

General Aviation Problems in Greece

By AOPA Hellas www.aopa.gr

October, 2017

This translated in ENGLISH document is for our non Greek speaking readers, an excerpt from [AOPA Hellas's published "GA roadmap" \(in Greek language\)](#) , a list of 17 problems that hinder General Aviation (GA) in Greece and actions needed, in form of a roadmap. Intentionally some original paragraphs are omitted (missing paragraph numbers) to leave herein the most essential ones.

1. AIRPORTS

1.1 Lack of GA airfields

Greece is mostly comprised of sea and rugged terrain in the islands and in half of its mainland. There are not many opportunities for new large airports and the ever increasing costs of airport fees & handling services inevitably drive GA to small alternative airfields that need to be created around Greece. Local operators already have solutions but the certification of such GA dedicated airfields by CAA takes time and bureaucratic procedures. Recent examples of ongoing efforts for alternative local airfields are: Polichnitos as alternative for Mitilini LGMT, Polykastro or Kolchiko for Thessaloniki LGTS, Maleme for Chania LGSA, Maritsa for Rhodes LGRP and Anafi for Santorini LGSR.

AOPA ask CAA for the simplification and expediting of the process for new airfield commissioning.

1.2 Airport Operation Hours

Public (CAA) airports in Greece operate with a schedule exclusively fit to the airline service of the day like +/- 1~2 hours of the airline schedule. There is no understanding by CAA that GA must be served too. The very definition of GA is the ad-hoc scheduling of private flights. Off airport operation hours any aircraft is not allowed to operate in Greece's (closed) airports. There are airports, especially off summer period, which are closed all day or open for one or two hours per day only while the "port", non human, infrastructure is there available 24 hours. In comparison pilots wonder why a sea vessel can dock in a port whilst an aircraft cannot land at an unmanned airport. Pilots have ways to communicate between them on airport frequency if (lack of) ATC is the argument and airport lighting is able to be operated by pilots. It is done abroad at many unmanned airports on pilots' responsibility. The only risk pilots have to assess there is the lack of Emergency Services.

AOPA ask for the airports to accept GA off published operation hours on "pilots' responsibility". Only manning required at these times is by security/police personnel - something needed anyways for infrastructure security - for apron access control.

1.3 Airport parking space

Airports in Greece have not catered for GA dedicated apron parking space. It is not considered as part of the necessary infrastructure. An outcome of this is during summer

periods to not have available space for GA parking and flights being denied parking permission on ground capacity reasons. Apron capacity for GA should be part of airport expansion plans. When it comes down the actual space required for GA aircraft, what they occupy in practice is minimal surface since they can even be parked at the edge of aprons or even, just off the edge of them on gravel. For example in Kerkyra LGKR airport there is ample space for 13 GA aircraft at the dedicated apron whilst FRAPORT allows only 6 widely spaced apart light aircraft to park at the GA apron at any time. Based on this fact many flights are denied visit permission on this crucial International airport which is a prime entry and refueling stop to/from Europe.

AOPA ask that private and CAA airport administration understand how little space GA aircraft occupy and to consider carefully approval denials due to space.

1.4 GA airports in Athens capital area

The only truly open to GA airport in Athens area is E. Venizelos International, a very large, busy and expensive airport for GA standards. GA in Athens is served by Military airports which have access restrictions.

AOPA ask a) the Air Force and Army for relaxation of GA access restrictions to Megara and Tatoi Military airports around Athens and b) Venizelos Intl. airport administration for reduction of the prices for a GA aircraft visit.

1.5 Military airports in general

Almost half of the airports in Greece are Military with limited access to GA flights. Air Force and Army do not allow civil GA to visit unless there is CAA presence.

AOPA ask that the Air Force accept civil GA aircraft in a more relaxed manner.

1.6 Aviation fuel availability

AVGAS is available at only 8 airports in Greece. Pilots can refuel only with the presence of fuel company personnel. Self-refueling is officially allowed at airports which have the relevant procedure (regulation) implemented but in practice many airports have not yet implemented fully the regulation requirements hence blocking indirectly the process.

AOPA ask for self-service credit card payment mobile units to be installed in airports around Greece so that pilots can have more access to fuel. AOPA ask that self-refueling by carriage of canisters be allowed and implemented in airports that have not yet implemented the regulation.

2. GA COSTS

2.1 Fuel cost

Aviation fuel (AVGAS) in Greece is quite expensive in comparison to other European countries. It varies between 2.8 and 3.0 Euro/Lt. The reason is the high initial price by the fuel company and the heavy taxation on it as a luxury consumable.

AOPA ask for the fuel company to reconsider the basic price and for the state to reconsider the high taxation on this consumable.

2.2 Airport charges

Public airport charges include a 12 Euro passenger fee (called: airport development fee) per passenger and a 7.3 Euro daily parking (airport use) charge to non-European GA aircraft while for European GA aircraft the amount is 1.6 Euro per day.

AOPA ask CAA for the reduction of the daily parking charge to non-European aircraft since it's a discriminating charge compared to the equivalent of 1.6 Euro for European aircraft. AOPA ask for the abolition of the passenger fee since GA, by definition, does not transport paying passengers as Commercial Aviation does.

2.3 Ground Handling charges

Ground Handling at airports in Greece is compulsory by law "where available". The charges of the handling companies are extraordinary for GA standards for providing just a marshaling for parking and foot escort or bus transfer to terminal. The handling costs vary from 100 to 300 Euro per GA flight. With the advent of newly privatized airports (4/2017) Handling Companies increased their charges by huge amounts for extra services required like prior permission (PPR), SLOTS for IFR flights or Disbursement (commission) fees for payments where the pilot cannot process them directly in the airport.

