



EASA
European Aviation Safety Agency

Panel 5

A flexible framework for small aircraft - Maintenance

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Panel 5 Scope

- Aeroplanes below 5700 kg MTOM
other than complex-motor-powered
- Single engine helicopters below 3175 kg
- Sailplanes and Powered sailplanes
- Balloons (Hot air and gas)
- Airships

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Panel 5 Members

- **Juan Anton , EASA**
- Franz Meier, ECOGAS
- Bruno Guimbal, Guimbal Helicopters
- Jean-Pierre De Loof, French Gliding Federation
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Regulation (EC)1056/2008

Certain alleviations were introduced in Part-M in 2008 (Regulation 1056/2008):

- Airworthiness reviews performed by the NAA at the request of the owner.*
- Alleviated requirements for airworthiness review staff.*
- CAMO allowed to issue the ARC for aircraft outside controlled environment.*
- Independent licensed engineers may perform the airworthiness review, complex maintenance tasks and certain component maintenance.*
- Introduction of Baseline and Generic Maintenance Programmes.*
- A detailed list of Pilot-owner maintenance tasks.*



Regulation (EU)1149/2011

***Certain alleviations were introduced in Part-66 in 2011
(Regulation 1149/2011):***

- Introduction of the B3 licence.*
- Type examinations were replaced by experience for a significant number of aircraft categories and licences.*



Ongoing activities (advanced)

Part-M General Aviation Task Force (Phase I) already voted in EASA Committee, including for example:

- *Self-declaration of Maintenance Programme (ELA1 non-COM)*
- *Minimum Inspection Programmes (ELA1 non-COM)*
- *Template for the Maintenance Programme (Non complex motor-powered aircraft)*
- *Airworthiness Reviews by maintenance organisations (ELA1 non-COM)*
- *Maintenance programme developed by maintenance organisations (ELA2 non-COM)*

Upcoming Opinion with simplified licences:

- *B2L: Avionic licence for light aircraft*
- *L licence for sailplanes, powered-sailplanes, balloons, airships and ELA1 aeroplanes*

NPA 2014-24 for Standard Changes and Repairs (with references to FAA AC43-13) published on 06 October 2014.



Ongoing activities (starting)

Part-M General Aviation Task Force (Phase II) recently started, including discussions on issues such as:

- *ACAM (Aircraft Continuing Airworthiness Monitoring) programmes.*
- *Acceptance of components without EASA Form 1.*
- *Combined approvals.*
- *Management of defects.*
- *Airworthiness reviews by independent certifying staff.*
- *Light Part-M.*
- *Increase the limit to ELA2 aircraft for:*
 - *Self-declaration of the Maintenance Programme*
 - *Minimum Inspection Programmes*
 - *Airworthiness Review by maintenance organisations*



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Small and Medium Enterprises: Main Problem

CAT

**CAT from
commercial
Glider to to the
A380**

**Organisation
from 11 to
10'000 + Staff**

**Present
Regulation**

vs

non CAT

**non CAT, non
complex (=
leisure mainly)**

**Organisation <
10 Staff**

Should be

**Mass
Transport**

***up to 2 Billion
€ per event***

Major

**< 19/30
Pax**

0.5 -100 Mio €

vs



Small & Medium Enterprises (SME)

- Satisfaction Rating : "satisfied" to " V unsatisfied"
 - GA Road Map extremely welcome
 - example "*CS SR Phase 1*" (2014-24)
- **TLtL** for those, who **make a living** within aviation.
- **Regulation & oversight** not proportionate to potential worst case scenarios, **leads to too detailed regulation.**
- The present **lack of differentiation** in the definition **CAT** takes **all risk's into one basket.**
 - It is overseen (occ.) very close from watchmakers*



ECOGAS > SME on rulemaking

- **New rulemaking activity** only if it is proven that without safety is reduced.
- **Proportionality** key factor in new rulemaking.
- Present rules and regulations to reduce & simplify for GA and **SME** active in **CAT**.
- We do not regulate nuclear power plants like medium water driven electrical power plants



Examples for immediate action:

- Personal training and licensing for MM Staff
- Application R's & O's = puzzle 32 **different** bits.
- Complex is of simple, > req. by basic EU law.
 - ▶ Part 66 vs. 65: **266 vs. 38 pg's.**
- EASA destroys SME's, **but President EC** 14. 0702014
- EU > *"big & A big things, smaller & M in small things"*
- **RISK BASED**
- **NEEDED:** emergency process for quick fixes by EC
- **CHANGE OF BASIC REGULATION (EC Survey)**



