Comment Response Document (CRD)
to Notice of Proposed Amendment (NPA) 07-2005

for a Commission Regulation amending Commission Regulation (EC) No 2042/2003, on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks.

PART-M AMENDMENT FOLLOWING REGULATORY IMPACT ASSESSMENT

Explanatory Note

I. General

1. The purpose of the Notice of Proposed Amendment (NPA), dated 23 June 2005, was to evaluate the impact of Part-M in the non-commercial activities and consequently amend Annex I Part-M to Commission Regulation (EC) No 2042/2003 of 20 November 2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks[1].

II. Consultation

2. The draft Executive Director Opinion was published on the web site (www.easa.europa.eu) on 23 June 2005.

   Due to the importance of the subject the consultation period was extended by two months. By the closing date of 24 November 2005, the Agency had received 441 comments from national authorities, professional organisations and private persons.

III. Publication of the CRD

3. All comments received have been acknowledged and incorporated into a Comment Response Document (CRD). This CRD contains a list of all persons and/or organisations that have provided comments and the answers of the Agency.
   The revised NPA text resulting from the CRD responses has been included in ***Appendix I to CRD 07/2005 "Draft Opinion of the European Aviation Safety Agency".***

   In view of the complexity of the issue and, as it is expressed in the corresponding ToR, task M.017 was created in order to review the comments resulting from NPA 07/2005 and to propose further changes to the rule and to AMC/GM. This review has led to this CRD, which introduce some changes to NPA 07/2005. The revised NPA text resulting from the CRD responses includes, among others, the following changes:

   - Clarification of the "indirect approval procedure" for the approval of the Maintenance Programme by a Continuing Airworthiness Management Organisation (CAMO) (See M.A.302 (b)).
   - Clarification of the content of the Maintenance Programme (See M.A.302 (c)).
   - Clarify that a Reliability Programme is not required for other than large aircraft (See M.A.302 (e)).
   - Clarify that the operator's technical log is only required for commercial air transport and also when required by the Member State in accordance with M.A.201(i). (See M.A.305).
   - For certifying staff in Subpart F maintenance organisations, the six month experience requirement in every two year period has been changed to refer to the experience requirements of Part-66, which in the case of gliders and balloons refer to national rules (see M.A.607 (a)).

1 OJ L 315, 28.11.2003, p. 1.. Regulation as last amended by Regulation (EC) No 376/2007 (OJ L 94, 4.4.2007, p. 18).

- For aircraft of 2730 Kg MTOW and below, which are not used in Commercial Air Transport, remove the concept of "recommendations" when the Airworthiness Review Certificate is issued by the Competent Authority. In this case, recommendations will be issued only for the import of an aircraft (See M.A.711).
- Add the possibility to use organisational reviews instead of a quality system for organisations issuing Airworthiness Review Certificates for aircraft of 2730 Kg MTOW and below (See M.A.712).
- For aircraft of 2730 Kg MTOW and below, which are not used in Commercial Air Transport, remove the need for 12 months under the management of a Continuing Airworthiness Management Organisation (CAMO) in order to have the Airworthiness Review Certificate issued by a CAMO (after a full airworthiness review). This requirement is maintained in order to have the Airworthiness Review Certificate extended (without airworthiness review) (See M.A.901).
- Include in Appendix I "Continuing Airworthiness Arrangement", the obligation of the owner to inform the Continuing Airworthiness Management Organisation (CAMO) about the flying hours and any other utilization data, as agreed with the CAMO.
- The instructions for completing the EASA Form 1 by Subpart F organisations have been revised to include the need for a Release to Service Statement in Block 13, which is referenced in Block 19.
- Appendix VIII "Limited Pilot Owner Maintenance" has been revised to include additional tasks (is currently being further revised by M.005 working group).

Nevertheless, Working Group M.017 has been proposing further changes to the text in the last several months, which will be complemented by other changes to be agreed in the next couple of months before a new NPA is published for external consultation, expected by June 2007. These proposals include, among others, the following:

- Definition of which is the Member State responsible for the approval of the Maintenance Programme in those cases where the State of Registry is different from the State approving the Continuing Airworthiness Management Organisation (CAMO).
- Clarification of the meaning of Competent Authority and how many Competent Authorities can exist in a Member State.
- Clarify the concept of maintenance of components and when an approved organisation is not required. Revise Appendix VII "Complex Maintenance Tasks" to include certain maintenance tasks on engines.
- Regarding the possibility to use organisational reviews instead of a Quality System, base the definition of small organisation on the number of persons instead of on the number of managed aircraft.
- Produce guidance material with the content of an Organisational Review for a small CAMO.
- Remove the obligation for certain aircrafts to perform all maintenance at approved maintenance organisations for the issuance of an Airworthiness Review Certificate by a CAMO. Any appropriately approved CAMO with Subpart I privileges may issue the ARC after a full airworthiness review.
- Give the choice to the owner, for certain aircrafts, of having the Airworthiness Review Certificate renewed by a CAMO or by the Competent Authority.

- Clarification of what is a Generic Maintenance Programme and not require to have a customer (the specific Maintenance Programme) in order to get the initial approval of a CAMO. Revise the approval certificate Form 14 as appropriate.
- Evaluate the possibility to incorporate AC 43-13 as an approved document for standard repairs and modifications.
- Clarify the concept of Work Card / Work Sheet.
- Clarify the concept of Work Order.
- Re-evaluate the requirements for the Airworthiness Review Staff (M.A.707).
- Include the privilege of subcontracting maintenance for a Subpart F maintenance organisation.
- Clarify the terms "experience" and "proper qualifications" included in M.A.801.

4. In responding to comments, a standard terminology has been applied to attest EASA's acceptance of the comment. This terminology is as follows:

   - **Accepted** – The comment is agreed by the Agency and any proposed amendment is wholly transferred to the revised text.
   - **Partially Accepted** – Either the comment is only agreed in part by the Agency, or the comment is agreed by the Agency but any proposed amendment is partially transferred to the revised text.
   - **Noted –** The comment is acknowledged by the Agency but no change to the existing text is considered necessary.
   - **Not Accepted** - The comment is not shared by the Agency.

5. The Agency's Opinion will be issued at least two months after the publication of this CRD to allow for any possible reactions of stakeholders regarding possible misunderstandings of the comments received and the answers provided.

6. Such reactions should be received by EASA **not later than 26 June 2007** and should be sent by the following link: CRD@easa.europa.eu.

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
000	F.F.V.V.	Draft Opinion	M.A.603	MA 603 "(b)- Extent of approval An approved maintenance organisation may fabricate, in conformity with maintenance data, a restricted range of parts for the use in the course of undergoing work within its own facilities, as identified in the maintenance organization manual. " Restricted range of parts can be fabricate, in conformity with maintenance data, for the use in the course of undergoing work within its own facilities, can be achieved by Clubs maintenance workshops, even not approved maintenance organization, as long as technical skillfulness and experience of the maintenance staff is recognized.	Permission to remove components is generally not expressed by the aircraft maintenance manual, and achievement of such requirement would mean not removal at all! So we propose to invert the argument. It seems also necessary to get a more accurate definition of "maintenance" for components to distinguish between "assembling-dissembling" and operate in/on the component itself.	Not accepted. M.A.603(b) gives the privilege of fabricating parts during maintenance. It is not felt that these could be fabricated outside of an approved organisation.	
001	Aeroclub de France	Draft Opinion	M.A.712	The MA 703 Extend of Approval should be able to include aircrafts used for some commercial activities and older aircrafts above 2730 kg MTOW	In France, the Aeroclub system which allows for most of private flying hours uses aircrafts for many uses, some of them could in the future, and depending on the regulation evolution, be considered as “commercial” activities although this consists only in local flying for non club members. These small structures cannot afford the cost and do not need the quality system for the maintenance of their aircraft (s) that the MA712 implies. It is not proved that this system would bring any additional level of safety to this kind of operation and it would surely add to the paperwork burden of these kinds of organizations which would be detrimental to the day to day care of the airplane (s) but these very small operations. For older, larger aircrafts (ie NA T6, T28, JU52, ...), the quality system for organizations dealing with older out of date technologies is not the answer to better safety level (which does not pose any problem in current ways of managing these aircrafts). Once again, a quality system as described in MA712 would	Partially accepted. "Old aircraft having a clear historical relevance" are not considered by the regulation as they are excluded by Annexe II of Basic regulation. Any subject related to Commercial Operations is under discussion with the Parliament and the Commission and the Commission proposal 0579 will give the elements. It is premature to take the proposal. Not withstanding the decision to be taken by the Parliament, M.A.201(g) regulates the maintenance of commercial operated aircraft. However this comment does illustrate a problem with the drafting of M.A.712 in the NPA, it has never been the intent to impose a quality system on small CAMOs managing large aircraft nor to allow large organisations to work without a quality system. A new drafting has been proposed that reflects the real	See revised M.A.712

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					divert precious ressources and knowledge to paperwork tasks without real added value to these aircrafts operations.	intent which was to allow one man organisation to carry out airworthiness reviews on aircraft not considered as complex	
002	Aeroclub de France	Draft Opinion	M.A.901	We strongly oppose the absence of a derogation regarding the possibility of issuance of an ARC by an approving person for less than 2730 kg aircraft or old historic aircrafts of any weight with specific technologies which are no longer teached in current training programs.	The agency does not provide any element sustaining that derogating from Part M concept for smaller organizations or simplier airplanes would lead to down grade current safety level as long as the certifying person is at the correct level of knowledge and training regarding the characteristics of the airplane for which ARC should be issued	Noted. Historical aircraft are excluded by Annex II to Basic Regulation. A one man organisation which issues an ARC is not prevented by the actual Part-M. Initial issuance of ARC is carried out by the competent authority as it also issues the CoA and re issuance is carried out either by the competent authority or by an approved CAMO that can be a one man organisation as mentioned in the NPA 7/2005. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO. This text has been modified. AMC will be added to limit the number of bodies involved.	See revised M.A.901
003	Jargon Aviation Consultancy	Draft Opinion	Appendix II	Whit the new instructions for completing Block 19, also the remaining text of the appendix II for Block 19 should be reviewed. Main text and subparagraphs (a) to (c) are no longer correct, complete or consistent.	Clarification of text.	Accepted. Text will be modified	See revised Appendix II, EASA Form 1
004	Jargon Aviation Consultancy	General	M.A.607 (b) and new M.A.801 (c)	Please note that if the content of the old M.A.607 (b) is moved to the new M.A.801 (c), also Article 5 of IR 2042/2003 must be amended, The reference to M.A.607(b) must be replaced by M.A.801(c). This change is not included in the NPA.	Consistency of Implementing Rule with Annex I	Accepted. Text will be modified	See revised 2042/2003, Article 5
005	Jargon Aviation Consultancy	Draft Opinion	M.A.801 (c)	New M.A.801 (c)	Clarification of text.	Accepted	See revised M.A.801

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				Clarify the meaning of “contracted organisation”. Which organisation is meant, contracted maintenance organisation or continuing airworthiness management organisation or the person responsible under M.A.201(a)? What if no CAMO has been contracted?			
006	Austro Control	Appendices, Subpart G	Appendix II	Block 19 "...the box "other regulation ~~box~~ specified in block 13"..."	Delete the word "box" after "other regulation" which is in error.	Accepted. Text will be modified	See revised Appendix II, EASA Form 1
007	Austro Control	Draft Opinion, Subpart G	M.A.712 (f) Quality system	(f) Change first part of paragraph "In the case of a small M.A.Subpart G organisation that does not have the privileges granted under M.A.711(b),..." to "By derogation to M.A.712(a),in case..."	This will harmonize text used in other paragraphs in Part M (e.g. M.A.801(c)).	Not accepted Adding this sentence makes the text heavier, and this is a concern to general aviation.	
008	Austro Control	Draft Opinion, Subpart G	M.A.801	(c) change "...person responsible under M.A.201(a)..." to "...owner..."	The person responsible under M.A.201(a) is in any case the owner of the aircraft.	Accepted.	See revised M.A.801
009	Austro Control	Draft Opinion, Subpart G	M.A.801(c)	3. notify the competent authority ~~or~~ and the contracted Subpart G organisation responsible for continuing airworthiness management when contracted in accordance with M.A.201(e) within 7 days of the issuance of such certification authorisation.	The competent authority should be informed in any case when certification authorisation was contracted in accordance to M.A.201(e)	Not accepted. Not all aircraft are managed by a subpart G organisation. Furthermore, when they are, informing the competent authority is seen as an overly burdensome request that may lead to unnecessary exchanges between authorities and aircraft owners.	
010	Austro Control	Draft Opinion, Subpart G	M.A.901	(e) Whenever circumstances show the existence of a potential safety threat or in the absence of a continuing airworthiness management organisation, approved for the aircraft type, located in a reasonable distance of the location where the aircraft is permanently located, the…	The competent authority should only carry out the airworthiness inspection when no continuing airworthiness management organisation, is located in the vicinity of the location where the aircraft is permanently located. If a CAMO is available than the NAA should not carry out the review.	Noted. This issue will be considered by M.017 group, as further Regulatory Impact Assessment is needed.	
011	Austro Control	General	SIM	M.A.712 Quality system (f) In the case of a small M.A. Subpart G organisation that does not have the privileges granted under M.A.711(b), the quality system can be replaced by performing organisational reviews on a	The discriminates should be in line with Part 21A.14(b) used for “alternative procedures, because helicopters above 1361kg could be very complex and could not be classified as products of simple design.	Partially accepted. It has never been the intent to impose a quality system on small CAMOs managing large aircraft nor to allow large organisations to work without a quality system. A new drafting has been proposed that	See revised M.A.712

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				regular basis, provided that the M.A.703 extent of approval does not include aircraft used for commercial activity or ~~aircraft~~ aeroplane above 2730kg MTOW or ~~multi-engine~~ helicopters above 1361 kg		reflects the real intent which was to allow one man organisation to carry out airworthiness reviews on aircraft not considered as complex. The paragraph 21.A.14 refers to alternatives procedures of approval of design on simple designed aircraft, and no direct link can be made with approval of CAMO organisation.	
012	Austro Control	Appendices	Appendix I	7. "...or make a recommendation for an airworthiness review certificate to the competent authority..."	The word " certificate" after "...airworthiness review..." is missing.	Partially accepted. Text modified and the words “airworthiness review” have been removed.	See revised Appendix I, Continuing Airworthiness Arrangement
013	CAA UK	General	SUP	Please be advised that the UK CAA has no comments to make on the above NPA.		Noted.	
014	Alberto Fernandez	General	M.A.902	Instead of ..(b) An aircraft must not fly if the airworthiness certificate .. It should say ..(b) An aircraft must not fly if the airworthiness review certificate ..	To express the intention of the rule (valid ARC required to fly). Current legal meaning allows the aircraft to be operated with an invalid airworthiness review certificate, but this is not the intent of the rule.	Not accepted. This paragraph is to reflect that the validity of the ARC is linked to the validity of the Certificate of Airworthiness.	
015	CAA UK	General	M.A.504	Unserviceable components shall be identified and stored in a secure location segregated from serviceable items until a decision is made on the future status of such component.	Part 145 and Part 21 sub part F have specific requirements relating to storage and component control. The original wording also implies that the retention of the component must be at an approved organisation. The part could also be retained by the owner of the part who is also accountable under Part M. If a Part 66 licensed engineer has declared a part unserviceable it is not practical to expect him to send it to a M.A. 502 approved organisation for retention.	Partially accepted. Due to safety concerns, unserviceable parts must be kept from entering into service. That is why those parts must be kept under the control of a Subpart F or Part 145 organisations in secure locations until a decision is made on the future status of the part. This does not prevent the owner to keep parts that have been declared unsalvageable, as long as they are appropriately mutilated as per M.A.504(d). Anyway, AMC will be revised to clarify what is meant by "under the control of....."	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
016	CAA UK		M.A.707	The experience and qualifications in M.A. 707(a) 1 & 2 are not appropriate for review staff solely involved with either balloons or gliders where there is no applicable Part 66 licensing.		Partially accepted. This issue is recognised as applicable to general aviation (not just gliders and balloons). Amendments would be made to AMCs to clarify the requirements for these categories of general aviation aircraft. Note that within M.A.707(a)2, Part-66 defers to national regulations for balloons and gliders .	
017	CAA UK		M.A.711	(c) An organisation shall be located in one of the Member States to be granted the privilege pursuant to paragraph (b).	The word change is proposed to be compatible with Regulation 2042/2003 Article 2 paragraph i. Unless this is changed, it will preclude approval of a "natural person" who is not required to be registered in a Member State. Item 20 of the NPA refers to a person being declared or holding a work permit as being assimilated as a registration, however not all persons hold work permits, identity cards or passports.	Not accepted. The organisation has to be registered in a Member State to carry out legal actions in case of negligence or fraudulent activities. A person's location is only temporary. The registration of an individual person does not deprive him from being approved.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
018	CAA UK		M.A.801	The CAA would propose an alternative to the paragraph in M.A.801 (c) PROPOSED TEXT: (c) By derogation to M.A.801 (b) in the following unforeseen cases, where an aircraft is grounded at a location outside the territory of a Member State the person responsible under M.A.201 (a) may authorise any person with not less than three years maintenance experience and holding a valid ICAO aircraft maintenance licence rated for the aircraft type requiring certification, provided there is no organisation appropriately approved under Part M or Part 145 at that location. The person responsible under M.A.201 (a) shall: 1 obtain and hold in the aircraft records details of the work carried out and the licence of that person issuing the certification; and 2 notify the contracted subpart G organisation responsible for continuing airworthiness management when contracted in accordance with M.A.201(e) within thirty days of the issuance of such certification authorisation.	It is considered that this provision for non-commercial aircraft should apply only outside of member states as certifying staff available within the Member States will meet M.A 801 (b). There is no need to include a requirement for maintenance that could affect flight safety to be recertified. The certifier is after all required to hold an ICAO type license. All maintenance could be said to fall in this category or it will need to be clearly defined how the responsible person should determine whether the maintenance carried out affects flight safety. There should be no need to notify the competent authority when this provision is used as they are not responsible for maintenance carried out and no actions is required to be taken by them on receipt of such a notification.	Partially accepted. The basic premise of restricting these options to outside the EU is rejected as a non necessary limitation. However alternative procedures have been evaluated, the item is amended accordingly and will be further clarified in AMC material.	See revised M.A.801
019	CAA UK		M.A.803	b) For any privately operated aircraft of simple design with a maximum take-off mass of less than 2730 kg, the pilot-owner may issue the certificate of release to service after limited pilot owner maintenance listed in Appendix VIII.	The definition of an aircraft in Regulation 2042/2003 Article 2 includes balloons and gliders.	Not accepted. The text specifically includes "gliders and balloons" to avoid confusion on whether they are of simple design or not.	
020	Performance Variable e.K	General	PAR	I am not shure if this is the right we to get Informations? Comment about Maintanance Organisation Part M subpart F for Personal Parachutes. We are a production Organisation for personal Parachutes and need to be certified under Part M for maintenance		Noted. Refer to answer made to comment 21 from FFP. Currently the airworthiness and maintenance aspects have not been defined, however once the safety parachutes are definitely affected by Part-M, subpart E and F of Part-M will be modified accordingly.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				our own equipment. I think we could not be components. We could not maintenance or parachute inside an aircraft. So, how can we handle that in the future? The Part M does not fit on us and our ETSO C23 equipment.			
021	FFP	General	PAR	In EASA rules EC N° 1592/2002 Basic rules article 4 Paragraph 1 and paragraph 2 Annex II also specifies that aircraft lighter than 70 kilos including all components are outside the application field Text 2042/2003 Article 1 paragraph 2 in reference to Annex II of basic rules (1592) shows that this text does not apply to aircraft lighter than 70 kilos, therefore also includes parachutes. In order to guarantee safety and public protection (mission of FFP) We ask to modify annex II from rules 1592 paragraph 2: “ aircraft with a total mass without pilot of less than 70 kilos” into “ aircraft with a total mass without pilot of less than 70 kilos except personnel and safety parachutes “ Let’s add and create this item i : The personnel safety parachutes will be the object of a specific reglementation About the 1702/2003 We are asking, in accordance with paragraph i from annex II of rule 1592, that will be created a subpart “parachutes” In the rule 2042 article 1 paragraph 2, we ask to add : In accordance with annex II from paragraph “i”, just created (from basic rule 1592) the personnel safety parachute		Noted. Any modification to regulation 1702/2003 shall be considered by MDM 032. In EASA policy, the parachutes are not considered as an aircraft, thus they are not excluded by the Annexe II of Basic regulation 1592/2002. However a presentation made on December 2006 by EASA Certification Directorate on the responsibilities for parachutes states that: "EASA has received several questions from NAAs with regard to parachutes and the responsibilities for this equipment. After a comprehensive analysis of the issue EASA confirms that, in accordance with the scope of Regulation (EC) 1592/2002 and its implementing rules, EASA is the responsible Authority for ‘emergency parachutes’ designed for wearing or installation on board of an aircraft within the scope of EASA’s responsibilities" ... "EASAs responsibility for emergency parachutes is based on the fact that the emergency parachutes are requested by e.g. national operating rules as aircraft (emergency) approved equipment, like life vests or life rafts under JAR-OPS, equipment which are also certified by EASA."	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				will be the object of a specific subpart. The European manufacturers shall make the proposal for the specific subpart concerning parachute 2042 (certification, construction) and ESPWPG shall make proposals relative to the subpart "parachute from text 2042" In case our proposal for these 3 texts is not acceptable considering that personnel safety parachutes is outside the application field (like shown above), we will ask to apply a specific text to the parachute equipment.			
022	EPSPWG	General	PAR	Assuming that “Personnel safety parachutes” are considered as operational components, we wonder whether Part M applies or not.If EASA considers that Part M applies to “Personnel safety parachutes”, there is definitely a need for an adaptation of at least Subpart E and Subpart F of Part M.	On the one hand, Article 1 of commission regulation (EC) No 2042/2003 states that “Part M applies only to aircraft and components for installation thereto”.“Personnel safety parachutes” include “emergency parachutes”, usually worn by pilots, and “reserve parachutes”, usually worn by parachutists. So, “Personnel safety parachutes” are not components “installed there to” (an aircraft) but personnel components that are worn by human beings in an aircraft.In this case, it seems that Part M does not apply to “Personnel safety parachutes”. On the other hand, any “personnel safety parachute” manufacturer may ask EASA for a CS-ETSO certification (CS-ETSO c23d).In this case, it seems that Part M applies to “Personnel safety parachutes”.Indeed, as far as “personnel safety parachutes” are concerned, there are potential contradictions and multiple interpretations of Part M scope. If EASA	Noted. Refer to answer made to comment 21 from FFP. Currently the airworthiness and maintenance aspects have not been defined, however once the safety parachutes are definitely affected by Part-M, subpart E and F of Part-M will be modified accordingly.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					considers that Part M applies to “personnel safety parachutes”, here are a few examples of issues that can be further discussed :1/ paragraphs (a) and (b) of M.A.501 and paragraph (b) of M.A. 502 :If they apply, these paragraphs should be adapted to “personnel safety parachutes” since they do not “fit in an aircraft” but are “worn by human beings”.2/ paragraph (d) of M.A.501 :If it applies, this paragraph may have a significant economical impact on parachute activity since this provision is not at all commensurate to parachute business and maintenance means.For instance, a safety parachute includes consumable rubber bands that cannot reasonably be “traceable”.3/ paragraph (a) of M.A.502 :If it applies, this paragraph may have a significant economical impact on parachute activity.Indeed, the maintenance organisation required in Subpart F does not seem to be commensurate to the most usual type of maintenance performed on personnel safety parachutes : “repacking”. This maintenance task includes : personnel safety parachute opening, visual inspection, safety canopy folding and safety parachute packing. In Europe, this maintenance task is usually performed by a qualified packer on a year basis, it takes only a few hours and does not need any formal “organisation”. A clean room and a qualified packer is usually quite enough.The European Personnel Safety Parachute Working Group (EPSPWG) is ready to participate to any discussion that EASA may set up.		

