

JULY 2015



In honour of Dominique Méreuze, our headline photograph this issue features a microlight that has just landed after a competition flight. A symbol of summer and what Europe Air Sports is working for.

To enable many of us to keep our aircraft maintenance as simple as possible, members of the EAS team have been working long hours reviewing and commenting on several large and complex topics from EASA. In this newsletter we focus on technical and maintenance topics, with detailed reports from our Programme Manager René Meier.

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FLIGHT CREW LICENSING – PROPOSED AMENDMENTS

by René Meier, Programme Manager

Notice of Proposed Amendment (NPA) 2014-29, published in December 2014, proposed amendments to Commission Regulation (EU) No 1178/2011 (the Aircrew Regulation), amended by Cover Regulation, Annex I, Annex II, Annex III and AMC & GM to Annex I (Part-FCL). It represents the outcome of work done within Rulemaking Tasks RMT.0188 (FCL.002(a)) & RMT.0189 (FCL.002(b))

This NPA addressed safety and regulatory coordination issues related to flight crew licensing (FCL). The main objective was to introduce the long syllabus and Learning

Objectives (LOs) for professional licences and instrument ratings in the EASA regulatory system. It also aimed to resolve any inconsistencies identified after the adoption of the FCL Implementing Rules. This was necessary to ensure that the EASA regulatory system reflects the state of the art, and specifically the best practices developed in the Member States in the field of pilot training.

The NPA was split into four parts:

- Part A contained the Explanatory Note and the changes to the rule text of
 - Annex I - Part-FCL
 - Annex II - Conditions for the conversion of existing national licences and ratings for aeroplanes and helicopters, and
 - Annex III - Conditions for the acceptance of licences issued by or on behalf of third countries.
- Part B contained the changes to the existing AMC and GM text (Acceptable Means of Compliance and Guidance Material).
- Part C contained the new AMC with the Flight Examiner Manual (FEM).
- Part D contained the new AMC with the Learning Objectives.

“The proposed changes are expected to increase safety, reduce regulatory burden on Member States, improve harmonisation, ensure compliance with ICAO, and improve proportionality of the rules for General Aviation by applying the principles of the General Aviation Road Map” the Agency writes.

The package of 1532 pages was split into two parts with different comment periods. We commented on the A, B and D parts by the closing date of 17 May 2015, sending 57 comments on A and 10 on B to the Agency. We did not comment on the D parts, as they are a bit out of our scope. For the three C parts the period lasts until 17 July 2015 and we will comment on these parts as needed. The Opinion should be published in the fourth quarter of 2015, most probably together with the Decision of the Executive Director. We shall inform you as soon as these texts are available.

EUROPEAN PARLIAMENT CONSIDERS ITS POSITION ON CIVIL RPAS

Report from Timo Schubert

At a meeting on 14 July, members of the European Parliament’s Committee on Transport and Tourism (TRAN) considered their draft position on Remotely Piloted Aircraft Systems (RPAS) for civil use. While the European Commission’s Directorate-General for Mobility and Transport (DG MOVE) and EASA advance with their own preparations of common European rules to govern RPAS, the EP has chosen to submit a formal position through a so-called Own Initiative Report.



*Drone flying over the European Parliament building
(© European Union 2015 - European Parliament)*

The parliament’s work takes place on the basis of a [draft report](#) (see agenda item 13 of the report, available in many European languages) by UK conservative Jacqueline Foster MEP. Very positively for sports and recreational aviation, the draft report underlines the needs for the safe integration of RPAS in non-regulated airspace while fully respecting the principle of “see and avoid”, paramount to flights conducted under the Visual Flight Rules (VFR). The report stresses furthermore that existing airspace users shall not be overburdened with additional equipment requirements. While Mrs Foster worked on her report, Europe Air Sports had a chance to meet her in order to convey some of the concerns for our sector. We are particularly pleased that she has reflected many of our points in her report, which illustrates her high level of expertise.

During the debate members of the TRAN Committee were very supportive of the draft report. While they expressed concerns that an irresponsible use of RPAS could violate citizens' privacy, they also saw significant economic potential of this emerging industry sector.

Of particular importance to our model flying members, Luxembourgish Conservative Georges Bach stressed in his intervention that a clear distinction shall be made between commercially operated RPAS on the one hand and model flying on the other.

As for the next steps, MEPs had until 22 July to table amendments to the report. These will be considered and put to the vote after the summer break.

