



EUROPEAIRSPORTS

EUROPE AIR SPORTS

The Association representing
European National Aero Clubs and Air Sports Organizations in
Regulatory Matters with European Authorities and Institutions.

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Consultation European Chemical Agency

Name: Tetraethyllead (TEL)
EC Number: 201-075-4
CAS Number: 78-00-2
Entry Nr in Annex XIV: 55
Use name: Use of tetraethyl lead in the formulation of aviation fuel

To whom it concerns

Summary

Europe Air Sports, the one and only non-profit NGO representing actively the interests of ca. 650000 private, recreational and airports aviators in the area of the European Union, welcomes this true democratic consultation process. This procedure will result in a fair and risk-orientated decision based on existing facts after the evaluation of the inputs and comments of the affected European citizens. We like to stress that this application and the granting of the exemption covers one of the key issues for all those 650 000 pilots of the European aviation community.

We as Europe Air Sports therefore recommend and ask for a clear and positive decision in favour of the Shell application. TEL must be allowed to be imported for the continuous blending of fuel to produce AVGAS 100LL in Europe. The operation of piston-powered aeroplanes in Europe until the proposed date or until a suitable alternative fuel must be assured at reasonable cost.

We also like to stress the necessity for a European coordinated effort to develop an own norm and alternatives for AVGAS LL by investing financial resources to the benefit of the 650 000 European pilots and aviators. Ideally, EASA should be tasked as the coordinating body between Member State Authorities, Industry, Business and stakeholders affected to accelerate finding a solution without relying on TEL.



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Detailed comments

Present Situation

Europe Air Sports agrees and supports that hazard chemical substances are carefully controlled, and that citizens and children are always protected. TEL which was discovered in 1853 by a German chemist, in the early 1920's General Motors started to use TEL as octane booster, scavenger and combustion agent to increase the performance of cars; in World War 2 TEL was used to increase significantly the power and performance of war aeroplanes. After WW II the US became the main market for General Aviation. Engines and airframes were designed to fulfil the US standards which included the AVGAS ASTM norm. Type certification of the US aircraft followed those parameters, they became more or less the worldwide standards. To fulfil those standards, flight testing, especially engine performance, went through the full envelope of operating conditions, temperatures and altitudes in which the aeroplanes were designed to manoeuvre. At that time leaded AVGAS was the only fuel available and therefore was used for the tests. No alternative fuel was tested. In hindsight, the manufacturers were and are not interested nor ready for investing new money in testing alternative fuels. After the boom years, towards the end of the last century, environmental matters, the movement started in Germany, received more attention, but it was very difficult, complex and also expensive to get other fuels than leaded AVGAS approved for the Type Certificate of an aeroplane. National activities were helpful. That is why attempts to change this situation developed very slowly and at low profiles.

Recommendation:

To task EASA to coordinate with high priority a Europe wide joint concentrated research project to develop a high-octane AVGAS formula without toxic components, to be acceptable to industry and available Europe wide at the end of the authorisation period asked by Shell. Financial support should be made available by the EU.

Import stop of TEL

Four refineries produce AVGAS 100LL for the use in Europe and in the US blending TEL which is produced by the UK company Innospec. AVGAS 100LL is then distributed to EU and other countries. As we understand the present legal situation asks for the import of the TEL concentrate to be banned after Nov 2025 if no authorisation is being granted. Avgas 100 LL itself is not being banned.



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This would require AVGAS 100LL to be imported from outside the EU, transport and customs would push the price, but the fleet of high compression rate aeroplanes would still be operated emitting leaded vapour smoke and fumes. This seems to our opinion counterproductive to the objective of the Agency to protect the citizens. The US EPA in their study has clearly stated that especially children living in the vicinity of airfields with dense traffic of piston aeroplanes are subject to a higher risk, especially cancer.

Recommendation

The EU and its Member States should grant the authorisation as asked by Shell. A single import point is easy to control for proper handling of TEL. The risk for the professional and expert refinery staff is considered acceptable.

EASA should ASAP collect and coordinate the information available about unleaded AVGAS which is already available and used in the EU area. A promotion campaign should be initiated to inform the aviation community about the alternative AVGas and fuels. The aim is to reduce AVGAS 100 LL consumption. Thus, leaded fumes around airfields will be reduced to the benefit of the citizens living around airfields.

For Europe Air Sports

Rudolf Schuegraf

We allow us to add the document which was produced by
GAMA-IAOPA-EHA-EAS-ERAC-EBAA-ECOGAS-IAAPS as
Response to EC Consultation on Draft regulation - Ares(2021)4120146 / Chemicals
(REACH)regulation–amendmenttothelistofsubstancesofveryhigh concern in Annex XI

Europe Air Sports is offering cooperation and its expertise if the ECHA so accepts and agrees. For further questions and contact please contact.

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