benefit(s) of OPTOUT

- ***Break away** from unaffordable aviation*
- ***Affordable** Basic Training for **young people***
- ***Tuition including** (ultra)light A/C maintenance*
- *Better **care** of A/C during operation*
- ***Reduction** of **fuel** consumption 20 to 50%*
- *Reduction of Noise*
- ***Ecological benefits** in substituting Aircraft and therefore facilitating aging fleet renewal*
- *Return to more **voluntary work***
- ***Smooth innovative Electrical Transition** taking benefit of car industry experiences*
- *Apply **electrical Drone technology** where Switzerland is well ahead*
- *Allow swiss factory to develop or apply new technology*

Actually in SWITZERLAND

- ***As our primary goal is to support basic microlight Aviation with actions for safety knowledge, tuition, experience sharing***
- ***SMF workforces are now vanishing under administrative burden and opposition from our FOCA whereas other Foreign Microlight Associations are being supported by their NAA***
- ***Most of swiss microlight flyers are real refugees outside our borders taking benefit of our neighbour regulations***

Actually in SWITZERLAND

- ***Microlight (Ecolight) could still be registered but FOCA rendered that inaccessible with resistance and huge costs for certification or modifications***
  Conditions:
  - 3 axes with LTF UL Zulassung or Bcar + Swiss Finish max 472.5 kg noise max 65 db
  Licence LAPL / PPL basic training was allowed flt hrs OK for basic training but all will be revoked BAZL Schreiben vom 11.12.2017 still pending
  - acc Annexe 1 e) max 450 kg or 472.5 kg
  - Gyros Certification LTF UL ou Bcar max 600 kg max 65 db
  cf Annexe 1 e) 600 kg

- ***ACC EASA AMC and FOCA, microlight 3 axis Flight hours are taken in account for SEP LAPL recency, not yet for basic training***

- ***- Electric Microlight shall take off from an aerodrome (Trikes Paragliders etc)***

Références & Bases légales

- ***Lufttüchtigkeitanforderungen Unterkategorie Ecolight 12.06.2015***
- ***Erweiterung der Zulassung von UL Luftfahrzeugen***
- ***UL Erweiterung im CH Luftraum 16.05.2015***
- ***UL Umsetzung von Art 2b der Luftfahrtverordnung 11.06.2015***
- ***Gyrokopter Lärm Begrenzung 20.04.2015***
- ***AIC 001/ 002/ 003/ 004/ 2019 31.01.2019***
- ***Part 21 L (EASA)***
- ***Part ML (maintenance) 24.03.2020***
- ***OPTOUT STAKE HOLDER INFORMATION***
- ***Ecolight Flugstunden Anrechnung***
- ***Présentation Révision RPN***
- ***OFAC Organigrame***
- ***CAA 450 – 600 kg consultation***
- ***Decision OFAC OPTOUT 600 19.12.2019***

EASA Basic Regulation 2018/1139 Annexe 1 e)

(e) aeroplanes having measurable stall speed or the minimum steady flight speed in landing configuration not exceeding 35 knots calibrated air speed (CAS), helicopters, powered parachutes, sailplanes and powered sailplanes, having no more than two seats and a maximum take-off mass (MTOM), as recorded by the Member States, of no more than:

	Aeroplane/Heli-copter/Powered parachute/powered sailplanes	Sailplanes	Amphibian or floatplane/helicopter	Airframe mounted total recovery parachute
Single-seater	300 kg MTOM	250 kg MTOM	Additional 30 kg MTOM	Additional 15 kg MTOM
Two-seater	450 kg MTOM	400 kg MTOM	Additional 45 kg MTOM	Additional 25 kg MTOM

When an amphibian or a floatplane/helicopter is operating both as a floatplane/helicopter and as a land plane/helicopter, it must fall below the applicable MTOM limit.

(f) single and two-seater gyroplanes with a MTOM not exceeding 600 kg;

(g) replicas of aircraft meeting the criteria of points (a) or (d), for which the structural design is similar to the original aircraft;

(h) balloons and airships having a single or double occupancy and a maximum design volume of, in the case of hot air not more than 1 200 m^3, and in the case of other lifting gas not more than 400 m^3;

(i) any other manned aircraft which has a maximum empty mass, including fuel, of no more than 70 kg.