AOPA ask for the handling companies (e.g. SKYSERVE & GOLDAIR) to reduce their prices to a GA acceptable level in the region of 10~40 Euro (depending on service) like all over Europe.

2.4 Privatized airports

With the advent of airports' privatization (14 regional airports by FRAPORT 4/2017 and Athens Intl. airport 55% state - 45% private 2/2001) the cost of GA flying in to these airports, which are half of the country's civil airports and the most popular destinations, has risen by 300%. In May 2017 AOPA met with FRAPORT in order to cooperate and try to reduce GA operation costs at their airports

AOPA ask for privatized airport operators to reduce costs for GA and to implement processes whereby pilots execute themselves their additional requirements (PPR, payments) without the need of handlers intervention.

3. AIRSPACE AND SERVICES

3.1 Lack of ATC radar service to VFR flights

VFR flights in Greece do not receive radar information service even though the transponder targets are visible by FIS staff. In the name of safety it would best if Flight Information personnel would inform pilots of other visible traffic.

AOPA ask CAA for VFR information service (FIS) to be allowed to inform of other traffic based on what is also visible on radar and not only based on what is communicated by other pilots on VHF.

3.4 Night VFR

VFR flight at night is not allowed in Greece. The argument is that it is dangerous and hence allow it only in exceptional cases by ATC (CAA) special approval to SAR/state/medevac etc. flights only.

Private pilots and Flight Training organizations in Greece need this to be abolished for proper completion of EASA pilot training programs and for private GA pilots to operate as they so wish based on personal risk assessment.

AOPA ask CAA for Night VFR prohibition to be abolished

4. BREAUCRACY and GROUND OPERATIONS

4.1 Customs control and Schengen flights

In Greece any GA aircraft, entering from/exiting to another country, must fly via an "International Airport". CAA when asked claims that the Schengen treaty - about free circulation of private individuals - is indeed in effect for all Schengen treaty member states including Greece BUT this treaty allows for local CUSTOMS legislation to remain in effect. In Greece customs authorities require GA aircraft (the vehicle) to pass via airports where they are present (International airports). So it is not a passport control but a customs requirement on the vehicle of transport. This ruling increases tremendously the cost and delays of GA operation in Greece making it for pilots flying to/from abroad an unpopular destination.

AOPA ask for customs authorities to abolish this discriminating rule for flight to/from European member states. It is GA aircraft specific and has no practical outcome if compared to equivalent sea or road travel or even airline flying to Europe where there is no customs control at any other mode of transport used.

4.2 General Declaration

A CAA regulation which remains in effect since the 50's is the obligation for the pilot in command of a GA flight to always submit an (ICAO) GENERAL DECLARATION form in two copies for any flight, anywhere in Greece, even for a local traffic pattern. Instead of a declaration declaring that passengers carried on board from abroad do not have a disease (its original purpose) CAA uses this document as an obligatory passenger on board manifest. This process has no practical use and private pilots have no means to cater for having each time everywhere these document copies available to be filled in and submitted. CAA does not provide them but yet requires them. Pilots also complain that these documents are against privacy of free circulation of individuals travelling on private GA flights since there is no process of safekeeping such data after submitted.

AOPA ask CAA for the General Declaration requirement to be abolished for GA flights within Greece.

4.3 Form 731

Another recent (2016) requirement in breach of passengers' private data is the "[Form 731](#)" which CAA has imposed by law whereby the Pilot in Command of a GA flight, again, has to submit, a document for each flight which has to have the following data:

The people on board fill in a legal declaration that they are aware this is not a commercial flight and it is signed at bottom by the pilot and the following passengers' data filled in:

Name and Surname

Relation to the person/entity operating the aircraft

ID/Passport

Contact details

Signature

The aim of this legal signed declaration is to theoretically block private flights of being charged for. In practice all it achieves is for airport (CAA) personnel to be relieved of the responsibility of knowingly allowing paid for private flights to take place.

AOPA ask CAA for this document to be abolished since it offers nothing practical and only adds bureaucracy to each flight. Possible illegal operations are not restricted by legal declarations before flights.

4.4 Obligatory submission of Flight Plan

For any flight within Greece, even for a local traffic pattern, the pilot in command is obliged to submit an ICAO Flight Plan. The requirement derives from decades ago when VHF & Radar communications and emergency locator devices were in much primitive state. Nowadays ATC and SAR services have many more means to locate a missing aircraft and all aircraft flying in Greece are nowadays in VHF contact with some FIS or ATC unit. The Flight Plan document serves no purpose for short inland flights, especially for local ones within airport proximity. This process is one more pre-flight bureaucratic requirement.

AOPA ask CAA to abolish this requirement for flights within Greece or at least for flight within a specific range from departure airport or shorelines. The flight data (intentions) are communicated anyway from the pilot via VHF to FIS or airport tower on departure.

6.3 Residents' permit delays

Foreign students, who want to come in Greece for their commercial pilot training in GA Flight Schools in a country with 300 days of excellent weather, take up to 6 months to get issued their temporary residents' permit. Inevitably these students look elsewhere for their Flight Training and Greece loses a big opportunity of influx of foreign currency.

AOPA ask the ministry of foreign affairs to expedite the process of this lost opportunity.

Kyprianos Biris

AOPA Hellas Vice President

biris@aopa.gr