EUROPEAN AVIATION SAFETY AGENCY
AGENCE EUROPÉENNE DE LA SÉCURITÉ AÉRIENNE
EUROPÄISCHE AGENTUR FÜR FLUGSICHERHEIT

Part-M General Aviation Workshop

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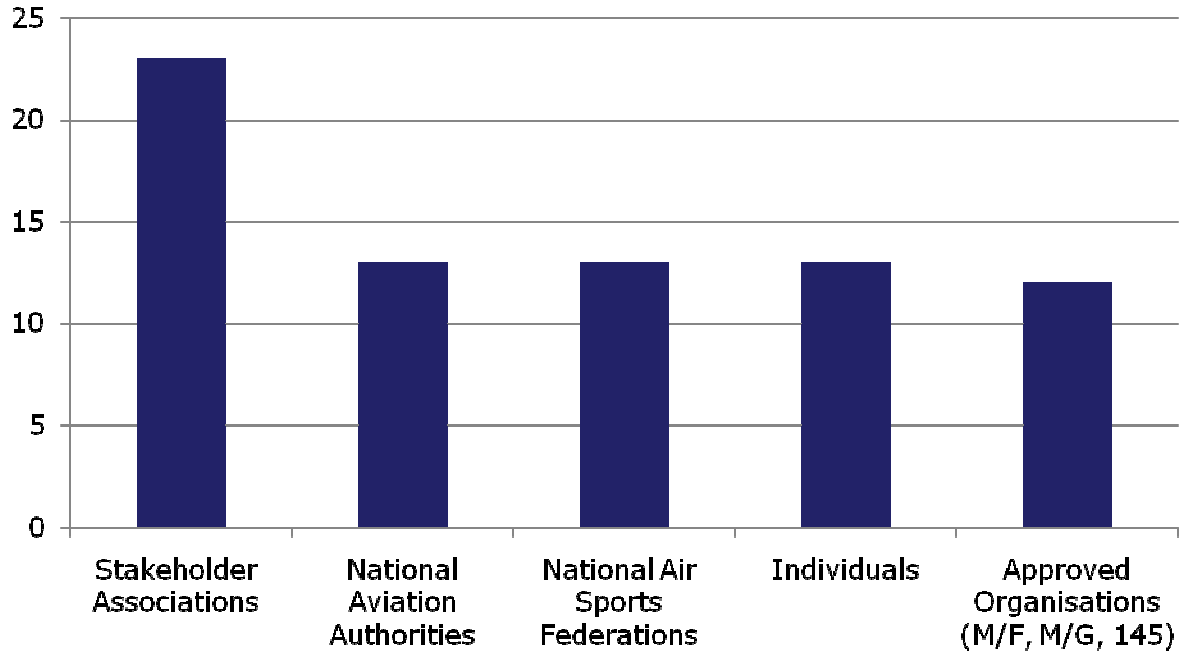
Number and origin of comments

- Number of contributions received, ranging from short, simple e-mail messages to detailed surveys (e.g. AOPA, EGU): 73