475 kg
With BRS

Gyros
600 kg

EASA Basic Regulation 2018/1139 art 2 para 8

- ***8. A Member State may decide to exempt from this Regulation the design, production, maintenance and operation activities in respect of one or more of the following categories of aircraft:***
- ***(a) aeroplanes, other than unmanned aeroplanes, which have no more than two seats, measurable stall speed or minimum steady flight speed in landing configuration not exceeding 45 knots calibrated air speed and a maximum take-off mass (MTOM), as recorded by the Member State, of no more than 600 kg for aeroplanes not intended to be operated on water or 650 kg for aeroplanes intended to be operated on water;***
- ***(b) helicopters, other than unmanned helicopters, which have no more than two seats and a MTOM, as recorded by the Member State, of no more than 600 kg for helicopters not intended to be operated on water or 650 kg for helicopters intended to be operated on water;***
- ***(c) sailplanes, other than unmanned sailplanes, and powered sailplanes, other than unmanned powered sailplanes, which have no more than two seats and a MTOM, as recorded by the Member State, of no more than 600 kg.***
- ***However, as regards the categories of aircraft referred to in the first subparagraph Member States may not take such a decision concerning aircraft in respect of which a certificate has been issued, or has been deemed to have been issued, in accordance with Regulation (EC) No 216/2008 or with this Regulation, or in respect of which a declaration has been made in accordance with this Regulation.***

WHY IS OPTOUT 600 IMPORTANT ?

- ***Nowadays a swiss Family can no more sustain initial training costs for a young ado***
- ***Subventions are only a mean to put the costs at new summits***
- ***UNTIL WHEN WILL SWISS AIRFORCE PAY FOR FUEL TAXES ?***
- ***Only swiss Airforce is doing positive work for aviation not FOCA***
  (SPHAIR COURSES AND VERY GOOD TUITION MATERIAL INTERNATIONALLY USED)
- ***A new aircraft EASA certified Twoseater costs now 200–240 000 CHF incl VAT,***
  a 3-4 seater > 400 000 CHF
- ***Aerodrome constraints have financial repercussions on training costs***
- ***Maintenance costs exploded***
- ***Ageing SEP Fleet > 47 years***
- ***Knowhow, voluntary work, last known on GLIDING activity has been blown off due to EASA constraints (Tuition Handling Maintenance …)***

BENEFITS OF OPTOUT 600

- ***Drastic Fuel / CO2 reduction as electrical A/C proved not to be reasonably operational***
- ***Innovation (New Material)***
- ***Implementation of Safety items (BRS)***
- ***Easier conversion for better performance and economy (f e VAR PROP)***
- ***Initial Training at reasonnable costs***
- ***Training and experience gaining at equal level of heavier A/C***
- ***Sharing of technical Knowhow***
- ***Fleet renewal***
- ***Aerodrome (Grassrunway)***
- ***Maintenance by owner with possibility to delegate***

