



Notice of Proposed Amendment 2025-04 (A)

in accordance with
Article 6 of Management Board Decision No 01-2022

New air mobility

Rules for air operations with airships (AsOP)

RMT.0731 (Subtask 4C)

EXECUTIVE SUMMARY

This Notice of Proposed Amendment (NPA) proposes requirements for air operations performed with airships, to support the uniform application of the related essential requirements in Regulation (EU) 2018/1139.

The proposed regulatory material covers all aspects related to airship operations, including technical requirements, requirements for operators and competent authorities, and flight time limitations for airship pilots, as well as consequential amendments to related regulatory areas, such as airspace requirements.

The proposed regulatory material is expected to maintain, and in some cases enhance, the level of safety and to provide benefits in terms of efficiency, with a low to very low economic impact.

REGULATIONS TO BE AMENDED

- Regulation (EU) No 965/2012 (Air OPS)
- Regulation (EU) No 923/2012 (SERA)
- Regulation (EU) 2023/203 (Part-IS)
- Regulation (EU) 2023/1770 (Part-AUR)

REGULATIONS TO BE ISSUED

- Regulation (EU) 20XX/XXX – AsOP
- Regulation (EU) 20XX/XXX – FTL for AsOP

ED DECISIONS TO BE AMENDED

- ED Decision 2014/019/R – GM to Regulation (EU) No 965/2012
- ED Decision 2014/025/R – AMC & GM to Part-ARO

ED DECISIONS TO BE ISSUED

- ED Decision 20XX/XXX/X – AMC & GM to AsOP
- ED Decision 20XX/XXX/X – AMC & GM to FTL for AsOP

AFFECTED STAKEHOLDERS

National competent authorities (NCAs), airship operators, airship crew members, airship task specialists, ground handling personnel involved in airship operations, airship design and production organisations.

WORKING METHODS

Development	Impact assessments	Consultation
By EASA with external support	Light	Public – NPA

RELATED DOCUMENTS / INFORMATION

[ToR RMT.731, Issue 3, dated 28 April 2025](#)

PLANNING MILESTONES: Refer to the latest edition of Volume II of the *European Plan for Aviation Safety*.

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1. About this NPA

1.1. How this regulatory material was developed

The European Union Aviation Safety Agency (EASA) developed this NPA in line with Regulation (EU) 2018/1139¹ (the 'Basic Regulation') and the Rulemaking Procedure². This rulemaking activity is included in the 2025 edition of Volume II of the European Plan for Aviation Safety (EPAS)³ under rulemaking task (RMT).0731, Subtask 4c.

The scope and timescales of the task were defined in the related Terms of Reference (ToR). EASA developed this NPA following a preliminary consultation with its advisory bodies (ABs), i.e. Member States (MSs) and other affected stakeholders.

When developing the regulatory material, EASA received support and inputs from the Airship Manufacturer Group (AMG) and from the NCAs of Germany and France.

The AMG was established in 2019 with the purpose of sharing common knowledge and expertise to ensure a qualified group of experts supporting the new airship regulation to come.

1.2. How to comment on this NPA

The draft regulatory material is hereby submitted for consultation of the public.

Please submit your comments using the automated **Comment-Response Tool (CRT)** available at <http://hub.easa.europa.eu/crt/>⁴.

To facilitate the collection and technically support the subsequent review of comments by EASA in an efficient, controlled, and structured manner, stakeholders are kindly requested to submit their comments to the respective predefined segments of the NPA within the CRT, and refrain from submitting specific comments or all their comments to the 'General Comments' segment.

Further, once all comments are placed to the respective predefined segments, there is no need to submit them (as a pdf attachment) to the 'General Comments' segment.

The deadline for the submission of comments is **10 January 2026**.

¹ Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (<http://data.europa.eu/eli/reg/2018/1139/oj>).

