Part-M for General Aviation
EASA workshop October 27, 2011

Europe Air Sports' View

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Today's situation, a general view…

Looking at maintenance and operations of aircraft up to 2'000 kg MTOM, Part-M

- is too complex (IR, AMC, GM);
- is too voluminous, only a small percentage deals with our aircraft;
- provokes selective reading (and understanding);
- necessitates translation;

More details:

Today's situation, a general view…

First of all, two definitions:

ELA 1 aircraft:

- an aeroplane with MTOM <1'200 kg not classified as complex motor-powered aircraft;
- a sailplane or powered sailplane <1'200 kg MTOM;
- a hot air balloon <3'400 m3 volume;
  a gas balloon <1'050 m3 volume;
- a tethered gas balloon <300 m3 volume.

Today's situation, a general view…

First of all, two definitions:

ELA 2 aircraft:

- an aeroplane with MTOM <2'000 kg not classified as complex motor-powered aircraft;
- a sailplane or powered sailplane <2'000 kg MTOM;
- a balloon;
- a hot air ship;
- a gas air ship;
- a very light rotorcraft (<600 kg MTOM).

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Aeroplanes and sailplanes

1 The format of the rules

Comments	Proposals	Rationale
All commenters agreed: Today‘s Part-M is not adequate to our ops and maintenance!	Prepare a new set of rules for aeroplanes/sail-panes and TMG up to 2‘000 kg MTOM (ELA 2).	Safety is not increased by adding paperwork. Emphasis must be on the actual condition.

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Aeroplanes and sailplanes

2 Generic maintenance programmes and Indirect approval procedures

Comments	Proposals	Rationale
Well accepted, but not widely enough introduced, with some strange definitions. Implementation problems occur.	We ask for a very simple Generic maintenance programmes for aeroplanes, sailplanes and TMG below 2‘000 kg MTOM /ELA 2).	We see no need for national variants.
M.A.604 does not correspond with M.A.201(e).	Clarify M.A.201(e)(ii)!	No ambiguities should exist.

Aeroplanes and sailplanes

3 Approval/acceptance of repairs and modifications, M.A.304

Comments	Proposals	Rationale
The process works well, with national accents. M.A.603(c) is too restrictive.	We propose „CS-Standardised Changes and Repair“ and quick; unrestricted adoption of FAA AC 43.13	Fully harmonised approvals/acceptances save time and money. We have no doubts about FAA AC 43.13, appro- by NAAs. (1977)

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Aeroplanes and sailplanes

4 Acceptance of components from USA and Canada (from „3rd countries“)

Comments	Proposals	Rationale
Not of importance to the gliding community in Europe, but a big issue for aeroplanes. No comments with regards to „3rd countries“.	Accept such compo-nents when accompanied by the appropriate documentation.	Reduces stress, distress and costs.

Aeroplanes and sailplanes

5 Scope of work authorised to the pilot/owner, M.A.803, Part-M App. VIII

Comments	Proposals	Rationale
Room for further liberal-isation. Widen the scope to maintain easily accessible controls and to minor adjustments to power-plants of simple design, plus towing / winch hooks in sailplanes / tow planes.	Create a rulemaking task to cater for adaptations.	This will keep flying affordable at the same level of safety.

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Aeroplanes and sailplanes

6 Scope of work authorised to the independent certifying staff, M.A.607

Comments	Proposals	Rationale
Adequate.	Create an AMC to clarify that there is no obligation for an approved workshop.	Level paying field!

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Aeroplanes and sailplanes

7 Licensing requirements for certifying staff, M.A.607, Part-66, Part-M Annex III

Comments	Proposals	Rationale
More harmonisation is needed. Delay in Part-66 B3 and L licenses causing difficulties in various countries.	Create an an appro-priate L-License without further delay.	Our community needs it urgently.

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Aeroplanes and sailplanes

8 Qualifications and position incompatibilities/requirements for airworthiness review staff, M.A.707

Comments	Proposals	Rationale
Some incompatibilities/ exist.	Impose a uniform application of the rule. A joint workshop EASA/NAA/stakeholders will contribute to this.	We see no need for national variants.

Aeroplanes and sailplanes

9 Performance of the airworthiness review and issuance of ARC/ recommendation, M.A.801

Comments	Proposals	Rationale
Adequate.		

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Helicopters

General remarks

Comments	Proposals	Rationale
STC approvals take too much time.	Check the efficiency of the competent authority.	It‘s about time and money!

Balloons

5 Scope of work authorised to the pilot/owner, M.A.803, Part-M App. VIII

Comments	Proposals	Rationale
Room for amelioriation! Widen the scope to maintain balloon and burner.	Create a rulemaking task to cater for adaptations.	This will keep flying affordable at the same level of safety.

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All aircraft

General remark

Comments	Proposals	Rationale
Lifing of parts: x hours/ y years provokes un-necessary costs.	Exercice influence to come to a more liberal „on condition“ scheme.	The safety level will not decrease.

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All aircraft

10 Aircraft Continuing Airworthiness Monitoring (ACAM) programme for General Aviation aircraft (only for competent authorities), M.B.303

Comments	Proposals	Rationale
In the end, we pay the bill, so we comment on this!	Create a GA-appropriate risk-based programme, 2‘000 kg MTOM should be the separation line. (ELA)!	In doing so a reasonable output will result.

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Subpart-F, -G and -I Organisations, EASA aircraft

The contents of the rules

Comments	Proposals	Rationale
Today‘s regulations do not fit.	A joint workshop EASA/NAA/stakeholders could help to find better rules.	The scope of work should be reflected by the rules.

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Subpart-F, -G and -I Organisations, “Annex II” aircraft

The contents of the rules

Comments	Proposals	Rationale
Today‘s regulations do not fit.	A joint workshop EASA/NAA/stakeholders could help to find better rules.	The scope of work should be reflected by the rules.

Occurrence reporting, ELA aircraft

The contents of the rules

Comments	Proposals	Rationale
Today‘s occurrence reporting is too burden-some, it is not risk-based.	A joint workshop EASA/NAA/stakeholders could also here help to find better rules.	Only a proportionate system produces pro-portionate results.

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