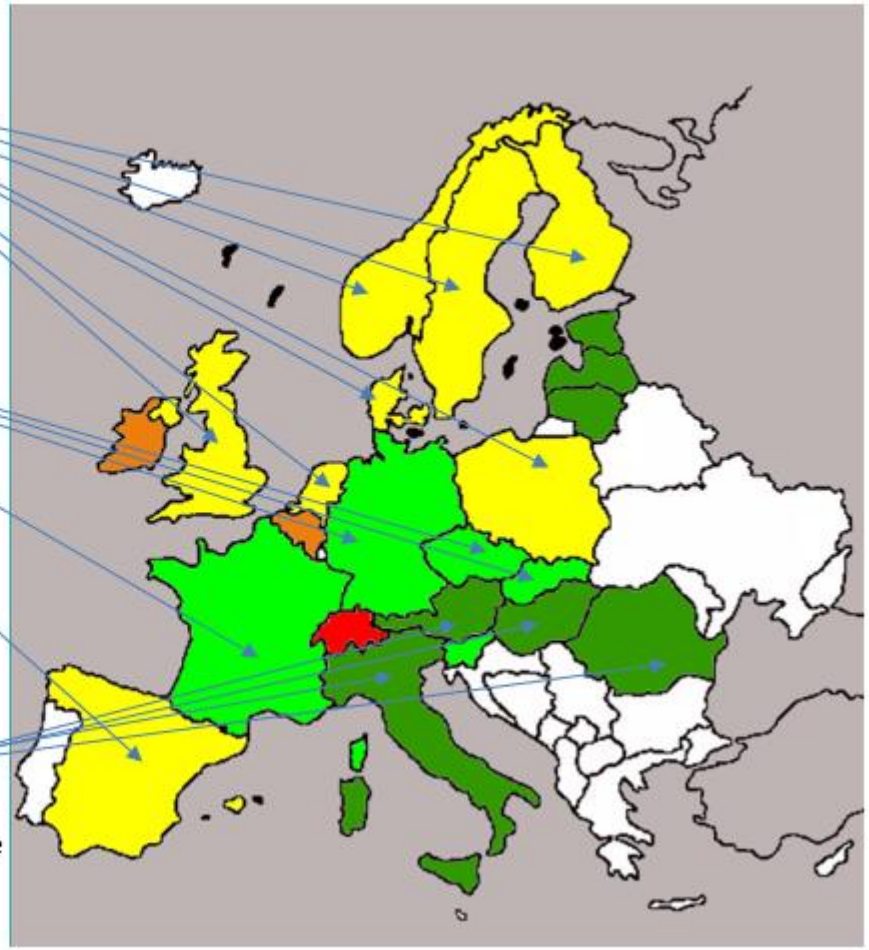
EASA OPTOUT 600 in Europe as of July 2020

In Negotiation winter 2020-2021

Already active

Active without regular EASA declaration

Belgique 472.5 kg as negotiations are not possible
(No elected government)
Irland 472.5 kg OK

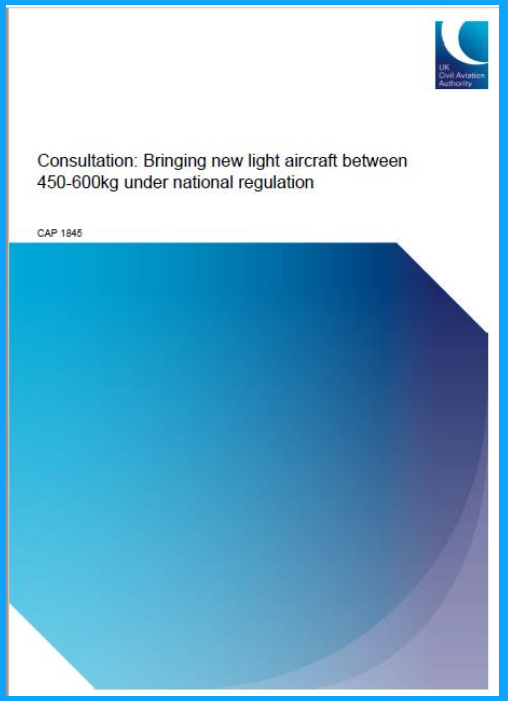


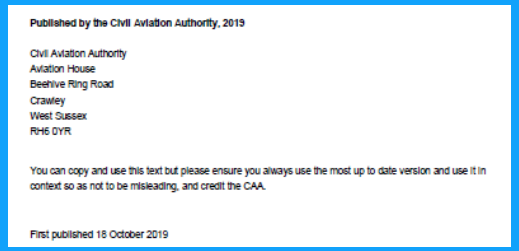
Microlight Swiss Owner

Sergy (5 km NNW of LSGG)
Bellegarde LFHN (26 km W of LSGG)
Corbonnod 37 km SW LSGG
Bourg en Bresse LFHS
Cervens 25 km E of LSGG
Habère Poche
Arc sous cicon
Pontarlier LFSP
Fournet Blanche Roche
Lanans
Saulnot
Besançon Thise LFSA
Montbéliard LFSM
Vieux Ferrette
Habsheim LFGB
Herten
Hueten Wehr
Binningen
Hilzingen
Wildberg
Scheidegg
Wildberg
Hohenems LOIH
Sondrio
Italien ?
… not less of about 200 A/C

