

Position Paper

Drones

*- Urgent call to implement
measures for safeguarding
safety in the
Dutch airspace -*

Paper by:

Dutch Airline Pilots Association (*VNI*)

Royal Dutch Airlines (*KLM*)

Dutch Air Traffic Controllers Guild (*VNLG*)

ANWB Medical Air Assistance (*ANWB-MAA*)

Aircraft Owners and Pilots Association (*AOPA*)

Board of Airline Representatives in the Netherlands (*BARIN*)

Schiphol Group

Martinair

KLM Cityhopper

| April 2016

Drones increasingly pose a great danger to manned aviation. The recent incidents at Amsterdam Airport Schiphol provide evidence of this and it cannot be denied that the number of serious incidents with drones and manned aviation reported internationally is also increasing at an alarming rate. The sector parties VNV, KLM, VNLG, ANWB-MAA, AOPA, BARIN, Schiphol Group, Martinair and KLM Cityhopper have serious concerns about the safety of manned aircraft in the (controlled) airspace.

It is highly undesirable and incomprehensible that an easing of the commercial regime for drones in the mini-drone regulations is introduced on the one hand, without the simultaneous or short-term drawing up of legislation for recreational drone aviation. The sector parties are of the opinion that further delay of the implementation of the measures for drones listed below can lead to fatal accidents in the short term.

The technological developments have resulted in a mass introduction of drones on the consumer market. The technology undeniably offers many practical and efficient applications that can be exploited safely and responsibly by commercial parties operating within the current legal framework, supervision, and requirements. The risks of incidents with manned aviation can adequately be mitigated in this context. However, it is the recreational and illegal commercial drone use that can form a serious threat to safety in the airspace.

A number of issues call for extra measures:

- The shortcomings in the possibility of enforcement.
- The consumers' ignorance of the dangers and technical possibilities versus the legal restrictions.
- The lack of awareness concerning the consequences of a collision between a drone and manned aircraft.

The current Model Aircraft Flying Regulation is not focused on the modern drone market and its users, and is therefore inadequate. Mandatory knowledge, registration of the drone, and – depending on the properties and features of the drone – a license or diploma (similar to a weapon license) should be included, as it is for the commercial sector.

The proposed measures have emerged from an in-depth, sector-wide risk analysis¹ and form thresholds (barriers) to prevent irresponsible and improper recreational use of drones. Considering the

availability of drones, which offer unlimited possibilities and performances, the current (government) measures insufficiently limit the risks with far-reaching consequences.

The signatories jointly demand the introduction of the following measures for drones (excluding toys) simultaneously with, or in the very short term after, the entry into force of the regulations for mini-drones in order to preserve the high level of safety in the airspace:

1. Registration of all drones²

The owner/pilot can be traced, which also forms a barrier to (wilful) violation of the regulations and can serve as a starting point for training. Ideally, registration should immediately occur at the time of purchase.

2. Mandatory training and diploma/license

The obligation to obtain a diploma and license (depending on the properties and features of the drone) guarantees in-depth knowledge of the applicable regulations and restrictions, considering the complexity of the Dutch airspace and aviation regulations. Moreover, a legally required diploma also offers the possibility of enforcement. Operating and obtaining a drone is reserved for people who have been granted a license to do so.

Toy drones can be excluded from these requirements, whereby toy drones are understood as having a maximum weight of 1 kilogram and a radius of action of no more than 10 metres.

3. Extensive public campaign

The general public, but also (commercial) clients, must be aware of the dangers, duties, liabilities (insurance), responsibilities (privacy), and the resulting possibility to monitor others. More resources must be dedicated to this end than have been so far.

¹ Drone Operations - Full predictive SIRA Version: 1.0, Principal and Host; Dutch Ministry of Infrastructure and Environment issued January 2016

² Example Ireland and USA: <https://www.iaa.ie/general-aviation/drones/drone-registration>; <https://www.faa.gov/uas/registration/>

4. Increase in the capacity of enforcement

The government must be able to guarantee the safety of manned aviation. Enforcers must also receive the training and technical equipment to be able to monitor regulation compliance.

5. Technical restrictions

By means of built-in geofencing and altitude restriction the safety risks concerning critical airspace, terrains, and buildings are significantly reduced.

6. In-depth research into the impact of collisions between drones and manned aircraft

It is presently unclear what damage a consumer drone (Model Aircraft Flying Regulation permits a weight of up to 25 kg) could cause manned aviation and there is no insight into which drones can cause no or limited danger (toys). On the basis of scientific research, further mitigating measures can be taken or regulations eased.

7. Revision of the Model Aircraft Flying Regulation

The current Model Aircraft Flying Regulation is inadequate for drone flyers, because the classic model aircraft flyers traditionally build in greater safety margins than drone users presently do.

Therefore, a revision of this regulation is appropriate, including stricter operational limits (in altitude and distance) and obligations. The regulations must provide for clear, readable frameworks, specifically focused on this group. Moreover, the above-mentioned points must be included in the regulations.

Further information

Dutch Airline Pilots Association
Joost J. van Doesburg (MSc)
Public affairs advisor
j.vandoesburg@vnnv.nl
+31 6 13 676 898

Signed by parties from the field of manned aviation,



**Vereniging
Nederlandse
Verkeersvliegers**



** BARIN agrees that drones pose a great danger to civil aviation. BARIN leaves the determination of the measures necessary to limit this risk to the expertise of the other organisations.*