status: 19th October 2011

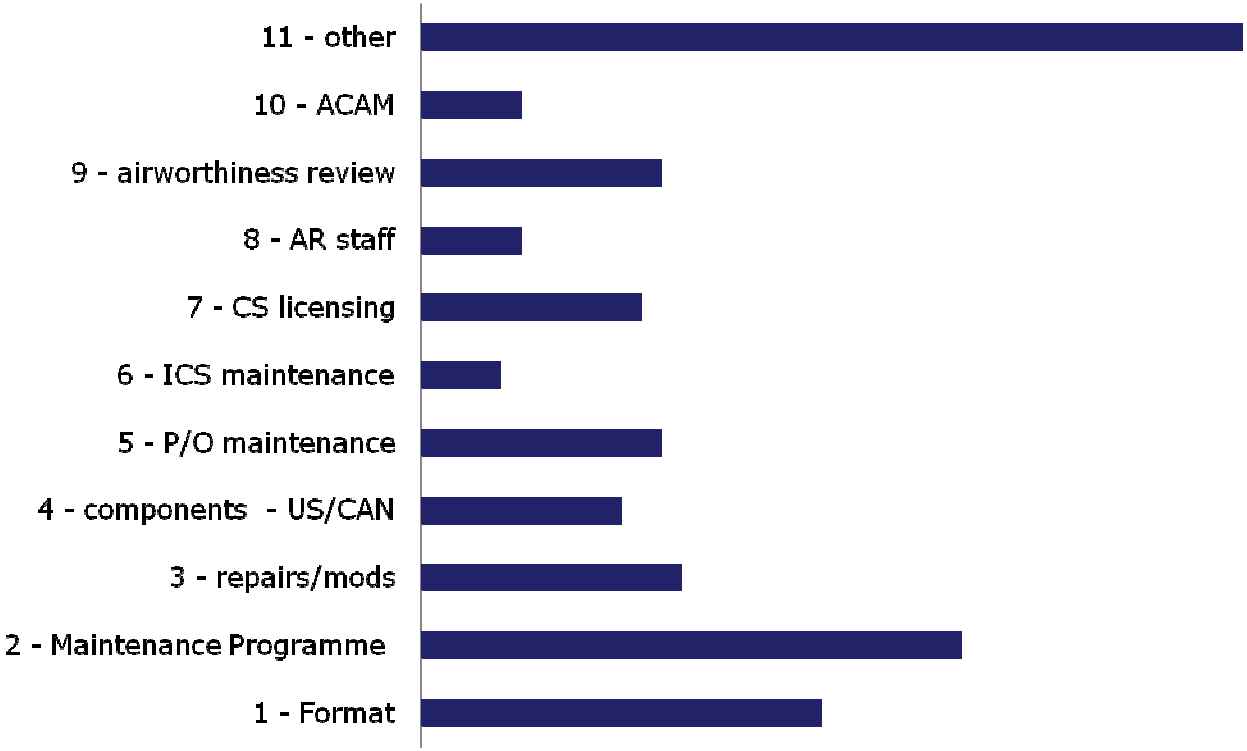
Topics

1. Format of the rules
2. Maintenance programmes general – generic MPs and indirect approval procedures
3. Approval/acceptance of repairs and modifications
4. Components general - acceptance of components from US and Canada
5. Scope of work authorised to the Pilot-owner
6. Scope of work authorised to independent certifying staff
7. Licensing requirements for certifying staff
8. Qualification and position (incompatibilities) requirements for airworthiness review staff
9. Performance of the airworthiness review and issuance of ARC/recommendation
10. Aircraft Continuing Airworthiness Monitoring (ACAM) programme for general aviation aircraft

Additional Comments

Distribution (net amount of text)

- Distribution of contributions for the different topics



Topic 1

- Format of the rules

1. Format of the Rules

- **The <u>format</u> of Part-M is too complicated for GA:**
  - not easy to understand and open to wide interpretation
  - completely oversized and abstract for general and leisure aviation
  - unclear structure with too many paragraphs, subparagraphs and cross-references, double-negations, only partially touch upon the needs of general aviation, duplicate statements (sometimes self-contradictory) and exceptions (are not suitable to be understood by the pilots)

- **<u>AMCs</u>**:
  - problem with the language: only in English
  - not binding
  - too complicated
  - introduce new "requirements", which are not mentioned in the regulation itself

1. Format of the Rules

Solutions proposed in feedback received:

- Simplification of Part M with regard to GA and a proper consultation with GA engineers and pilots in the drafting stage so that safety is improved with minimal regulatory and financial impact.

- Some proposals for this simplification:
  - no Subpart G requirements for ELA1 aircraft and gliders.
  - suppression of Part-M for aircraft up to ELA 2.
  - separation of the specific rules for non-complex, privately operated aircraft (GA) from the complex or commercially operated aircraft
  - "Part-M light" for non-commercial, non-complex light aircrafts
  - some plain-written handbooks focused to General Aviation pilots/owners
  - develop a separate rule for non-commercial general aviation (e.g. limited to ELA), with requirements for the design, manufacture, maintenance and continuing airworthiness

1. Format of the Rules

Solutions proposed in feedback received :

- similar approach than OPS (ORO, CAT, SPA, NCC, NCO and SPO) should be used to separate ELA 1 and ELA 2 aircraft in a user-friendly manner in relation to EC No 2042/2003
- a change to the horizontal rule structure originally proposed
- free electronic tools enabling the use of filters in order to select requirements applicable to different categories of users (CAT, COM, GA, MTOW, ELA etc.)
- AMCs, GM and CSs' translations in all national languages
- maintain the effort of publishing at regular intervals consolidated versions of the Part-M.