CAA – BMAA – working together

- ***On the 18th of October 2019 CAA consulted not only the BMAA (UK SMF) but also all pilots by internet.***
- ***A dream instead of a nightmare in Switzerland***

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RH6 0YR

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FOCA EASA Response

Part ML applicable from 24 March after more than 10 yrs administrative work …

It would allow partly Owner maintenance but very restrictive, with huge administrative burden and only for some parts.

At the same moment Owner Maintenance is described as the weak point of Riskmanagement…

FOCA EASA Response

Part 21 Light (certification)

"Striving to introduce proportionate regulations"
"simpler for sports and recreational aircraft and products"

Simpler lighter better, they said and …..it never has been so complicate

Like FOCA, EASA employees have lost contact with General Aviation and Flight Operation . They also never had a physical approach of very light planes they assimilate with heavier ones.

Even worse, as EASA lost control of microlights in favor of national regulations, they never approached national LAA organisations so as to take benefit of their experences.

You will see that they are trying to copy the french declarative system for certification extending it to 1200 kg ELA 01 in an absurd complicate system which at present time will never work unless a further 10 to 15 years development would improve it.

Part 21 L What is it ?

- ***New EASA way of certification claiming for simpler better lighter … (as usual)***
- ***- No US FAA / EU EASA joint venture like CS-23 / FAA part 23***
  - Mass limit of 2730 kg or 1200 kg for the declarative system
- ***OPERATION***
  Licensing acc EASA FCL,
  Maintenance acc Part ML,
  Airfields acc EASA SERA Rules
- ***Two ways of certification :***

  1. Classic procedure EASA NAA (FOCA) certification

  Type certification ICAO approved
  Design acc CS VLA or CS 23 or CS 22 (motorglider) CS-LSA excluded
  As usual A/C factories shall demonstrate different items strength sometimes up to the rupture acc limits laid down in CS-23 or CS-VLA

Let us consider now the case ‘’Declarative up to ELA 01 1200 kg which is more interesting for us

PART 21 L Declarative 1200 kg

- ***2. Declarative procedure***

- ***That means that the items checked depend on the sole responsibility of the A/C Factory***

  - ***No TC Type Certification***
  - ***Conformity of each built aircraft has to be declared by the manufacturer***
  - ***No ICAO approval (→ operation outside EU problematic)***
  - ***Design acc CS-VLA or CS-23 or CS 22 (motorglider) CS-LSA excluded !!!***
  - ***No lower limit or special very light category up to 600 kg f example***
  - ***LTF-UL based on JAA 22 not approved***

Climate Ecology

No consideration about this very actual worrying subject

Only a mention that electrical aircrafts are not suitable (Here they are actually right)

MASS : 2730 – 1200 kg vs600 kg or 525 kg

Microlight max 600 kg

Airworthiness directives same

Part 21L comments

- ***How such a non matured project could be accepted in the next future ???***
- ***If EMF was not consulted (like SMF with FOCA), is it the same for manufacturers?***
- ***Which manufacturer would use this not burden free declarative procedure ?***
- ***OPTOUT (like in Germany for us) is NOW even MORE PLENTY OF SENSE***
- ***Regarding ecology, initial training, continuous training Microlight are the future***
- ***Finally the guys which elaborated this project are the best supporters of OPTOUT 600***

SMF TARGETS

- ***Maintain actual Achievements AIC form 3 jan 2019***
- ***Foreign reg EU aircraft operation or ML 600 kg registration without swiss finish***
- ***Registration acc actual Gyros procedure (LTF UL (D) Bcar (UK) or LAA CZ)***
- ***Maintenance like DULV model with annual check by Prüferklasse 5 (Part M66 not necessary)***
- ***Nat LAPL Licence with EASA LAPL THEORY and EASA LAPL SYLLABUS***
- ***LAPL (EASA regular) delivered after simple familiarization on EASA SEP A/C***
- ***Mixing of Flight fours (already OK but only for recency)***
- ***Promote Voluntary work***
- ***Campaign launch for LAPL theory***
- ***Affordability***