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
023a	Keith Auchterlonie	Explanatory Note	-	The RIA (Regulatory Impact Assessment) did not cover all the concerns that the gliding community has relating to the application of Part M. The scope of the RIA has been restricted as only subparts E to I were chosen to be impact assessed by EASA. In addition, the questions raised by the RIA did not reflect many of the concerns of the gliding community. Recommendation: EASA should set up a working group to address the issues within Part M that are of particular concern to gliding.		Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
023b	Keith Auchterlonie	Draft Opinion	M.A.302	Outline: Part M requires a maintenance programme to be drawn up for every individual aircraft and approved by the competent authority. This is a totally unacceptable burden on the gliding community in particular and is inappropriate. FAR 43 13 in the USA provides an appropriate procedure model that avoids the expense and bureaucracy suggested by MA302. Recommendation: EASA should relax this	There is no need within gliding, in terms of safety or otherwise, for the additional bureaucracy that an individual maintenance programme will entail. Writing thousands of manuals is a huge task and will have significant production and monitoring costs that will be passed on to owner/operators. The current situation, where national gliding associations oversee generic maintenance programmes that incorporate manufacturer's	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				rule for gliders and if necessary replace it with a rule similar in context to FAR 43 13.	maintenance manuals and instructions for continuing airworthiness such as Airworthiness Directives is effective and proven.	current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	
023c	Keith Auchterlonie	Draft Opinion	M.A.901	Outline: A Part M Regulatory Impact Assessment consultation recommendation was that for gliders the Airworthiness Review Certificates should be issued by a certifying person – effectively maintaining the status quo in the UK. EASA has rejected this proposal and insists that the ARC should be issued by the 'competent authority' (i.e. the State). EASA should reconsider that position because of the increased cost burden to owner/operators and no tangible increase in safety. Part M does not take into account that gliders are simple in construction and system design. Gliders are designed in a way that maintenance can be performed in accordance with the manufacturers' maintenance programmes and there would be no increased risk associated with individual glider maintenance inspectors making an ARC recommendation to the approved certifying person. A periodic (5 year) requirement to carry out an external airworthiness review by a sub part G organisation (Airworthiness management Organisation such as the BGA would plan to be under EASA) would enable the competent authority to maintain oversight. The Part M procedure for renewing the airworthiness certificate in what is termed an "uncontrolled" environment will be a significantly increased administrative burden and therefore more expensive than	See above (commentary 23b)	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				the existing procedure. EASA should issue AMC (Acceptable Means of Compliance) material that simplifies the procedure for gliding. In the uncontrolled environment it should be possible for the approved certifying person at a sub part G organisation to issue the ARC rather than having in place two separate bureaucratic and expensive operations to achieve the same result. Within Europe, the majority of gliding organisations maintain their fleets under the delegation of the National Aviation Authority. In the UK, the gliding fleet is not currently regulated by the State but is effectively maintained in the same manner as all other gliders in Europe. The existing UK gliding airworthiness system, formally approved by the CAA, provides all the necessary processes and safeguards. The statistics in terms of airworthiness related accidents speak for themselves. Forcing the gliding community to comply with the large aircraft maintenance solutions described in Part M, including the need to comply with the stringent requirements of subpart F and G organisations will significantly increase the administrative burden and cost of maintenance. It is a particular concern that the gliding community is not satisfied that Part M will provide an equivalent level of safety to that currently associated with existing glider processes. Recommendation: Appropriate AMC material or a lighter version of Part M should be developed to effect simpler and more cost-effective procedures that apply to gliders.			

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
023d	Keith Auchterlonie	General	-	Outline: In the UK, gliding has not been state regulated at all since 1948, other than in areas where gliding interfaces with other aviators and airspace users. The British Gliding Association self-regulates and manages all aspects of gliding. In order to be able to continue to benefit from this freedom in the framework of Part M, the BGA would have to become the Competent Authority for Gliding in the UK. Unfortunately the UK Department for Transport has already designated the UK CAA as THE (rather than 'a') Competent Authority, and as yet has not seemed willing to grant this privilege to the BGA. The EGU therefore request EASA to find a means to allow the BGA to become the Competent Authority for gliding in the UK. Recommendation: EASA should find a means to enable the BGA to continue to develop and manage gliding airworthiness processes as it has done so successfully to date.	The BGA has managed UK gliding in a satisfactory way for decades. CAA scrutiny has invariably found that the BGA is fully capable of ensuring air safety as demonstrated by accident / incident rates which compare favourably with, and often exceed, those of countries where stricter legislation is applied. Details of accident rates due to airworthiness or maintenance, since 1987, have already been supplied to the EASA Rulemaking Director. If the BGA has to enter into the Part M mould and become a continuing airworthiness management organization ("sub part G"), the administrative and cost burden will increase significantly for no likely increase in safety based on historic performance.	Further to the reply to your comment 23a: Competent Authority status can only be designated by a Member State.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
024a	Darren Smith	Explanatory Note	M.A.302	The RIA did not address all of the concerns that the gliding community has relating to the application of part M. The scope of the RIA was restricted. The questions raised did not address gliding community concerns. Recommendation: EASA should set up a working group to address the gliding communities concerns about part M. MA302: Outline: Part M requires a maintenance programme to be drawn up for every individual aircraft and approved by the competent authority. This is a totally unacceptable burden on the gliding community in particular and is inappropriate. FAR 43 13 in the USA provides an appropriate procedure model that avoids the expense and bureaucracy suggested by MA302.	MA302: There is no need within gliding, in terms of safety or otherwise, for the additional bureaucracy that an individual maintenance programme will entail. Writing thousands of manuals is a huge task and will have significant production and monitoring costs that will be passed on to owner/operators. The current situation, where national gliding associations oversee generic maintenance programmes that incorporate manufacturer's maintenance manuals and instructions for continuing airworthiness such as Airworthiness Directives is effective and proven. Recommendation: EASA should relax this rule for gliders and if necessary replace it with a rule similar in context to FAR 43 13.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
024b	Darren Smith	Explanatory Note	M.A.901	The RIA did not address all of the concerns that the gliding community has relating to the application of part M. The scope of the RIA was restricted. The questions raised did not address gliding community concerns. Recommendation: EASA should set up a working group to address the gliding communities concerns about part M. MA901: Outline: In the UK, gliding has not been state regulated at all since 1948, other than inareas where gliding interfaces with other aviators and airspace users. The British Gliding Association self-regulates and manages all aspects of gliding. In order to be able to continue to benefit from this freedom in the framework of Part M, the BGA would have to become	MA901: The BGA has managed UK gliding in a satisfactory way for decades. CAA scrutiny has invariably found that the BGA is fully capable of ensuring air safety as demonstrated by accident / incident rates which compare favourably with, and often exceed, those of countries where stricter legislation is applied. Details of accident rates due to airworthiness or maintenance, since 1987, have already been supplied to the EASA Rulemaking Director. If the BGA has to enter into the Part M mould and become a continuing airworthiness management organization ("sub part G"), the administrative and cost burden will increase significantly for no likely increase in safety based on historic performance. Recommendation: EASA should find a	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				the Competent Authority for Gliding in the UK. Unfortunately the UK Department for Transport has already designated the UK CAA as THE (rather than 'a') Competent Authority, and as yet has not seemed willing to grant this privilege to the BGA. The EGU therefore request EASA to find a means to allow the BGA to become the Competent Authority for gliding in the UK.	means to enable the BGA to continue to develop and manage gliding airworthiness processes as it has done so successfully to date.	The status of BGA within the UK airworthiness structure is a matter for UK alone and not a responsibility of the Agency.	
025	A MacGregor	General	-	These proposed part M rules are inappropriate to glider maintenance. For many years, the BGA has overseen the C of As for gliders with an entirely satisfactory outcome. The proposed rules would be very detrimental to UK gliding and GA in the UK.	The BGA has managed UK gliding in a satisfactory way for decades. CAA scrutiny has invariably found that the BGA is fully capable of ensuring air safety as demonstrated by accident / incident rates which compare favourably with, and often exceed, those of countries where stricter legislation is applied. Details of accident rates due to airworthiness or maintenance, since 1987, have already been supplied to the EASA Rulemaking Director. If the BGA has to enter into the Part M mould and become a continuing airworthiness management organization ("sub part G"), the administrative and cost burden will increase significantly for no likely increase in safety based on historic performance. Part M does not take into account that gliders are simple in construction and system design. Gliders are designed in a way that maintenance can be performed in accordance with the manufacturers' maintenance programmes and there would be no increased risk associated with individual glider maintenance inspectors making an ARC recommendation to the approved certifying person. A periodic (5 year) requirement to carry out an external airworthiness review by a sub part G organisation (Airworthiness Outline: In the UK, gliding has not been state regulated at	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Subsequently, Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					all since 1948, other than in areas where gliding interfaces with other aviators and airspace users. The British Gliding Association self-regulates and manages all aspects of gliding. In order to be able to continue to benefit from this freedom in the framework of Part M, the BGA would have to become the Competent Authority for Gliding in the UK. Unfortunately the UK Department for Transport has already designated the UK CAA as THE (rather than 'a') Competent Authority, and as yet has not seemed willing to grant this privilege to the BGA. The EGU therefore request EASA to find a means to allow the BGA to become the Competent Authority for gliding in the UK. The BGA has managed UK gliding in a satisfactory way for decades. CAA scrutiny has invariably found that the BGA is fully capable of ensuring air safety as demonstrated by accident / incident rates which compare favourably with, and often exceed, those of countries where stricter legislation is applied. Details of accident rates due to airworthiness or maintenance, since 1987, have already been supplied to the EASA Rulemaking Director. If the BGA has to enter into the Part M mould and become a continuing airworthiness management organization ("sub part G"), the administrative and cost burden will increase significantly for no likely increase in safety based on historic performance. Recommendation: EASA should find a means to enable the BGA to continue to develop and manage gliding airworthiness processes as it has done so successfully to date.	implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
026	J. McWilliam	General	-	As an ex-RAF flying instructor, general aviation pilot and a qualified and practicing mechanical engineer designing, making and installing airport equipment and servicing motor-gliders and gliders under the British Gliding Association may I offer the observations and comments below to help you make safe and worthwhile decisions relating to light aircraft maintenance: 1a. COMMENT TO NPA-07-2005 General comments: In my experience light aircraft and glider maintenance quality (and therefore flight safety) is best served by people with experience and specialisation on type whether or not they have official qualifications. In over 5,000 hours on all types from Phantom to Piper Cub and gliders my most dangerous flying experiences have been after servicing at major service organisations using fully licenced engineers. 1b. AFFECTED PARAGRAPHS: RIA:- Discus with the British Gliding Association, Popular Flying Association, etc. how Part M can best use them and their engineering services. M302:- Replace this with a rule similar to FAR 43 13 MA901:- The most "competent authority" in my experience for gliders in the UK is the BGA and so MA901 should ensure the gliding asociations remain in charge of glider maintenance procedures by providing appropriate AMC guidance or a rewording Part M. GENERAL COMMENT I believe it is wise to encourage the continuance and improvement of specialist maintainers within specialist organisations such as the British Gliding		Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Subsequently, Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's Re- MA302 . As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which	See revised M.A.302 and M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				Association, Popular Flying Association, etc. These have proven track records and a large body of experience on type. They are doing a good job and should be encouraged and empowered to continue.		several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re- issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005. The status of the BGA within the UK airworthiness structure is a matter for UK alone and not a responsibility of the Agency.	
027a	Mike Knell	General	M.A.302	EASA should work with BGA for part M EASA should accommodate BGA so that BGA continue to manage gliding airworthiness processes 1) MA302 EASA should relax this rule and use something like FAR 43 13		Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	
027b	Mike Knell	General	M.A.901	EASA should work with BGA for part MEASA should accommodate BGA so that BGA continue to manage gliding airworthiness processes2) MA901 A lighter version of Part M or appropriate AMC should apply to gliders.		Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.The status of BGA within the UK airworthiness structure is a matter for UK alone and not a responsibility of the Agency.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
028a	P.J. Galloway	General	M.A.302	MA 302Outline: Part M requires that a maintenance program is drawn up for every individual aircraft and approved by the competent authority. This is a totally unacceptable, unjustified and inappropriate bureaucratic burden on the Gliding Community. In the USA, FAR 43 13 provides an appropriate model that avoids the bureaucracy and its associated cost that would be imposed by MA 302There is no justification within the Gliding movement, in terms of safety or otherwise for the additional bureaucracy and the massive additional cost that an individual maintenance program would cause. Writing many thousands of manuals is an enormous task involving vast production and monitoring effort that could involve owners in costs that would, in a significant number of cases exceed the value of the aircraft. Where national gliding associations oversee maintenance programs that incorporate the manufacturer's maintenance manuals and instructions for continuing airworthiness such as Airworthiness Directives have proved to be highly efficient, impressively flexible and cost effective.Recommendation: The EASA should relax the rule for gliders and only if necessary replace the existing arrangements with a rule similar in context to FAR 43 13		Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC.Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
028b	P.J. Galloway	General	M.A.901	MA 901 Outline: A recommendation from the Regulatory Impact Assessment was that for gliders the Airworthiness Review Certificates should be issued by the certifying person – thereby maintaining the status quo in the UK. EASA has rejected this proposal, insisting that the ARC should be issued by the "competent authority" (i.e. The State). EASA should reconsider the position because of the massive costs to owners for no benefits in safety. Part M fails to take into account that gliders are simple in design and construction and provide for maintenance to be carried out in accordance with the manufacturer's instructions with no added risks associated with individual glider inspectors making an ARC recommendation to the approved certifying person. A periodic (500 hours) requirement for an airworthiness review by a specialist organization such as the BGA under the EASA enabling the competent authority to maintain oversight The Part M procedure for the renewal of airworthiness certificates in what is termed an "uncontrolled" environment will produce a massively increased administrative burden and therefore cost by comparison with current procedures. EASA should issue Acceptable Means of Compliance material that simplifies the procedure for gliding. In the uncontrolled environment it should be possible to for the approved certifying person to issue the ARC rather than having two separate bureaucratic and costly operations which add no value in terms of efficiency or safety. The current arrangements in Europe allow the national gliding organizations to		Noted. M.A.901 Historical aircraft are excluded by Annexe II to Basic Regulation. A one man organisation which issues an ARC is not prevented by the actual Part-M. Initial issuance of ARC is carried out by the competent authority as it also issues the CoA and re-issuance is carried out either by the competent authority or by an approved CAMO that can be a one man organisation as mentioned in the NPA 7/2005. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO. This text has been modified. AMC has been added to limit the number of bodies involved. Status of BGA The status of BGA within the UK airworthiness structure is a matter for UK alone and not a responsibility of the Agency.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				maintain their fleets under the delegation of the National Aviation Authority. In the UK the gliding fleet is not currently controlled by the State but is effectively maintained in the same manner as all other gliders in Europe. The existing UK airworthiness system for gliders that is formally approved by the CAA, provides all the necessary processes and safeguards. Airworthiness related accident statistics over many years speak for themselves. There is no better system in the world. Forcing the gliding community to maintain their aircraft like airliners is Euro-idiocy of the first magnitude exemplified by the requirements of Part M, including the need to comply with the stipulations in subparts F and G organizations, significantly increasing the administrative and cost burdens of maintenance. The Gliding Community is seriously concerned that Part M will provide a significantly lower level of safety than that currently provided by the existing UK glider processes. Recommendation: Appropriate AMC material or a lighter version of Part M should be produced to effect simpler, more cost effective and efficient procedures that apply to gliders. General Comments Outline: In the UK gliding has been free from state regulation since 1948 except in areas where gliding interfaces with other airspace users. The British Gliding Association self-regulates and manages all aspects of gliding. In order to continue to benefit from the this freedom in the framework of Part M, the BGA would have to become the Competent Authority for Gliding in the UK. Unfortunately the UK Department for Transport (who have already brought the railway system to its knees and reduced the road network to			

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				gridlock) has already designated the UK CAA as THE (rather than A) Competent Authority, and as yet has proved unwilling to grant this privilege to the BGA. The EGU therefore request EASA to find means to allow the BGA to become the Competent Authority for gliding in the UK. The BGA has managed gliding in the UK in am exemplary fashion for decades. CAA scrutiny has invariably shown the BGA to be fully capable of ensuring flight safety as demonstrated by accident/incident rates which compare favourably with, and often exceed those of countries where stricter legislation is applied. The Rulemaking Director of the EASA has the detail of accident rates due to airworthiness or maintenance defects since 1987. If the BGA is forced into the Part M mould, becoming a continuing airworthiness management organization (sub part G), the administrative and cost burden will significantly increase while, based on historic performance, no improvement to safety will result. Recommendation: EASA should find a means to enable the BGA to continue to develop and manage gliding airworthiness processes as it has done so successfully to date.			