Topic 2

- Maintenance Programme

2. Maintenance programme

- **Content of the maintenance programme**
  - Difficult to find the required maintenance in the documentation from manufacturer, differences in content and level of detail, manufacturers follow FAA system.
  - NAA interpretation that all maintenance suggested by the manufacturer is mandatory.
  - Vintage aircraft do not have proper ICA available: a generic "task based" set of requirements should be offered for some general types of aircraft.

- **Baseline/ generic maintenance programme**
  - Generic AMP is not allowed in many Member States.
  - Encourage manufacturers of simple light aircraft to adopt common generic maintenance requirements.
  - Generic AMP is a good idea if the format can be downloaded from the NAA website.

2. Maintenance programme

- **Burden and cost of review of AMP vs. safety effect**
  - Appendix I to AMC M.A.302 is not adapted to GA.
  - CAMO in GA work in several types and mainly only doing Airworthiness Reviews. Difficult to have an adequate generic AMP for so many different aircraft types. CAMOs should be allowed group ratings without the need for having generic AMP.
  - If EASA thinks maintenance documentation issued by manufacturer is insufficient for the safe maintenance of aircraft, then EASA should supply the maintenance programmes.
- **Indirect approval**
  - Not allowed in many Member States.
  - For aircraft MTOM<2000 kg indirect approval should be authorised to licensed maintenance technicians.
  - Indirect Approval does not work cross-borders (the State of Registry usually does not accept indirect approval by a CAMO located in another Member State).
  - Cost of being approved for using indirect approval is too high.

2. Maintenance programme

- **No level playing field/standardisation**
  - What an NAA approves as part of the AMP differs from what is approved by a different NAA for the same aircraft type.
  - Some NAAs have accepted MPs only quoting the applicable TC holder instructions references, others require complete listing of tasks.
  - Many NAAs have defined specific national requirements to be included in the AMP. We believe that EASA should evaluate the need to keep these requirements and take actions to ensure they are either deleted or harmonised.

- **Amendment to Part-M**
  - Introduce a 100 hours/yearly inspection included in Annex to Part-M instead of AMP.
  - Clarify that only ADs and ALIs are mandatory items.
  - Eliminate the yearly revision of the AMP, which is a burden for NAA and owners.

Topic 3

- Approval/acceptance of repairs and modifications

3. Approval/acceptance of repairs and modifications

- **Approval by EASA too long and costly**
  - Approval costs often exceed the costs of the equipment to be installed.
  - Aircraft grounded in await of repair approval.
  - Steers aircraft owners away from EASA type aircraft to Annex II aircraft.
  - Allocation of tasks to NAAs adds complexity and delay.

- **Alternative Procedure (AP) to DOA not a viable alternative**
  - AP approval through EASA is inadequate (sometimes > 1 year).
  - No “market”: limited volume of repairs/modifications.

3. Approval/acceptance of repairs and modifications

- **Modifications**
  - Part-21 takes the simplistic view that any embodied change to an aircraft impacts the TC basis.
  - Part-21 approval for simple modifications is detrimental for aviation safety (FLARM, ELT).
  - Privileges of a CAMO should include the approval of modifications for some cases.

- **STCs**
  - EASA to maintain a list of all approved & grandfathered STCs and modifications.
  - Accept all FAA and TCCA STCs.
  - STC holders in US and Canada are reluctant to apply for EASA approval (additional cost and workload).

3. Approval/acceptance of repairs and modifications

- **FAA AC 43-13**
  - Urgently needed (accelerate task MDM.048)
    - For some aircraft the TC holder is unable to provide support for repairs and changes.
    - Undesirable increase in unauthorised modifications by owners.
    - Applying FAA AC 43-13 shall be limited to approved maintenance organisations.

- **FAA approved repairs**
  - Ensure automatic acceptance of all FAA field repair data.