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- **HG is the only light / General Aviation helicopter manufacturer out of the USA. What follows applies to our helicopters, but also to the whole fleet**
- **There are similarities with fixed-wing aircraft. However helicopters are complex mechanisms and require more certification than fixed-wings for the same level of safety.**

In Europe :

- **Strong development of civilian helicopters in the last 30 years**
- **Strong need for CPLH coming from GA, to take-over ex-Military**
- **Strong demand in training from emerging aviation countries**

Light Helicopters are now a full part of light GA in Europe

Two different GA

- 1) → airclubs, private pilots
 - flight schools
 - light occasional aerial work
- 2) → regular aerial work
 - public transportation

Very different needs in terms of maintenance

Nota: UL / Class 6 is based on non-technical certification

- restriction in size and use → no commercial activity
- basically different market and different maintenance

Too much safety is against safety

- **Airworthiness system is oversized for light GA**
- **Competent and experienced mechanics lack “paperwork ratings”**
- **The CAMO system creates “fake” responsibility : transfers responsibility from the hands-on mechanic to a bureaucratic layer,**
- **Too many different levels of responsibility dilute responsibility**

Unfair distortion of competition

- The CAMO system creates undue costs
- Big differences in costs within EASA countries encourage unsafe practices (e.g. remote CAMO in low-cost countries)
- Differences in national regulations within EASA countries
- The manufacturer has no privilege corresponding to his high level of responsibility
 - EASA operators have an economic penalty

A few proposals

- Create a sub-category of Light GA helicopters
 - Single engine, Under 1500 kg
 - VFR only,
 - No public transportation or public operation.
- Continued Airworthiness carried by the rated mechanic
- No B2 for non-critical avionics
- Give the manufacturer privilege in training / rating delivery

Will help keep light helicopter activity in Europe !





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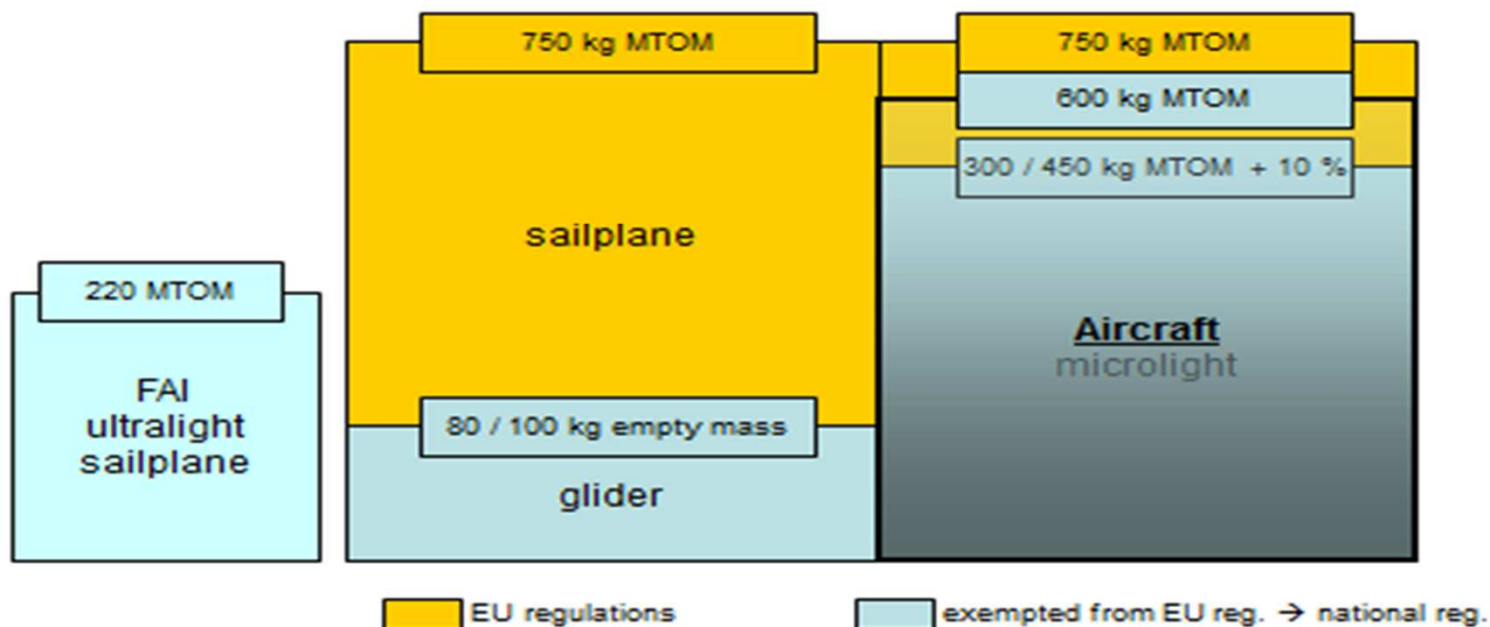