Rationale

- ***OPTOUT 600:***
  - ***Useful legal masses (reasonable loads)***
  - ***Initial aeronautical training affordable***
  - ***Security at same level or better than SEP (BRS mandatory)***
  - ***Ecology Climate 10 – 17 lt/h***
  - ***Use of Grass Runways Better T/O Performances***
  - ***Noise acc ICAO limits or better (65 db vs 70.2 db)***
  - ***Flt hrs for SEP revalidation***
  - ***Nat LAPL identical to EASA LAPL nce possible***
  - ***More than 200 (Swiss Owner) ML registered across our border***
  - ***Swiss ML Flyers paid more than 1 million SFR VAT to our neighbour***
  - ***Foreign ML may fly ‘’occasionnally’’ in Switzerland***
  - ***FOCA has enough ressources to lend employee working for Part 21L at EASA but NOT ENOUGH TO IMPLEMENT OPTOUT 600 !!!***
- ***IMPLEMENTATION:***
  - ***Use of German british Bcar or Rep Czech LAA certification***
  - ***No supplemental ressources necessary***
  - ***SMF AéCS ready to collaborate actively***

Analyse Meeting OFAC AéCS 19.12.2019

- ***Décision prise sans consultation ou collaboration aucune avec les intéressés***
- ***Aucun sens commun ou critique***
- ***Collaborateur(s) en ignorance de cause avec le sujet !!!***
- ***Aucun collaborateur n'a de licence valable s'il en a jamais détenu une***
- ***Aucune velléité de collaboration, pire, de recherche d'information***
- ***Proposition de rencontrer Jo Konrad DULV refusée (Ils font faux pas sérieux On est meilleur!!!)***
- ***Étayage des arguments mal étudiés cf mail D Roland EASA***
- ***Refus d'OPTOUT 600 pris avant de chercher des arguments négatifs***
- ***Arguments tous négatifs et souvent erronés voire arbitraires***
- ***Economie de CO2 - Hrs de vol SEP pour l'entraînement mêmes pas évoqués***
- ***Par contre Soutien à la part 21L → 2730 kg sans pensées écologiques aucune***
- ***D'emblée ils se ménagent une sortie en invoquant qu'ils se plieraient à la ''politique''***
- ***Débordement grave lors de discussions verbales entourant le refus d'OPTOUT 600***
- ***Proposition aberrante Part 21L disproportionnée pour les ML car elle concerne des aéronefs jusqu'à 2730 kg***
- ***Exemple de nos voisins CAA Consultation ouverte avec explications et libre choix***

Mesures d’urgence

- ***Volonté FOCA de voir les ML disparaître***
- ***Importance d’assurer les acquis***
- ***AIC du 31.01.2019 Aéronefs étrangers Vols occasionnels***
- ***Ecolight Certification***
- ***Aéronefs immatriculés F, D ou I***
- ***Compétences OFAC pour stationnement marchandise dédouanée***
- ***….***

SMF AéCS Meeting BERN 31.01.2020

- ***Objectifs :***
- ***- Analyse Meeting OFAC du 19.12.2019***
- ***- Mesures d'Urgence***