² EASA is bound to follow a structured rulemaking process as required by Article 115(1) of Regulation (EU) 2018/1139. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the 'Rulemaking Procedure'. See MB Decision No 01-2022 of 2 May 2022 on the procedure to be applied by EASA for the issuing of opinions, certification specifications and other detailed specifications, acceptable means of compliance and guidance material ('Rulemaking Procedure'), and repealing Management Board Decision No 18-2015 ([EASA MB Decision No 01-2022 on the Rulemaking Procedure, repealing MB Decision 18-2015 \(by written procedure\) | EASA \(europa.eu\)](#)).

³ [European Plan for Aviation Safety \(EPAS\) 2025 - 14th edition | EASA](#)

⁴ In the event of technical problems, please send an email to crt@easa.europa.eu with a short description.



1.3. The next steps

Following the consultation of this draft regulatory material, EASA will review all the comments received and will duly consider them in the subsequent phases of this rulemaking activity. For this purpose, if needed, EASA may involve external experts, depending on the topic.

Considering the above, EASA may issue an Opinion proposing:

- amendments to Commission Regulation (EU) No 965/2012 ('OPS')⁵;
- amendments to Commission Implementing Regulation (EU) No 923/2012 ('SERA')⁶;
- amendments to Commission Implementing Regulation (EU) 2023/1770 (Part-AUR)⁷;
- amendments to Commission Implementing Regulation (EU) 2023/203 (Part-IS)⁸;
- a new Implementing Regulation containing the requirements for airship operations (AsOP); and
- a new Delegated Regulation containing the requirements on flight time limitations for airship operations (FTL for AsOP).

The Opinion will be submitted to the European Commission, which shall consider its content and decide whether to issue amendments to or adopt the above-mentioned regulations.

Following the adoption of the amending or new regulations, EASA may issue decisions issuing the related acceptable means of compliance (AMC) and guidance material (GM) in order to support the application of the regulations. When issuing the Opinion and Decisions, EASA will also provide feedback to commentators and to the public on who provided comments during the consultation on the draft regulatory material, which comments were received, how such engagement and/or consultation was used in rulemaking and how the comments were considered.

⁵ Commission Regulation (EU) No 965/2012 of 5 October 2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (OJ L 296, 25.10.2012, p. 1) (<http://data.europa.eu/eli/reg/2012/965/oj>).

⁶ Commission Implementing Regulation (EU) No 923/2012 of 26 September 2012 laying down the common rules of the air and operational provisions regarding services and procedures in air navigation and amending Implementing Regulation (EU) No 1035/2011 and Regulations (EC) No 1265/2007, (EC) No 1794/2006, (EC) No 730/2006, (EC) No 1033/2006 and (EU) No 255/2010 (OJ L 281, 13/10/2012, p. 1) (http://data.europa.eu/eli/reg_impl/2012/923/oj).

⁷ Commission Implementing Regulation (EU) 2023/1770 of 12 September 2023 laying down provisions on aircraft equipment required for the use of the Single European Sky airspace and operating rules related to the use of the Single European Sky airspace and repealing Regulation (EC) No 29/2009 and Implementing Regulations (EU) No 1206/2011, (EU) No 1207/2011 and (EU) No 1079/2012 (OJ L 228, 15.9.2023, p. 39) (http://data.europa.eu/eli/reg_impl/2023/1770/oj).

⁸ Commission Implementing Regulation (EU) 2023/203 of 27 October 2022 laying down rules for the application of Regulation (EU) 2018/1139 of the European Parliament and of the Council, as regards requirements for the management of information security risks with a potential impact on aviation safety for organisations covered by Commission Regulations (EU) No 1321/2014, (EU) No 965/2012, (EU) No 1178/2011, (EU) 2015/340, Commission Implementing Regulations (EU) 2017/373 and (EU) 2021/664, and for competent authorities covered by Commission Regulations (EU) No 748/2012, (EU) No 1321/2014, (EU) No 965/2012, (EU) No 1178/2011, (EU) 2015/340 and (EU) No 139/2014, Commission Implementing Regulations (EU) 2017/373 and (EU) 2021/664 and amending Commission Regulations (EU) No 1178/2011, (EU) No 748/2012, (EU) No 965/2012, (EU) No 139/2014, (EU) No 1321/2014, (EU) 2015/340, and Commission Implementing Regulations (EU) 2017/373 and (EU) 2021/664 (OJ L 31, 2.2.2023, p. 1) (http://data.europa.eu/eli/reg_impl/2023/203/oj).