Cf. TIP § 3.3.4 on automatic acceptance of repair design data from the US

Topic 4

- acceptance of components

4. Acceptance of NEW components

- **Need for an FAA 8130-3**
  - Suppliers charge considerable amounts for the form.
  - Alleviate requirements for non-critical components (an statement explaining where the original form is held should be enough).
- **Components for ELA 1 aircraft not engaged in commercial operations**
  - For other than engines/propellers, there should be no need for a Form 1 or equivalent - delivery note or equivalent proof of source should be enough.
- **Standard Parts**
  - More guidance on acceptance needed.
  - Some NAAs tend to insist on availability of FAA Form 8130-3.
- **PMA parts**
  - Accept all parts that come with an FAA 8130-3.

4. Acceptance of USED components

- **Components from US and Canadian organisations not being EASA approved (AMC M.A.613(a) § 2.8)**
  - Should only be accepted when there is no EASA approved organisation with suitable capability in a Member State.
  - How to avoid that such components removed serviceable from a non-CAT aircraft can be installed in a CAT aircraft?
  - Problematic in case of aircraft to be transferred into commercial operations.
  - Expand existing alleviation to aircraft performing CAT within a MTOM of 2730kg and below.
  - Accept the repaired /overhauled components without additional requirement to issue an EASA Form 1 on top of the FAA 8130-3 / CAN Form 1 (liability issue)

4. Acceptance of USED components

- **Older aircraft**
  - Alleviate use of parts coming from dismantled aircraft.
  - Alleviate requirements for non-critical components (a statement explaining where the original form is held should be enough).

- **Components for ELA 1 aircraft not engaged in commercial operations**
  - For other than engines/propellers, there should be no need for a Form 1 or equivalent - delivery note or equivalent proof of source should be enough.

- **Swapping of components**
  - Alleviate provisions on installation of components removed serviceable from another aircraft (AMC M.A.613(a) § 2.6).

4. Acceptance of components

- **Fabrication of parts**
  - Interpretation of M.A.603(c) too restrictive
    - protects manufacturers
  - Owner-produced parts should be allowed
    - originally foreseen in NPA 2008-07 but removed in the Opinion 01/2011

- **Traceability**
  - Some CAMOs require full history checks on every component since the aircraft was built, even for aircraft transfers between Member States.
  - Some NAAs seem to impose bar-code system for management of spare-parts (undue burden for small organisations).

Topic 5

- Scope of work authorised to the Pilot-owner

5. Scope of Work Authorised to Pilot-Owners (P/O)

- **Complexity**
  - Too many restrictive conditions on a person to be qualified, to be entitled to sign-off.
  - Restriction to pilot holding a valid licence is too severe and should be extended to persons who are members of the aero-club; or to authorise during a period of 5 years pilots having lost their licence to perform such tasks.
  - Mentioning the licence number in the CRS of a P/O task should not be required. The name should be enough.
  - The Agency should alleviate the restrictions linked to repetitive ADs for pilot owners.

5. Scope of Work Authorised to Pilot-Owners (P/O)

- **Extend the scope of P/O authorisations**
  - Add more complex tasks.
  - Allow the P/O to carry out similar tasks to those allowed to the maintenance licence holders.
  - Include defect deferment.
  - Weight limit should be increased to 2700 kg.
  - Modify the scope of work authorised to the LSA pilot-owner so that the LSA pilot-owner has MORE authority than a TMG (Touring Motor Glider) pilot-owner, not less.

5. Scope of Work Authorised to Pilot-Owners (P/O)

- **Abuse**
  - Fear of abuse of privilege as competency of P/O is based on self-confidence. P/O not qualified enough, not being aware of Part-M, missing documentation and tools.
  - Tendency that P/Os accept the full list of P/O tasks as being within their capability.
  - Some P/O maintenance tasks are not carried out in accordance with M.A.803 (on commercial aircraft, by friends, out of the legal scope, release not signed in accordance with requirement, or not at all…).