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
029	JF Goudie	Explanatory Note	-	The RIA was restricted to subparts E to I without reference to partr M		Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Subsequently, Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
030	B. Smyth	General	-	EASA should find a means to enable the BGA to continue to develop and manage gliding airworthiness processes as it has done so successfully to date.	We have a saying: “If it ain’t broke, don’t fix it.” The British system has worked successfully for years and glider pilots do not see any reason for an added level of costly bureaucracy	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 “ A concept for better regulation on General Aviation”, which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's. The status of BGA within the UK airworthiness structure is a matter for UK alone and not a responsibility of the Agency.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
031	Phil King	Explanatory Note	-	The RIA did not address all my concerns about how Part M affects gliding. In particular it was restricted to subparts E through I. You should set up a working group to resolve those additional items which concern gliders, glider pilots, and gliding clubs.	Implementation of the regulations requires that they are workable and that they have the support of all stakeholders. Currently I do not believe they are workable, therefore I do not support the regulations, nor do many others in the gliding community.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
032	Phil King	General	-	The primary aim of Part M as applied to gliders is to prevent death and injury by maintaining the airworthiness of gliders in Europe. A secondary aim is to provide a uniform airworthiness framework across Europe. As a pilot with 40 years experience who flies gliders in 8 European countries I am in full agreement with the first of these aims and see some benefits with the second. I do not wish to comment on the details of the regulation because I know that the BGA and the EGU have already done this on my behalf and I fully support their comments. However I have this observation. Gliding is a dangerous sport. Accidents are nearly always caused by pilot error and very rarely by lack of airworthiness. If it were possible to eliminate all accidents caused by lack of airworthiness the effect on the accident rate per hour or per flight would be negligible. This suggests that there is no purpose in making the airworthiness procedures more onerous than they are currently in the UK. Indeed the new regulations may increase the accident rate by diverting resources away from pilot training towards over-complicated and expensive maintenance procedures. I urge EASA to keep procedures for glider maintenance simple!	Complex procedures entail unnecessary expense and delay and may have a negative effect on overall safety.	Noted. The reply given to your comment 31 also refers.	
033	Derek Wilson	Explanatory Note	IV A, 8	IV, A, 8 The RIA did not cover gliding, the concerns of glider pilots and was restricted in scope to subparts E to I	EASA Needs to address the issues of PART M that affect gliding	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
034	Derek Wilson	Draft Opinion	M.A.901	The RIA recommendation was that glider ARC's should be issued by a certifying person (as is currently the case in the UK). EASA has rejected this system which has worked faultlessly in the UK since 1948 despite the recommendation of the consultant.	The rejected system has been trialed in the UK for 57 years and has been proven to be successful. Rejection of this system will place an unnecessary and bureaucratic burden of expense on all glider operators in the UK without (an already proven) increase in safety.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
035	Derek Wilson	Draft Opinion	M.A.302	Part M requires a maintenance programme to be approved for every individual aircraft. This is an unnecessary burden on gliding and the US FAR 43 13 is a proven procedure that is more appropriate.	Writing thousands of manuals is a bureaucratic nightmare that will result in passing on unnecessary cost to glider owner/operators. The European National Gliding Associations systems of generic type manuals and airworthiness directives is currently proven to work satisfactorily. Forcing the gliding communities of Europe to adopt large aircraft maintenance solutions as proposed will add further cost and overheads without improving safety.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
036	David Martin	General	-	The British Gliding Association on behalf of the UK CAA, have managed to run gliding in the United Kingdom for almost 60 years. This self regulatory role has proved efficient and effective. Please do not introduce unnecessary bureaucracy and expense to a system that is and has itself ob=ver many years of successful management. Gliding provides a challenging stimulating and rewarding hobby for many people that can be enjoyed whether the person is young old, male or female, disabled or fit. It provided a great of social and active interaction between people of different social, economic and ethnic backgrounds.	I am a trustee for a charity that helps to fund women, young people and the disabled in gliding. Increasing the bureaucracy and with it the expense will mean more people from less privileged back ground will be prohibited from participating in and enjoying the benefits of the sport and the interaction with others.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Subsequently, Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
037a	Dominic Conway	Explanatory Note	M.A.302	RIA did not include issues which are of concern to gliders. What were the decisions which led to the exclusion of paras other than e to i. With out addressing the RIA for the gliding world how can the assessment be regarded as inclusive and addressing the concerns of all those that may be affected by new regulation. RIA should address the issues of Part M which may impact upon gliders. MA 302: I have not seen evidence that there is a requirement for individual maintenance programmes to improve flight safety or long term design improvements in gliders. The current method of manufacturers AD's and BGA directions either for maintenance or continuation of airworthiness have worked very well without evidence to the contrary for the last 40 years. Recommendation: This is a proposed rule which should be relaxed and control be placed in the hands of the BGA who are better placed to exercise control than other remote parties.		Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
037b	Dominic Conway	Explanatory Note	M.A.901	RIA did not include issues which are of concern to gliders. What were the decisions which led to the exclusion of paras other than e to i. With out addressing the RIA for the gliding world how can the assessment be regarded as inclusive and addressing the concerns of all those that may be affected by new regulation.RIA should address the issues of Part M which may impact upon gliders.- MA901:The RIA suggests that ARC's should continue to be issued by a certifying person ie the status quo should be maintained I the UK. I have seen no evidence that supports this rejection of the		Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				RIA recommendation nor evidence to suggest greater flight safety . It seems that the only result will be greater costs to all involved but in the end the owner will pay to achieve no additional benefit.Gliders are of non complex design with simple control surfaces and control systems. Maintenance is simple compared with powered aircraft. What are the imperatives that require gliders to be treated in the same way as A300's or 747 s. Yet again the additional costs and administration to support this system will not be cost effective and without evidence to support this proposal I cannot see how the proposed system is viable.What is the improved level of safety that is to be achieved by this proposal.-Recommendation:A new statement of safety performance should be drawn up as applied for gliders and the appropriate version of Part M AMC's drawn up to achieve this. - General CommentThe gliding world has been self regulating since at least the 1940's in the UK.The CAA has continued to prove that the BGA's flight safety and aircraft airworthiness management has been effective. The record which I trust has been examined speaks for itself.The introduction of Part M as proposed for gliders will increase the complexity and administrative burden upon all involved without any objective or measured increase in flight safety.Recommendation:Measures be taken to ensure that the BGA continues to be the authority that develops and manages airworthiness and safety in the UK.		G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
038	Neil McAuly, Scottish Gliding Centre	General	-	I write as the Chief Flying Instructor of the Scottish Gliding Centre, one of the largest British gliding clubs with 10,000 flights per year. Our airworthiness record is very good and we take safety very seriously. Part M proposes a very expensive, bureaucratic and unnecessary procedure, which will not be any more effective than the BGA system with its proven record of safety.		Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
039	Roderick William Weaver	General	-	There should be no change to add to the already overly complicated regulatory regime in place for gliders and motor gliders.I am a Full cat gliding instructor , I hold a PPL -SEP and own a Dimona motor glider and a Discus glider.To evidence my non aviation responsibilties I add that I am Finance Director of a UK public company.I can drive a car on public roads having rebuilt it from scratch including all brakes, steering, suspension		Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				and electrical systems which is something I am not in any way qualified to do. I do not do such things because I have some common sense. If I was stupid enough to try to this no amount of regulation would stop me.This is an unnecessary and probably futile complication to what is a well controlled self-regulated environment.In particularComment on page 8 of NPA 07-2005 C) a) The BGA is a competent authority with regard to all aspects of gliding and glider maintenance. The reason given for failing to act on the recognised problem that the text would be too difficult to implement is not fair or reasonable nor within the spirit of the Treaty Of Rome. The BGA should be given full reponsbility until it is proven not to be competent.Comment on Appendix V111:Delete all references to gliders and insert:-"All gliders registered with the BGA may be maintained within the guidelines of the BGA as set out by the BGA ."The justification for the exemption is that gliders are inherently safer than powered aircraft as they are designed to fly without the aid of an engine. The intrumentation to sustain safe flight is very simple and robust and does not require any special skill to maintain. Gliders land slowly the undercarriage is also simple and robust and failure is unlikely to result in significant damage to third parties. Gliders are typically flown by owner pilots who have a strong incentive to protect the equipment that thaey rely on. This is a more effective incentive for good maintenance than regulation. The BGA is a responsible organisation which has succesfully controlled gliding operations in the UK for many years. It understands how gliding clubs operate and has an effective management of them. Regulation is likely to be costly for no benefit and ineffectual.		NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA'sCompetent Authority status can only be conferred on an organisation by its Member State.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
040a	EJ Smallbone	Explanatory Note	M.A.302	MA302 would mandate an intolerable and unnecessary load on the gliding movement. The administration that individual maintenance programmes would involve is not required as expert European gliding bodies already effectively manage common maintenance schedules based upon manufacturer's technical manuals. It is recommended therefore that EASA lessen the imposition of this rule and adopt a similar rule to FAR 43 13 which works well in the USA.	The British Gliding Association has for over 50 years demonstrated itself to be an effective and proficient self-regulating body for gliding in the UK. This has been shown to be very satisfactory arrangement and CAA examination has shown that UK gliding safety is competently managed and accident rates measure well against other more strict regimes. This established and successful arrangement is incompatible with the structure of Part M. However, it is most unlikely that any tangible improvement in safety will be achieved by the implementation of Part M. It is recommended therefore that EASA should exploit the advantages and benefits of the BGA continuing to manage gliding safety and airworthiness as it has done most expertly for so long. In general the points raised in the RIA do not address many of the concerns of gliding. It is requested that EASA rectify this by establishment of a specific working group to deal with the areas of Part M that are of concern to the European gliding movement.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
040b	EJ Smallbone	Explanatory Note	M.A.901	MA901 does not recognize that gliders are uncomplicated in design and construction such that maintenance in accordance with the manufacturers guidance is straightforward. Consequently, they do not require the Part M proposal intended for large aircraft. Again, Part M would present an unnecessary and expensive burden which is unlikely to ensure the same level of safety as our established practices. It is recommended that EASA develops Acceptable Means of Compliance or less stringent version of Part M appropriate to gliding.	The British Gliding Association has for over 50 years demonstrated itself to be an effective and proficient self-regulating body for gliding in the UK. This has been shown to be very satisfactory arrangement and CAA examination has shown that UK gliding safety is competently managed and accident rates measure well against other more strict regimes. This established and successful arrangement is incompatible with the structure of Part M. However, it is most unlikely that any tangible improvement in safety will be achieved by the implementation of Part M. It is recommended therefore that EASA should exploit the advantages and benefits of the BGA continuing to manage gliding safety and airworthiness as it has done most expertly for so long. In general the points raised in the RIA do not address many of the concerns of gliding. It is requested that EASA rectify this by establishment of a specific working group to deal with the areas of Part M that are of concern to the European gliding movement.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901
041	Dan Pitman	Draft Opinion	M.A.901	I would recommend that EASA propose a more appropriate AMC for gliders, or a lighter version of Part M for gliders. This would allow simpler, more cost effective and efficacious procedures to apply for gliders. In the RIA consultation, a recommendation was made for AMCs to be issued by a certifying person. I understand EASA has rejected this proposal and insisted the AMC be issued by the 'ompetent authority' (i.e. the ' state').	Within Europe, the majority of gliding organisations maintain their fleets under the delegation of the National Aviation Authority. In the UK, the gliding fleet is not currently regulated by the State but is effectively maintained in the same manner as all other gliders in Europe. The existing UK gliding airworthiness system, formally approved by the CAA, provides all the necessary processes and safeguards. In the UK the CAA is the only “competent authority” whilst gliding remains regulated by the BGA, under formal approval from the CAA. The accident statistics show that this arrangement is satisfactory, with accident rates due to airworthiness being as good or better than in member states where the competent authrority regulates	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 “ A concept for better regulation on General Aviation”, which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					gliders directly. The current proposals given by EASA will result in a significant increase in bureaucracy and workload, with no demonstrable increase in safety. Gliders are comparatively simple structures, designed in a manner that allows them to be maintained in accordance with the manufacturers maintenance programs, and there would be no additional risk from allowing individual glider maintenance inspectors making an ARC recommendation to the approved certifying person. A 5 year external airworthiness review by a sub part G organization (i.e. the BGA) would ensure the competent authority could maintain oversight. The Part M procedure for an "uncontrolled" environment is overly burdensome and unnecessary for gliders. Allowing the approved person from the sub-part G organization to issue the ARC would achieve the same outcomes as those proposed by EASA without the need for two new, expensive and bureaucratic operations. Forcing the gliding community to comply with the large aircraft maintenance solutions described in Part M, including the need to comply with the stringent requirements of subpart F and G organisations will significantly increase the administrative burden and cost of maintenance. It is a particular concern that the gliding community is not satisfied that Part M will provide an equivalent level of safety to that currently associated with existing glider processes, although they would dramatically increase costs and workload.	has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's M.A.901 Partially accepted: Initial issuance of ARC is carried out by the competent authority as it also issues the CoA and reissuance is carried out either by the competent authority or by an approved CAMO that can be a one man organisation as mentioned in the NPA 7/2005. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO. This text has been modified. AMC has been added to limit the number of bodies involved.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
042	Dan Pitman	Explanatory Note	-	I would recommend that EASA set-up a working group to discuss the issues within Part M that remain of interest to gliding, to ensure that regulations set-up for Commercial Aviation, and with a significant cost implication for gliding are not applied unthinkingly, and changes are made only where there is a valid, demonstrable safety benefit.	Only subsections E to I of the RIA were given sufficient impact assessment, and of these many of the questions raised were not able to reflect the legitimate concerns of the gliding community.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
043	Dan Pitman	Draft Opinion	SIM M.A.302	MA302 I would recommend that EASA relax this rule with respect to gliders. If an alternate rule was felt necessary, then I think the model proposed by the FAA /FAR 4313 would be suitable in context.	Gliders are comparatively simple structures (when compared to large commercial aircraft) and the design and maintenance of each is fairly generic by type. Creating an individual maintenance program for each airframe would be overly bureaucratic and burdensome, and would not show a demonstrable increase in safety. In fact, given the commonality between airframes of each glider type, one would expect the maintenance schedule to be identical for each - an individualized program repeated many thousands of times allows greater opportunity for error than a single program per type, and so may actually contribute to reduced safety. In summary, this proposal would dramatically increase costs and workload, whilst at best merely maintaining current levels of safety.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
044	Dan Pitman	General	-	EASA should find a way to enable the BGA to continue to operate, develop and manage airworthiness for gliders within the UK as it has successfully done to date. The BGA is the source of expertise within the UK and is admired and copied by many other organizations world-wide. It should be allowed to remain as the authority for gliding in the UK.	The BGA has satisfactorily managed all aspects of gliding, including airworthiness in the UK for decades (gliding has not been directly controlled by the state since 1948). CAA scrutinisation of the BGA has repeatedly found it competent to operate in this way, whilst the accident statistics show a level of airworthiness as good or better than in other Member States. The EGU support the request for EASA to find a means for the BGA to become the competent authority for gliding in the UK. Details of accident rates due to airworthiness or maintenance, since 1987, have already been supplied to the EASA Rulemaking Director. If the BGA has to enter into the Part M mould and become a continuing airworthiness management organization (“sub part G”), the administrative and cost burden will increase significantly for no likely increase in safety based on historic performance.	Further to the reply to your comment 42: Competent Authority status can only be designated by a Member State.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
045a	Rory O'Conor	General	M.A.302	MA302 – I agree with the BGA that this is excessively burdensome. And I don't understand it. Light aircraft use a generic schedule, and gliders also use a generic schedule. A generic schedule, with any variations should be adequate and appropriate.	MA302 - Excessive burden with no added value. Difficult to maintain up to date.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
045b	Rory O'Conor	General	M.A.901	MA901 – I agree with the BGA that it is unnecessary that the CAA should issue CoA, when all the work and knowledge for gliders and other sailplanes is held by the BGA. This could be counterproductive because the CAA may have limited knowledge of relevant gliding issues.	MA901 – Excessive cost and burden, and possibly a negative impact due to a lack of central knowledge about the peculiarities of gliders.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005. The status of BGA within the UK airworthiness structure is a matter for UK alone and not a responsibility of the Agency.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
046	Steve Parker	General	-	EASA should find a means to enable the BGA to continue to develop and manage gliding airworthiness in the UK.	The BGA have regulated gliding successfully in the UK for decades. Why change something that works so well.	Not accepted. Competent Authority status can only be designated by the Member State.	
047	Grenville J Croll		IV A 9	The regulatory Impact Assessment has such a potentially wide and devastating effect on gliding that a representative sample of individual pilots should be consulted.	The capital tied up in gliders is substantially at risk due to the overwhelming impact that the proposed regulatory changes would have.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
048	Grenville J Croll	General	-	The certification of the airworthiness of Gliders should continue to be supervised by the National Gliding organizations - in the UK by the British Gliding Asscociation.	The BGA and other national bodies have a 50+ year history of the successful management of Glider airworthiness and safety. The increased paperwork proposed by the EASA would not contribute in any way to increasing the safety of gliding flight, and may actually compromise safety through the introduction of unnecessary	Noted.Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					additional system complexity.	EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Subsequently, Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's.Competent Authority status can only be designated by the Member State.	
049	Grenville J Croll	General	M.A.302	The introduction of individual maintenance schedules for individual aircraft is unpractical and unworkable. In some cases, it will be impossible due to the age of the aircraft and the non availability of manufacturers detailed information. The production of large numbers of detailed manuals for the hundreds of gliders types presently in use is a large writing task that is infeasible due to the absence of sufficient numbers of qualified technical writers capable of performing the task. Manuals will have to be translated into the European languages. The gliding movement is not able to financially support the production of such large numbers of technical manuals.	The BGA and other national gliding bodies have effectively supervised the certification of Gliders for in excess of 50 years through a network of trained inspectors and senior inspectors. Changing an efficient system that is clearly working is an unnecessary burden and will only compromise the high safety standards that are already extant. Fatal Glider accidents caused by aircraft structural and maintenance issues are very rare.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	
050	Grenville J Croll	General	-	The BGA should be granted status as a Competent Authority by which it can continue to regulate gliding airworthiness and other related matters in the UK	The BGA has successfully managed gliding in the UK for a very long time. It should be allowed to continue to do so. The organizational success of the BGA can be measured through UK accident statistics which I believe have already been supplied to the EASA. These statistics compare favourably with accident statistics from other countries, and it is noted that they are better than those found in some countries with stricter regulation.	Noted. Competent Authority status can only be designated by a Member State.	
051	Colin Sutton	General	-	Don't kill of GLIDING		Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						implementation of the continuing airworthiness regulation lies with the individual NAA's	
052	Jerry Pack	General	-	The amendments proposed are not sufficient to address the issued raised by the gliding movement in the UK. Gliding in the UK has been self regulated with a "lite" regime that judging by the statistics has been very successful and totally cost effective. The regulations that are currently in force are a major imposition on the sport of gliding throughout the EU and need significant amendments which these proposals are not.	Gliding has a time proven system of operation and maintenance, there has been no significant failing or event that justifies the changing of the regulator environment for the sport of gliding. The current regulations and these amendments represent SIGNIFICANT imposition on the sport of gliding that will be disruptive and can not be justified. Further in most industries adoption of "best practice" is the norm. One measure of best practice would be cost effectiveness. The current regulations have nothing in common with the best practice procedures for gliding that have been developed in member states of the EU, being costly, bureaucratic and unessesary.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
053	David Searle	Explanatory Note	-	The RIA did not cover the application of Part M, and did not recognize many of the concerns of the gliding community. In particular Part M needs further examination to ensure that it is appropriate to gliders.	A working group to look at the issues associated with gliding and Part M would ensure that safety and bureaucracy are balanced	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
054	David Searle	Draft Opinion	M.A.302	A maintenance programme and manual for each individual aircraft is “gold plating” the existing situation where manufacturer’s maintenance manuals, BGA check lists, and Airworthiness Directives are already in use and are proven to work. The “Gold Plating” will add bureaucracy and hence cost, but will not achieve any better oversight of inspections. It is totally unacceptable to add cost without a demonstrable gain in safety. If the present regime can be shown to be ineffective, something like on the FAR 43 13 procedures in the USA would be a more acceptable model.	Safety is an attitude of mind fostered by intelligent procedures with an obvious relevance to the task at hand. Inappropriate procedures breed rule bending and short cuts which can destroy safety and traceability. It can also damage safety by generating an attitude of doing the task by numbers, rather than by thinking what you are doing, run under a regime which has general respect.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						confusion and has been reviewed.	
055	David Searle	Draft Opinion	M.A.901	As with MA302, Part M has "gold plated" the existing system without showing how safety might be improved. It proposes solutions to a non existent problem. The existing organization for renewing C of As can generate ARCs, and has full traceability though to the CAA via the BGA, and is proven to work. The "Gold Plating" will add bureaucracy and hence cost, but will not achieve any better oversight of inspections. It is totally unacceptable to add cost without a demonstrable gain in safety.	Redefinition of the level of competencies of the existing organizations would provide an excellent level of certification of gliders as evidenced by the current level of airworthiness accident statistics. Gliders are inherently simpler, and hence simpler and safer to certify than heavier passenger carrying aircraft. Bureaucratic increases in costs of certification cannot be permitted without a demonstrable gain in actual safety.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005. The status of BGA within the UK airworthiness structure is a matter for UK alone and not a responsibility of the Agency.	See revised M.A.901
056	David Searle	General	-	The BGA has self regulated gliding in the UK with CAA scrutiny since 1948. While this does not of itself justify its existence, its track record does. There is yet again no reason in safety terms to "Gold Plate" the existing system. Of course evolving requirements mean evolving procedures and organizations, but that is no reason to throw out the baby with the bath water.	Redefinition of the level of competencies of the existing CAA and BGA organizations under Part M to reflect the existing realities would provide an excellent level of control of gliding generally, as evidenced by historical analysis of airworthiness processes in the UK. Bureaucratic increases in costs of managing gliding cannot be permitted without a demonstrable gain in actual safety. The principles of subsidiarity would allow the existing organizational structure to work very well without compromising the European vision.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's.Competent Authority status can only be designated by the Member State.	
057	John F. Goudie	General	M.A.302	This appears to need a programme of maintenance for each individual glider and not just for a type. If so this would expensive and unneccessary and would be better modelled on FAR 43 13 as used in the USA	The existing situation with gliding associations overseeing type maintenance using manufacturers manuals and advice has been proven over many years. Relax this rule and if considered absolutely necessary (which I doubt) base it on a model of FAR 43 12	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
058	John F Goudie	General	-	As a cross country pilot in the UK for some 40 years I must emphasise that the BGA has controlled UK gliding in an exemplary fashion over that time. The CAA has acknowledged that our record in accident rates due to airworthiness/ maintenance compares well with other	If the BGA is forced into Part M increased administration and its consequent costs will bring much pressure to bear on what is one of the great flying sports Find a method to enable the BGA to continue what has been a very successful	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				countries whre “stricter” legislation applies.	management process to date.	General Aviation”, which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's. Competent Authority status can only be designated by the Member State.	
059	A. R. Blanchard	General	M.A.302	Maintenance schedules for individual aircraft is unpractical and unworkable, especially as many items on a glider are generic throughout a fast range of gliders. In some cases, it will be impossible due to the age of the aircraft and the non-availability of manufacturers detailed information. The production of large numbers of detailed manuals for the hundreds of gliders types presently in use is a large writing task that is infeasible due to the absence of sufficient numbers of qualified technical writers capable of performing the task. Manuals will have to be translated into the European languages. The gliding movement is not able to	The BGA and other national gliding bodies have effectively supervised the certification of Gliders for in excess of 50 years through a network of trained inspectors and senior inspectors. Changing an efficient system that is clearly working is an unnecessary burden and will only compromise the high safety standards that are already extant. Fatal Glider accidents caused by aircraft structural and maintenance issues are very rare.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC.	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				financially support the production of such large numbers of technical manuals.		Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	
060	John Galloway	Explanatory Note	-	The procedure described for the Regulatory Impact Assessment has not resulted in an appreciation of the impact of the EASA Part-M proposals on UK glider pilots. It is an example of the worst aspects of dysfunctional EU bureaucracy and this has contributed to proposed procedures for glider regulaton and maintenance that are unworkable and unnecessary. (See other comment sheets.) There seems to be little understanding in NPA_07_2005 of the financial and organisational impact of the proposals on glider pilot/owners and gliding clubs and one can only came about either by disregarding evidence from the BGA, or not taking evidence from the BGA or not caring about the impact of the proposals on glider pilots and clubs. I urge EASA to give due consideration to regulatory impact assessment evidence from the BGA and to find a mechinism to allow the British Gliding Association, perhaps in partnership with the CAA, to remain in day to day control of UK glider maintenance.	Starting from proposals that EASA appears to have recognised were unsatisfactory, EASA has viewed the way forward as a matter of modifying texts. Unable to find the time and resouces to conduct a Regulatory Impact Assessment itself EASA has emloyed an outside consultant to assess on only selected areas of Part M. The consultants came up with proposals that were not entirely acceptable to EASA the agency has just gone ahead with its own proposed draft. With respect to gliding (and other air sports that use simple aircraft may think the same) one has to wonder when EASA is going to ask itself "what problem are we trying to solve?" It would seem to make sense to design a maintence regulatory regime by first going to the organisations currently responsible, looking at the experience gained there over many decades, considering the nature of the type of aircraft under question and their maintenance requirements, their historical accident rate from maintenance failure and the level of risk that they represent to the public. Having done this a logical, appropriate and safe maintence regime could be devised using the best experience of those most expert in the field. The texts of the regulations would follow the design of the regulatory system instead of the utterly ludicrous system EASA is following of trying to write text suited for commercial aircraft and then trying to introduce variants for simpler sport aircraft - i.e. trying to design the system backwards by first writing the text and then being forced to retract some of the impractical outcomes when text	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's. Competent Authority status can only be designated by the Member State.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					appropriate for one area of aviation is applied to another. Failure on the part of EASA to recognise that, in the UK, the British Gliding Association are THE expert body on the maintenance of gliders would be irresponsible as it is highly unlikely that another body, necessarily more remote from gliding, would ever develop the same expertise.		
061	John Galloway	Draft Opinion	M.A.901	The Part M Regulatory Impact Assessment consultation recommendation was that for aircraft under 2730kg (therefore including all gliders) the Airworthiness Review Certificates should be issued by a certifying person but EASA has rejected this and insisists that the ARC should be issued by the 'competent authority' of the member state. EASA's justification for this punitive change is simly that "the Agency considers that this proposal does not follow the general concept of Part-M". It beggars belief that EASA should propose to introduce changes that would have significantly negative financial and organisational impacts on UK sporting glider pilots for no other reason than ideological consistency. This is especially disturbing as it is likely that the proposed structure would be less competent in the maintenance of gliders than the one it would replace. EASA should find a means to enable the BGA to continue to develop and manage gliding airworthiness processes as it has done so successfully to date.	Gliders have very different maintenance requirements from more complex powered aircraft - especially commercial aircraft. Modern gliders may be highly sophisticated in terms of their airframe materials and construction but their control systems are very simple and generally require minimal maintenance as specified in the manufacturer's maintenance programme such as cleaning, inspection and simple application of lubrication. In the UK there is a great resource of gider inspection and maintenance certification within the memebersh of the British Gliding Association. There are extremely few glider accidents that are the consequence of airworthiness problems. There would be no increased risk associated with individual glider maintenance inspectors making an ARC recommendation to the approved certifying person. Moreover I am extremely concerned that, in time, the EASA proposals would result in a loss of that invaluable resource of inspection expertise that is represented by the pool of BGA inspectors. My belief is that the EASA proposals will result in a reduction rather than an increase in safety. Please, EASA, take a fresh look at the current record of UK glider airworthiness and the inspection expertise within the	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005. The status of BGA within the UK airworthiness structure is a matter for UK alone and not a responsibility of the Agency.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					British Gliding Association and modify the proposals under MA 901 in a manner that would allow us to maintain these resources. This would allow us to continue effective, and cost effective maintenance. The CAA could be the ultimate competent authority but it could continue to delegate most of the annual maintenance certification to the BGA.		
062	John Galloway	Draft Opinion	M.A.302	The understanding of the British Gliding Asociation, having consulted the author of MA 302, is that this section refers to a requirement for each glider to have an individual maintenance schedule. This requirement would be extremely onerous for UK glider pilots, not justified by any safety need, and is impractical. Gliders should be exempted for this requirement and an alternative regime devised that is justified by need, affordable, practical and recognises the invaluable voluntary and professional resources of glider inspection and minor maintenace expertise within the British gliding movement. The most cost effective as well as the most expert method of glider maintenance would be for EASA to find a mechanism to allow the competent authority in the UK, the CAA, to recognise as an acceptable means of compliance the current BGA maintenance and inspection regime.	In the UK there already exists a highly successful and proven mechanism for the verification of the maintenance of gliders. This uses the generic (and generally similar) techniques for the maintenance of simple glider mechanical systems and also uses the type specific maintenance programme included in gider manuals. There is no safety case for replacing this expert system with a burdensome and bureacratic one. It should be emphasised that within UK gliding there exists a highly desirable state in which technical, maintenance and inspection expertise extends out into the cubs where it is available to be used on an "as required" basis as well as for statuatory inspections and maintenance. MA 302 would require a huge amount of dysfunctional work in writing individual maintenance programmes according to a model of maintenance that is suited to an entirely different regulatory and safety environment such as commercial aviation. This would then require a back up bureaucracy to regulate it at a level of cost likely to be detrimental to the viability of the sport of gliding. In the UK there already exists an effective overseeing body, the BGA, and an effective regime of maintenance and expert inspection by BGA inspectors. For EASA to accept this would be for it to choose the best and most proven model for	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					glider airworthiness and safety as well as the best outcome for UK glider pilots. I would urge EASA to look at the excellent airworthiness safety record of UK gliding and to try to avoid undermining it unecessarly.		
063	Richard Cooper	Draft Opinion	M.A.302	The cost of drawing up a maintenance program to cover each individual glider is likely to be so great that I would not be able to continue flying my glider.	I have used the standardised maintenance procedure for nearly forty years, so far without accident. I cannot see that having an individual maintenance procedure would bring any advantage or make me any safer. Ultimately it is my own life at stake in a single-seat glider, and I am unlikely to stint the maintenance. The FAR 43 13 would be a far better model than this absurdly over-bureaucratic and self-defeating idea.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
064	Richard Cooper	Draft Opinion	-	This Paragraph requires that my glider require an airworthness certification by a state-run organization. This woulda.) be less effective, andb.) be more expensive, andc.) not raise standards andd.) would not reflect the simpler construction of a sailplane.	There is a clear history of incompetence and poor value in state organizations caused by the self-centered entrenched bureaucracy which places its own interest above that of the people whom it is supposed to serve. They would take over from the present system of “amateurs”: those people who work for the love of the operation, largely unpaid or underpaid. The result would be a lack of understanding of the problem, a tendency to provide one-size-fits all solutions, and a huge increase in costs without any improvement in safety. The present UK set-up using the BGA is dedicated, competent, and highly cost-effective, as reflected by its excellent safety record. I cannot see any such justification for	Noted.Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 “ A concept for better regulation on General Aviation”, which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed,	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					changing to a state organization.	jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
065	Shaun McLaughlin	General	-	EASA should scrap this proposal and leave the maintenance in control of the National Associations as currently legislated. At most it should be replaced with a process similar to FAR 43 13 in the USA	Adding this additional process and bureaucracy is unnecessary and will place a huge burden on the gliding world. Existing, proven frameworks for this area already exist in the UK. If legislation is required then FAR 43 13 would be suitable and sustainable for gliding to continue in the UK. There is no evidence, in safety or otherwise, that this individual maintenance program would increase safety any further than the current rules, or FAR43 13. The current process of the National Bodies overseeing maintenance is effective and proven. Adopting a process similar to FAR 43 13 will limit the additional paperwork and production/monitoring costs and provide a proven level of safety if EASA view the existing process to be unsuitable	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
066	Shaun McLaughlin	General	-	EASA should continue with the RIA proposal that ARC's are issued by a certifying person, as currently implemented in the UK	Even if ARC's are issued by the state rather than a certifying person would not increase safety as the ARC's are built around certifying safety. Changing this only increases the cost to the owner/operator with no tangible increase in safety. Gliders are of simply construction and design and can be easily maintained to the Manufacturers maintenance programs by the process already in place. The Sub Part G organization could take over the annual issuing of ARC's and report to the state on a 5 year basis to ensure the state had overall visibility, but would not increase the cost of ownership and maintenance without any increase in safety. In the UK glider maintenance is overseen by the BGA who are formally approved by the State (CAA). The safety statistics for gliding in the UK under BGA guidance speak for themselves. Forcing stricter maintenance schedules better suited to large aircraft maintenance solutions in the Airline industry will significantly increase the cost of maintenance/ownership. For this reason I am not satisfied Part M will increase the safety of gliding in any way but will only prove to be a burden and restrictive to gliding. I recommend that EASA should develop appropriate AMC material or re-evaluate Part M to provide simpler and cost effective procedures to apply to gliders.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
067	Shaun McLaughlin	General	-	The RIA did not address the concerns of the gliding community in relation to Part M. EASA has restricted the scope of the RIA unacceptably and subsequently only subparts E to I have been impacted assessed. In addition the RIA did not reflect the gliding communities concerns appropriately.	EASA should impact assess Part M and establish a working group to address the issues of particular concern to gliding, to ensure gliding can continue successfully under EASA rather than destroy it.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
068	Shaun McLaughlin	General	-	EASA should develop a framework for the British Gliding Association to continue to develop and manage gliding airworthiness processes as it has done for over 50 years.	Gliding has not been state regulated in the UK for over 50 years other than in airspace issues to ensure safety. The British Gliding Association self regulates and manages all areas of gliding in the UK. In order to continue in this capacity the BGA would need to become the Competent Authority for gliding in the UK- but the Department of Transport has already designated the CAA as the Competent Authority for all UK aviation, which the CAA then allows	Further to the reply to your comment 67: Competent Authority status can only be designated by the Member State.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					the BGA to self regulate- at present there is no allowance for this under Part M		
069	M R Shaw	General	-	EASA should find a means to enable the BGA to continue to manage & develop gliding airworthiness processes as it has done so successfully to date in the UK.	The BGA has, since 1948, successfully managed all aspects of glider airworthiness. I feel to move this responsibility to a faceless giant is courting with disaster.	Further to the reply to your comment 70:Competent Authority status can only be designated by the Member State.	
070	M R Shaw	Explanatory Note	-	EASA must set up a working group to address all the issues within part M that have been highlighted as being of particular concern to gliding.	The RIA did not cover all the concerns that the gliding community has relating to the application of part M. The scope of the RIA has been restricted as only subparts E to I were chosen to be impact assessed by EASA. In addition, the questions raised by the RIA did not reflect many of the concerns of the gliding community.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
072a	Malcolm Lassan	Explanatory Note	M.A.302	1A Explanatory Note. The RIA did not address the specific needs of or take account of the views of the gliding community in the UK in the way it dealt with Part M Recommendation: A working group should now be established by EASA to address the concerns and issues raised and not taken account of in respect of Part M where that proposal affect gliding. MA302: This proposed rule is wholly inappropriate to gliding in the UK and it should therefore be relaxed. It is more appropriate to develop a similar rule to FAR 43 13 if any change is necessary at all! Recommendation: If necessary EASA should adopt the approach given in FAR 43 13.		Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
072b	Malcolm Lassan	Explanatory Note	M.A.901	1A Explanatory Note. The RIA did not address the specific needs of or take account of the views of the gliding community in the UK in the way it dealt with Part M Recommendation: A working group should now be established by EASA to address the concerns and issues raised and not taken account of in respect of Part M where that proposal affect gliding. MA901: Part M is written around more complicated structures, powered aircraft, and not the simpler structures we have in a glider. Gliders have very successfully been maintained over many years with a proven safety record in accordance with the manufacturers maintenance programme. The current situation whereby national gliding associations such as the BGA in the UK oversee maintenance is well proven with a clearly established and enviable safety record.		Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				There is no benefit to be gained by or safety implication by maintaining the status quo. The proposed change is purely bureaucratic costly, serves no befit and would undoubtedly prove expensive. Recommendation: Given that there is no benefit to be gained Gliders should be exempt from this rule and the current status be maintained. General Comments. The competent authority in the UK is the CAA and under delegated authority the BGA which has successfully self-regulated all aspects of Gliding, including maintenance, in the UK for many decades. The BGA is fully capable of ensuring safe operation, EASA is in possession of accident / incident rates demonstrating the effectiveness of the self-regulation. If the has to enter into Part M, continuing airworthiness management organisation (sub part G) then it is the cost burden associated with the additional administration with no increase in safety based on historic performance. Indeed the opposite may prove the case the change may actually adversely affect safety. Recommendation: EASA should not make this change but should find the appropriate means to enable the BGA to continue to manage gliding airworthiness processes as it has done so effectively and successfully to date.			