2. In summary — why and what

2.1. Why we need to act

Airships are within the scope of the Basic Regulation. Still, even though some airships are type certified by EASA, and there is an ongoing certification process for another type, today there are no suitable European rules for the operation of airships. This gap is only partially mitigated by national rules. This hinders both their introduction into the market and their cross-border operation, thus hindering the competitiveness of the EU.

2.1.1. Description of the issue

Even though airships are within the scope of the Basic Regulation, the related European regulatory framework has not been yet fully developed. Such framework only exists, with certain limitations, as regards aircrew licensing and continuing airworthiness. Improvement for these regulatory domains is addressed under Subtasks 4A and 4B of RMT.0731. Meanwhile, no requirements for airship operations currently exist.

Additionally, in recent years some new airship manufacturers have entered the market, starting the development of new products that are expected to be employed in commercial operations, which will extend the scope of the current airship operations.

These manufacturers need to be subject to a clear regulatory framework to enable safe operations.

2.1.2. Who is affected by the issue

- NCAs;
- airship operators;
- airship crew members;
- airship task specialists;
- ground handling personnel involved in airship operations;
- airship design and production organisations.

2.1.3. Conclusion on the need for rulemaking

EASA concluded, as explained further in Chapter 3 below, that an intervention was necessary and that non-regulatory actions cannot effectively address the issue identified.

Therefore, amendments to existing regulations and related AMC and GM as well as the introduction of new regulations and AMC and GM are required.

2.2. What we want to achieve — objectives

The overall objectives of the EASA system are defined in Article 1 of the Basic Regulation. This NPA will contribute to achieving the overall objectives by addressing the issues described in Section 2.1.

More specifically, with the regulatory material presented here, EASA intends to establish a comprehensive and proportionate regulatory framework addressing the needs of existing and future airship operations whilst ensuring appropriate requirements for the protection of commercial passengers and other aircraft operators.



2.3. How we want to achieve it — overview of the proposed amendments

This NPA proposes the following elements.

Amendment of authority requirements regarding the certification and oversight of aircraft operators

Currently there are no requirements for NCAs with respect to the certification and oversight of persons and organisations involved in manned airship operations; however, there are authority requirements for the certification and oversight of the operations of other types of aircraft (e.g. aeroplanes, rotorcraft, balloons).

This NPA proposes to extend the applicability of such requirements, which are contained in Annex II (Part-ARO) to Regulation (EU) No 965/2012, to include airships. The main benefit of this approach lies in that it should be easily implemented by NCAs. Indeed, many of the provisions already existing in Annex II (Part-ARO) to Regulation (EU) No 965/2012 and in the related AMC & GM can be directly applied to the airship domain without major changes.

Therefore, the proposed amendments are essentially meant to extend the application of the existing material and to introduce the links with the newly proposed regulatory framework related to airships. For example, a new Appendix V to Part-ARO is proposed to better accommodate the specificities related to certification and approval of airship operators.

Some amendments are also proposed to the articles of Regulation (EU) No 965/2012 for the same purpose.

Extend the applicability of Annex V Subpart G to Regulation (EU) No 965/2012 to airships

Some amendments are proposed to Subpart G ‘Transport of dangerous goods’ of Annex V (Part-SPA) to Regulation (EU) No 965/2012. The main reason for such amendments is to extend the applicability of these provisions to airships transporting dangerous goods.

