

Notes on the discussion of CAA Consultation: Review of UK Unmanned Aircraft Systems (UAS) Regulations at SFTC meeting 13 Dec 2023.

Circulated to members before the meeting & intro

- The 22 Nov CAA Cap 2610 consultation paper
- The BMFA's response
(Access to both of these via links on the Chair's North York Moors Ridge Soaring Club web site recommended: <https://www.nymrsc.org.uk/Club%20News.htm>)
- Comments from the East Sussex Soaring Association (.pdf attached to committee members)
- Previous discussion on the BARCS forum (online)
<https://www.barcs.co.uk/forums/topic/12332-cao-review-of-uk-uas-regulations/>
- FPV UK's response to the consultation <https://www.suasnews.com/2023/12/fpv-uks-response-to-cao-consultation/>

Chair Jon Edison gave a further introduction to the consultation, BMFA response and the BMFA's "Invisible Model Flyers - Capturing Flying Site information" initiative. He focused in particular on Remote ID and para 5.8 of the CAA's 22 Nov consultation document, especially the proposed Model Aircraft exemption in para 5.8(viii).

In discussion

Several other issues were discussed by way of context to the consultation: the NOTAM system; experience of field transponder trials; information on the introduction of Remote ID in models in France.

The meeting noted that:

- The scope of Sub-para 5.8(viii) of the consultation document (partial Remote ID exemption for model aircraft) is unclear on central issues (for example the meaning of 'within a model aircraft club' and the relationship of this with Article 16 sub-para 'c.'). And its impact will be critically dependent on how this sub-para is clarified and developed in the negotiations between CAA and modellers which para 6.16 says are to come. (For example, which aircraft will be covered for exemption in sub-para 'a.'? And what will be the criteria and the process for the designation and authorisation of model aircraft flying sites under sub-para 'b'?)
- The consultation paper's restrictive conception of model flying as a 'hobby' in which club members fly at their own field suggests issues of particular concern to silent fliers and to the SFTC:
 - Slope-soaring pilots often fly at multiple locations over a wide area, with or without specific club arrangements.
 - Competition flying often includes pilots from other clubs and other countries, and does not always take place on a club site.
- Breadth and technicality of the consultation paper (and arguably the BMFA response approach) are not calculated to encourage members to respond. Apparent response rate so far is disappointing,

- Focus should be on realpolitik – where SFTC / BMFA / model fliers can realistically hope to make a difference (for example not the merits or demerits of the BMFA response to the consultation already made, and not on seeking to challenge the whole basis of the proposals – for example by pushing for reliance solely on avoidance technology fitted to commercial drones rather than identification of model site / models as envisaged in the consultation document). Engagement in, or at least feeding into, para. 6.16 negotiations will be critical to this. (Para 6.16 includes the statement: “If this proposal is taken forward, we expect to work closely with the Model Aircraft community to define an appropriate definition for exempt Model Aircraft and approach to locational exemptions.”)

Actions to be taken:

- Jon Edison to liaise with BMFA centrally and ask Andy Symons and perhaps Dave Phipps to a dedicated an SFTC Zoom meeting before 10 Jan if possible.
- Meeting to focus on
 - Preparing an agreed statement by SFTC (and perhaps BARCS) for SF pilots on UAS regulation on SF model flying.
 - How best to liaise with other disciplines and with the BMFA centrally on future developments on UAS regulation and model flying
 - How best SFTC (the Technical Committee) and BARCS / GBSRA (the two silent flight Specialist Bodies) can best be engaged in, or feed into, para. 6.16 negotiations.
- Encourage all SF pilots to respond to the consultation by the Jan 10 deadline – concentrating if they wish on Questions 22.
- Keep in good communication with silent flight pilots about any developments.

Nick Jackson