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
073	David A Salmon	Explanatory Note	-	All the worries of gliding participants and owners were not assessed during the RIA, which only looked at parts E through I. Many of our concerns were not addressed at all.	There has been a totally satisfactory regulatory regime operating in the UK (and elsewhere) for 70 years. The phrase "if it ain't broken, don't mend it " comes to mind. As an absolute minimum, EASA should set up a working party to lookwith an open mind, at the aspects of Part M that cause concern to gliding, and if implemented will cause great and irreversible harm.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
074	David A. Salmon	General	M.A.302	The requirement to produce an individual maintenance programme for every glider, and which has to be approved, is totally unnecessary, totally inappropriate, and totally unacceptable for such simple structures as gliders. There is no history of problems to necessitate further rules and regulations over what is done now. In the USA an appropriate model exists FAR 43 13, which avoids the expense and bureaucracy of the proposed MA302. Thousands of manuals (2000+ in the UK alone), would have to be written and approved at great cost, ad would result in no improvement to a situation that is already totally satisfactory in terms of risk to participants, other air users and third parties on the ground. The situation is that national gliding bodies look after maintenance and modification procedures based upon manufacturers manuals and Airworthiness Directives. This is totally satisfactory, effective and proved by the 70 years of experience of these bodies in carrying this out.	EASA should not impose this requirement on gliders, against all need and common sense.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
075	David A. Salmon	Draft Opinion	M.A.901	2. It was recommended by an RIA that glider Airworthiness Certificates be issued by an appropriate person, which is in effect the current situation. This has been rejected by EASA who require a Competent Authority (the State), thereby inevitably increasing bureaucracy and cost for no tangible benefit to safety. It should be recognized that gliders are (compared with large aeroplanes)very simple and easy to maintain in accordance with the manufacturers programmes, and there would be no increased risk in maintaining a similar system to that already in place. There is demonstrably no justification, other than a desire to impose bureaucracy for its own sake, for further unproductive and totally ineffective layers in the system, and to make gliders meet the same requirements as large, complex, fare	A system appropriate to gliders should be developed, keeping it simple and therefore cost effective.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				paying passenger aircraft.		7/2005.	
076	David A Salmon	General	-	There has been no state regulation of gliding in the UK since 1948, except where other airspace users are involved. Obviously the government and regulatory bodies have been totally satisfied with the way in which the BGA has regulated and managed gliding. To continue with this situation is clearly the sensible way forward, but as the CAA has been appointed the n only competent authority, under present terms this cannot be done, unless EASA find a way to appoint the BGA as the Competent Authority for gliding in the UK. History speaks for itself, and the CAA has always found that gliding is regulated by the BGA, as well as or better than in other countries. In fact BGA procedures have been used as models for others to use. Proof of this competence has been supplied to EASA.	The BGA should be allowed to continue and develop its role of managing airworthiness of gliders in the UK, as it has so successfully in the past.	Further to the reply to your comment 74:Competent Authority status can only be designated by a Member State	
077	Peter Gray	General	M.A.403	MA202(a). MA403 (a) and (b). The otherwise unqualified pilot/owner is barred from deciding the significance of any defect found at pre-flight inspection. With reference to gliding, amendments are required to enable the pilot owner to take responsibility for deciding the hazard level of a defect. It is not clear how a minimum equipment list will assist the decisions required at daily inspection nor is it perceived that the competent authorities acceptable list will ever be sufficiently exhaustive to be effective.	In the UK, at least, virtually all gliding is done NOT under the umbrella of a maintenance organisation on a day to day basis. The current system that allows solitary inspectors to take decisions in the field and the cascade of knowledge from them to the pilots via the instructor cadre has proved effective in maintaining technical safety and is economic. There is not the reservoir of personnel as described in MA 801 to service all the gliding sites in the UK (and I daresay the whole of Europe) and since gliding is not a commercial activity there probably never will be. The effect will be to convert a five-minute task into one taking weeks that has unacceptable social and economic consequences. The UK model for gliding whereby the national competent authority delegates authority to the sport's governing body has	Not accepted. For M.A.202: The statement "otherwise unqualified pilot/owner is barred from deciding the significance of any defect found at pre-flight inspection" is wrong. Actually, the pilot owner is obliged to report serious defects. This procedure is in fact the existing procedure in the BGA. Part-M is not the appropriate place to incorporate pilot responsibilities. Rules concerning pilot responsibilities will be developed in the appropriate licensing and operational rules.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					proved effective in supplying an appropriately simple solution to what is in fact a simple form of aviation. The "commercial based" approach of the whole of Part M is not well suite to gliding (and other amateur aviation) and I recommend EASA set aside time for workshops with the EGU with a view to separating out amateur aviation and devising workable, economic methods that disseminate expertise downwards instead of restricting it.		
078	Peter GH Purdie	Explanatory Note	-	The Regulatory Impact Assessment does not cover many of the matters affescting recreational aircraft, particularly gliders where proposed changes will impose major increases in bureaucracy and cost to the user with no apparent benefit in terms of safety. A working party should be set up to recommend restrictions in the scope of the document to those justified on the grounds of safety.	EASA's remit is safety, and changes to the status quo should be only those which can be justified on the grounds of safety and are no more bureaucratic and expensive than existing procedures unless there is a clear safety benefit.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						the individual NAA's	
079	Peter G. H. Purdie	General	M.A.302	MA302 Part M requires a maintenace program to be drawn up and approved by the competent authority for every individual aircraft. This is a massive increase in bureaucracy and has no justification for simple aircaft such as gliders whichhave previously been maintained in accordance with a standard maintenance manual supplied by the manufacturer with continuing airworthiness instructions.	The present system is proven and effective. If EASA believes a change is needed then a model based on the United States FAR 43 13 provides an appropriate procedure for simple receational aircraft such as gliders.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
080	Peter G. H. Purdie	Draft Opinion	M.A.901	The Regulatory Inpact Assessment recommended that gliders should have their Airworthiness Review Certificate issued by an approved certifying person with demonstrated knowledge of the type of aircraft. EASA has rejected without giving sufficient reason this recommendation. Issuing of the Certificate by the Competent Authority will transfer responsibility to a body with less knowledge and competence while increasing cost and resources necessary. This is detrimental to flight safety and the recommendation of the RIA should be accepted.	Part M does not recognise that since gliders are simple in construction and the maintainance can be carried out by following the manufacturer's maintenance instructions, there is not only no increased risk by using the procedures appropriate to highly complex public transport aircraft, but the risk is higher by using more complex procedures involving the 'competent authority' who have less direct knowledge of the type of aircraft. It is pointless to carry out a RIA and have a clear safety case made, and then reject the findings.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
081	Ken Basterfield	General	-	The changes to maintenance for british gliders is daft.	Has the world gone mad, or is it just European bureaucrats? Gilder maintenance has been managed very successfully under the BGA's control for many years now. The is no significant evidence to show that this system has weaknesses with safety implications, so why do we need changes that are inevitably going to lead to significant expense and time wasting. Abandon your silly regulations and remain with a system that delegates this matter to the BGA.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's. Competent Authority status can only be designated by a Member State.	
082	Pete Harrison	General	M.A.302	MA302The introduction of individual maintenance schedules for individual aircraft is unpractical and unworkable. In some cases, it will be impossible due to the age of the aircraft and the non availability of manufacturers detailed information. The production of large numbers of detailed manuals for the hundreds of gliders types presently in use	The BGA and other national gliding bodies have effectively supervised the certification of Gliders for in excess of 50 years through a network of trained inspectors and senior inspectors. Changing an efficient system that is clearly working is an unnecessary burden and will only compromise the high safety standards that are already extant. Importantly Fatal	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				is a large writing task that is infeasible due to the absence of sufficient numbers of qualified technical writers capable of performing the task. Manuals will have to be translated into the European languages. The gliding movement is not able to financially support the production of such large numbers of technical manuals.	Glider accidents caused by aircraft structural and maintenance issues are v The introduction of individual maintenance schedules for individual aircraft is unpractical and unworkable. In some cases, it will be impossible due to the age of the aircraft and the non availability of manufacturers detailed information. The production of large numbers of detailed manuals for the hundreds of gliders types presently in use is a large writing task that is infeasible due to the absence of sufficient numbers of qualified technical writers capable of performing the task. Manuals will have to be translated into the European languages. The gliding movement is not able to financially support the production of such large numbers of technical manuals.Ery rare. It must be proved by EASA that the proposed complex regulatory system will a) Not limit gliding to a few well off individuals while b) providing an even better level of maintenance. In short - is it broken? - if so is this the way to fix it?	rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC.Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	
083	S. C. Thompson	Draft Opinion	M.A.901	2. MA901 seems to require state approved personnel for certification. This is unnecessary for gliding. I suggest that a means needs to be found to allow the BGA to continue as it has for many decades.	Gliding the UK has used the BGA non-governmental system since the 1950's with complete success and a good safety record. There is no evidence that a change in this system is needed or indeed that safety needs to be or would be enhanced.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						7/2005. The status of BGA within the UK airworthiness structure is a matter for UK alone and not a responsibility of the Agency.	
084	S. C. Thompson	General	M.A.302	MA302 The approved maintenance programme is required by this paragraph is not needed for most gliders.	Gliders are simple aerial vehicles and they have been maintained in the Uk for many years under the BGA system without type specific maintenance programmes. Thus there seems no need to do this now!	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
085	SC Thompson	Explanatory Note	-	Para IVa the RIA was not sufficiently comprehensive, when considering its effect on gliding in the UK. I suggest that further assessment work is needed to fully take account of the needs of the sport of gliding.	The RIA did not consider all subparts of Part M, nor did the points raised entirely reflect our concerns in gliding in the UK.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
086	SC Thompson	General	-	I suggest that the regulations need to be drafted to allow the BGA to continue to be the competent authority, and to be able to use its existing system of maintenance control.	Gliding in the UK has been regulated by the BGA since the '50's, with the agreement of the CAA and its predecessor. The safety record has been satisfactory while costs have been contained to reasonable level. This has enabled the sport to grow. I feel that the various changes resulting from a more governmental approach to the organisation of glider maintenance will increase costs while not enhancing safety. Increasing costs may well lead to reduced safety due to reduced pilot proficiency flowing from lower flying hours. I take this view following 30 years flying BGA and PFA cerytified aircraft and gliders in the UK and Europe, as well as 15,000 hours flying commercial jets worldwide.	Further to the reply to your comment 85:Competent Authority status can only be designated by a Member State	
087	Peter Gray	General	M.A.302	M.A.302 Maintenance programme (a) Every aircraft shall be maintained in accordance with a maintenance programme approved by the competent authority, which shall be periodically reviewed and amended accordingly. (b) The maintenance programme and any subsequent amendments shall be approved by the competent authority.	Individual maintenance programs for gliders monitored by the national competent body appears as an unnecessarily burdensome exercise as there exists in the UK a working system of annual airworthiness checks based on manufacturers manuals and subsequent technical directives, supervised by gliding's governing body the BGA. The	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				(c) The maintenance programme must establish compliance with: 1. instructions for continuing airworthiness issued by type certificate and supplementary type certificate holders and any other organisation that publishes such data in accordance with Part-21, or 2. instructions issued by the competent authority, if they differ from subparagraph 1 or in the absence of specific recommendations, or 3. instructions defined by the owner or the operator and approved by the competent authority if they differ from subparagraphs 1 and 2. (d) The maintenance programme shall contain details, including frequency, of all maintenance to be carried out, including any specific tasks linked to specific operations. The programme must include a reliability programme when the maintenance programme is based: 1. on Maintenance Steering Group logic, or; 2. mainly on condition monitoring. (e) When the aircraft continuing airworthiness is managed by an M.A. Subpart G organisation the maintenance programme and its amendments may be approved through a maintenance programme procedure established by such organisation (hereinafter called indirect approval). Consideration should be given to encouraging gliding governing bodies to be Part G organizations to benefit from the dispensation on MA 302 (e). Subpart G may need critical analysis as to its suitability for gliding.	technical safety record is proven. For all that gliding is an amateur activity the existing proponents are capable of running a safe operation but in numerical and organizational terms they are probably not capable of fulfilling the full requirements of Subpart G. There is no commercial arm generating the income to pay for the requirements. The economic burden that will fall therefore on the pilot owners is unacceptable especially as there will be no significant improvement in outcome.	rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
088	Robbie Robertson	General	-	- Explanatory Note: As far as I can tell, few if any of the concerns raised by the UK gliding movement about Part M have been taken into account in the Risk Assessment analysis. The BGA are an extremely responsible body with an impressive record with regards to safety issues and really do need to be consulted in depth re the issues within Part M that could seriously affect the way gliders are maintained in the UK. Ideally a specific working group should be set up within EASA to address the issues in conjunction with the BGA- General Comment(s). The way that gliding has been administered by the BGA in the UK is regarded enviously by many of our European partners. Having spent several years living in France and being involved at a major gliding club, I can state this with the benefit of experience. The involvement of gliding with the CAA in the UK has not been particularly happy as their expertise lies with the management of commercial aviation and gliding is really a “nuisance” to them. In my view, it is imperative that a way is found to allow the BGA to become the Competent Authority for all aspects of gliding in the UK.The CAA have scrutinized the way in which the BGA handles matters and has always commented very favorably. Details of accidents to gliders relating to maintenance matters have already been submitted to EASA and demonstrate extremely clearly that no problem exists. If the BGA has to conform to the ridiculous demands of Part M as applied with gliders, there will be no practical gain and in fact could well have a negative effect due to the greatly increased administration. There will always be a risk that people will “bypass” the system. As an example, all you have to do is to walk into any private aviation hanger in Italy and see the number of		Noted.Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 “ A concept for better regulation on General Aviation”, which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's. Competent Authority status can only be designated by a Member State.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				"invisible" aircraft that are bypassing the over-administered Italian private aviation sector.In summary, EASA must find a way to allow the BGA to continue in its successful administration of gliding airworthiness in the UK.			
089	Bruce Stephenson	General	-	I am writing to you after being made aware of current proposals that are being discussed regarding Part M and its impact on Gliding as a sport. As you are aware, Part M requires vast amounts of information to be published regarding each particular aircraft, and whilst in the Airline World (I am currently employed in this area as Aircrew on a Boeing 757) this is necessary due to, for example, the complexity and number of different of aircraft systems and the effects of varying thrust and configuration of the aircraft. This material is vital to operators in order to operate a passenger aircraft to maintain the highest possible standards within the designed operating envelope. Naturally, large aircraft manufactures have amassed huge amounts of data through major investment of flight tests and excellent customer feedback over the years, but in the case of simple technology, these same rules cannot necessarily, for various reasons, be applied in the same way, and therefore each case has to be taken into consideration for its individual requirements. As part M does not appear to take into account that "gliders are of simple construction and design", to saddle our sport with such draconian measures would, at very best, have detrimental consequences to the sport as a whole, and I would strongly urge that a more representative solution be sought under Part M, and that gliders be regulated as in	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's. Competent Authority status can only be designated by a Member State.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				the current situation, where a national gliding association oversees the issues of generic maintenance programmes, maintenance manuals, ADD's etc. I therefore would like to propose due consideration for the development of a simpler subversion of Part M, so as cost and safety effective procedures be put in place that BEST caters for the needs of glider design/safety and the long term future of the sport. It may also be worth pointing out, that here in the UK, the BGA has managed gliding in this country for many years now, and it is vital that they be recognised as a Competent Authority for gliding in the UK, and that EASA should do their utmost to ensure that the BGA are in a position to manage airworthiness processes. I feel EASA is in a unique position to make a change for the better for all aviation (and non aviation) users in Europe, and would urge them at political level they do not loose sight of what the voting individuals needs really are. It seems that these days that anything to do with European politics has thus far seen an escalation of draconian rules and laws that have in many cases, have had a marked effect on our personal freedoms and rights. Ladies and Gentlemen, this is YOUR opportunity, please don't squander it!			
090	Colin Baines	Draft Opinion	M.A.302	The imposition of individual maintenance programs for gliders will lead to the creation of a mountain of very expensive paperwork to deal with the many glider types that are operational in the UK. Many of these are generic types which differ very little one from another and so	The current method of self-regulation which has been active for over fifty years is well tried and tested and provides a standard of safety which is at least equal to other modes of air transport.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				do not required individual servicing regimes. This will effectively lead to the scrapping of many of the older types which give the sport so much of its charisma and add prohibitive costs across the board. For many young people and those who are on low incomes, this is the only way in which they can afford to engage in what is an exciting and inherently safe air sport. The proposed legislation will effectively bring about their exclusion.		programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	
091	Colin Baines	General	M.A.901	Preventing the certifying person from issuing Airworthiness Review Certificates will yield no benefit and will add significant unnecessary cost and add delay to the glider certification process. Gliders are designed to be easy to inspect and maintain; so any additional requirements should be aimed at improving what is already a safe and well regulated system rather than replacing it with a complex and expensive regime which is designed to prevent a lean and profit driven industry from cutting corners.	British Gliding Association has provided data which proves that for many years its self-regulating system produces safety statistics which equal, or exceed those achieved by countries where more stringent regulation is in place.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005. The status of BGA within the UK airworthiness structure is a matter for UK alone and not a responsibility of the Agency.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
092	Peter Gray	General	-	Subpart in general: The limitations on components, particularly instruments, are a severe restriction on the needs of glider pilots. Notwithstanding the proposed changes to Appendix Vlll this section illustrates how the needs of amateur aviation are not well served by Part M and there is a need for further workshops to establish the needs and position of gliding in the EU.	"Certified" parts for out of production gliders may well not exist nor will there be any standard equipment lists. Glider instrumentation is a matter of pilot choice and where equipment lists are devised they should be on a generic basis. Glider pilots need to be able to tailor their instruments to their varying needs and remove/replace them as required. In this respect the MA 801(b)2 qualification is unnecessarily onerous. Glider instrumentation (including pneumatic data connections) is simple and there should be scope for limited expertise privileges obtainable by pilot owners.	Partially accepted Items installed on an aircraft can only be those defined by the TC or STC holder or any standard part as per manufacturer documentation, or any approved modification action. Decision 2006/13/R has been issued by the Agency which redefines the definition of standard parts installed on sailplanes and powered sailplanes certified under the provision of CS 22.1301b. The action of removal and installation of some instruments on aircraft are allowed as per the paragraph 30 of Appendix VIII of PartM.	
093	Peter France	General	-	Since about 1950 the BGA has supported and overseen gliding in the UK. This has been with the blessing of the CAA, who have regarded the BGA as competent in this role. The technical expertise and back-up provided (invariably by professional volunteers) has been effective over the years, as shown by the records. It has kept to a minimum the costs imposed on the gliding community.	Gliders are not complicated aircraft, and maintenance, in accordance with instructions supplied by the people who design and build them, is necessarily simple. There is no need for separate maintenance schedules, nor for the expensive bureaucracy that would go with it. See the USA approach, in FAA 43.13 as a way to do it, for example.	Partially accepted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	
094	Stephen Giedziun	General	-	Just a 'general comment' AGAINST your proposals.As a low hours glider pilot for 30 years, without my own aircraft, I can see your proposals putting this sport beyond the reaches of many of us because of the financial burdens they will occur because of the increased costs of your intended Maintenance Rules.A large responsibility on organisations like yourselves is to promote gliding, especially to the youngsters of today, who, with encouragement, will continue and pass on the tradition of this exciting sport to future generations. Even now, the costs are restrictive to these young people, which with your proposals will alienate even more.The other knock on effect that will be felt, directly on the clubs, is for Air Experience Flights and Trial Lessons,		Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				again putting them beyond the reach of the average person financially, and therefore reducing the income, which many clubs rely on for their survival.I can also imagine aircraft being 'grounded' because of the increased bureaucracy causing a 'backlog' in these certificates being issued.I won't go into the realms of individual maintenance schedules for aircraft, I'm sure you'll get enough of those without me adding to them. Needless to say, I am vehemently against them.		industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
095	Peter Gray	General	M.A.901	MA901(d) (d) If an aircraft is not within a controlled environment, or managed by an M.A. Subpart G approved continuing airworthiness management organisation that does not hold the privilege to carry out airworthiness reviews, the airworthiness review certificate shall be issued by the competent authority following a satisfactory assessment based on a recommendation made by an appropriately approved continuing airworthiness management organisation sent together with the application from the owner or operator. This recommendation shall be based on an airworthiness review carried out in accordance with M.A.710. There need to be powers for the competent authority, following existing models, to delegate to relevant national sporting governing bodies the authority to oversee and issue repeated ARCs.	Such arrangements for gliders, which are of simple construction, exist in the UK. They are economic and effective. The additional annual workload proposed for the competent authorities in the EU involves up to some 22,000 craft of all types (Air Eurosafe data) the owner/pilots of which are largely amateur with no associated commercial activity to pay for the increased costs of the proposed system. The existing technical safety record is good. Laudable even. There is no justification given for instituting an onerous system without demonstrable further benefits. It is a perceived concern that if the powers of inspection, maintenance and certification are taken away from those closely involved with the type eg. glider the expertise that underpins the current good safety record will be eroded.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005. The status of BGA within the UK airworthiness structure is a matter for UK alone and not a responsibility of the Agency.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
096	Guccini, ENAC	Draft Opinion, Appendices	Appendix VIII	Note: proposed modifications in respect to NPA-07-2005 are bold underlined (text added) or barred (text erased). Preferred option of text: Appendix VIII Limited Pilot Owner Maintenance … 32. Replacement Removal, installation of wings and tail surfaces and controls, balloon envelope, baskets, burners and controls (including safety pins, turnbuckles and karabiners) the attachment of which are designed for assembly immediately before each flight and dismantling after each flight. In the case of gliders, also minor adjustment to non-flight or propulsion controls whose operation is not critical for any phase of flight. 33. Replacement Removal, installation of main rotor blades that are designed for removal where specialist tools are not required. …	The substitution of the wording "Replacement" with the wording "Removal, installation" is considered more appropriate for the item number 32 since it presumes routine actions to be done immediately before and after each flight. The replacement of wings, surfaces, etc., with a different serial number, might also require a knowledge level of the type design of the aircraft not normally in possess of the pilot owner. For the same reason we propose, also, the substitution of the wording "Replacement" with the wording "Removal, installation" in the item n. 33. The elimination of the balloon envelope from the item n. 32 is proposed since the Certificate of Airworthiness of balloons is normally associated with the envelope (this is the case in Italy). Otherwise one could fly with the CofA of another balloon or even bypass the necessity of obtaining of a new CofA in case, for instance, of a perished balloon. The proposed modification is also in line with the content of the item n. 27 of the appendix.	Noted. Revision of Appendix VIII will be performed by Working Group M.005.	
097	Peter Startup	General	-	WITH REGARD TO THE REQUIREMENT FOR A MAINTENANCE PROGRAMME TO BE DRAWN UP FOR EACH INDIVIDUAL AIRCRAFT.	THERE CAN BE NO JUSTIFICATION TO APPLY THIS BURDEN TO THE GLIDING COMMUNITY.ALL GLIDERS HAVE 2 BASIC CONSTRUCTION METHODS,WOOD/STEEL TUBE/FABRIC FOR OLDER TYPES AND COMPOSITE STRUCTURES FOR GLIDERS FROM AROUND 1965 TO DATE. INSPECTION METHODS FOR THE 2 TYPES OF CONSTRUCTION ARE GENERIC AND WELL KNOWN,AND INDIVIDUAL TYPE DIFFERENCES ARE CATALOGUED THROUGH EXPERIENCE AND MANUFACTURER INFORMATION IN THE FORM OF	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					MAINTENANCE MANUALS.THE APPLICATION OF SERVICE BULLETINS,AIRWRTHINESS DIRECTIVES TEC,IS OVERSEEN BY THE BRITISH GLIDING ASSOCIATION.	AMC M.A. 302 has created confusion and has been reviewed.	
098	Peter Gray	General	-	My comments are as a UK glider pilot and instructor but I dare say I speak for all amateur aviators. The RIA reports in terms of safety, economy, social impact and other. From the perspective of the UK, where the British Gliding Association has for more than 50 years performed an effective, delegated role as a competent authority, Part M offers a probable continuation of the current level of safety, a hugely increased economic burden with the negative social impact of increased downtime for the sake of paperwork trails and the prospect of pilot/owners giving up flying because of a hopeless cost benefit analysis. No small part of the success of the UK system is due to the fact that the cascade of expertise is downwards and the criteria for granting responsibility are appropriate to the responsibility assumed. The part M proposals appear to gather the responsibilities to the centre. The constraints of subparts D and E and the requirements for Subpart F personnel and activities are such that the availability of authority at the airfield level sufficient to keep a day to day operation going will be sadly curtailed. If aircraft are grounded for a lack of decision making qualifications this will be severely damaging to the flying clubs. Frustrated pilots who do not see the need for delay over a problem they know the answer to will grow contemptuous of the system which has serious implications for safety. There is an urgent need to devise a greater delegation of authority than is proposed		Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				which will be economic and socially acceptable. The UK gliding structure and current practice is a working model. I urge EASA to take more time to consult with the EGU , particularly with respect to relaxing the means whereby the amateur can take a responsible and meaningful role in the maintenance and equipping of his aeroplane.			
099	Dutch Gliding Association	Draft Opinion	-	In must be possible for gliding association to become a Part F Maintenance Organisation. At this moment only AMC is developed for small organisations (less than 10 maintenance staff).	If the Duch gliding association can not become a Part F organisation, it means that the CAA-NL (Dutch Authority), has to issue 35 Part F approvals (for each glider club one approval). Furthermore it means that the CAA-NL has to perform audit every 12 month for each approval. This will increase the workload of the CAA-NL and increase the costs of gliding clubs, because they have to pay for each audit and for each approval.	Noted. Nothing prevents an association from being approved as a Subpart F organisation. Such organisations are not limited to those with less than 10 persons. AMC to M.A.604 recommends for organisation having 10 or more persons to submit a manual in the form expected of a Part 145 organisation.	
100	Dutch Gliding Association	Explanatory Note	M.A.901	Comment: Individuals, authorized by the competent authority, should be able to issue ARC for small aircraft below 2730 kg	If individuals, authorized by the competent authority, can issue an ARC, then it is not necessary anymore for a glider club/association to become a Part G organisation or contracting a Part G organisation for the issuing of an ARC. For a glider the club/ association a Part G organisation is to complex and absolute unnecessary for simple designed aircraft like a glider Instead of having a quality system the competent authority could perform random inspection of ARC's, which are issued by the individuals, to verify all the requirements are adhere to.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
101	Dutch Gliding Association	General	-	The Part M is very difficult to read, because Part M is applicable for large aircraft, commercial aviation, general aviation, gliders, balloons and approved maintenance organizations. A part M for non-commercial operated aircraft below 2730 kg MTOM should be published	A part M for non-commercial operated aircraft below 2730 kg MTOM will increase the level of safety, because there will be less confusion of which requirement is applicable for a certain aircraft type and/or operation	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
102	Dutch Gliding Association	Draft Opinion	M.A.302	For small aircraft below 2730 kg: A maintenance programme has not be approved by the competent authority if, the maintenance progamme is made according: - instructions issued by the type certificate holder and supplementary type holder and any other organisation that published such data in accordance with Part 21, or - instructions issued by the competent	If the maintenance programme and any subsequent amendments had be approved by the competent authority this will be increase workload of the competent authority and increase the costs of the aircraft owner. Because the most gliders will be in uncontrolled environment this means that after changes of the instructions by the type certificate holder or new instructions issued by the competent the maintenance programme has to be	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				authority	approved. This is will only add costs and not improve safety. Instead of approving the maintenance programme by the competent it could be verified during ARC inspection that the maintenance programme is in accordance with the instructions issued by the TC holder or competent authority.	current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	
103	Alan Sparrow	General	M.A.302	MA302 requires a maintenance program to be drawn up for every individual aircraft and approved by the "competent authority." EASA should relax the rule for gliders and if necessary replace it with a rule similar in context to FAR 43 13.	An individual maintenance program serves no useful purpose for gliding - either for safety or for any other reason. Writing the manuals would be a huge task and would have large associated costs that will, inevitably, be passed on to owner and operators. The current situation where generic maintenance programs (written by national gliding associations) that incorporate manufacturer's maintenance manuals and instructions for continuing airworthiness such as Airworthiness Directives has been used for many years and has proved to be effective means of accomplishing a high level of airworthiness.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
104	Alan Sparrow	General	-	EASA should form a working group to consider concerns of the gliding movement with issues arising from Part M.	The Regulatory Impact Assessment was restricted only to subparts E to I and did not cover all the concerns of the gliding community relating Part M. Many of the concerns of the gliding movement were therefore effectively excluded from the assessment. The working group is needed to allow a proper assessment of concerns relating to gliding.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
105	Peter Startup	General	M.A.901	The issue of ARC's by "competent authories" - ?	I am an AESA part 66 B2 licensed avionics engineer and british gliding associaton authorised glider inspector. For 60 years in the UK we have had a system of glider inspection by people appointed as inspectors and overseen by the BGA,which itself has this authority delegated to it by the civil aviation authority.this has worked well as has been shown by the safety record of BGA authorised inspectors,most of whom are not licensed engineers and not employed in the aircraft industry.however,in my experience the standards of inspection and maintenance of gliders by those approved by the bga has been beyond reproach with safety being of paramount importance at all levels. I work with the regulatory systems of EASA and the CAA as part of my day to day work,and consider this level of enforced maintenance and regulation usually reserved for commercial aircraft wholly inapropriate to gliders. All gliders are similar and are maintained to a fixed generic schedule, which in conjunction with glider' individual	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					maintenance manuals and the prompt deliverence of mandatory service bulletins and airworthiness directives direct to owners and inspectors has been a proven and more than adequate system of maintenance for almost 60 years . I can see no justification for a change in the system that we have in place. it would significantly increase the cost of maintenance with no safety benefit. That safety comes from people skilled and experienced in this work. I recommend that EASA work to find a way that the BGA can be the UK "competent authority" for the continued maintenance of gliders and authorisation of inspectors,who can recommend the renewal of the ARC.	direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's.. M.A.901 Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	
106	Rob Nicol	General	-	*SAME COMMENT AS FROM Colin Baines N° 91* Preventing the certifying person from issuing Airworthiness Review Certificates will yield no benefit and will add significant unnecessary cost and add delay to the glider certification process. Gliders are designed to be easy to inspect and maintain; so any additional requirements should be aimed at improving what is already a safe and well regulated system rather than replacing it with a complex and expensive regime which is designed to prevent a lean and profit driven industry from cutting corners.	British Gliding Association has provided data which proves that for many years its self-regulating system produces safety statistics which equal, or exceed those achieved by countries where more stringent regulation is in place.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	
107	Nicholas Norman	General	-	Gliding within the UK has been effectively regulated by the BGA for over 50 years. The rate of technical incidents and accidents is no worse and sometimes better than other EU states where the National Authority was the regulator. I wish this status to continue as it provides very satisfactory safety standards without an overhead of unnecessary beaurocratic and financial burden. Had the effectiveness of the BGA been questionable, the UK CAA would have found it appropriate to retake control over the activity, but they have not done so. With the UK Department for Transport already having designated the UK CAA as the competent authority, the gliding movement will find itself under the control of the CAA unless EASA can help it to become an alternative competent authority for gliding. It is my opinion that it should do that. Resources for ensuring technical safety of gliders is limited – if time has to be spent complying with a beaurocratic process that is designed for large powered aircraft and are largely irrelevant to gliding, there will be no increase in safety and possibly a reduction therein.		Further to the reply to your comment 108:Competent Authority status can only be designated by a Member State	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
108	Nicholas Norman	Explanatory Note	-	The scope of the RIA has been limited to sections E to I, however I am concerned that other sections of the proposed legislation will have an adverse effect on gliding in the UK, without bringing any safety benefit. For example MA302 requires the creation of maintenance programs for every individual aircraft, which must then be approved by the Authority. This massive burden will not improve safety at all, because gliders are mechanically simple, standardized and fit well into a generic maintenance program which takes into account the manufacturers recommendations	Gliding in the UK has operated very safely from a technical and airworthiness point of view, for many years under the systems developed by the BGA. The proposed rules, which seem to be only relevant to large commercial aircraft, are likely to damage gliding in the UK by increasing the beaurocratic and financial burden without bringing any safety benefit. It should be a guiding principle that the legislation exists to serve flying activities and not the other way round. Legislation without reason is bad legislation. Eliminating some areas from the RIA prevents a comprehensive analysis of the issues.Although gliding represents a financially small element of European aviation, EASA should not impede it where there is no safety justification. EASA should form a working group to assess and adjust part M to better suit light aviation and gliding in particular.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's. Concerning your example (M.A.302):.As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC.Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	
109	Nicholas Norman	Draft Opinion	M.A.901	Airworthiness Reviews for light aircraft and gliders should be able to be certified by a certifying person, not the "competent authority"	The requirement for the Airworthiness Review to be certified by a competent authority is grossly out of proportion to the nature of gliding and light aircraft. This large additional burden will not improve flight safety. Part M fails to deal adequately with the widely varying complexity between, for example, commercial airliners and gliders. Restrictive legislation such as this should not be introduced without a clear indication, supported by facts, that there is a safety problem to be addressed, and that the proposals will address the issues satisfactorily.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
110	F.F.V.V.	Draft Opinion	M.A.302	MA 302 Maintenance Program Maintenance programme will have to be drawn up for each and every aircraft and approved by the competent authority. The FFVV therefore asks the EASA to relax this rule for gliders / sailplanes and to replace it by recommending to maintenance staff to applied manufacturers programmes rules.	French Authority enforced Maintenance programmes since October 2000. Individual Maintenance Programmes (IMP), are never taken into account, by maintenance staffs, as only manufacturer maintenance programme rules are to be applied. Most useful data for maintenance work: Airworthiness Directives, work cards or works check list for periodic maintenances, delivered by manufacturers, are not includes in such IMP, but in NAA, or EASA, mailing and Manufacturers maintenances data. This means that IMP is just an additional administrative layer, involving administrative work to establish them, and more to keep updating, as many amendments have to be achieved. There is no evidence that AA could keep and manage such amended IMP records. (No evidence neither from the French AA experience!).	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
111	F.F.V.V.	Draft Opinion	M.A.502	MA 502 - Component maintenance "Such components, nevertheless, can be temporarily removed for maintenance when such removal is expressly permitted by the aircraft maintenance manual to improve access." Such components, can't be temporarily removed for maintenance when such removal is expressly forbidden by the aircraft maintenance manual to improve access."	Permission to remove components is generally not expressed by the aircraft maintenance manual, and achievement of such requirement would mean not removal at all! So we propose to invert the argument. It seems also necessary to get a more accurate definition of "maintenance" for components to distinguish between "assembling-dissembling" and operate in/on the component itself.	Partially accepted. This issue will be clarified through an AMC. In the light of this remark, the wording "Aircraft maintenance manual" is replaced by "maintenance data" in M.A.502.	See revised M.A.502
113	F.F.V.V.	Draft Opinion	M.A.607	1. that certifying staff can demonstrate that in the preceding two-year period they have either had six months of relevant maintenance experience or, met the provision for the issue of the appropriate privileges; This requirement can not be achieved by small organizations : Maintenance experience must be accounted for longer	In France, about 40 % of Gliding Clubs maintain only one Tug and less than 10 gliders, the average use of Towing aircrafts (tugs) is under 100 hours a year, and annual maintenance inspection for gliders needs less than 50 hours per year (not including modifications or repairs of course).	Partially accepted. In the light of this remark, the wording will be clarified by referring to experience requirements in Part-66 that itself currently refers to national rules for gliders and balloons Furthermore, for powered aircraft a Part-66 light is under consideration	See revised M.A.607