- **Supervision by the NAA**
  - Many comments asking for more oversight by NAAs.
  - Proposal that the competency, tools, facility of P/Os be checked by the NAA and that these P/Os be "authorised" by the NAA.
  - "there is no possibility for the NAA to control the application"

5. Scope of Work Authorised to Pilot-Owners (P/O)

- **Competency**
  - Training at manufacturers should be mandatory.
  - P/O should have attended a maintenance course.
  - P/O maintenance shall only be possible when the aircraft in question is only operated by the owner.
  - Some P/Os do not want to carry out maintenance themselves.
  - According to a M/F and CAMO organisation, pilot-owners (P/O) are not trained to issue a CRS in accordance with M.A.803(d), which makes it difficult for CAMOs to accept P/O maintenance.
  - There are no indications that the P/O scope of work on non-complex aircraft presents any safety risks.

5. Scope of Work Authorised to Pilot-Owners (P/O)

- **No level playing field/standardisation**

  - In certain Member States P/O maintenance is uncommon and unwelcome by the NAA. In certain cases, LSA are excluded from P/O maintenance.
  - Maintenance personnel has been against P/O maintenance, making difficult its implementation.
  - It is assumed that the list of tasks in the Appendix only provides some examples. However, certain NAAs restrict the authorisations to the tasks mentioned.
  - Suspicion that the CAMO is not aware of a requirement to evaluate the Maintenance Programme.

Topic 6

- Scope of work authorised to independent certifying staff

6. Scope of Work of Independent Certifying Staff (CS)

- **Scope of work of independent CS**
  - Complaints that national licenses are limited to national registered aircrafts.
  - Limit of ELA1 aircraft should be more than 1000 kg.
  - Scope of independent CS should be extended to some complex tasks.
  - Correct Appendix VII of Part M which contains technical errors in the definition of some complex tasks, especially on primary structures.
  - Independent CS should be authorised to remove serviceable components from an aircraft and install them on another aircraft.
  - Scope of independent CS could be broadened to work more like an FAA Designated Airworthiness Representative (DAR).
  - Tasks permitted to independent CS are limited by the definition of complex tasks as defined in Appendix VII, but "what means specialised tooling"?

6. Scope of Work of Independent Certifying Staff (CS)

- **Oversight by NAA**
  - The extension of ELA1 from 1000 kg to 1200 kg in Opinion 01/2011 will drastically extend the scope of activity of independent CS to provide ARC recommendations. It is recommended that EASA issues rules for NAAs to have better control over these CS.
  - Independent CS is not well controlled with regard to the practical experience which should be recorded in log-books.
  - There should be an annual survey by the NAA on continuous training, facilities, tools and permission should be granted by the NAA.

6. Scope of Work of Independent Certifying Staff (CS)

- **No level playing field/standardisation**
  - Independent staff have much less regulatory constraints and control than certified organisations with almost the same privileges. In particular, the requirements in M.A.606 (Personnel requirements in M/F organisations) and M.A.607 (Certifying staff in M/F organisations) should also apply to independent CS.
  - Appendix VII "Complex tasks" should only be performed by CS working for an approved maintenance organisation. Some complaints that "the vast majority of tasks on GA aircraft can now be done by independent staff".
  - Certain NAAs do not allow independent CS to perform airworthiness reviews.
  - The definition of "controlled environment" in M.A.901(b)(ii) should include maintenance work carried out by independent CS. It is felt that, otherwise, it is unfair treatment.
  - Some NAAs maintain a system of specialist-licences ('S' licence) which may be performed either independently or within an organisation".

6. Scope of Work of Independent Certifying Staff (CS)

- **Abuse - mistakes**
  - Independent staff should not be permitted to issue recommendations for an ARC. Mistakes have been noticed.

- **National rules**
  - Some complaints about national rules in which some maintenance personnel lost their privileges. European rules for licensing of personnel for sailplanes and balloons would be welcome.

Topic 7

- Licensing requirements for certifying staff

7. Licensing requirements for Certifying Staff

- **Requirements and privileges**
  - For LSA, the licensing requirements in Part-66 are over-dimensioned.
  - The regulation does not reflect the current staff situation – system was performing very well before Part-M.
  - Criteria used to issue certificates are the same as for large airplanes.
  - Endorsement of sub category group wood/metal/composite is too complicated.
  - Content of several modules is too theoretical. Better to focus on more practical training.
  - Loss of privileges by associations or federations to train and qualify staff.