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Second Amendment to Reg. 1592 as proposed by EMF (23 April 05)

sporting code

EU Regulation 1592/2002



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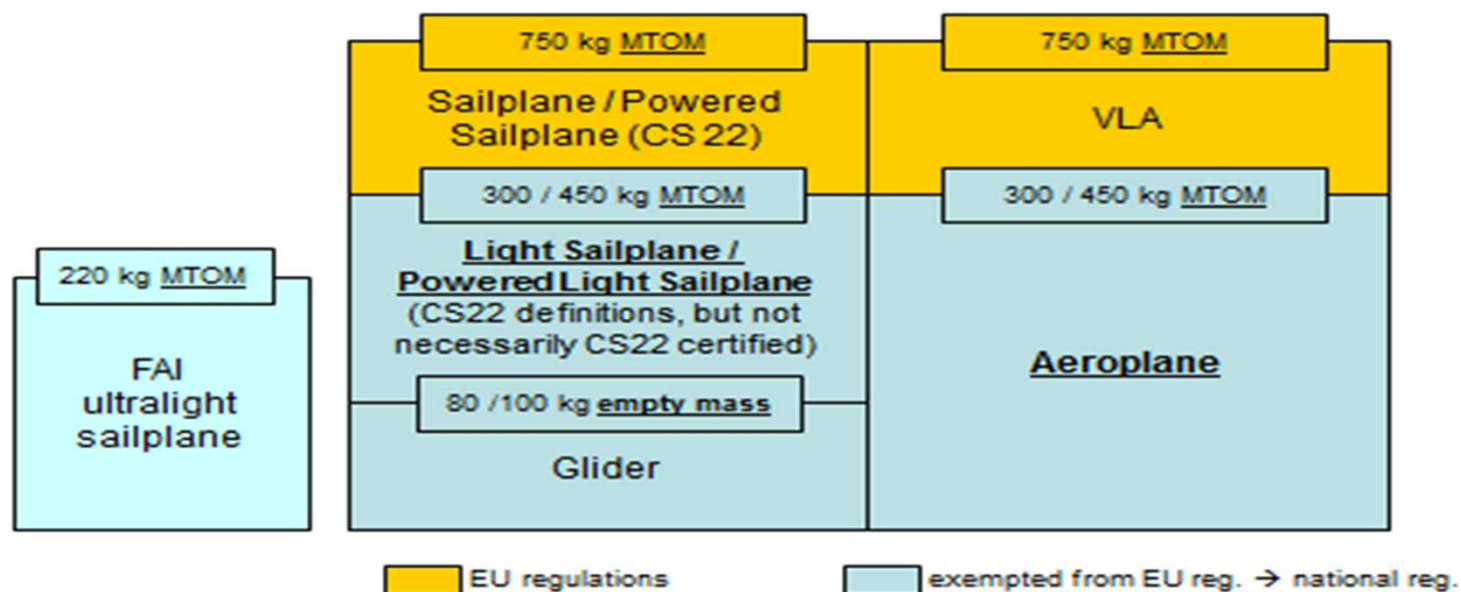
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European Gliding Union (EGU) Proposal (May 2005)

sporting code

EU Regulation 1592/2002



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National & Sporting Associations seek:

- Greater opportunities for self regulation and autonomy
- Steps to engage Associations in self education, self help and 'self accreditation'
- A freedom to shape internal processes to individual sector needs
- A proportionate external review process based on internally generated safety analysis



Part M Implementation – We did it!

BUT

- The extant process is not proportionate nor is it risk based
- It is overseen from afar by un-practiced officials
- Volume of paperwork and signatures is mistaken for quality and safety
- It ignores the participant's expertise and is demotivating
- Massive overhead in complexity, effort and cost



Examples for immediate action:

- Simplified, integrated procedures for Airworthiness/Maintenance, minimising the number of separate approvals required (started in GATF)
- Urgent review of Part 66 proposals for individual engineer licensing
- Emphasis on supportive information, not rules, eg: harmonised code for safety management
- A code of practice for proportionate audit and external monitoring



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**Thank you
for your attention**

The EGU is as member of
Europe Air Sports
and is supported by 20
European national gliding associations

An EGU overview report on
Part M implementation is available on
www.egu-info.org

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