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				period, including, at least, 5 year aircraft maintenance inspection. Proposed text : that certifying staff have relevant maintenance experience or, met the provision for the issue of the appropriate privileges;		and a working group WG 66-008 is addressing the issue of renewal of licences and associated recent experience required.	
114	F.F.V.V.	Draft Opinion	M.A.610	MA 610 - Maintenance work orders "Before the commencement of maintenance a written work order shall be agreed between the organisation and the customer to clearly establish the maintenance to be carried out." This can't applied to small organisation, i.e. gliding clubs, where distinguishing, organisation and customer is nonsense. Exposition of maintenance organisation is sufficient.	In small organizations, the maintenance staff is most of the time one personnel appointed or often volunteer, this personnel in charge of maintenance organizes his work by himself and there is no way to formalized his daily or even hourly maintenance activity.	Partially accepted: The reason of having an agreed Work Order is to protect both parties. Firstly, the Subpart F organisation is protected from undeclared maintenance needs since the release to service must only cover what has been ordered. Secondly, the owner / operator is protected from requested work not being carried out. The word "customer" has been found to be misleading and will be replaced by "the entity requesting maintenance" Additional AMC material is under consideration to specify the type of documents that can constitute a Work Order (i.e, Snag Sheet, Log Book entry, etc).	See revised M.A.610
115	F.F.V.V.	Draft Opinion	M.A.710	MA 710 Airworthiness review staff these staff shall have acquired: An appropriate Part-66 licence or an aeronautical degree or equivalent Avoid this sentence. Replace by: aeronautical maintenance general knowledge and experience.	Conducting Airworthiness Review does not need L66 Licensed personnel, as this level of Technical skillfulness is not necessary. If necessary, for specific matters, the Airworthiness review staff can required the expertise of a L66 licensed personnel.	Noted. As mentioned in the response to M.A.707(a)2: Part-66 defers to national regulations for balloons and gliders.	
116	F.F.V.V.	Draft Opinion	M.A.803	MA 803 Pilot-owner authorisation (c) Limited pilot owner maintenance shall be defined in the M.A.302 aircraft maintenance programme. Pilot –owner authorization should include operational maintenance as listed in the flight manual.	Presently 50H maintenance inspection for aircrafts, 100 H for gliders are maintenances authorized to pilot-owner. For gliders, assembling / dissembling of main parts (wings, stabilizers) is of current practice, as a consequence of gliding activity (country landings,	Noted. The Flight Manual includes only tasks which can be carried out by the pilot, so, they are not considered maintenance activities.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					competitions meeting, or even daily storage in trailers! As long as these operations are included in the flight manual, there is no way to consider this operational activities depending of maintenance authorisation.		
117	Shalbourne Soaring Society	General	M.A.901	The issuing of Airworthiness Review certificates needs to be carried out by the certifying person. This will enable the certification process to proceed with the minimum of delay and in a cost-effective manner. Such is the design of sailplanes and gliders that they are simple in construction method and general control systems. Therefore manufactures maintenance programs can be safely carried out to a very high degree by individual glider maintenance inspectors.	The British Gliding Association system of self regulation of its inspectors and certification works well, and has a proven track record based on many years expertise which has been gained by a system of suitably qualified people in all areas and disciplines, often directly involved as active precipitants in the sport and therefore well placed to ensure standards are met maintained, and were necessary improved via feedback to the British Gliding Association.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005. The status of BGA within the UK airworthiness structure is a matter for UK alone and not a responsibility of the Agency.	See revised M.A.901
118	Shalbourne Soaring Society	General	M.A.302	The Implementation of a maintenance program for each Glider would lead to a huge and totally unnecessary amount of paperwork in the form of preparation of new manuals and schedules. Many of these Glider types differ very little from one another and a general set of procedures works well, in fact manufactures often use common parts and system designs from type to type. This enables directives and maintenance information to be cost effectively	The British Gliding Association has for many years implemented its own self regulation and has in place a system where by information relevant to Aviation safety and maintenance can be centrally controlled and distributed to those whom it is relevant to. This has led to what has become a huge technical source of information tailored to the exact needs of our sport to maintain safety in a cost effective way. This has proven over many years to work well and produce	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				generated, easily managed and understood.	maintenance standards to a high degree.	several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	
119a	Michael Corfield	General	M.A.302	Comment on MA302There is no need for an individual maintenance program for gliders, generic maintenance programmes that incorporate manufacturer's maintenance manuals are sufficient.		Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC.Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
119b	Michael Corfield	General	M.A.901	Comment on MA901 Part M does not take into account that gliders are simple in construction. The existing UK gliding airworthiness system, formally approved by the CAA, is sufficient		Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	
120	Colin J Hamilton	Draft Opinion	M.A.302	MA302 It seems to me that this needs a programme of maintenance for each individual glider and not just for a given type. If so this would prohibitively expensive and unnecessary. It would be better to use the model of FAR 43 13 as used in the USA.	Gliding Associations have overseen type maintenance using manufacturers manuals and advice. This has been shown to be more than adequate over many years. I can see no evidence of enhance levels of safety being afforded by the proposals for increased layers of bureaucracy. This rule should be removed but if considered absolutely necessary (which I continue to argue against) please use FAR 43 12 as the model.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
121	Colin J Hamilton	Explanatory Note	-	Paragraph 9The RIA appears only to have dealt with a limited issues. It does not appear to cover a number of serious concerns I have with the application of part M.	The RIA was restricted to subparts E to I. No reference was made to part M.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
122	Colin J Hamilton	General	-	I have been flying cross-country in gliders in the UK since 1976 and I have to stress that I have found the BGA to have controlled UK gliding in a highly commendable fashion during that period. I understand that the accident rates due to airworthiness/ maintenance issues in British gliding compare favourably with other countries where stricter regulation applies.	Please do not force the BGA into Part M which is overly bureaucratic and its consequent costs will bring much pressure to bear on what is one of the great flying sports Please allow the BGA to continue to develop it's own management processes to manage our sport.	Noted. Reply to your previous comment covers this point also.	
123	L.E.N. Tanner	Draft Opinion	Appendix VIII	Many of the maintenance proposals for gliders will result in greatly increased costs without any obvious benefits to safety. I have been operating gliders (and powered aircraft) for many years without all of this regulation. There is absolutely no need to include gliders in this NPA and if it is published I shall ignore it! EASA is becoming a bureaucratic nightmare, and the perpetrators of these documents need to get into the real world. We fly for fun and do it safely. We do not need these proposals and they are not		Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				wanted. EASA - European Action Stops Aviation!!!		ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
124	Neil F. Goudie	General	-	As a cross-country pilot in the UK for some 13 years, I have seen proper control of the sport by the British Gliding Association in all regulatory areas. The CAA (our member state competent authority) has acknowledged that our record in accident rates due to airworthiness/ maintenance compares well with other countries where “stricter” legislation applies.	If the BGA is forced into Part M increased administration and its consequent costs will bring much pressure to bear on all members of the Association, without any additional improvements to airworthiness/maintenance. Find a method to enable the British Gliding Association to continue what has been a very successful management process to date.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 “ A concept for better regulation on General Aviation”, which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's. Competent Authority status can only be designated by the Member State.	
125	Neil F. Goudie	Draft Opinion	M.A.901	The Part M Regulatory Impact Assessment that the ARC should be issued by a certifying person as is now effective in the UK was rejected in favour of "the competent authority".	The increased administration costs will be significant. The existing BGA method approved by the CAA that has worked for many years, and the statistics prove this. An reasonable AMC, or a much simpler version of part M, should be applied to gliders.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901
126	Neil F. Goudie	Draft Opinion	M.A.302	MA302 This appears to need a programme of maintenance for each individual glider and not just for a type. If so this would expensive and unreasonable and would be better modelled on FAR 43 13 as used in the USA.	The existing situation with gliding associations overseeing type maintenance using manufacturers manuals and advice has been proven over many years. Any change to the present system MUST be justified by a cost/benefit analysis or this contravenes my basic human rights to enjoy a sport I do for pleasure and for no financial gain.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					Relax this rule and if considered absolutely necessary, base it on a model of FAR 43 12, if this is more reasonable than the existing system.	and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	
127	Neil F. Goudie	Explanatory Note	GEN	Paragraph 9 The RIA does not appear to cover the concerns that I have with the application of part M.	The RIA was restricted to subparts E to I without reference to part M. This is a failure of the consultation process and should be reviewed further before progressing	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
128	Belgian Gliding Federation	General	M.A.202	M.A.202 Occurrence reporting Par. (a) requires reporting to the State of registry, the organisation responsible for the type design or supplemental type design, and if applicable, the Member State of the operator. Proposed change: single reporting to the State of registry	A reporting system must be easy /simple to fulfil to be adequate. One single reporting address in every Member state will do. The pilot/owner must not know which organisation is responsible for the TC's/STC's	Partially accepted. We recognise that a simplified reporting system is a good objective but this issue must be addressed through Part-21 before hand. We agree that the competent authority of the state of registry is a better structure for reporting than just the state of registry. Nevertheless to ensure communication between the TC holder or STC holder and the owner is upheld, such reporting is also mandated. Furthermore, the Agency will work towards finding a more efficient manner to carry out occurrence reporting in order to simplify the system for the applicant and to avoid loss of information.	See revised M.A.202
129	Belgian Gliding Federation	General	M.A.302	M.A.302 Maintenance programma Par. (a) requires the approval of the maintenance programme, amendments and the periodical review by the competent authority. To comply with this rule, the necessary GM and AMC's are needed.	Besides the remarks already made about the immense administrative work/cost, the necessary AMC and GM is needed to prevent 25 different interpretations/requirements of the competent authorities involved and also for the related costs. All EU-pilot/owners must be treated in an equal way.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
130	Belgian Gliding Federation	General	M.A.303	M.A.303 Airwortiness Directives Of course any applicable AD must be carried out but the pilot/owner must be able to collect this information. An easy reachable/consultable system must be set up. Also the language problem must be	The pilot/owner must be able to find/collect the necessary AD's and related material in an easy way. Actual the pilot/owner has to consult the EASA-AD-list, publications by the member state/CAA, even the state of origin,	Noted. Article 15(1)(j) of Regulation No. 1592/2002 together with 21A.3B assign the responsibility for design related ADs to the Agency. In other words, only the Agency has the	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				solved.	websites of manuafacturers, … Due to the importance of this information, it should an advantage to get this information at one single address and preferable in different languages.	power under the EU legal framework to issue design related ADs. Through the issuance and distribution of ADs to the ICAO States (including the MS), EASA exercises the State of Design and the relevant design related State of Registry responsibilities as described in ICAO Annex 8 paragraph 4.2.3. An EASA AD is therefore directly applicable and enforceable in all EU Member States. Furthermore, Part 21 Subpart H clarifies the role of Member States in the verification of the conformity of aircraft (including products, parts and appliances fitted thereon) on their register with the type design approved by the Agency (or grandfathered by Regulation 1702/2003) when issuing a certificate of airworthiness. This includes of course the related ADs issued or validated by the Agency. Furthermore, the obligations for owners and operators to comply with the EASA ADs are firmly enshrined in Part M. This part makes the EASA ADs mandatory for those operators and aircraft owners. Member States are responsible for implementing Part-M.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
131	Belgian Gliding Federation	General	M.A.304	M.A.304 Data for modifications and repairsPutting Part 21 in force without introducing an equivalent of AC 43-13 and draw a clear dividing line between small, non-structural damages and minor repairs requires maintenance organisations to ask for approved data for every simple repair. This situation has besides the administrative burden, a dramatic negative economical effect on the owners.	Via an AMC the description of damage must become clear. A distinction must be made between damage when it has any relation to the airworthiness or not. Damage assessment relies on practical experience of the person checking the damage. Not every situation can be written down as checklistAnother aspect of the safety impact is the requirement expressed by some Member States to set a European equivalent of AC 43-13, in order to ease the design of standard repairs. This is agreed and recommended by Air EuroSafe.	Partially accepted. Task M.019 is scheduled to start at the beginning of 2008 in order to define an equivalent to AC43-13. As an interim measure, group M.017 will evaluate how to incorporate AC43-13 in the current rule.	
132	Belgian Gliding Federation	General	M.A.306	M.A.306 (b) Technical log system must approved by the competent authority# Clarifying GM/AMC is necessary. A Subp. G organisation must be permitted to approve log systems.	Without assisting material there will be different interpretation by the different competent authorities. Systems must be as simple as possible and in relation to the type of aircraft involved. As Subp. G organisations can be responsible for the continuous airworthiness, means that they are also responsible for the log systems.	Not accepted As mentioned in 201(h) and (i), the word operator is limited to commercial air transport and activities which needs a certificate. This paragraph is not intended to be applicable to non commercial operation.	
133	Belgian Gliding Federation	Draft Opinion	-	IV Content of the draft decision A) 8 and B) 13 The RIA was tasked to look at the safety, economic and social side. We have the feeling that the social/economic side was not really taken into account in the air sports environment.	In gliding clubs nearly all maintenance tasks are done by volunteers, even the airworthiness inspections. As already said so many times, sailplanes are ‘simple’ aircraft. On the social side, carrying out maintenance tasks is a ‘part of the game’, and it is also an element in the training, to have some practical technical knowledge which leads to respect for the hundreds of hours labor done by the club key persons to keep the sailplanes ready to fly season after season. A large group of skilled and experienced persons are granting this system. On the economical side, gliding clubs can only survive with the support of a large number of flying members and a large group of volunteers who takes care of the	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 “ A concept for better regulation on General Aviation”, which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					club management. For the most clubs the real flying season runs from March till September, and often only on weekends as it is a sport and also due to many restrictions on airfields and airspace during the week, on top often meteo conditions do not allow to fly! So you can not run a club on a 'business wise' way. Even with the possibility of doing a lot of 'pilot-owner-maintenance tasks', the gliding federation will be forced to set up a Subpart G /CAMO and to work in a 'controlled environment' as it is called. The workload will increase as such (more and complex paperwork) that volunteers will resign … (they like the necessary operational work but are scared to become a "secretary"). This means that our organistation we will be forced to engage at least two full time employed officers. A first ruff estimation was made: taking into account the cost of the approval fee, the audits costs, salary and social costs, office and working costs, … an overall cost increase for our federation with nearly 130 000,00 € per annum or nearly 280,00€ / sailplane! (actual +/- 450 sailplanes) This means even for some older (mostly club) sailplanes 20 to 25% of their value! Even choosing to stay with our sailplanes in an 'un-controlled environment' the annual cost/sailplane will increase up to 400/500,00 € per year: cost for the 'recommendation' survey by a CAMO, and the fee for the renewal of the ARC by the competent authority. It is clear that these changes will have a dramatic impact on the gliding activities.	taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
134	Belgian Gliding Federation		Appendix VIII	Appendix VIII - Limited Pilot Owner Maintenance Proposal to change the system of a list with tasks which are authorized to be done by the pilot/owner into a called 'negative list', a list with task which may not be done by the pilot/owner.	As already mentioned, sailplanes are 'simple' aircraft to maintain, and listing all those easy maintenance tasks as they are now by the pilots/owner, will end up in list of many, many pages. In our opinion it is much easier to make a list of the tasks which may not be done by the pilot/owner and it will make it much more clear to everybody.	Noted. Revision of Appendix VIII will be performed by Working Group M.005.	
135	Belgian Gliding Federation	General	-	Please find attached our comments forms related to NPA 7-2005. As a founding member of the European Gliding Union, we fully support the comments made by this organisation. *COMMENTS SPREAD FROM 128 TO 134* Best regards, On behalf of the Belgian Gliding Federation, Patrick Pauwels, Board member		Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
136	DGAC France	General	2042/2003	Entry into force of Part M has to be postponed	• All interested parties have not yet really started to prepare transition from national requirements to Part M. They are notably waiting for improvements brought by this NPA. • A number of questions raised during the impact assessment are supposed to be answered through the development of appropriate AMC and guidance material. According paragraph 11 of the explanatory note, work should only start end of 2006 which means that an NPA may only be published end 2007 and the final material may only be available end of 2008. Under these conditions it may be quite difficult for interested parties and Authorities to understand what the intent of specific provisions of Part M is and what means of compliance are acceptable.	Noted. Currently there are no plans for postponing the entry into force fixed for 28 September 2008.	
137	DGAC France	General	-	The RIA should have addressed the level of qualifications required for Part M, subpart F certifying staff as it appears to be one of the major impact of this regulation. An option which should have been considered as part of the RIA is to align Part M requirements on Annex 6, Part II, 8.1.3 and Annex 6, Part I, 8.7 by modifying M.A.606(g) as follows: "The maintenance organisation shall have sufficient certifying staff to issue M.A.612 and M.A.613 certificates of release to service for aircraft and components. ~~They shall comply with the requirements of Part 66.~~ They shall be qualified in accordance with ICAO Annex 1, Edition 9, Amendment 166.	A number of questions have been raised during the impact assessment on the impact of Part 66 requirements for certifying staff of small aircraft. The Consultant has answered by considering that these questions were a 66 issue and that no impact assessment was needed. However, if the detailed content of 66 may be considered a 66 issue, the requirement to be compliant with Part 66 is a Part M issue. Unless Part 66 is amended to be suitable for general aviation aircraft, ICAO Annexe 1 qualification should be considered as the appropriate reference.	Partially accepted The MDM 032 working group decided to propose a "Light" Part 66. This task is being taken by a subgroup of M.017 group.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
138	DGAC France	Explanatory Note Appendix 2, RIA Final Report	M.A.604	Following comments from FFA and DGAC on the level of qualification required for certifying staff of light aircraft, the Consultant answers that the current French system is not ICAO compliant and impact does not need to be assessed. This is not the case and thus impact of Part M should have been assessed	As notified by France to ICAO and confirmed by ICAO audits, if there are differences for maintenance outside approved organizations, the French system is compliant with ICAO Annex 6 and Annex 1 for maintenance within approved organizations as, in all maintenance units approved for general aviation certifying staff are required to hold appropriate qualifications (even if this is not in the form of a license). The RIA should have addressed the question of certifying staff within approved organizations without license but with appropriate ICAO Annex 1 qualifications.	Noted. ICAO Annexe 1 specifies that certifying staff within an approved Maintenance Organisation should be qualified to the same standard as licensed engineers. The only difference is therefore the formal issuance of a document. This activity has little or no impact as stated by the consultant. Nonetheless the group will work on a Part-66 licence more adapted to light aviation.	
139	DGAC France	Explanatory Note Appendix 2, RIA Final Report	M.A.607	Following a comment from DGAC on category C personnel for large maintenance organizations, the consultant has answered that EASA work plan includes requirements for Part 66 category A and C licenses for aircraft below 5700 kg. This is not the case to our knowledge.	Part 66 limits the prerogatives of a category C aircraft maintenance licence to Part 145 organisations, however there is no reason why a Part M, Subpart F organisation should not be authorised to have similar procedures and use Category C personnel.	Noted. The category C certifying staff system has been built around the Part-145 system. The Part-M system does not have base maintenance, does not mandate a quality system, and does not have support staff.	
140	DGAC France	Explanatory Note Appendix 2, RIA Final Report	M.A.703	The RIA has not properly address the impact of Part M on aircraft registered in Europe and operated outside	This question has been addressed in the RIA final Report annexed to the explanatory note under M.A.703 Safety Impact Assessment but 1) the problem is not limited to M.A.703, 2) it is not stated properly, 3) the assessment made by the consultant does not seem appropriate. 1 & 2) the problem does not relate to aircraft operated by EU operators, but to aircraft registered in the EU and operated by non EU operators. A number of European aircraft manufacturers enter into different kinds of lease arrangements with customer airlines where the aircraft is put on the registry of the State of manufacture while it is operated by a foreign operator. There are a number of ATR, Airbus, and Dassault airplanes and Eurocopter helicopters registered in France and operated in different parts of the world. Today, when these aircraft are operated in a country where the national aviation	Partially accepted. It is accepted that the assessment made by the consultant in M.A.703 was addressing aircraft operated in the EU, which is not the case. However, in the absence of an 83bis agreement Regulation, 2042/2003 does not require the foreign operator to be approved as a CAMO because these aircrafts are not operated as Commercial Air Transport in the meaning of 2042/2003, Article 1, paragraph 3. So, it is enough with having a contract with an approved CAMO, and performing maintenance in a Part-145 organisation. Anyway, further information has been requested DGAC-F in order to analyse the impact of the issue. The	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					authority is known, through ICAO audits and other means, to be competent, DGAC may delegate part of the surveillance and rely on Air Operator Certificates and Maintenance Organisation Approvals granted by the local Authority. However, responsibility for the validity and renewal of the airworthiness certificate remains with DGAC as no 83bis agreement has been signed. Regulation 2042/2003 does not allow anymore such recognition and impose either foreign operator to be approved according Part M or France to sign 83bis agreements. Both solutions are not easy to implement. 3) The Consultant considered that these operations are commercial air transport operations and thus not subject to the RIA. However, according article 1.3 of the regulation commercial air transport only covers licensed air carriers licensed as defined by community law, and thus only covers EU operators. An aircraft registered in EU and operated by a foreign airline is subject to the same requirements as the same aircraft operated in general aviation by an EU operator. These operations were not excluded from the RIA and the impact should have been assessed	Agency will perform the appropriate evaluation.	
141	DGAC France	Explanatory Note Appendix 2, RIA Final Report	M.A.607	The question raised by FFVV on recent experience requirements has not been properly assessed by the consultant. In the world of light sport aircraft, where a number of air clubs may have a limited number of aircraft with low flying hours, the question of recent experience is a subject of concern. It should be noted that in FAR 65.83 an alternative solution is for the FAA Administrator to find the mechanic able to do the work.	a) Obviously the consultant did not understand FFVV question, which did not relate only to gliders but was also referring to aircraft towing gliders, when a club has one or two of these aircraft, it may be possible for the certifying staff to maintain recent experience on gliders but quite impossible to maintain on tow aircraft; b) Nothing in M.A.607(a) says that it is limited to certifying staff with a 66 license and thus it could also be applicable to balloons, gliders, and equipment certifying staff.	Noted This paragraph will now refer to experience requirements in Part-66 that itself currently refers to national rules for gliders and balloons Furthermore, for powered aircraft a Part-66 light is under consideration and a working group WG 66-008 is addressing the issue of renewal of licences and associated recent experience required.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
142	DGAC France	Draft Opinion	M.A.801(c)	The new paragraph (c) should read"(c) By derogation to M.A.801(b) ~~in the following unforeseen cases~~, where an aircraft is grounded at a location other than the main base where no organisation appropriately approved under this Part and no appropriate certifying staff is available, ~~the person responsible under M.A.201(a) may authorise~~ the certificate of release to service may be issued either by a person authorised by a maintenance organisation approved for the work performed in accordance with ICAO Annex 6 or by any person with not less than 3 years maintenance experience and holding a valid ICAO compliant aircraft maintenance licence rated for the aircraft type requiring certification~~, provided there is no organisation appropriately approved under this Part at that location and the contracted organisation obtains and holds on file evidence of the experience and the licence of that person.The person responsible under M.A.201(a) shall:1. obtain and hold in the aircraft records details of all the work carried out and of the licence held by that person issuing the certification, and~~Basic details of the maintenance carried out and evidence of approval of the contracted organisation or of experience and qualification of the certifying staff shall be notified within 7 days to the person responsible for the continuing airworthiness of the aircraft under M.A.201, who shall ensure that any such maintenance that could affect flight safety is rechecked by an appropriately authorised M.A.801(b) person, ~~and 3. notify the competent authority or the contracted Subpart G organisation responsible for continuing airworthiness management when contracted in accordance with M.A.201(e) within 7 days of the issuance of such certification authorisation~~."In addition sub-paragraph (d)(2) should read:"in the case of sub-	• Certificate of release may be issued by a person working within an approved organisation. In that case, according ICAO Annex 6 and Annex 1, the certifying staff may be authorised to issue CRS without a licence but with appropriate qualifications.• Prior notice does not seem practicable for private flights which do not benefit from permanent assistance.• It is considered that a declaration of work performed outside would already be beneficial.	Partially accepted. The paragraph has been changed and now meets the concerns raised.	See revised M.A.801