Europe Air Sports will continue to follow developments closely and continue to liaise with MEPs as appropriate.

Next our Programme Manager René Meier reviews two developments in the area of maintenance and engineering.

B2L AND L LICENCES: COMMENT RESPONSE DOCUMENT (CRD) PUBLISHED

124 comments on NPA 2012-15 were sent to the Agency, 18 by Europe Air Sports. This was our introduction:

"As our organisation covers a very wide range of air sports activities, some of our members will submit their comments directly. We invite the Agency to consider these comments submitted by individuals, clubs or groups active at the forefront of general aviation, working in a not-for-profit-environment. Most activities are un-paid, but nevertheless accept the highest standards in training of personnel and in maintaining privately or club-owned aircraft not used for commercial air transport operations.

"We carefully read the document proposed. Our comments will essentially cover the more general topics, we leave the initiative to deal with the more specific topics to our specialised federations like e.g. the European Gliding Union (EGU) and the European Powered Flight Union (EPFU), and to the National Aero-Clubs.

"Particularly important to our entire community is the existence of unrestricted grandfather rights: no-one previously active in the field of light aircraft maintenance becomes less capable just because of the fact that new regulations are created, safety does not increase just by implementing new provisions. What count are human factors like capability, capacity, integrity, sound judgment, good airmanship.

"As a general remark we like to state that in our view the approach to such new licences is a positive step. We believe, however, that a real danger of escalating costs exists, and that a level playing field will, for many years to come, not be reached.

"Another aspect making it difficult to submit appropriate comments is the fact that we are not informed precisely enough at this very moment of the probable outcome of the activities of Part-M for General Aviation Task Force.

"A general feeling among our members is that the Agency believes very much in organisations, not so much in individuals. We see it a bit differently: We firmly believe in competent, well trained individuals, forming organisations. It is in our view not only the form of an organisation that contributes to safety, it is first of all the selection of the best-qualified individual to perform a task, particularly in the sports and recreational sector of aviation where one-man/one-woman organisations perform excellently."

<http://www.easa.europa.eu/system/files/dfu/CRD%20to%20NPA%202012-15> is the link to the text of the CRD. According to the process map of the Agency, the Executive Director's Decision will be published in the fourth quarter of 2016. The task was contained in the Rulemaking Programme 2014-2017 bearing the descriptor RMT.0135, which was previously 66.027(A).

Please read the comments of the community and the answers of the Agency. As the Decision of the Executive Director will be binding, leaving no room for national

particularities and interpretations, please send your comments on the CRD to the Programme Manager. He will co-ordinate, if required, an additional input on this set of rules of great importance to our community.

STANDARD CHANGES AND STANDARD REPAIRS – *these have been discussed at different levels during the past years. Recently, the EASA has published the results stemming from Notice of Proposed Amendment (NPA) 2014-24.*

The concept of Standard Changes and Standard Repairs was introduced with Regulation (EU) No 748/2012. For this purpose, the establishment of Certification Specifications (CS-STAN) was required. Rudi Schuegraf, Julian Scarfe and René Meier prepared comments on this NPA, which addresses a proportionality issue: it will allow a simpler process for the design and embodiment of many changes and repairs on certain aircraft (aeroplanes up to 5 700 kg MTOM, rotorcraft up to 3 175 kg MTOM and most sailplanes, balloons and airships). On 7 July 2015 the Comment Response Document (CRD) 2014-24 was published. We sent 24 comments to the Agency in total, a summary of the introduction to our comments was:

"The comments of Europe Air Sports reflect inputs from several member organisations. Europe Air Sports and its members strongly support the principle of Standard Changes and Standard Repairs. These are adequate to the operations and consider complexity and risks. We expect the Agency to adopt and further develop the concept of Standard Changes and Standard Repairs in future as well, when it will come to integrate new material, new technologies and new measures/possibilities to demonstrate the safety of the work executed on aircraft by members.

"Today we ask the Agency to broaden the scope of these Standard Changes and Standard Repairs to a maximum, to provide positive inputs for the lower end of General Aviation, i.e. sports and recreational flying, while maintaining an adequate level of safety of flight.

"In addition, we propose to the Agency to involve us as early as possible in 'Phase 2' activities: This 'Phase 2' is a 'must', not a 'could' topic for us. We offer our assistance to the Agency, we have hundreds of competent persons well knowing what is important and what adds to safety.