7. Licensing requirements for Certifying Staff

- **B3 and L licences**
  - The postponement of Part 66 B3 and L licences compels to continue to use company authorisations as the primary certification vehicle.
  - The delay in the introduction of EASA licences (with suitable grandfather rights) increases the dependence on Subpart F organisations as in the accomplishment of complex maintenance tasks and component maintenance on ELA-1 aircraft.
- **Lack of certifying staff**
  - Getting a B 1.2 license is too time-consuming and too cost-intensive.
  - Conversion process for certifying staff makes that older and experienced inspectors decide to quit.
- **Part-147 Organisations**
  - No training by Part-147 available for several types of aircraft.

7. Licensing requirements for Certifying Staff

- **Standardisation**
  - More harmonisation across Member States.
  - Competent authorities tend towards a restrictive use of the conversion process, asking for more training / tests / showing of competency.
- **Solutions proposed in feedback received**
  - Single L licence with simplified categories and allow grandfather rights.
  - "L" mechanic license conditions and rights similar to Light-Sport repairmen certificate in the USA.
  - Recognition of locally trained and authorised engineers by national sporting bodies.
  - Mutual recognition of national licences before implementation of future regulation for sailplanes/powered sailplanes licences.
  - Manufacturers (European or not) may obtain a Part-147 certificate for their aircraft types by complying with some light requirements to be defined.

7. Licensing requirements for Certifying Staff

- **Solutions proposed in feedback received (continued)**
  - Introduce the concept of „knowledgeable and competent staff" (or similar) for all tasks on ELA aircraft that are not complex.
  - Maintenance personnel with a maintenance license and comprehensive Part-M knowledge could have a scope of work similar to personnel within M-F organisations, but only for balloons not involved in commercial operation.

Topic 8

- Qualification and position (incompatibilities) requirements for airworthiness review staff

8. Airworthiness review staff

- **Qualifications**
  - B1/B2 license or relevant engineering degree should not be replaced by additional years of experience.
  - ELA1 national authorisations to be considered as equivalent to Part 66.
  - Delay of B3 and L licenses is impacting the GA community.
  - Lack of proportionality on the qualification requirements for ARS of balloons.

- **Physical survey**
  - Assistance from a Part-66 should always be required.
  - Role of the Part-66 support staff assisting the ARS during the airworthiness review not clear.

8. Airworthiness review staff

- **Adequate responsibilities criteria**
  - Remove the requirement to be independent as per AMC M.A.707 for GA aircraft:
  - Separation of responsibilities in small organisation is not possible.
  - When the ARS is also involved in the accomplishment and certification of maintenance, criterion on independence is not necessary to ensure an adequate level of safety.

Topic 9

- Performance of the airworthiness review and issuance of ARC/recommendation

9. Airworthiness review

- **Scope of AR**
  - AR process significantly increases the cost and paperwork.
  - AR for balloons/gliders should be combined with the yearly inspection and performed by the same person.
  - The AR for simple aircraft must be more in line with the practical aspects. Focus should be on a physical inspection of the aircraft rather than on document verification.
- **Privileges**
  - CAMO should be allowed to issue the ARC instead of recommendation even in non-controlled environment.
  - Allow the Part-66 licensed engineer to perform the AR on any non complex non commercial aircraft.
  - Allow the ARC extension to ELA1 in non-controlled environment.
  - Concept of controlled environment to be relaxed or deleted.
  - Deletion of the concept of recommendations sent to the NAA.
  - Move towards the concept of yearly inspection+ AR as in FAA.

9. Airworthiness review

- **Period**
  - Increase the AR period to 3 years for private aircraft which usually fly very few hours per year. This will reduce costs.
  - Limit the AR to the last 12 months when the AR is performed by the same CAMO.

- **Other**
  - Problems with cross border acceptability of reviews, recommendations and certificates.
  - Takes too long to get the AR staff authorisation from the NAA.
  - Time frame of 10 days to send a copy of the ARC to the NAA is too short.
  - More guidance required for the NAA on import of aircraft from third countries.

Topic 10

- Aircraft Continuing Airworthiness Monitoring (ACAM) programme for general aviation aircraft

10. ACAM

- **From the NAA point of view**
  - Ramp checks should be maintained for GA aircraft
    - It means for the authority to reach aircraft owners and "educate" on Part-M
    - Contributes to effective oversight, as owners know their aircraft could be sampled
  - However, root-cause analysis is of very limited value.

