EASA Part M GA Workshop
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Summary of responses from International Council of Aircraft Owners and Pilots Associations (IAOPA) Europe

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Compiling the IAOPA response

- IAOPA Europe invited the individual country AOPAs to submit responses to EASA, copy to IAOPA
- A questionnaire format was offered and used by some AOPAs
- AOPAs were asked to answer the questions in M Sivel's letter
- They were also asked to suggest improvements – thereby helping the formulation of recommendations for change

IAOPA submissions from

- Germany (14 private owners, 1 maintainer)
- Iceland (summary response)
- Italy (1 private owner, 1 maintainer, 1 aeroclub, 1 aviation expert)
- LAMA Europe (Light Aircraft Manufacturers Association Europe, Czech Republic – by arrangement)
- Netherlands (13 private owners, 1 maintainer, I aeroclub)
- Sweden (1 maintainer/owner)
- UK (11 private owners, 4 maintainers, 3 aeroclubs)

Breakdown into categories

- 40 private owners
- 8 maintainers
- 5 aeroclubs
- 3 others (summary response, aviation expert, manufacturers' association)

Overview of responses

- All the individual responses are important
- The majority of these offer recommendations for improvement
- A summary of the private owners' responses to some of the questions posed in M Sivel's letter follows
- Also included are summary responses to questions asked by IAOPA
- Following this is a summary of the maintainers' responses

Private owners (1)

- Format of the rules - to the private owner, Part M is complicated, not user friendly and difficult to understand
- This is a universal view from all owners across all countries
- It is recommended that an audit be conducted to identify and remove those parts that do not contribute to flight safety or airworthiness of light aircraft

Private owners (2)

- Many owner modifications are to improve flight safety – approval costs for these should be minimal (recommendation)
- Added cost of Part M ranges between €1000 and €3700 per aircraft per year compared with pre-Part M. These are costs that the maintainers have had to pass on to owners
- The additional costs have to be sourced from owners' disposable income
- Owners were asked if increased maintenance costs have reduced their flying hours and, if so, by how much?
- 75% said 'yes', typical reduction in annual flying hours was about 20% across all countries, although it is recognised that fuel costs have an impact, and also the general financial situation on disposable income

Private owners - conclusion

- **<u>Conclusion - GA activity in Europe has shrunk as a result of the introduction of Part M</u>**
- It is recommended that EASA work closely with maintainers to strip out unnecessary administration and procedures to reduce cost to the private owner, thereby alleviating the current situation
- This should now become a major objective for EASA
- More on objectives to follow after the maintainers' responses below

Maintainers (1)

- Format of the rules – complicated, not user-friendly – same as for private owners
- Generic maintenance programmes – mixed views, probably due to imprecise definition of what a GMP is
- Indirect approval procedures – more use of maintainer's experience and qualifications should be allowed (recommendation)
- Blanket approval should be given to FAA approved STCs
- NAA approved documentation e.g. FAA 8130 tags should be acceptable by EASA – getting EASA Form 1 equivalent is too costly

Maintainers (2)

- Pilot/owner maintenance – not a universally accepted concept across different countries
- In countries where used, is acceptable with adequate oversight by CAMO
- Independent certifying staff – should not be limited to those employed by an approved organisation, should depend on qualifications and experience alone
- Licensing requirements should not cover aspects only found on large transport aircraft

Maintainers (3)

- GA maintenance organisations are generally small relative to those that cover CAT, but they deal with a much wider range of aircraft
- Difficult to find two signatories for uncommon aircraft – move to one signatory process (recommendation)
- ARC – significant increase in paperwork reported – reduce to only what is absolutely necessary
- ACAM – Germany, Iceland and Italy report over-zealous activity by their NAAs

Maintainers (4)

- Part M setting-up costs have been €10,000 to € 20,000 (UK) and ‘several thousands of Euros’ (Netherlands)
- The requirement for an AMP individually tailored to each aircraft was probably responsible for a large proportion of these costs
- Some maintainers have almost as many different aircraft types to look after as they have aircraft, and many have a high proportion of non-EASA aircraft on their books
- Also, the high average age of GA aircraft still airworthy (40 years in the UK) leads to problems relating to manufacturers’ maintenance manuals or schedules (some are non-existent), ADs, SBs and manufacturers’ recommendations

Further comments (1)

- ADs are safety critical and it is appropriate that they are mandatory
- SBs and recommendations are less critical to safety, the latter often established simply for product liability purposes, not regarded as mandatory by the FAA
- Part M should be written such that it is not possible for different country NAAs to adopt different interpretations, the most stringent examples of which makes all of these mandatory

Further comments (2)

- The single objective stated in Part M (Art 1, para 1) of effectively standardisation is far from being achieved
- This and the scope for different interpretation has led to senseless maintenance tasks which serves only to reduce the credibility of Part M in the eyes of experienced maintenance engineers
- Although EASA offers an alternative means of compliance with TCHs' recommendations that appear mandatory (e.g. seat belt life of 10 years for some Cessna aircraft over-riding OEMs' recommendations), a looser non-prescriptive approach should be adopted

Maintainers – some questions and specific proposals

- Is the individually tailored AMP really necessary to achieve flight safety and consistent airworthiness?
- As per the FAA system, can it not be replaced by inspection, the requirement being to pass the inspection by carrying out whatever maintenance is necessary?
- Allow a Part 66 mechanic to issue the ARC, not limit it to a CAMO
- Adjust component rules to allow the owner and certifying staff more power in deciding what may or may not be installed

Conclusions

- To reiterate – GA activity has shrunk as a result of the introduction of Part M
- IAOPA would like to see a more risk based oversight established as an objective leading to identifiable safety improvements
- This workshop offers a good opportunity to address and improve the situation, and IAOPA thanks EASA for organising this meeting
- From the point of view of GA aircraft owners, the working together of EASA with the maintainers is key to achieving a successful outcome

Thank you. Questions welcome!