

CONTRIBUTION TO THE CONSULTATION ON THE ROADMAP FOR DRONE STRATEGY 2.0 FOR EUROPE

Thank you for the opportunity to respond to the consultation on the Roadmap for drone strategy 2.0 for Europe.

UECNA strongly supports the initiative, however we are concerned about the somewhat “transport and mobility” coloured perspective that is taken. As an example, in the Context section it is mentioned that daily commuting (by drone we assume) would be an enabler of social life. We think the noise consequences in a society where workers would commute by drones would create a nightmare scenario that is not something to strive for.

We note that the roadmap aims to ensure safe and efficient development of a drone “ecosystem” but considers that societal concerns merely need to be “addressed” while the sentence ends with the aim to ensure that the EU drone industry can grow. In our view safety, security, privacy and in particular environmental protection and health of citizens must equally be ensured. Our position is that if the drone ecosystem would lead to any deterioration of the noise environment, negative health impact or to security and privacy concerns, such development must not be allowed to take place. A cornerstone of the European Union is to protect and promote the wellbeing of European citizens, and as such safety and environmental protection (including reducing, not increasing, environmental noise) should be on equal footing in defining the problems to be attacked.

We think the use of drone-like vehicles for passenger transport in urban environment is a very worrying development that should be made possible only if these forms of transport would be without even the slightest noise impact. We note that the noise in urban environment is often already well above acceptable levels and adding further noise is the last thing one should want. Quiet areas in cities and villages are often protected by natural barriers from ground-based noise sources. Air borne vehicles would seriously threaten such valuable and needed quiet areas. As such the noise from drones should be below noticeable background levels in quiet areas which in our opinion is practically impossible.

We agree that this is a subject that needs to be dealt with at a European level, otherwise the risk exists that individual member states will be competing unfairly by a “race to the bottom” in allowing higher noise impact than elsewhere. We think this is very similar to the situation where airports compete against each other in allowing night flights.

In addition to the above we offer the following items of consideration, which are also partly in response to the quoted study on societal acceptance of Urban Air Mobility by the European Union Aviation Safety Agency.

1. The precautionary principle should be applied to the impact of this new technology.
2. Unlike classical aviation (which benefits many, with unacceptable annoyance to the relatively few), noise from unmanned aircraft systems (UAS) is more likely to annoy the many and benefit the few (rich people). Safety, security and privacy concerns may increase opposition. Therefore, popular support for it is likely to be limited and it may well generate outright opposition.
3. Any framing of the use of drone (and flying taxis) as necessary to alleviate traffic congestion is incorrect. A possible development is not the same as a desirable development and certainly not a necessary development. We note that land traffic noise is expected to go down with more investment in quiet forms of public transport and as more electric cars and more cycling and walking are



introduced as part of the EU Green Deal. Additionally, road pricing is likely to be introduced in a number of European cities.

4. We would be concerned about a step-by step introduction. To some extent this may be inevitable with new technologies but any gradual introduction so that “the frog will let itself be boiled” is unrealistic and irresponsible.
5. It is critical to recognize that the new machines will have new sound characteristics (more insect-like medium high frequency, varying with local atmospheric variations). While we always support good interaction with local communities, it is fantasy to believe that that, if this is “properly managed”, there will be no or limited annoyance.
6. In view of the fact that these will be very different machines, new metrics to measure noise from UAM vehicles and to assess noise annoyance will be needed.
7. The reference soundscape to compare noise from UAM vehicles against should be quiet areas such as suburban back yards. Not buzzing city centres! Nor helicopter operations.
8. Our view is that the new machines will not just replace helicopter operations but add to them because they will open up new markets. We cannot see any hard evidence that they will replace them.
9. Noise certification should not be taken as a blank cheque for unlimited operations (as has happened with most of classical aviation). Noise certification at best ensures that a design is “as quiet as possible” but that is not the same as quiet enough!
10. No new development has an historic right. It should not lead to an increase in significant adverse effects. Do not repeat mistakes from the past.
11. Evening and night flights should not be accepted in any case, unless the operations are inaudible (10 dB below background noise levels)
12. Research should be unbiased. As an example, to ask the public which sound character they would like best, while limiting the choice to car, buzzing bee, helicopter or truck and then reporting that the public has little concern when the UAS would sound like a humming bee is inappropriate. Another example of indecent reporting is to say that of all concerns, privacy concerns are the smallest. It does not mean that the privacy concern is small! In particular drones with face recognition would be a significant concern.
13. Research should also be focused. If more research is required, it makes sense that any introduction of the new technology should come to a standstill until it is done