10. ACAM

- **From the Stakeholders' point of view**
  - No added value for GA aircraft, constitutes another unnecessary burden
    - verification of a verification
    - very often reduced to document check - generates findings on document issues only - no contribution to flight safety
    - findings mainly due to the difficulties in understanding Part-M, in particular for pilot owners and independent certifying staff
    - destroys motivation of staff as GA is pictured as low performing
  - In-depth surveys create disproportionate burden for smaller CAMOs/maintenance organisations
  - In some cases aircraft was grounded without justification.

10. ACAM

- **Solutions proposed in feedback received**
  - Create customised ACAM programmes focussing on the essential risk elements for
    - sailplanes
    - balloons
    - ELA aeroplanes
    - other GA aircraft
  - Envisage delegation to qualified entities (air sports federations) with better GA background,
  - Encourage assistance between NAAs for CAMOs managing aircraft registered in other Member States.
  - Adopt "annual inspection system" (combine maintenance check and airworthiness review) - perform ACAM at the occasion of the annual inspection.
  - Ensure uniform implementation within Member States.

- Additional Comments

Rulemaking

- What seems to have been missing over the last few years is a ”change management programme”:
  - a much more co-ordinated education approach with NAAs and affected parties,
  - adequate time for understanding and communication, after the rules were finalised but before their implementation,
  - more time for ironing out language translation anomalies and generally getting ”buy-in”.

- A workshop is the lowest scale of making improvement of Part-M possible,
  - EASA to present a real plan how to improve the shortcomings or principal problems within Part-M for the General Aviation communities.
  - Also clear words would be welcomed on how and how fast improvements could be made.
- Involve European Commission in order to avoid confusion like with L licence at Part 66.

Standardisation

- Problems are not always solved at the level of NAAs - only EASA has the ability and power to clarify interpretation and force any NAA to react.
- Why does EASA have no actual power over the different NAAs?
- EASA principle, whereby rules are developed centrally by EASA, but interpreted and applied nationally by NAAs is flawed:
  - different interpretations of rules – the more complicated the rules the worse the situation - simpler rules would help here very much,
  - after the creation of EASA, NAAs no longer write the rules and they increasingly see themselves as law enforcement agencies only,
  - most NAAs seeking to justify their existence and impress the other with the rigorous application of all possible interpretations,
  - aircraft owners and pilots as well as maintenance organisations are having a tough time defending reason and proportionality.

Standardisation

- Language and translation issues lead to different interpretation.
- EASA standardisation inspections of undertakings:
  - creates burden for small CAMOs – send prior notification to CAMO on paperwork to be prepared.
- Who oversees the auditors?
- "Rule change process has generated overly intrusive behaviour by the EASA standardisation team and NAAs alike, to the dis-benefit of the stakeholder operators and aircraft owners."

Level playing field

- Use of a CAMO in another Member State:
  - when an owner is using a foreign CAMO+, this CAMO+ can be faced with extra requirements, even extra audits, which lead to extra costs,
  - in extreme cases a foreign CAMO+ might decide to stop dealing with cross border customers because of the protracted discussions with the aircraft owner's NAA,
  - economies of scale expected from mutual recognition and common rules have not materialised.

- CAMO scope: Aircraft types/series/groups to be included on the EASA Form 14 are not clearly defined:
  - results in different treatment of changes by the NAAs and possible unequal treatment between Member States.

- Level playing field is a "myth":
  - results in complex and highly detailed regulations on how to do something instead of describing the required result,
  - if the description of a result is clear, it can be left to the different 'cultures' how to achieve them.

Part-M and costs

- Increases in cost and complexity:
  - jeopardise the future of all General Aviation activities across Europe.

- Major escalation in NAA involvement:
  - usually at the expense of national sporting associations,
  - massive increases in volume of office functions and paperwork.

- Multiple layers of audit function specified in Part-M have increased massively the complexity and cost of operation:
  - key driver of increased complexity & costs is the requirement to separate the functions of physical maintenance, including annual maintenance, from continuing airworthiness oversight.

