



Brussels, March 29th, 2016

Subject: ToR for the RMT 0677 (Easier access for GA pilots to IFR flying)

Dear Mr. Kessler,

We refer back to the last ATM sub-SSCC in December 2015 where ATCEUC, CANSO and ETF expressed their interest in providing EASA with ATM expertise in the RMT.0677.

While we welcome the subsequent circulation of the Terms of Reference together with a concept paper, we are disappointed that these documents fail to adequately capture the consequences of the proposals for ATM. The concept paper states:

"GA aerodromes would benefit from the increase in activity. Some stakeholders have identified possible ATM issues associated with increased GA IFR traffic, such as impacts on capacity of terminal airspace and the difficulty of integrating traffic of a different performance profile to that of commercial air transport aircraft. While these are important considerations, even in the most positive outcome, the overall increase in GA IFR activity is likely to be quite small when compared to the total volume of commercial air transport (CAT) activity. It is also anticipated that any such increase would be primarily at aerodromes that already serve mostly GA traffic, and that have limited CAT operations. Increasing the amount of IFR traffic, that would otherwise have flown under VFR, would generally increase the predictability of the overall ATM system, allowing greater ATC knowledge of the intentions and likely trajectory of GA of traffic."

It remains unclear what evidence has been used to support the statement that the increase in GA IFR traffic will be small. Furthermore, the impact of this change on ATM has not been addressed. The documents do not provide justification for the urgency to regulate this topic, nor do they address issues such as how and who is going to provide the new air traffic services, how GA will contribute to its funding, how to mix the new GA IFR with current traffic, nor how ATS are informed of the pilots' capabilities.



Therefore, we would welcome the following from EASA:

- An impact assessment taking into account the impact on the network and other stakeholders, including ATM
- Greater clarity of the rationale of the need to establish regulations on this matter.
- An update to the ToRs to include the involvement of ATM expertise from the industry.

A handwritten signature in black ink, appearing to read 'V. Dick'.

Volker Dick
President of ATCEUC

A handwritten signature in blue ink, appearing to read 'Guenter Martis'.

Guenter Martis
CANSO Director
European Affairs

A handwritten signature in blue ink, appearing to read 'François Ballestero'.

François Ballestero
ETF Political Secretary