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				paragraph (b)(2) and (d) …"			
143	DGAC France	Draft Opinion	M.A.901(c)	a) Considering the impact of this requirement on authorities which, although unable to plan the amount of work, have to comply with the rule, we require that this subject is discussed between EASA and authorities. b) Add in M.B.303 (c) "The survey programme shall also take into consideration whether aircraft airworthiness reviews have been made under a quality system or not"	a) Regulation 2042/2003 has directly transferred the airworthiness review to the industry, but the RIA has proven afterwards that the industry may not be ready in all Member States for all types of aircraft and it is now proposed to partly come back to airworthiness reviews by the authority. This only shows that such drastic changes are hard to implement directly and we probably have to expect other difficulties when the new system will be progressively implemented. The situation where authorities will have to play at the same time the role of a service provider similar to approved organisations and the role of supervision of those approved organisations is not totally sane (for example how should the authority consider the aircraft for which it has made the airworthiness review in the fleet survey required by M.B.303?). The intent of the proposal is not totally clear. When reference is made to the absence of an approved organisation does it mean in a reasonable range (today the authority has regional offices to be within the vicinity of aircraft for C of A renewal) or does it mean there should be no approved organisation in Europe, and that if an approved organisation exists even thousand miles away (eventually in the French Antilles for example) then the owner has arrange with such organisation? Some flexibility need to be given to authorities concerning appropriate airworthiness review staff and access to applicable data as they will not be able to plan the number and types of aircraft which will require authority's airworthiness review and some of these	a) Noted. The proposal need further Regulatory Impact Assessment, which will be performed by M.017 group.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					aircraft (notably withy restricted C of A) may be old and limited in number). b) A major step has already been made by changing from the actual system of independent airworthiness review by the authority to industry review. Accepting that no independent control is made of these airworthiness reviews is only acceptable if additional surveillance of the system is made by the authority through fleet sampling. We need to get some experience with the new regulatory background before going further. Airworthiness reviews are the last barrier in case something was not done properly and we need to have full confidence in the new system and be able to correct eventual deficiencies as soon as possible.	b) Not accepted. The M.B.303(c) already contains provisions for taking into account the local knowledge and past surveillance activities.	
144	DGAC France	Draft Opinion	M.A.901(d)	Replace existing sub-paragraph (d) by (d) and (e) as follows: "(d) If an aircraft is in a controlled environment and managed by an M.A. Subpart G approved continuing airworthiness management organisation that does not hold the privilege to carry out airworthiness reviews, the airworthiness review certificate shall be issued by the competent authority following a satisfactory assessment based on a recommendation made by an appropriately approved continuing airworthiness management organisation sent together with the application from the owner or operator. This recommendation shall be based on an airworthiness review carried out in accordance with M.A.710. When the aircraft remains within a controlled environment and is managed by the same M.A. Subpart G approved continuing airworthiness management organisation, the authority may extent twice the validity of the airworthiness review certificate for a period of one year	Burden on the industry could be reduced by giving some credit to aircraft in a controlled environment and the airworthiness review is done by an independent organisation. The same credit of 3 years as when the airworthiness review is not independent seems more than reasonable.	Not accepted. It is not the intention to give the Authority the possibility of extending ARCs because they have no control of the aircraft and they can not guarantee compliance with M.A.902(b) without performing a full review.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				each time. (e) If an aircraft is not within a controlled environment, ~~or managed by an M.A. Subpart G approved continuing airworthiness management organisation that does not hold the privilege to carry out airworthiness reviews~~, the airworthiness review certificate shall be issued by the competent authority following a satisfactory assessment based on a recommendation made by an appropriately approved continuing airworthiness management organisation sent together with the application from the owner or operator. This recommendation shall be based on an airworthiness review carried out in accordance with M.A.710."			
145	DGAC France	Draft Opinion	M.A.803	Add the following note at the beginning of Appendix VIII: "Note: Appendix VIII is only applicable to airplane and helicopter maintenance", and delete reference to gliders and balloons	According Part 66, Subpart B, for relevant Member State regulations apply for the issuance of certificates of release to service of aircraft other than airplanes and helicopters. Thus there is no need to include common requirements for pilot owners for these categories of aircraft. Each Member State is entitled to give such privileges (or either less or more) in its national requirements. A clarification of the scope of Appendix VIII would probably avoid misunderstanding.	Not accepted. The release of gliders and balloons is made in accordance with Part-M requirements, not under national requirements. In those cases where Part-M calls for a Part-66 licence, it means a national licence for gliders and balloons. In the case of pilot-owner tasks carried out i.a.w Appendix VIII, there is no need for a maintenance licence.	
146	Alec Stevenson	General	-	For gliders these are a severe tightening of regulations, because in most European countries, Sailplane Technicians (or other equivalent national ratings) have been permitted to authorise or recommend continued airworthiness, and have been permitted to certify that a glider is released to service based on their personal license and not necessarily on the approval of an organisation. If these rules are implemented it is no exaggeration to say that it will cause the demise of gliding, for absolutely no gain in safety. These requirements are simply unrealistic		Partially accepted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest,	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				for the majority of gliders and light aircraft owners, and unnecessary, though the general intent of having some “order and organisation” of work is sufficient. These rules impose a severe increase in the requirements for glider maintenance, with respect to facilities, personnel and staffing.. These rules appear to have been developed with a relatively large commercial maintenance organisation in mind. Some parts are installed on gliders which are not aeronautical products - for example, GPS calculators. Their use does not compromise airworthiness and this is not recognized in the proposals. Particularly in small countries, the National Gliding Bodies, which have a continuing airworthiness management system based on voluntary people, will have to engage paid staff. This will dramatically affect the cost of maintenance. There is no safety case identified to require a Part 66 license or equivalent to carry out an airworthiness review of a glider. It is more appropriate to have practical experience of continuing airworthiness. The impact on owners of gliders seems to be excessive as there will be an increase in staff costs to the industry. It is believed that aviation activities such as balloons and gliders do not require responsible persons to hold the experience and qualifications specified in MA 707. There will be a significant impact in terms of employing qualified airworthiness review staff. The requirements for airworthiness review staff are much too stringent and would		including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's A Decision 2006/13/R has been issued by the Agency which redefines the definition of standard parts installed on gliders. The obligation of having staff in a CAMO per M.A.706 does not mandate to have them employed. They can be contracted even on a voluntary basis. Part-66 refers to national rules for licensing of certifying staff for gliders and balloons. In addition MDM 032 has proposed the creation of a "Light" Part-66 licence. It is recognised that the qualification requirements for CAMO personnel need to be amended for non complex non commercial aviation. Amendments would be made to AMC to M.A.707 to clarify the requirements for these categories of general aviation aircraft. Finally, Competent Authority status can only be conferred on an organisation by it own National Airworthiness Authority. In UK this is a matter for the UK Civil	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				virtually stop gliding in wide areas. In particular, the minimum requirements under M.A. 707 (a) cannot be fulfilled by the thousands of inspectors working on an unpaid voluntary basis, who have been proven to undertake good and safe work. The BGA has managed UK gliding in a satisfactory way for decades. CAA scrutiny has invariably found that the BGA is fully capable of ensuring air safety as demonstrated by accident / incident rates which compare favourably with, and often exceed, those of countries where stricter legislation is applied. Details of accident rates due to airworthiness or maintenance, since 1987, have already been supplied to the EASA Rulemaking Director. If the BGA has to enter into the Part M mould and become a continuing airworthiness management organization ("sub part G"), the administrative and cost burden will increase significantly for no likely increase in safety based on historic performance.		Aviation Authority and we understand this discussion is ongoing.	
147	Mark Fischer	General	-	Part M EASA should take account of the following facts: • gliders are a basically a very simple type of aircraft • the proposed regulations are unneccessarily complex for gliders • we already have a system that works very well. Extra bureaucracy will add to the cost of participating in the sport and inevitably this will put it out of reach of some current and potential participants. The British Gliding Association is currently putting a lot of effort into expansion strategy so that the sport does	The existing airworthiness procedures for gliders in the UK are accepted by the CAA and work very well. The accident record of gliders in the UK does not give any cause for concern with regard to airworthiness procedures. The system of gliding inspectors (appointed by the BGA) who can repair and sign off aircraft on the basis of their personal qualifications without reference to any national or government based organisation is fundamental to the way the gliding movement in the UK works.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				not fall into decline. The proposed EASA requirements for airworthiness certification will undo all that good work.		industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
148	Michael Feursedon	Explanatory Note	-	There should be a working group to look at the issues of concern to gliding. within Part M.	Many concerns within the gliding community were not covered by the Regulatory Impact Assessment (RIA)	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
149	Michael Fursedon	Draft Opinion	M.A.302	MA302This rule should be relaxed or replaced for gliders.	There is no justification, on safety grounds, for the additionalbureaucracy that an individual maintenance programme will entail. There is already an effective and proven system whereby national gliding associations oversee generic maintenance programmes.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC.Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
150	Michael Fursedon	Draft Opinion	M.A.901	Airworthiness Review Certificates should be issued by a certifying person as at present	This is in accordance with the recommendation coming out of the Regulatory Impact Assessment. Otherwise there will be an increased cost burden to owner/operators and no tangible increase in safety.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
151	Michael Fursedon	General	-	The British Gliding Association (BGA) has my complete support in its dealing with EASA in these matters. EASA should allow the BGA to continue to develop and manage gliding airworthiness processes.	UK gliding has been managed by the BGA in a satisfactory way for a very long time and has stood the test of . CAA scrutiny. There has never been any question that the BGA is fully capable of ensuring air safety and this is amply demonstrated by accident / incident rates which compare favourably with, those of countries where stricter legislation is applied.	Further to the reply to your comment 148:Competent Authority status can only be designated by a Member State	
152	CAA NL	General	-	CAA-NL agrees with the proposed changes but foresees the need for extensive guidance material to help the general aviation world with implementing this regulation uniformly over the EU territory.		Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
153	FH Joynes	Explanatory Note	-	Paragraph 9 I am concerned regarding the application of part M. The RIA does not fully address these concerns.	The RIA covered parts E to I but no reference to part M	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
154	Jose Barriga	Draft Opinion	M.A.302	Add the following paragraph: "The maintenance programme for gliders may include only the glider manufacturer's maintenance manual. The glider owner/operator must annually update it according to manufacturer technical notes and airworthiness directives."	The text I propose above reflects the present conduct followed by gliders owners/operators for many years (decades I would say). This conduct have proved to be efficient from the security point of view and easily implemented by glider owners/operators. Accident statistics that you already had access to, prove what I'm saying. Further procedures will be a difficult	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					burden for glider owner/operators, raising costs and human effort. In what concern to gliders I would tend to believe that no additional security would be achieved with these further procedures as proposed in the present M.A.302.	current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	
155	FH Joynes	General	M.A.302	Does this mean that each individual glider will require its own individual programme of maintenance or does it mean a programme for each glider type. If the former this is going to be costly and expensive for the individual glider owner to implement and will add nothing to improve the safety of glider flying above the present procedures	This rule should be relaxed. For many years in the UK the British Gliding Association has overseen the maintenance of glider types using manufacturers maintenance manuals for glider types and the issue of mods and directives for type when an airframe construction and/or safety issue becomes apparent. This arrangement has proved to be sound over many years. A similar model for Europe on safety grounds is justified. Alternatively consider a model based on FAR 43 12	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
156	Karen Wright	General	-	The regulatory Impact Assessment has such a potentially wide and devastating effect on gliding that a representative sample of individual pilots should be consulted.	The capital tied up in gliders is substantially at risk due to the overwhelming impact that the proposed regulatory changes would have.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest,	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
157	Karen Wright	Draft Opinion	M.A.901	The certification of the airworthiness of Gliders should continue to be supervised by the National Gliding organizations - in the UK by the British Gliding Asscociation.	The BGA and other national bodies have a history of the successful management of Glider airworthiness and safety. The increased paperwork proposed by the EASA would not contribute in any way	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
158	Karen Wright	General	M.A.302	The introduction of individual maintenance schedules for individual aircraft is unpractical and unworkable. In some cases, it will be impossible due to the age of the aircraft and the non availability of manufacturers detailed information. The production of large numbers of detailed manuals for the hundreds of gliders types presently in use is a large writing task that is infeasible due to the absence of sufficient numbers of qualified technical writers capable of performing the task. Manuals will have to be translated into the European languages. The gliding movement is not able to financially support the production of such large numbers of technical manuals.	The BGA and other national gliding bodies have effectively supervised the certification of Gliders for in excess of 50 years through a network of trained inspectors and senior inspectors. Changing an efficient system that is clearly working is an unnecessary burden and will only compromise the high safety standards that are already extant. Fatal Glider accidents caused by aircraft structural and maintenance issues are very rare.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
159	Karen Wright	General	-	The British Gliding Association should be granted status as a Competent Authority by which it can continue to regulate gliding airworthiness and other related matters in the UK	The BGA has successfully managed gliding in the UK for a very long time. It should be allowed to continue to do so.	Further to the reply to your comment 156:Competent Authority status can only be designated by a Member State	
160	FH Joynes	Draft Opinion	M.A.901	In the UK the equivalent Airworthiness Review Certificate is issued by a certifying person. A part M Regulatory Impact Assessment recommended that an ARC be issued by a certifying person. However EASA rejected this proposal stating that the ARC MUST be issued by the competent authority. In other words, The State. More bureaucracy, more cost to glider owners with no demonstrated benefits of improved safety. Although of sophisticated aerodynamic design gliders are relatively simple structures and applying large aircraft procedures to the maintenance of gliders on the grounds of standardisation will not add to and may be detrimental to the safety of gliding. Gliding is a amateur recreational sporting activity and does not require the disproportionate added burden of	A simpler and lighter version of part M should be developed for gliders to minimise bureaucracy and its associated cost.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				administration and costs that may be appropriate to commercial organisations.		7/2005.	
161	Peter France	General	-	- Explanatory Note C of A renewals are made by the BGA on recommendation from their approved inspectors. This type of arrangement is common in most European gliding organizations. The CAA formally recognizes this arrangement in the UK. - Draft Decision All C of A renewals (ARC s) must be issued by the "competent authority", i.e. the State. - General Comment(s) Since about 1950 the gliding clubs in the UK have, under the guidance of the British Gliding Association, and with the approval of the CAA, successfully maintained their gliders with a minimum of bureaucracy and expense. The record regarding accidents attributable to airworthiness causes speaks for itself. Safety would not be enhanced; quite possibly short cuts might be encouraged It seems that we are bombarded with proposed rules and regulations by persons who know nothing whatever about gliders, gliding clubs, the pilots who fly them, or the flights some of them achieve. The effect of most of these proposals would be to limit severely the number of people who could afford to fly, because the huge cost of compliance would fall directly upon them. It appears that some in EASA have the		Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				title “rulemaker”. May I respectfully suggest that they should make it their business to visit some of the countless gliding airfields and learn something about them, before making ill-considered proposals which could well destroy gliding for many people. You would be made very welcome.		ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's.	
162	Swedish Soaring Federation	General	-	In Sweden, the CAA delegates the maintenance of gliders and motor gliders to the Swedish Soaring Federation, which has been the solution since many years. All gliders in Sweden even private owned are managed in the club structure if they use the Soaring Federations technical organisation i.e. glider technicians. Swedish Soaring Federation has within the organisation a technical office, with a Chief Engineer (employed). Maintenance or technical matters are normally handled by this office. The Chief Engineer also supports the glider technicians in the clubs. The Chief Inspector (employed) has a staff of airworthy inspectors (volunteer personnel) who are appointed by the federation and approved by the CAA. They do airworthiness inspections and revalidation C of A, in the name of CAA. Safety records over several decades show that there is no safety case for changing the existing arrangements. The cost for	Forcing the gliding movement to enter into the controlled environment mould of part M and to comply with the stringent formalisation of Subpart F and G organizations will dramatically increase the administrative burden and the costs of maintenance. With these new organisations the situation in Sweden would change a lot. The Soaring Federation will not longer receive an annual funding for the work with revalidation C of A, airworthiness inspections of gliders in the name of CAA etc. Airworthy gliders (incl. powered gliders SLG/SSG/TMG) are approx. 495 of today records, with a fee for C o A of 240 Euro. With the new organisations the Soaring Federation instead have to pay an annual fee for the F and G organisations; the new solution demands more people working which also gives a higher cost for the	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 “ A concept for better regulation on General Aviation”, which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				this solution is rather low. For the work with revalidation C of A, airworthiness inspections of gliders in the name of CAA etc, the Soaring Federation got a annual funding of 100 000 Euro from the CAA. The annual fee for Certificate of Airworthiness in Sweden is 240 Euro for every glider and the system is simple, administratively not too burdensome, and the CAA's auditing has demonstrated that the Soaring Federation are fully capable of ensuring air safety. Additionally, the solution we have in Sweden, which are mainly based on voluntary work, are cost effective.	system. If there will be the same number of gliders in Sweden with the new organisation of part –M, the cost of C o A will increase dramatically to a level around 650 Euro. To avoid such an increase of the bureaucratic burden and of the costs, the Swedish Soaring Federation asks the EASA to issue AMC material or even a Part M "light" in order to simplify this procedure and make it more cost effective.	corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
163	CR Ellis	General	-	Objection to proposed Airworthiness Regulations for gliders in UK on the grounds that the added expense and bureaucracy will not in any way contribute to safety. The BGA has a track record of airworthiness safety since 1948 and there is no good reason to change something that is working well. The added expense will put what is a relatively affordable form of aviation out of reach for many of its participants.	I have owned and flown gliders since 1957. I currently own a glider and a TMG. The proposed changes will add unnecessary costs and complications to the operation of what are very simple aircraft. In the USA the FAA have a simple and effective form of regulation which could be used as a model by EASA.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
164	Steve Barber	General	-	The British Gliding Association should be deemed to be a "Competent Authority" in respect of all gliding operations in the UK.	The British Gliding Association has managed gliding in the UK since 1948 to the satisfaction of the CAA, and has therefore proved its competence. There has been no need for state intervention in the past; nothing has changed so there is no need for state intervention now.	Further to the reply to your comment 166:Competent Authority status can only be designated by a Member State	
165	Steve Barber	Draft Opinion	M.A.901	As a result of a Part M RIA, a recommendation was made that Airworthiness Review Certificates could be issued by a certifying person. EASA has rejected this, even though the recommendation was in effect endorsing the existing system which has been proved to work.	Gliders are simple aircraft, and so well within the ability of a single individual to understand the entire system, and it is appropriate for that person certify that a glider is airworthy. The individuals of course need to have their competence assessed – the existing BGA methodology evolved over fifty years been proven to work and so there is no need to change it.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						(including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
166	Steve Barber	Explanatory Note	-	The RIA is not complete in that it failed to address all the issues raised in respect of the application of Part M as regards gliders. There needs to be a separate sub-committee whose task is to produce a document which is fair and reasonable for implementation by unpaid but expert personnel.	Gliding is run largely by enthusiasts and amateurs. A minutely detailed regime is inappropriate given that existing methods have worked safely for 50 years.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
167	Steve Barber	Draft Opinion	M.A.302	The requirement in MA302 for every individual aircraft to have a specific maintenance programme is an enormous administrative load which will be placed on the mostly amateur enthusiast in the gliding movement. The load will be too much to bear and many people will be denied the ability to take part in their sport.	The existing maintenance regimes as developed by the BGA over fifty years have been proved to work. There is no need to change them, certainly not to the extent proposed.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
168	FH Joynes	General	-	I have been a glider pilot for 12 years after retiring from a position as a chartered engineer. Over the last 12 years I have had intense enjoyment from both flying and assisting in maintaining gliders. Over that time I have been most impressed with the safety standards of the British Gliding Association particularly in the procedures and regulations of aircraft maintenance. Glider pilots looking after the safety of glider pilots.The glider pilot himself is more interested in his own safety than a european bureaucrat carving a career in Brussels. Within the UK, glider accidents due to airworthiness compare very favorably with those in other countries where stricter regimes apply.	The majority of glider pilots do not want EASA looking after our safety. However that is a lost cause. If the BGA is forced into the additional costs and administration it will be detrimental to the magnificent sport of gliding and a further reduction in participants. At present the cost of gliding is such that it is prohibitive to most of to-days youth which is demonstrated by the ever increasing average age of glider pilots, I fear that todays youth will not at any time have the opportunity of flying in a glider. Gliding is very much a minority sport but that does not mean it can be allowed to wither away. Please find a way to enable a very successful organisation, The BGA, to continue to administer our sport without increasing costs as this proposed legislation will surely do.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
169	FH Joynes	Draft Opinion	M.A.901	In the UK the equivalent Airworthiness Review Certificate is issued by a certifying person. A part M Regulatory Impact Assessment recommended that an ARC be issued by a certifying person. However EASA rejected this proposal stating that the ARC MUST be issued by the competent authority. In other words, The State. More bureaucracy, more cost to glider owners with no demonstrated benefits of improved safety. Although of sophisticated aerodynamic design gliders are relatively simple structures and applying large aircraft procedures to the maintenance of gliders on the grounds of standardisation will not add to and may be detrimental to the safety of gliding. Gliding is a amateur recreational sporting activity and does not require the disproportionate added burden of administration and costs that may be appropriate to commercial organisations.	A simpler and lighter version of part M should be developed for gliders to minimise bureaucracy and its associated cost.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901
170	KJ McPhee	Explanatory Note	-	The Regulatory Impact Statement (RIA) has disregarded some of the concerns of the gliding movement about the application of Part M. EASA has restricted the scope of the impact assessment to sub-parts E to I and in consequence the RIA did not contain many of the concerns of the gliding	Lack of scope of the RIA. Recommend that this deficiency is corrected by the formation of a Working Group to address the issues in Part M of concern to gliding	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				community.		charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
171	KJ McPhee	Draft Opinion	M.A.901	The recommendation that the status quo in the UK, whereby airworthiness is certified by an appropriately qualified person, should be continued has not been agreed by EASA who are insisting that the ARC should be issued by the State authority. The existing UK system works well and provides all the necessary safeguards and processes. I work within this system as an inspector following 34 years as an RAF engineer and I have found the BGA airworthiness processes to be entirely efficient, responsive and effective. Please reconsider this matter to retain this effective and responsive service for owner/operators and to avoid increased costs to owners. This could be achieved by developing simpler and more cost effective procedures to apply to gliders	Part M is appropriate for complex aircraft. However, gliders are simple both in construction and systems design. There is no need for change to the present procedures to introduce the full rigours of Part M for gliders. It is recommended that Individual glider maintenance inspectors continue to make an annual ARC to the approved certifying person. This procedure has provided an excellent safety record and supporting statistics have been provided to EASA. A periodic overlay (5 yearly) external review by the BGA for example would enable the competent authority to keep control. Furthermore, it is unlikely that the more remote and bureaucratic procedures in Part M could provide the high level of safety inherent in the existing glider processes.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				under the management of the BGA which has managed the gliding airworthiness processes very successfully for many years as demonstrated by an excellent safety record within gliding and very rare technical/engineering failures.		CAMO as mentioned in the NPA 7/2005.	
172	KJ McPhee	Draft Opinion	M.A.302	MA302 The complex demands for individual glider maintenance set out in Part M are not appropriate to the relatively simple process of keeping gliders in an airworthy condition. The USA has appropriate procedures in place that provide a good model and avoids the expense and bureaucracy of MA302. The production and updating of thousands of individual maintenance manuals will increase the costs to the owner/operators, many of whom could not afford this future high cost of glider ownership causing an inevitable and serious decline in the number of participants in gliding throughout Europe which at the moment leads the world.	The current situation with national gliding associations overseeing maintenance programmes based upon manufacturers' maintenance manuals and airworthiness directives works very well and it is recommended that EASA should reconsider this rule for gliders and if necessary replace it with a rule modelled on FAR 43 13.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
173	Verb Deutscher Segelflugzeugherst eller + EGMA	General	-	The manufacturers of sailplanes and powered sailplanes in Europe see the planned introduction of Part M in 2008 to become a serious threat to the gliding community. The actual situation of operating more than 20.000 gliders and powered gliders world-wide since more than 40 years under different national rules has not resulted into safety problems regarding maintenance. This is due to the inherent simple design of the gliders but also a	At present, the requirements in Regulation (EC) No 2042/2003 (including Part M) will complicate maintenance on CS-22 products without any expected gain on safety. CS-22 products have been maintained in most states like a private car: specialized maintenance procedures / personnel only when needed in special cases combined with a regular inspection.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				result of the experience of the manufacturers and the operators of these aircraft. Part M will change the way of operation of gliders and powered gliders (further both named only “gliders”) because the “philosophy of maintenance” will be changed fundamentally: Today the people operating the gliders look for proper maintenance but basically can conduct these tasks mostly themselves. Procedures for proper education of personnel for more complex maintenance are there as is the information provided by the manufacturers. All EASA member states have systems to insure a regular inspection (mostly on an annual basis) where airworthiness has to be shown. With Part M at first sight nothing changes but closer examinations shows: everyone conducting maintenance work has to show proper qualification, every task has to be documented, every task has to be followed by a release to service, every maintenance programme has to be approved by the competent authority, every annual inspection has to be followed by airworthiness review certificate issued by the competent authority, there is a danger that minimum qualification for the often voluntary working staff becomes too onerous, and so on.... All these changes seem to be only logical to everyone who knows how maintenance should be conducted within airlines and rightly so as Part M is already in use in commercial aviation. The problem is that with all these changes maintenance of gliders will become much more complicated and therefore also more expensive without any obvious need for this change. It has to be realised that for the typical	This existing system has proven to be feasible without resulting into a safety concern.	EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				owner (be it a club or a private owner-operator) increase only of the maintenance costs for each glider by few hundreds of Euro per year will make the difference between being able to carry on with operation of the glider or not. Additionally for the typical person conducting maintenance on a glider the Part M is much too complicated to be understood fully (because of the wording, the cross-referencing within and to other regulations and also because the official translations are not correct in all cases). Therefore the association of European sailplane manufacturers proposes either to change the wording of the requirements in the Commission Regulation (EC) No. 2042/2003 and Part M and the Guidance Material of Part M in several places or to postpone introduction of Part M to the light aviation sector until a much simpler version has been edited and agreed upon with the operators and manufacturers together with EASA.			
174	Verb Deutscher Segelflugzeugherst eller + EGMA	General	2042/2003	Amend the wording of Article 2 - Definitions: (j) "pre-flight inspection" means the inspection carried out before flight to ensure that the aircraft is fit for the intended flight.... ... In the case of CS-22 aircraft “pre-flight inspection” includes inspections carried out daily before flight operations or carried out after assembling the aircraft and the pre-flight checklist as specified in the flight and/or maintenance manual.	These tasks are being carried out on a regular basis by pilots and operators and are therefore comparable to the definition of Article 2 (j). Nevertheless the wording “daily inspection” and “inspection after assembly” might preclude definition as pre-flight inspection.	Not accepted. The NPA 7/2005 which amends the Appendix VIII of Part-M includes any check below the 6 months / 50 h inspection to be carried out by the pilot/owner. This covers the daily inspection currently applied to sailplanes which is accepted as part of pilot / owner maintenance.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
175	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.801	The actual wording of Part M and Part 66 means that there is no definition for certifying staff for CS-22 aircraft - therefore no specific minimum requirements from Part 66 - and therefore national requirements apply. This is adequate as Part 66 has much too stringent minimum requirements for certifying staff for CS-22 aircraft. Nevertheless there should be a European minimum requirement for the certifying staff working on CS-22 aircraft in order to avoid too stringent requirements by the national authorities.	The already existing rules for maintenance inspectors in the different air-sport communities within the European member states should be possible to be taken over into Part M.	Not accepted. For gliders and balloons national laws apply in accordance to 66.A.100.	
176	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.607	Due to the fact that there is no requirement for Part 66 certifying staff for CS-22 aircraft there is also no need for certified training organisations. Training of certifying staff in existing systems is nevertheless existing and is generally well organised. It must be taken care that these existing organisations are not burdened by being forced into becoming Part 147 organisations as the minimum requirements in Part 147 are much too stringent for this field.	The already existing rules for the training of maintenance inspectors in the different air-sport communities within the European member states should be possible to be taken over into Part M.	Noted. Part-66 currently refers to national rules for gliders and balloons. Therefore, training in Part-147 organisations is not required.	
177	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.302	For CS-22 aircraft it must be possible to use a) the relevant parts of the maintenance manual b) plus a generic inspection check list c) plus few pages for the individual aircraft (typically weight report, list of equipment plus time-limited equipment) without the need for more detailed maintenance programme.Furthermore it must not be needed to approve every individual maintenance programme for each individual CS-22 aircraft as the numbers of those aircraft precludes this procedure and/or makes it too expensive for the owners.The minimum requirements regarding maintenance programme must be specified in the AMC in order to avoid unrealistic high minimum requirements by	Some European already have made mandatory the use of individual maintenance manuals for each individual CS-22 aircraft.This has increased the burden upon the owners considerably without any obvious safety benefit.Additionally in those cases the main part of the maintenance programmes have been edited by photocopying or reproducing relevant parts of the maintenance programme.This task does only create more bureaucratic burden as the simple reference to the existing documents from the manufacturer would have been totally sufficient.Only by defining feasible minimum standards in the AMC such onerous implementation of Part M can be avoided.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC.Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				national authorities		created confusion and has been reviewed.	
178	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.402	For CS-22 aircraft some standard repair and inspection procedures do exist which are not formally fixed like e.g. the FAA AC 43.13. The manufacturers / TC holders of CS-22 aircraft have not issued standard repair procedures for all types and therefore some standards should be established EASA-wide. Either some existing standards (like the AC 43.13) shall be approved by EASA or missing standards (like repair of new types of structures) may be drafted together with manufacturers of those aircraft and published via EASA.	Especially for old aircraft the maintenance manuals do not always provide sufficient procedures for “standard repairs”. Nevertheless the know-how is existing how to perform these repairs. So only legalising of these type of repairs is missing in the current legislation.	Partially accepted. Task M.019 is scheduled to start at the beginning of 2008 in order to define an equivalent to AC43-13. As an interim measure, group M.017 will evaluate how to incorporate AC43-13 in the current rule.	
179	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.305	M.A.305 (b) Aircraft continuing airworthiness record system of Part M For CS-22 motor-gliders it must be sufficient to have the log-book of the particular aircraft alone (without additional log-books for engine or propeller). The AMC must have a wording which insures that the relevant data for each component can be taken from the single logbook in case of replacement of the engine / the propeller / a component.	Simple motor-gliders (like self-sustaining sailplanes) are being operated often without dedicated log-books for engines / propellers and this has not resulted into a safety issue.	Noted. Transferable log-books facilitate movement of components between airframes. To this end the use of transferable log-cards or binders is accepted as appropriate.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
180	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.306	M.A.306 Operator's technical log system of Part M The existing wording implies that a technical log system is needed also for non-commercial air transports which must not be the case as this would be much too complicated for simple aircraft like CS-22 aircraft.	The technical log system described in Part M cannot be meant for CS-22 aircraft – the procedures described within the paragraph would be not feasible and far too onerous.	Not accepted. As mentioned in 201(h) and (i), the word operator is limited to commercial air transport and activities which needs a certificate. This paragraph is not intended to be applicable to non commercial operation.	
181	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.403	M.A.403 Aircraft defects of Part M For CS-22 aircraft it must be possible for the pilot to decide whether an aircraft defect hazards seriously the flight safety. The flight manual gives information about such defects and authorised certifying staff is normally not present during free-time gliding activities. At least comment for AMC needed either to define the pilot as certifying staff or the exempt CS-22 aircraft from the requirement.	CS-22 aircraft and systems are normally simple enough to enable the pilot to make this decision. If this would not be permitted normal club operations would only be possible with certifying staff being present.	Not accepted. Part-M is not the appropriate place to incorporate pilot responsibilities. Rules concerning pilot responsibilities should be developed in the appropriate licensing and operations rules.	
182	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.501	M.A.501 Installation of Part M For CS-22 aircraft additional equipment which can be considered as standard part must not have the need for a Form 1 in order to be fitted. The companies producing such standard parts (= additional equipment for CS-22 aircraft) have often not the prerequisites to issue a Form 1. Non-functioning additional equipment poses no threat to flight safety per definition of these standard parts in Part 21(GM No. 1 to 21A.303(c) Standard Parts).	The EASA Rulemaking directorate together with the air-sport community and the manufacturers already drafted a new definition of standard parts (to solve the problem of equipment not already certified by TC / STC / ETSO). This procedure can only work if M.A.501 is modified accordingly.	Noted. Decision 2006/13/R has been issued by the Agency which redefines the definition of standard parts installed on sailplanes and powered sailplanes certified under the provision of CS 22.1301b.	
183	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.502	M.A.502 Component maintenance of Part M For simple aircraft like CS-22 aircraft there is no fundamental difference between maintenance on components or the whole aircraft. Therefore it has to be assured that the required minimum qualification for the maintenance	The maintenance standards for CS-22 aircraft / components has to be consistent.	Partially accepted. Answer to the request on Standard parts is made in answer n° 182 to Verb Deutscher Segelflugzeughersteller + EGMA. Qualification of personnel carrying maintenance on aircraft or on a component is specified in M.A.606	See revised M.A.502