Establishment of a new draft regulation on air operations with airships

To ensure a more efficient regulatory structure and to avoid increasing the complexity of Regulation (EU) No 965/2012, EASA proposes a new regulation dedicated to airship operations, similarly to what was done for balloon operators (Regulation (EU) 2018/395⁹) and sailplane operators (Regulation (EU) 2018/1976¹⁰). However, the proposed new regulation does not include requirements related to continuing airworthiness (CAW) and flight crew licensing (FCL). Since the CAW and FCL regulations do not need major amendments to accommodate airships, such adjustments will be introduced directly in the existing regulations. It should also be noted that the adjustments of CAW and FCL rules to better accommodate airship operations are covered by Subtasks 4A and 4B respectively of RMT.0731. Therefore, these two domains are not covered by this NPA.

⁹ Commission Regulation (EU) 2018/395 of 13 March 2018 laying down detailed rules for the operation of balloons pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (OJ L 71, 14.3.2018, p. 10) (<http://data.europa.eu/eli/reg/2018/395/oj>).

¹⁰ Commission Implementing Regulation (EU) 2018/1976 of 14 December 2018 laying down detailed rules for the operation of sailplanes pursuant to Regulation (EU) 2018/1139 of the European Parliament and of the Council (OJ L 326, 20.12.2018, p. 64) (https://eur-lex.europa.eu/eli/reg_impl/2018/1976/oj/eng).



The proposed new draft regulation for airship operations includes two annexes as described in the following paragraphs.

Establishment of basic requirements for airship operations (Annex I, Part-AsOP.BAS)

This Annex proposes proportionate rules to be followed by any manned airship operator. This approach is similar to the one adopted for balloon operations (Annex II to Regulation (EU) 2018/395).

These proposed requirements and related AMC and GM address all the main aspects related to airship operations and are applicable to all airship operators, regardless of the type of operations conducted.

This Annex I is mainly drafted based on the principles and provisions contained in:

- Annex VII (Part-NCO) to Regulation (EU) No 965/2012; and
- Subpart BAS of Annex II (Part-BOP) to Regulation (EU) No 2018/395.

While the main principles and structures of the above regulations have been essentially replicated in the proposed basic requirements for airship operations, some differences are introduced to accommodate the specificities of airship operations.

The reasoning, the background and some additional information related to such differences are provided in the drafted material in the form of ‘rationale’.

Establishment of additional requirements for commercial airship operations (Annex II, Part-AsOP.AOC)

An additional set of requirements and related AMC and GM are proposed for operators conducting commercial operations with airships. These additional requirements are also applicable to operators conducting specialised operations and operators of large airships (see definition in the proposed amendment to Annex II to Regulation (EU) No 965/2012).

This proposal includes a certification regime that is similar to the framework applicable to commercial air transport conducted with other types of aircraft (i.e. Annex IV (Part-CAT) to Regulation (EU) No 965/2012).

While developing these proposals, EASA also assessed the opportunity to introduce a ‘declarative regime’ for airship operators, like the one adopted in Annex VI (Part-NCC) to Regulation (EU) No 965/2012. However, this approach had been discarded, primarily in consideration of the low probability that such airship operations will actually take place in the foreseeable future, considering the complexity of the infrastructure required to operate airships.

These additional requirements are mainly drafted based on the principles and provisions contained in:

- Annex III (Part-ORO), Annex VI (Part-NCC), Annex VIII (Part-SPO) and Annex IV (Part-CAT) to Regulation (EU) No 965/2012; and
- Subpart ADD of Annex II (Part-BAS) to Regulation (EU) No 2018/395.

While the main principles and structures of the above regulations have been essentially replicated in the proposed additional requirements for airships, some differences have been introduced to accommodate the specificities of airship operations.



The reasoning, the background and some additional information related to such differences are provided in the drafted material in the form of ‘rationale’.

Certain requirements contained in the above-referenced regulations are not proposed to be transposed in this NPA because they are not applicable in principle to airships, e.g. pressurised cabin requirements, support programme, location of aircraft in distress, flight crew training and checking, cabin crew elements, etc.

In the less obvious cases, a rationale for the decision of not transposing certain requirements has been included in the NPA.

In some cases, the additional requirements applicable to commercial operations are exceptionally presented in Annex I, to improve the readability and demonstration of compliance as the end users will have the possibility to retrieve in one rule provision all the requirements related to a specific domain. This approach has been used mainly when the difference between the regulatory framework for Annex I and Annex II appeared particularly straightforward or simple.