"In the case of this CS package it is essential that the Certification Specification decision will be available - like all EU regulations - in the official EU languages, otherwise much of the effort developing this system will be wasted.

"Also we sometimes found confused wording and we proposed several changes. May we kindly ask the Agency to eventually prepare clearer, simpler, more precise text considering the very high percentage of non-native readers and of volunteer aviators?"

This NPA contained a first draft (Phase 1). In the Comment Response Document (CRD) you will find all the comments that were sent to Cologne. The link to the CRD is: <http://www.easa.europa.eu/system/files/dfu/CRD%202014-24.pdf>

Based on the comments on the NPA, Decision ED 2015/016/R was published. Different regulations are affected, i.e. Part-21, Part-M, Part-145. Because of this wide field I do not comment on what was published, however, this is the link:

<http://www.easa.europa.eu/document-library/agency-decisions/ed-decision-2015016r24>

In future, CS-STAN will be further supplemented (Phase 2), based on experience and with new proposals provided by the affected stakeholders. It is included in the draft Rulemaking Programme 2016-2020. We will continue working on the subject, as in future the proposed changes are expected to reduce the regulatory burden for simple changes and repairs. Additionally, the simplified procedure may encourage the installation of safety equipment. It is expected that this will have a positive impact on the operation of general aviation aircraft in Europe.

Please contact me for further information on this topic.

PART M "LIGHT" – Rudi Schuegraf reports on another encouraging development in the area of maintenance

EASA has also published the NPA 2015 – 08, dated 09. July 2015. As a result of EAS moderation at the EASA Safety Conference in Rome last October, an EASA task force has worked on a Part M light.

The objective of this NPA is to propose a 'Light Part-M' with requirements proportional to the significantly lower complexity and associated risks of the lighter end of the General Aviation community, and as clear and simple as possible in order to facilitate implementation.

Further alleviations to those proposed during Phase I of the 'Part-M General Aviation Task Force' (see Reg. 1088) have been proposed, after evaluating possible options within the limits of Regulation (EC) No 216/2008 (the EASA Basic Regulation). These alleviations include, among other aspects:

- Maintenance programmes;
- Airworthiness reviews;
- Defects deferment; and
- Guidance for Time between Overhaul (TBO) extensions.

This NPA affects our lighter end of the General Aviation community, including aircraft owners/operators, independent certifying staff, maintenance organisations, Continuing Airworthiness Management Organisations (CAMOs) and competent authorities overseeing these aircraft and activities.

The link below connects to the NPA:

<http://easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2015-08>

The consultation period ends 09. October 2015.

EAS is grateful to EASA for the work done in cooperation with EAS and other stakeholders' experts.

FAR PART 23 AND CS-23 REORGANISATION – Reported by René Meier

A-NPA 2015-06 on FAR Part 23 (Federal Aviation Regulation is the USA authority) and CS-23 (the European authority) reorganisation was published shortly before AERO 2015 in Friedrichshafen and highlighted during the GA Roadmap update at that occasion. The consultation that ended on 27 May 2015 resulted in feedback from 32 entities and a total of 350, generally positive, comments. We sent 13 comments to the Agency. This was our general comment, followed by 12 more detailed ones:

"Europe Air Sports, on behalf of its members, thinks the direction chosen is the right one. We feel, however, that excluding CS-LSA (Light Sport Aircraft) from the reorganisation appears to further delay the availability of small, moderately priced certified aircraft suitable for basic training and personal use in Europe. It appears that nothing is done to remedy the situation where exactly the same *European built* (!) aeroplane is enjoying success in USA and overseas, but is denied entry to the European market due to the stringency of CS-LSA. Promoting CS-VLA (Very Light Aircraft), as the proposal does, is only partly a solution to this major problem, which continues to hamper the growth of private aviation with certified aircraft in Europe. We therefore recommend including CS-LSA in the work actually undertaken by the Agency in co-operation with FAA."



Pipistrel Sinus

Your Programme Manager firmly believes that including CS-LSA completes this global picture and continues to propose this idea.

Following the third meeting of the Rulemaking Group (of which I am a member), we decided to publish a short general CRD to inform stakeholders more precisely on the actual state of the task. There are several more stages to go through, complicated by the need to comply with the FAA process. The target publication date of "early 2017" for the publication of the Agency's Decision will be met.

Please contact me for further information on this complex, and thus very interesting task.