  - Préparation Action Politique (Motion) AéCS Matthias Jauslin

  - Protocole Déclarations collaborateurs OFAC du 19 déc 2019

  - Action juridique

Action politique

Objectif #1 de notre réunion

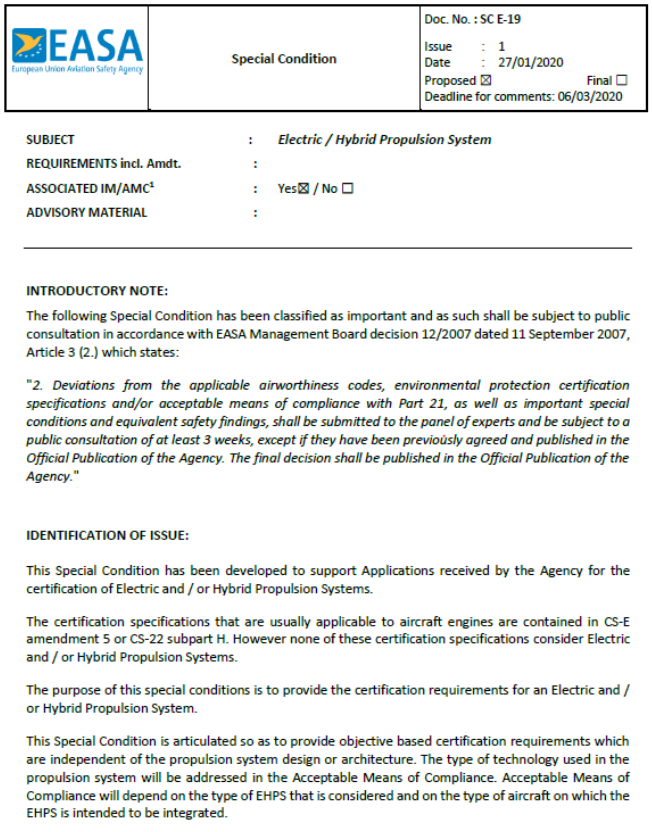
- ***Comment rédiger documenter une intervention ?***
- ***Communication Presse Contacts***
- ***Aide de nos membres ?***
- ***Ce que nous voulons BUTS SMF***
- ***Argumentaire***
- ***Autres faits***

Déclarations Collaborateurs OFAC 19.12.2019

- ***Avec des atterrissages à 18 CHF l'aviation légère peut coûter cher***
- ***Construction ML pas sérieuse***
- ***DULV pas très compétent***
- ***Jamais je ne volerais dans un ML***
- ***C'est construit avec des tuyaux de chauffage*** ***En a-t-il jamais vu de près ?***

USEFULL INFORMATION

- ***EASA is making a consultation about electric hybrid propulsion system***
- ***Swiss regional Aerodromes***



EASA European Union Aviation Safety Agency	Special Condition	Doc. No. : SC E-19 Issue : 1 Date : 27/01/2020 Proposed ☒ Final ☐ Deadline for comments: 06/03/2020

SUBJECT : *Electric / Hybrid Propulsion System*
REQUIREMENTS incl. Amdt. :
ASSOCIATED IM/AMC[1] : Yes☒ / No ☐
ADVISORY MATERIAL :

INTRODUCTORY NOTE:

The following Special Condition has been classified as important and as such shall be subject to public consultation in accordance with EASA Management Board decision 12/2007 dated 11 September 2007, Article 3 (2.) which states:

"*2. Deviations from the applicable airworthiness codes, environmental protection certification specifications and/or acceptable means of compliance with Part 21, as well as important special conditions and equivalent safety findings, shall be submitted to the panel of experts and be subject to a public consultation of at least 3 weeks, except if they have been previoùsly agreed and published in the Official Publication of the Agency. The final decision shall be published in the Official Publication of the Agency.*"

IDENTIFICATION OF ISSUE:

This Special Condition has been developed to support Applications received by the Agency for the certification of Electric and / or Hybrid Propulsion Systems.

The certification specifications that are usually applicable to aircraft engines are contained in CS-E amendment 5 or CS-22 subpart H. However none of these certification specifications consider Electric and / or Hybrid Propulsion Systems.