Establishment of flight and duty time limitations for airship operations

A new draft regulation is proposed on flight and duty time limitations (FTL) for flight and cabin crew members engaged in commercial airship operations.

These proposed requirements are applicable to all airship operators subject to the requirements of Annex II (Part-AsOP.AOC) to the proposed regulation on airship operations and are drafted based on the principles and provisions contained in Annex III (Part-ORO) to Regulation (EU) No 965/2012.

While the main principles and structures of Part-ORO have been essentially replicated in the proposed FTL requirements for airships, certain differences are introduced to accommodate the specificities of airship operations.

The reasoning, the background and some additional information related to such differences are provided in the drafted material in the form of ‘rationale’.

Amendment of the standardised European rules of the air

The proposed amendment to Regulation (EU) No 923/2012 (SERA) is related to the visual meteorological conditions (VMC) minima to be respected by airships. Airships should be subject to the same VMC minima as helicopters because they have very similar manoeuvrability characteristics.

It is worth noting that these VMC minima were already in place in the past with respect to the minima visibility for VFR flights of airships and helicopters.

Amendment of the airspace usage requirements

Regulation (EU) 2023/1770 (Part-AUR) is applicable to any aircraft, thus also airships.

The proposed amendment to point AUR.SUR.2005 is necessary to bring clarity to certain requirements that are applicable to aircraft with a maximum certified take-off mass (MCTOM) exceeding 5 700 kg. Indeed, the notion of MCTOM does not apply to airships and therefore this NPA proposes a reference to heaviness.

No other amendments to this regulation are considered necessary since, considering the current and predictable airship design features, it is not technically possible to operate airships above FL285. This



limitation is also reflected in the applicability of the proposed AsOP regulation (refer to Article 1(a) of the proposed AsOP regulation).

Amendment of the information security requirements

In October 2022, Regulation (EU) 2023/203 was adopted to address the management of information security risks with a potential impact on aviation safety.

This NPA proposes to extend the relevant Part-IS requirements to those organisations operating airships under Part-AsOP.AOC and to the relevant competent authorities. For this purpose, it is proposed to amend the scope of the Regulation (EU) 2023/203.

Expected impact of airship operations on other regulations

EASA assessed whether there are other EU rules potentially applicable to airship operations which needed to be amended to better accommodate this kind of operations. The outcome of this assessment is that the remaining regulations are either not applicable to airships or do not need any adjustment.

An instance of a regulation that is not applicable to airships is the recently published Regulation (EU) 2025/20¹¹, on ground handling, which is only applicable to aeroplanes.

An instance of a regulation that does not need any adjustment is Regulation (EU) 2017/373¹², on ATM/ANS, as it is expected that airship operations are conducted in adherence to ATM/ANS provisions, in particular those in Annex IV (Part-ATS).

2.3.1 Targeted applicability of the regulatory material

The proposed regulatory material should become applicable as soon as possible after its adoption, with the exception of the requirements related to information security (point AsOP.AOC.020(d)). For this specific requirement, it is proposed to allow a longer time frame (i.e. two years after entry into force of the regulation) for airship operators to establish compliance.

The proposed regulatory material contains some transitional provisions that are meant to reduce the burden to airship operators. These transitional provisions are introduced in Article 5 of the draft regulation laying down rules as regards airship operations.

2.3.2 The legal basis

The legal basis for amending the affected regulations and for the issuance of the newly proposed ones is summarised in the following table:

¹¹ Commission Delegated Regulation (EU) 2025/20 of 19 December 2024 supplementing Regulation (EU) 2018/1139 of the European Parliament and of the Council by laying down requirements for the safe provision of ground handling services and for organisations providing them (OJ L, 2025/20, 7.3.2025) (ELI: http://data.europa.eu/eli/reg_del/2025/20/oj).