- Part-M misused by some Member States to raise the fees or even to create new fees.

- Owners try to avoid Part-M and increasingly choose the ultra-light sector.

Part-M and safety

- High priority placed on bureaucratic paperwork instead of physically checking actual condition of the flying machines.
- Pilot experience and operation in uncontrolled airspace are causing the majority of (mainly unreported) incidents.
- Main factors affecting safety:
  - increased costs result in a reduction of flying hours,
  - risks induced by concentration on paperwork and procedures:
    - number of people involved increased - every extra interface in the process bears the potential of a failure,
    - direct communication between the pilot and the maintenance engineer is reduced and filtered.
- Implementation of Part-M greatly decreases the funding necessary to renew and update equipment for flight safety enhancement.

AMCs

- The apparent degree of flexibility in some areas is removed by the imposition of the associated Acceptable Means of Compliance:
  - "only offers a single way of complying with the regulations".
  - in some instances, this is compounded further by the interpretation of some NAAs of how to demonstrate compliance with the AMC material.
  - requested action: review of the AMC material and the introduction of additional AMCs specific to certain areas (sailplanes / balloons).

AMCs provide a presumption of compliance but are non-binding by definition – possibility to submit an alternative means of compliance for individual approval!

Organisation approvals

- ELA aircraft:
  - create group ratings for organisation approvals (Subpart F / Subpart G),
  - Subpart F to obtain privileges for CAM and ARC issue.

- CAMO approval - extension of ratings:
  - no justification that CAMO should pay to extend its rating,
  - main skill of a CAMO is process-oriented,
  - position on rating extension also valid for Part-M/F and Part-145 ratings in General Aviation.

TBO extensions

- Since most GA engines do not have Airworthiness Limitations in their Type Certificates, the recommended time between overhauls as found in e.g. Service Letters (non-mandatory service information) will be just that, a recommendation.

- Experience shows that most aero engines care very little for the recommended TBO be it flight hours or calendar time and run just fine year after year if maintained properly.

- Life-limited parts for non-commercial GA aircraft should only be replaced on condition - non-commercial GA aircraft tend to sit around for long times.

Balloons

- Review of the Basic Regulation and Annex II criteria to exclude more types of balloons (specifically one-man types).
- Some parts of the rule which might be logical for large aircraft are extremely difficult to apply on a normal balloon operation.
- Fabrication of parts by the maintenance organisation:
  - need to extend the scope.

Sailplanes

- Specificity:
  - only used for recreational / sports activities,
  - owners and pilots are generally one and the same in gliding,
  - balloons excepted they are the simplest type of aircraft subject to the BR.
- Annex VIII apart (which is helpful) Part M fails to recognise the specificity of gliding.
- Subpart F arrangements for Pilot/Owner maintenance have facilitated simple, unscheduled, in-the-field maintenance,
  - however it has been reported that some NAAs have withheld these privileges, presumably for local reasons.
- Take-up of Part-M approvals rather disappointing:
  - cost barriers, inability to maintain rates.
- New system interfaces less well than the more holistic safety systems which previously operated within Member States
  - global decline in safety standards.

LSA

- Cost level of maintaining an aeroplane under Part-M is many times higher than for a nationally regulated aeroplane.
- Major threat for the success of LSA in Europe - must be addressed by EASA.
- Sensible things such as the FAA LSA concept (no design organisation, no production organisation, no need for a medical, maintenance outside of an organisation etc…) are transposed in such a manner that removes all benefits.
- Manufacturers of ultra-light aircraft have either ignored the EASA requirements right from the start or have interrupted the process, although their products are quite successful in the US.

Miscellaneous

- AD notes
  - create a central database with AD notes issued by NAAs, EASA and the FAA
- Instructions for Continuing Airworthiness (ICA)
  - need to define a framework in order to facilitate users' access
  - current process is to follow each component manufacturer, which generate huge work load and risks
  - EASA to put in place a mandatory process requiring components' manufacturers to forward any ICA to TC holders of aircraft
- Permit to Fly
  - for GA aircraft operating within a single state responsibility should be delegated to the airworthiness authority for the state in which the flight takes place
  - remove limitation about approval of non-design related flight conditions by CAMO holding M.A.711(c) privileges

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