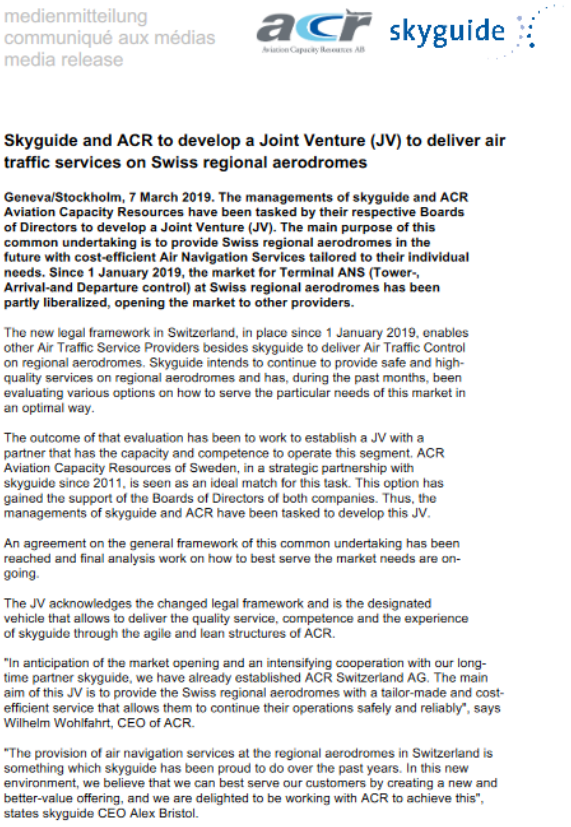
The purpose of this special conditions is to provide the certification requirements for an Electric and / or Hybrid Propulsion System.

This Special Condition is articulated so as to provide objective based certification requirements which are independent of the propulsion system design or architecture. The type of technology used in the propulsion system will be addressed in the Acceptable Means of Compliance. Acceptable Means of Compliance will depend on the type of EHPS that is considered and on the type of aircraft on which the EHPS is intended to be integrated.

USEFULL INFORMATION

- ***Swiss regional Aerodromes ATC intentions ….***

- ***https://acr-switzerland.ch/news/skyguide-and-acr-to-develop-a-joint-venture-jv-to-deliver-air-traffic-services-on-swiss-regional-aerodromes***



medienmitteilung
communiqué aux médias
media release

acr Aviation Capacity Resources AB skyguide

Skyguide and ACR to develop a Joint Venture (JV) to deliver air traffic services on Swiss regional aerodromes

Geneva/Stockholm, 7 March 2019. The managements of skyguide and ACR Aviation Capacity Resources have been tasked by their respective Boards of Directors to develop a Joint Venture (JV). The main purpose of this common undertaking is to provide Swiss regional aerodromes in the future with cost-efficient Air Navigation Services tailored to their individual needs. Since 1 January 2019, the market for Terminal ANS (Tower-, Arrival-and Departure control) at Swiss regional aerodromes has been partly liberalized, opening the market to other providers.

The new legal framework in Switzerland, in place since 1 January 2019, enables other Air Traffic Service Providers besides skyguide to deliver Air Traffic Control on regional aerodromes. Skyguide intends to continue to provide safe and high-quality services on regional aerodromes and has, during the past months, been evaluating various options on how to serve the particular needs of this market in an optimal way.

The outcome of that evaluation has been to work to establish a JV with a partner that has the capacity and competence to operate this segment. ACR Aviation Capacity Resources of Sweden, in a strategic partnership with skyguide since 2011, is seen as an ideal match for this task. This option has gained the support of the Boards of Directors of both companies. Thus, the managements of skyguide and ACR have been tasked to develop this JV.

An agreement on the general framework of this common undertaking has been reached and final analysis work on how to best serve the market needs are on-going.

The JV acknowledges the changed legal framework and is the designated vehicle that allows to deliver the quality service, competence and the experience of skyguide through the agile and lean structures of ACR.

"In anticipation of the market opening and an intensifying cooperation with our long-time partner skyguide, we have already established ACR Switzerland AG. The main aim of this JV is to provide the Swiss regional aerodromes with a tailor-made and cost-efficient service that allows them to continue their operations safely and reliably", says Wilhelm Wohlfahrt, CEO of ACR.

"The provision of air navigation services at the regional aerodromes in Switzerland is something which skyguide has been proud to do over the past years. In this new environment, we believe that we can best serve our customers by creating a new and better-value offering, and we are delighted to be working with ACR to achieve this", states skyguide CEO Alex Bristol.

INFO PART 21L

INFOS Part 21L BAZL From 10 march 2020

Still awaiting covid19 effect