¹² Commission Implementing Regulation (EU) 2017/373 of 1 March 2017 laying down common requirements for providers of air traffic management/air navigation services and other air traffic management network functions and their oversight, repealing Regulation (EC) No 482/2008, Implementing Regulations (EU) No 1034/2011, (EU) No 1035/2011 and (EU) 2016/1377 and amending Regulation (EU) No 677/2011 (OJ L 62, 8.3.2017, p. 1) (http://data.europa.eu/eli/reg_impl/2017/373/oj).



Regulation reference	Action proposed	Legal basis
Regulation (EU) No 965/2012 (Air operations)	Amendment	Article 31(1)(a) and (1)(b) of the Basic Regulation
Regulation (EU) 20XX/XXXX – (AsOP)	Issuance	Article 31(1)(a) and (1)(b) of the Basic Regulation
Regulation (EU) 20XX/XXXX – (FTL for AsOP)	Issuance	Article 32(1)(a) of the Basic Regulation
Regulation (EU) No 923/2012 (SERA)	Amendment	Article 44(1)(a) of the Basic Regulation
Regulation (EU) 2023/1770 (Part-AUR)	Amendment	Article 44(1)(a) of the Basic Regulation
Regulation (EU) 2023/203 (Part-IS)	Amendment	Point 3.1(b) of Annex II to the Basic Regulation

The legal basis for amending and issuing of acceptable means of compliance (AMC) and guidance material (GM) lies in Article 76(3) of the Basic Regulation.

2.4 Stakeholders' views

This NPA has been developed with the active support of affected industry (AMG, representing the major airship manufacturers and operators) and some NCAs.

The overall views of all the stakeholders involved in the preparation of this NPA were positive.



3. Expected benefits and drawbacks of the proposed regulatory material

EASA assessed that an intervention was required and that new or amended Regulations, AMC and GM are necessary to effectively address the issues described in Section 2.1, because the objectives described in Section 2.2 cannot be effectively achieved by non-regulatory action.

The proposed regulatory material has been developed in view of the better regulation principles, considering the regulatory fitness principles as well. In particular, the proposed regulatory material will support the development of airship industry in the EU and worldwide through proportionate rules allowing efficient airship operations.

3.1. Impact assessment

EASA assessed the impacts of the proposed regulatory material to ensure that it delivers its full benefits with minimal drawbacks. The main outcome of this assessment is described in the following paragraphs.

3.2. Safety impact

Although safety is not the main driver for this NPA, it is expected that some safety gains will be achieved by introducing and implementing the proposed regulatory framework which is much more comprehensive and complete than the existing national regulations addressing airship operations.

3.3. Environmental impact

EASA is committed to the strategies set out by the European Commission 2020¹³, namely, to ensure sustainable growth, by reducing greenhouse gas emissions and increasing energy efficiency.

Being buoyant aircraft, airships have the potential to reduce the aviation environmental footprint in terms both of CO₂ emissions for a given mission and of not needing large, paved runways. The low in-flight energy demands of airships implies that even with combustion engines they are already lower CO₂ emitters for a given range-payload than aeroplanes or helicopters. This low energy demand also makes airships suitable for electric propulsion with less need for large technological advances than are necessary for aeroplanes or helicopters.

As a result, airship operations are deemed to be more environmentally friendly when compared with similar operations conducted with heavier than air aircraft. Therefore, the overall environmental impact of airship operations is clearly positive.

Appendix 3 provides a high-level assessment of the reduction in CO₂ emissions that can be achieved by conducting airship operations.

Additionally, usage of airships for transportation might prevent the need to build ground infrastructures (e.g. roads, ports, railways) in remote locations that are not served by traditional surface transport.

However, considering that airship operations will remain a niche sector in the aviation industry, the weight of this positive effect might remain marginal over the time.

¹³ More information available at: http://ec.europa.eu/europe2020/europe-2020-in-a-nutshell/priorities/index_en.htm.



3.4. Social impact

A slight positive social impact is expected as the growing of airship industry might trigger more jobs in Europe. Appendix 2 provides an overview of such increase.

Additionally, usage of airships might allow operations in isolated territories or communities that are currently hardly accessible due to lack of ground infrastructures.