DRAFT RULEMAKING PROGRAMME 2016-2020 PUBLISHED BY THE AGENCY

The Agency published a draft Rulemaking Programme for the period 2016 to 2020 (RMP 2016-2020), firstly for internal use only. The final version of RMP 2016-2020, addressed to all stakeholders, will be distributed in autumn/early winter 2015. Working with individual task descriptions will be easier than in the earlier years. Three "drivers" were identified: "Safety/Environment", "Level Playing Field", "Efficiency/ Proportionality".

In the past years we repeatedly raised our voice when "Level Playing Field" related topics were on the table, as well as when we had concerns regarding "Proportionality". Our voice was heard: The draft RMP 2016-2020 contains some 50 tasks of importance to us. This is a positive development, which brings us a lot of work, a challenge for our organisation, but also many chances to exercise influence on the future of General Aviation as a whole. Sports and Recreational Aviation is the area we are foremost interested in.

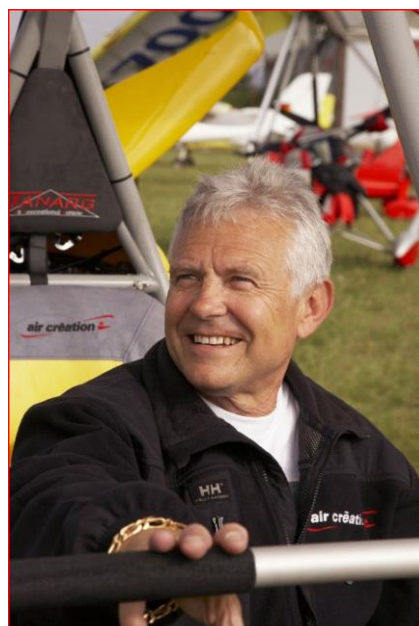
We shall inform you as soon as possible after our Board's evaluation of the final version of RMP 2016-2020. The high number of tasks and its widespread range of topics will require best possible coordination and careful co-operation among our members, best possible use of resources will be very important. You will hear from us in the autumn.

DOMINIQUE MÉREUZE

Following Dominique's death last month, we offer a translation of the tribute posted on the website of the Fédération Française de Planeur Ultra-léger Motorisé.

We are sad to inform you of the death of Dominique Méreuze, President of the French Microlight Federation (FFPLUM) since 1998 and a board member of Europe Air Sports. He died at Gap at the age of sixty-six after a brave and uncomplaining fight against cancer. Our thoughts are naturally with his wife Yvette, who was well known to many of us, as well as his daughter, his son and grand-children. We often say that microlighting is one big family and it is in this kind of circumstance that we feel this in full measure.

Dominique's highly charismatic personality had a great influence on FFPLUM and also on the wider world of aviation. Suffice to say that in 1998 there were 4,000 ultralight licenced pilots and there are now 15,000. Dominique was the Executive Officer of the French National Council of Aeronautical and Sporting Federations, the President of the Union of Federations of Insurance Managers, the founding President of the European Microlight Federation and a Vice President of Europe Air Sports. He was the holder of the aeronautical medal and an officer of the Légion d'Honneur.



Dominique would not have enjoyed tributes and nostalgia; he was a man of action and projects. We are lucky to have known him and to develop proudly all that he offered with so much generosity.

A Federation is a team, a programme, of principles, one history, and what counts most today is to thrive with the same spirit that we have built together. In this way we should be faithful to all that he has achieved, after this time of mourning and emotion.

David Roberts, President of Europe Air Sports, added this tribute to Dominique:

“To a dear friend and colleague, who understood that to fly as free as a bird is one of life’s great pleasures, to be defended with total passion and dedication. From all your many thousands of grateful and admiring friends in the Europe Air Sports community, soar forever in the blue sky Dominique.”

EUROPE AIR SPORTS GENERAL CONFERENCE 2016

The 2016 General Conference will take place in Bordeaux, France, through the kind invitation of Patricia Lamy, President of the European Ballooning Federation. We are pleased to say that the Executive Director of EASA, Patrick Ky, will attend the conference and we may also be able to welcome representatives of DGAC, the French Directorate General of Civil Aviation.

We suggest that members travel to Bordeaux Thursday 7th April 2016, or early Friday 8th April, for a combined EAS business and social programme on Friday 8th April, followed by the conference on Saturday 9th April and Annual General Meeting on the morning of 10th April, closing by 12.00 noon for travel home on the Sunday afternoon.



Patrick Ky

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