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				personnel does not become higher when maintenance of components is defined (instead as maintenance of the complete aircraft).		and this paragraph does not alter this requirement. In the light of this remark, the wording "Aircraft maintenance manual" is replaced by "maintenance data" in M.A.502.	
184	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.601	SUBPART F MAINTENANCE ORGANISATION of Part M For manufacturers of simple products like CS-22 aircraft it must be possible to conduct maintenance upon their own products. Either an approval as Subpart F organisation is granted together with the approval of the production organisation automatically or according wording should be included into Part M.	In some European member states it is already possible for a production organisation to conduct maintenance and inspection tasks upon their own products even after delivery to the customer without the need for a further approval. Introduction of this procedure into the production organisation manual is sufficient and the whole system has proven to be easy and feasible without creating any safety issue.	Noted. Approval of a manufacturer and of a maintenance organisation are made in reference to different requirements. To maintain an aircraft in service, a manufacturer needs a Part-145 or a subpart-F approval. An advanced NPA 15-2006 has been published on the consistency of organisations approvals.	
185	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.604	M.A.604 Maintenance organisation manual of Part M For maintenance organisations which are also production organisations of simple products like CS-22 aircraft it has to be possible that the organisation manual for both organisations are the same (one manual for both organisations) in order to avoid undue high bureaucratic effort.	In some European member states it is already possible for a production organisation to conduct maintenance and inspection tasks upon their own products even after delivery to the customer without the need for a further approval. Introduction of this procedure into the production organisation manual is sufficient and the whole system has proven to be easy and feasible without creating any safety issue.	Noted. Approval of a manufacturer and of a maintenance organisation are made in reference to different requirements. To maintain an aircraft in service, a manufacturer needs a Part-145 or a subpart-F approval. The Appendix IV to AMC M.A.604 has been developed for general aviation purposes and is already in use in some Member States An advanced NPA 15-2006 has been published on the consistency of organisations approvals.	
186	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.605	M.A.605 Facilities of Part M The maintenance of gliders may sometimes be carried out not within the workshop of the Subpart F organisation. It must be possible to extend the field of operation to other places. This poses no problem due to the often quite simple maintenance tasks and must be permitted by the wording of this paragraph.	Very often it is much simpler and also much more practical for the maintenance personnel to come to the aircraft instead to the aircraft coming to the persons involved.	Noted. Although we agree with the comment, M.A.615 Privileges already provides for the possibility to carry out unplanned maintenance activities outside the facilities for defect rectification.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
187	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.606	M.A.606 Personnel requirements of Part M The reference to Part 66 is not working for CS-22 aircraft as Part 66 does not define any certifying staff for such aircraft. For the time being this results to the application of national requirement for such personnel which might be too stringent. Therefore either a better definition in Part 66 is required (which has be less stringent as existing Part 66 requirements) or adequate wording to this paragraph has to be found.	This is common practice since decades.	Not accepted. Part-66 currently refers to national law for glider and balloon, refer to 66.A.100. Within the current rulemaking process a Part-66 "light" is under consideration.	
188	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.607	M.A.607 Certifying staff of Part MSame comment as for M.A.606: The reference to Part 66 is not working for CS-22 aircraft as Part 66 does not define any certifying staff for such aircraft. For the time being this results to the application of national requirement for such personnel which might be too stringent. Therefore either a better definition in Part 66 is required (which has be less stringent as existing Part 66 requirements) or adequate wording to this paragraph has to be found.	Already existing minimum requirements for certifying staff of the member states (which have proven to be adequate) must be superseded by more onerous requirements based on the existing wording of Part M or Part 66.Additionally the often voluntary personnel must not be measured against standards for commercial air transport maintenance.	Not accepted. Part-66 currently refers to national law for glider and balloon, refer to 66.A.100. Within the current rulemaking process a Part-66 "light" is under consideration.	
189	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.608	M.A.608 Components, equipment and tools of Part M The tools needed for CS-22 aircraft maintenance are often quite simple – comparable to simple repair work on cars. These types of tools are often not specified in the maintenance manuals of gliders. Control and calibration of these simple tools has to be kept on a reasonable level otherwise those tools become too expensive for the often small maintenance organisations. Example: the normal DC volt meter is sufficient to inspect glider electric systems in most cases without any calibration at all. Some comment in AMC needed.	If not specified otherwise by the manufacturer / (S)TC holder simple (and affordable) tools pose no problem within the maintenance of simple products like CS-22 aircraft.	Noted. Only those tools required by the maintenance data for a day-to-day job are required to be held. Other tools must only be accessed. Calibration only needs to be performed when required. The extent and complexity will depend on the scope of work of the approved organisation.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
190	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.613	M.A.613 Component certificate of release to service of Part M There are maintenance tasks for simple components on CS-22 aircraft which are conducted on a regular basis without issuance of a new Form 1. Additionally the organisations conducting this type of maintenance sometimes are not able to issue a Form 1. Therefore the wording of M.A.61 is too stringent for component maintenance of CS-22 aircraft. Comments in AMC needed.	Just like issuance of a release to service by the pilot might be quite sufficient (see comment on M.A.403) the absence of an EASA Form 1 might be acceptable in certain cases.	Noted. Decision 2006/13/R has been issued by the Agency which redefines the definition of standard parts installed on sailplanes and powered sailplanes certified under the provision of CS 22.1301b. Standard Parts do not need to be released on an EASA Form 1. All other components must be maintained in approved organisations and released on a Form 1.	
191	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.615	M.A.615 Privileges of the organisation of Part M There must be no limitation of the maintenance organisation upon locations specified in the organisation manual. There is a need for minimum qualification of personnel but it has to be possible to conduct such maintenance in other places too. Either it must be possible to extend the geographic region where maintenance can be performed within the approval certificate / manual or this has to be included in Part M for CS-22 aircraft. Comments in AMC needed.	(Same as for M.A.605): Very often it is much simpler and also much more practical for the maintenance personnel to come to the aircraft instead to the aircraft coming to the persons involved. This is common practice since decades.	Partially accepted. Although we agree with the comment, M.A.615 Privileges already provides for the possibility to carry out unplanned maintenance activities outside the facilities for defect rectification.	
192	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.701	SUBPART G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION of Part M For manufacturers of simple products like CS-22 aircraft it must be possible to conduct conduct management of continuing airworthiness upon their own products. Either an approval as Subpart G organisation is granted together with the approval of the production organisation automatically or according wording should be included into Part M.	In some European member states it is already possible for a production organisation to conduct maintenance and inspection tasks upon their own products even after delivery to the customer without the need for a further approval. Introduction of this procedure into the production organisation manual is sufficient and the whole system has proven to be easy and feasible without creating any safety issue.	Noted The approval of a manufacturer as an airworthiness management organisation is made in reference to different requirements. A manufacturer is approved according to Part-21 for design and production. In addition he may apply to a subpart-G approval to manage the continuing airworthiness of aircraft. An advanced NPA 15-2006 has been published on the consistency of organisations approvals.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
193	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.704	M.A.704 Continuing airworthiness management exposition of Part M For continuing airworthiness management organisations which are also production organisations of simple products like CS-22 aircraft it has to be possible that the organisation manual for both organisations are the same (one manual for both organisations) in order to avoid undue high bureaucratic effort.	In some European member states it is already possible for a production organisation to conduct maintenance and inspection tasks upon their own products even after delivery to the customer without the need for a further approval. Introduction of this procedure into the production organisation manual is sufficient and the whole system has proven to be easy and feasible without creating any safety issue.	Noted. The regulation does not prevent the combination of manuals as long as all the requirements are covered. An advanced NPA 15-2006 has been published on the consistency of organisations approvals.	
194	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.705	M.A.705 Facilities of Part M The tasks of continuing airworthiness management of gliders may sometimes be carried out not within the workshop / office of the Subpart G organisation. It must be possible to extend the field of operation to other places. This poses no problem due to the often quite simple inspection tasks and must be permitted by the wording of this paragraph.	Very often it is much simpler and also much more practical for the inspection personnel to come to the aircraft instead to the aircraft coming to the persons involved. This is common practice since decades.	Noted. There is no requirement for specific facilities beyond those set out in M.A.705. The requirement does not prevent from carrying out activities out of these facilities.	
195	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.707	M.A.707 Airworthiness review staff of Part M The reference to Part 66 is not working for CS-22 aircraft as Part 66 does not define any certifying staff for such aircraft. For the time being this results to the application of national requirement for such personnel which might be too stringent. Therefore either a better definition in Part 66 is required (which has be less stringent as existing Part 66 requirements) or adequate wording to this paragraph has to be found.	Already existing minimum requirements for inspection personnel of the member states (which have proven to be adequate) must be superseded by more onerous requirements based on the existing wording of Part M or Part 66. Additionally the often voluntary personnel must not be measured against standards for commercial air transport maintenance.	Partially accepted. This issue is recognised as applicable to general aviation (not just gliders and balloons). Amendments would be made to AMCs to clarify the requirements for these categories of general aviation aircraft. Note that within M.A.707(a)2, Part-66 defers to national regulations for balloons and gliders .	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
196	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.708	M.A.708 Continuing airworthiness management of Part M It is not feasible for continuing airworthiness management organisations to develop and control maintenance programmes for all individual aircraft. To illustrate the problem: the work of a Subpart G organisation might often be conducted by a national Aeroclub which has inspectors working on a voluntary basis. In such a case neither the Subpart G organisation nor the inspectors will develop the management programmes. Instead there will be maintenance documentation with each glider / motor-glider in the single clubs belonging to the Aeroclub. This typical system has worked since more than 40 years without any problems and must not be restricted by the wording of this paragraph. Additionally it should be pointed out that the issue of an EASA Form 1 (for a part / component) or Form 52 (for an new aircraft) can be made independently by the production organisation without any feedback by a competent authority. Therefore the need for approval of the maintenance programme by the competent authority seems undue in case of an continuing airworthiness management inside the production organisation. Any existing maintenance programmes by the manufacturers (e.g. the approved maintenance manuals for each type of aircraft) should be accepted by the Agency / the competent authorities without the need for individual approval.	For simple products like CS-22 aircraft the management of continuing airworthiness is normally quite straightforward: During the regular (often annular) inspection the inspector (=certifying staff) has a look at the aircraft log-book plus the folder with additional documentation of the particular aircraft. During this procedure the inspector himself is normally able to decide that the documentation is sufficient to give him the needed information to conduct the airworthiness review and to issue the according certificate. If in doubt he is also able to refuse the certificate. Until now those inspectors are normally not employees of the competent authorities (assumed to be normally the national aviation authorities). If all inspections on CS-22 aircraft in Europe are done annually this procedure takes place approximately 20.000 times per year within EASA. It would be not feasible either due to the sheer numbers or due to the financial burden upon the owners / operators to combine this with an individual approval of the maintenance programme in each case by the competent authority.	Partially accepted. The formulation of M.A.302 does not preclude generic maintenance programmes adapted to the aircraft configuration. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC to M.A.302. In accordance with M.A.302 when the aircraft is managed by a CAMO, its maintenance programme and its amendments may be approved through an "indirect" approval procedure to be agreed between the CAMO and the authority. MA708 is modified to reflect this possibility. Production organisation approval is separate from a CAMO approval and the issuance of an EASA form 1 or form 52 by the production organisation shall be made in accordance with Part-21.	See revised M.A.302 and M.A.708