3.5. Economic impact

The newly proposed regulation might have a slight negative impact on existing airship operators as they will have to comply with a more comprehensive regulation when compared with the one currently adopted at national level. Nevertheless, these additional costs are expected to be fully compensated by the flexibility and mutual recognition offered by an aircraft operator certificate (AOC) issued on the basis of a European regulation. This conclusion was confirmed by industry representatives that participated to the preparation of this NPA.

With respect to newcomers in the airship industry, the availability of an EU regulatory framework is clearly considered as an enabler to support new industrial initiatives and to raise funding.

Additionally, NCAs might run into an initial slight increase of their workload as they will have to adapt their processes and procedures to accommodate airship operations. However, the proposed regulatory material has been drafted with the aim of minimising such additional workload. This mitigation is essentially achieved by proposing an adaptation to airships of the already existing provisions for NCAs that are contained in Part-ARO of Regulation (EU) No 965/2012.

As a result, it is expected that all the additional costs generated by this proposed regulatory framework will be offset by the benefits described above.

3.6. Conclusions

The proposed regulatory material is expected to:

- introduce a comprehensive framework to enable current and future airship operations, including commercial operations;
- limit, as far as possible, the regulatory burden created by the newly proposed airship operations and FTL regulations to those airship operators already subject to national regulations. This intent is also achieved by the introduction of transitional measures.

There are no drawbacks identified for NCAs and airship operators, including aircrew, personnel on the ground and task specialists. The proposed regulatory framework is expected to facilitate and support the existing and future operations of airships.



4. Proposed regulatory material

Please refer to:

- NPA 2025-04 (B) Proposed amendment to Regulation (EU) No 965/2012 (Air Operations) and related AMC & GM;
- NPA 2025-04 (C) Proposed issuance of Regulation (EU) XXX/YYYY (AsOP) and related AMC & GM;
- NPA 2025-04 (D) Proposed issuance of Regulation (EU) XXX/YYYY (FTL for AsOP) and related AMC & GM;
- NPA 2025-04 (E) Proposed amendment to Regulation (EU) No 923/2012 (SERA);
- NPA 2025-04 (F) Proposed amendment to Regulation (EU) 2023/1770 (Part-AUR);
- NPA 2025-04 (G) Proposed amendment to Regulation (EU) 2023/203 (Part-IS).



5. Monitoring and evaluation

No specific monitoring or evaluation of the proposed amendments is foreseen, except the existing standardisation activities and exchange between EASA and the relevant stakeholders, which should identify any emerging issues.



6. Proposed actions to support implementation

No specific actions to support the implementation of the proposed amendments is foreseen, except the existing standardisation activities and exchange between EASA and the relevant stakeholders.



7. References

7.1. Related EU regulations

Not applicable.

7.2. Related EASA decisions

Not applicable.

7.3. Other references

Not applicable.



Appendix 1 — Quality of the NPA

To continuously improve the quality of its documents, EASA welcomes your feedback on the quality of this document with regard to the following aspects:

Please provide your feedback on the quality of this document as part of the other comments you have on this NPA. We invite you to also provide a brief justification, especially when you disagree or strongly disagree, so that we consider this for improvement. Your comments will be considered for internal quality assurance and management purposes only and will not be published (e.g. as part of the CRD).

1. The regulatory proposal is of technically good/high quality

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

2. The text is clear, readable and understandable

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

3. The regulatory proposal is well substantiated

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

4. The regulatory proposal is fit for purpose (achieving the objectives set)

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

5. The regulatory proposal is proportionate to the size of the issue

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

6. The regulatory proposal applies the better regulation principles^[1]

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

7. Any other comments on the quality of this document (please specify)

^[1] For information and guidance, see:

- https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how_en
- https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how/better-regulation-guidelines-and-toolbox_en

Appendix 2 — Forecasted evolution of the airship industry

The following tables show the potential development of FLYING WHALES, ZEPPELIN and EU operators using hybrid air vehicles (HAV) airships by comparing two scenarios:

- What is the potential development if ideally the type certificates of the new airship designs and the regulatory framework are delivered on time?
- What is the estimated development if there is no change in the regulatory framework for CAW, FCL and the OPS domains?

All the information contained in the following tables has been provided by the above-mentioned airship manufacturers.

Table 1 — Key development figures in terms of airship numbers and staff for FLYING WHALES

	2025	2026	2030	2035
IAW (manufacturer employees)				
Number of airships	0	1	35	160
Staff needed	200	300	500	500
Situation in France for IAW, FCL and OPS domains				
FCL – Pilots				
Staff needed	4	6	300	600
Staff available if no change in the existing regulatory framework	0	0	0	0
OPS				
Staff needed	7	30	1 300	3 000
Staff available if no change in the existing regulatory framework	0	0	0	0
Situation outside France				
Overall gross estimate for IAW+FCL+OPS employees				
Number of airships	0	1	45	160
EU	15	40	600	1 000
Non-EU	0	0	1 200	3 000

Table 2 — Key development figures in terms of airship numbers and staff for HAV

	2027	2028	2033	2038
IAW (manufacturer employees)				
Number of airships	0	1	40	160
Staff needed	100	200	1 000	1 000

	2027	2028	2033	2038
Situation in the UK or in future EU operators for FCL and OPS domains				
FCL – Pilots				
Staff needed		25	500	1600
Staff available if no change in the existing regulatory framework	0	0	0	0
OPS				
Staff needed		10	200	800
Staff available if no change in the existing regulatory framework	0	0	0	0

Table 3 – Key development figures in terms of airship numbers and staff for ZEPPELIN group

	2024	2025	2030	2035
IAW (manufacturer employees)	60	70	~80	~80
Number of airships	3	3	3+	3+
FCL – Pilots				
Staff needed	3 pilots. 4 in training	7 1 in training	7 2 in training	Depending on number of airships
Staff available if no change in the existing regulatory framework	Training is much more difficult without proper EU requirements	Training is much more difficult without proper EU requirements	Training is much more difficult without proper EU requirements	Training is much more difficult without proper EU requirements
OPS				
Staff needed	9 Ground crew for operations are in training 2 ground handlers as well Pilots performing OPS duties	11 ground ops staff Pilots performing OPS duties	11 ground ops staff 3 in training each year (ground crew) Pilots performing OPS duties	20 ground ops staff 3 in training each year (ground crew) Pilots performing OPS duties
Staff available if no change in the existing regulatory framework	0	0	0	0

Appendix 3 — Environmental sustainability of airship operations

To perform a high-level reduction in the environmental footprint achieved by airship operations, the full life cycle of the product needs to be taken into account as well as the energy mix used. Typical life cycle stages are:

- Upstream: Raw material extraction, part manufacturing
- Core: Final assembly
- Operation: energy production (kerosene or gasoline for the aircraft within the scope of this appendix), operation, spare parts
- End-of-life: Disassembly, land-fill, incineration, recycling

The following table presents the potential reduction of airship CO₂ emissions depending on the mission for which they are designed.

Table 1 — Potential reduction of CO₂ emissions

	Zeppelin NT (Zeppelin)	LCA60T (FLWH)	Airlander 10 (HAV)
Passengers transportation	12 to 15 passengers for a consumption of 40 kg/h. More than 5 times less emissions than equivalent aeroplanes.	Not intended for passengers transportation	Up to 90 % fewer emission per passenger-km than aeroplanes conducting the same operations.
Cargo operations	Not intended for cargo operations	20 to 30 times less emissions per tons transported compared with rotorcraft operations on specific and comparable missions	75 % to 100% (with electric engines) less than aeroplanes conducting the same operations
Specialised Operations	Around 2 tons of equipment for special missions (scientific, surveillance). 5 to 10 times less emissions than equivalent helicopters	20 to 50 times less emissions per tons transported compared with helicopters	75% to 100% (with electric engines) less than aeroplanes conducting the same operations

All the information contained in the above table has been provided by the airship manufacturers.