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
197	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.711	M.A.711 Privileges of the organisation of Part M In the case of simple aircraft like CS-22 aircraft it should be possible for the Subpart G organisation to issue the airworthiness review certificate on behalf of the competent authority in any case.	Due to the high numbers of CS-22 aircraft the recommendations for airworthiness review certificates to the competent authorities would cause delays and additional costs after each airworthiness inspection. The already existing system that the certificate is issued on behalf of the competent authority which has always the possibility to withdraw that certificate has proven to be feasible and not creating safety problems.	Accepted. M.A.711 has been proposed to be changed in response to comments to M.A.901. The need to issue recommendations for ARC re-issuance has been removed to simplify the process.	See revised M.A.711
198	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.712	M.A.712 Quality system of Part MA manufacturer with additional approval as continuing airworthiness management organisation must be able to fulfil this requirement by using the already existing quality system of the production organisation.Additionally the possibility of (f) to substitute the quality system by regular organisational reviews should be extended to Subpart G organisations dealing with CS-22 aircraft in principle.M.A.712 Quality system of Part MA manufacturer with additional approval as continuing airworthiness management organisation must be able to fulfil this requirement by using the already existing quality system of the production organisation.Additionally the possibility of (f) to substitute the quality system by regular organisational reviews should be extended to Subpart G organisations dealing with CS-22 aircraft in principle.	For the manufacturer already operating under a quality system within the production organisation undue burden of a second system should be avoided.Subpart G organisations for CS-22 aircraft do not need an expensive and labour intensive quality system (even more so if this organisation is an Aeroclub with voluntary working staff).	An advanced NPA 15-2006 has been published on the consistency of organisations approvals.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
199	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.802	M.A.801 Aircraft certificate of release to service of Part M In the case of pilot-owner maintenance as specified in Appendix VIII of Part M it is not practical to require a certificate of release to service (CRS) after completion of each task. These simple tasks are conducted by the pilot normally before the flight operations and he will also be the person to decide whether any flight hazard exists. Even if a simple entry into the aircraft logbook would be sufficient as CRS the experience of the last forty years shows that there is no need for CRS in case of pilot-owner maintenance. In order to avoid unnecessary and non-feasible bureaucratic burden upon gliding operations it is therefore proposed that after completion of tasks described in the "Operations" chapter of the approved flight manual of the CS-22 aircraft no CRS is needed. Those tasks are part of the flight operations are meant to be conducted by the pilot(-owner) and not by maintenance personnel. For the manufacturers it should be possible that the CRS can be also issued by accordingly qualified certifying staff from the production organisation. If this already existing staff must be trained / approved in a separate way to fulfil the same tasks or if this staff has to be enlarged without any increase in productivity this would have significant negative financial impact for the manufacturers.	Maintenance tasks falling under the rules of Appendix VIII are simple enough to be performed by the pilot per definition. Additionally they may be performed quite often and/or on a regular basis. The experience of operation of more than 20.000 CS-22 aircraft over more than 30 years shows that issuing a CRS after completion of these type of tasks would be required, a) very often the CRS would simply be forgotten b) no safety hazard would develop from that. (Because until now such a CRS was only issued on a voluntary basis, i.e. quite seldom.) For the manufacturer already operating under a quality system within the production organisation undue burden of a second system should be avoided.	Noted. This shall be reviewed with the AMC material.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
200	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.802	M.A.802 Component certificate of release to service of Part M Same comment as for M.A.801: In the case of pilot-owner maintenance as specified in Appendix VIII of Part M it is not practical to require a certificate of release to service (CRS) after completion of each task. These simple tasks are conducted by the pilot normally before the flight operations and he will also be the person to decide whether any flight hazard exists. Even if a simple entry into the aircraft logbook would be sufficient as CRS the experience of the last forty years shows that there is no need for CRS in case of pilot-owner maintenance. In order to avoid unnecessary and non-feasible bureaucratic burden upon gliding operations it is therefore proposed that after completion of tasks described in the "Operations" chapter of the approved flight manual of the CS-22 aircraft no CRS is needed. Those tasks are part of the flight operations are meant to be conducted by the pilot(-owner) and not by maintenance personnel. For the manufacturers it should be possible that the CRS can be also issued by accordingly qualified certifying staff from the production organisation. If this already existing staff must be trained / approved in a separate way to fulfil the same tasks or if this staff has to be enlarged without any increase in productivity this would have significant negative financial impact for the manufacturers.	Same comment as for M.A.801: Maintenance tasks falling under the rules of Appendix VIII are simple enough to be performed by the pilot per definition. Additionally they may be performed quite often and/or on a regular basis. The experience of operation of more than 20.000 CS-22 aircraft over more than 30 years shows that issuing a CRS after completion of these type of tasks would be required, a) very often the CRS would simply be forgotten b) no safety hazard would develop from that. (Because until now such a CRS was only issued on a voluntary basis, i.e. quite seldom.) For the manufacturer already operating under a quality system within the production organisation undue burden of a second system should be avoided.	Not accepted. Maintenance on components must be carried by an approved maintenance organisation according to ICAO. It is therefore not possible for pilot-owners to carry out component maintenance.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
201	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.803	M.A.803 Pilot-owner authorisation of Part M The definition of the pilot-owner is too stringent: members of flying clubs (which individually do not own the particular glider), persons not holding a valid licence (e.g. the club mechanic not flying CS-22 aircraft conducting the maintenance) have to be taken into the definition. Additionally similar comment as for M.A.801: In the case of pilot-owner maintenance as specified in Appendix VIII of Part M it is not practical to require a certificate of release to service (CRS) after completion of each task. These simple tasks are conducted by the pilot normally before the flight operations and he will also be the person to decide whether any flight hazard exists. Even if a simple entry into the aircraft logbook would be sufficient as CRS the experience of the last forty years shows that there is no need for CRS in case of pilot-owner maintenance. In order to avoid unnecessary and non-feasible bureaucratic burden upon gliding operations it is therefore proposed that after completion of tasks described in the “Operations” chapter of the approved flight manual of the CS-22 aircraft no CRS is needed. Those tasks are part of the flight operations are meant to be conducted by the pilot(-owner) and not by maintenance personnel.	The definition of the persons falling under this paragraph must include typical situations in the maintenance environment of typical club operations. Additionally same comment as for M.A.801: Maintenance tasks falling under the rules of Appendix VIII are simple enough to be performed by the pilot per definition. Additionally they may be performed quite often and/or on a regular basis. The experience of operation of more than 20.000 CS-22 aircraft over more than 30 years shows that issuing a CRS after completion of these type of tasks would be required, a) very often the CRS would simply be forgotten b) no safety hazard would develop from that. (Because until now such a CRS was only issued on a voluntary basis, i.e. quite seldom.)	Noted. The issue of whether the members of a club are considered as pilot owners is being consulted with EASA Legal Services as part of Working Group M.005 and Task M.010. The TC holder should include in the Flight Manual all the tasks which can be carried out by the pilot, so they are not considered as maintenance activities.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
202	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.901	M.A.901 Aircraft airworthiness review of Part M Introduce to Part M the following way of conducting maintenance: Beside conducting maintenance in a controlled or non-controlled environment a third “Air-sport” environment should be introduced (and limited to non-commercial operated aircraft below 2730 kg MTOW [or at least to CS-22 aircraft]). For this Air-sport environment an “Air-sport Maintenance Inspector” should be defined which: - Conducts the (typically annual) inspections - Approves repairs / changes to aircraft maintained in the Air-sport environment - Issues airworthiness review certificates (ARC´s) which are marked “Air-sport environment” on behalf of the competent authority - Has a minimum experience and qualification to be agreed upon (standards to be defined by EASA, Air Sport Organisations, manufacturers together in a working group) The aircraft maintained in the Air-sport environment will have – due to the “Air-sport environment” entry in the ARC – a limited value on the used plane market as this shows to any potential owner / user that maintenance has been not conducted under the (higher) “controlled / non-controlled environment” standards. The owner of such an aircraft has the option to bring it back into the “controlled / non-controlled environment” by conducting a special acceptance inspection which has to be made by a Subpart F and/or Subpart G organisation followed by issuance of a “controlled /	The introduction of the third kind of environment (here called preliminary “Air-sport” instead of the already defined “controlled” / “non-controlled” environment) will ease the burden upon the operators and competent authorities equally. It will also enable for the Air-sport community to continue with already established practices which have shown to be feasible and not hazarding flight safety. Transition to the practices described in the Part M today (which are quite reasonable for commercial air transport) would be possible but not required. The philosophy in this Air-sport environment would be: “Operation like a private car”: Regular inspection but no additional bureaucratic procedures not needed for flight safety. (Would anyone consider to issue a CRS for his car after replacing the spark plugs or changing the tyres if he himself likes to do this job?) The bureaucratic burden of applying and awaiting tens of thousands ARC (which have to come from the competent authorities as most gliders will be operated in a non-controlled environment) will do nothing for improving safety in comparison to the existing systems where mostly the ARC was issued directly by the inspector conducting the review. There should be a way for the competent authority to control the issuance of ARC and/or to take appropriate action if a safety problem exists but generally it is not feasible to process all ARC through the competent authorities instead of issuing them on behalf of them.	Noted. A proposal has been made in the advanced NPA 14/2006 on a simplified DOA approval process with extended privileges for all non complex aircraft and one man DOA/POA depending on the scope.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				non-controlled environment" ARC according to Part M. Thereby the owner of a non-commercial operated aircraft below 2730 kg MTOW (or at least CS-22 aircraft) can choose between the already established ways of Part M maintenance or another alternative which may be cheaper during operation but limiting the re-sale value of this aircraft. Thereby the "forces of the market" can decide which option is most feasible. Additionally it should be possible either in the controlled or the non-controlled environment to issue an ARC directly by the Subpart G organisation on behalf of the competent authority as long as non-commercial operated aircraft below 2730 kg MTOW (or at least CS-22 aircraft) are involved. As already commented in M.A. 711 and M.A. 801 an ARC issued by a production organisation for an own product should be sufficient without need for additional approval by an competent authority. Otherwise airworthiness reviews conducted by the manufacturers will become undue bureaucratic and expensive tasks which will have a negative financial and social impact for the owners.	A simple way to conduct this control would be the requirement that a copy of the ARC has to be sent to the competent authority (a practice already in use in several European member states).		
203	Verb Deutscher Segelflugzeugherst eller + EGMA	General	M.A.903	M.A.903 Transfer of aircraft registration within the EU of Part M The principles of enabling an easy transfer of aircraft within Europe are important. Being able to operate the aircraft until the expiration date of the old registration ARC and the elimination of the need to conduct a completely new airworthiness review are improvements. Additionally it is recommended to have an entry in the ARC which clearly shows in what environment maintenance has been	The introduction of the proposed entry into the ARC will make the maintenance status of each aircraft transparent to each person / organisation involved and ease the flow of goods within the European Union.	Not accepted. Changes to M.A.901 remove the concept of "recommendations". It is not the purpose of the ARC to specify in what environment it was, because at the next renewal all the applicable conditions will need to be checked again.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				conducted for the particular aircraft. Therefore an entry like “controlled / non-controlled / Air-sport environment” will make immediately clear to each person involved under which conditions maintenance was made and how the ARC was issued.			
204	Verb Deutscher Segelflugzeugherst eller + EGMA	General	Appendix VII	Appendix VII Complex Maintenance Tasks of Part MAmend the wording of Appendix VII (Complex Maintenance Tasks):The following constitutes the complex maintenance tasks referred to in M.A.801(b), 2:1. The modification, repair or replacement by riveting, bonding, laminating, or welding of any of the following airframe parts:(a) a box beam;.....2. The modification or repair of any of the following parts:(a) aircraft skin, or the skin of an aircraft float, if the work requires the use of a support, jig or fixture;...(d) any other structure, not listed in (1), that a manufacturer has identified as primary structure in its maintenance manual, structural repair manual or instructions for continuing airworthiness.3. Additional complex maintenance tasks or exemptions from the complex maintenance tasks listed above may be specified by the manufacturer of the product, the holder of the TC or STC in its maintenance manual.	The manufacturer is the natural and obvious instance which can decide whether a task is complex (and thereby should be limited to higher qualified personnel) or not. This opportunity of classification of tasks being complex / non-complex should be also possible for the holder of the relevant TC / STC (thereby opening the chance for a third party to make this classification if it also takes the responsibility for it).	Not accepted. The item 2(d) of Appendix VII already covers the cases where the manufacturer has identified additional primary structures.The classification of repairs is the privilege of a TC or STC holder.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
205	Verb Deutscher Segelflugzeughersteller + EGMA	General	Appendix VIII	Appendix VIII Limited Pilot Owner Maintenance Tasks of Part M Replace the wording of Appendix VIII (Limited Pilot Owner Maintenance): "The following constitutes the limited pilot maintenance referred to in M.A.803 provided it does not involve complex maintenance tasks and is carried out in accordance with M.A.402: 1. Removal, installation of wheels. .... 33. Replacement of main rotor blades that are designed for removal where specialist tools are not required." By "Typical tasks considered as limited pilot maintenance referred to in M.A.803 and carried out in accordance with M.A.402 include: 1. 100 hour inspection 2. Annual Condition Inspection 3. Servicing of fluids 4. Removal and replacement of components for which instructions are provided by the manufacturer e.g. in the maintenance manual such as: • Fuel pumps • Batteries • Instruments, switches, lights and circuit breakers • Starters/generators/alternators • Exhaust manifolds/mufflers • Fuel tanks, (water) ballast tanks • Landing gear • Wheel and brake assemblies • Propellers • Sparkplugs, ignition wires and electronic ignition components • Hoses and lines • Sailcloth covering • (Ballistic) Recovery Systems • Floats	The manufacturer is the natural and obvious instance which can decide whether a task is suited as limited pilot maintenance task or not. This opportunity of classification of pilot / non-pilot should be also possible for the holder of the relevant TC / STC (thereby opening the chance for a third party to make this classification if it also takes the responsibility for it). Additional remark: The very specific list of tasks in the actual wording of Appendix VIII (and also the wording in this proposal which comes from the maintenance regulation for LSA aircraft) must be always considered as an example and not as the ultimate list. In the LSA wording tasks typical for gliders / balloons are not accounted for, in the Part-M list some tasks are too specific or not fitting to other aircraft categories. Therefore it is even more important that the manufacturer is the entity which decides which task is suitable to performed by the pilot owner.	Noted. Revision of Appendix VIII will be performed by Working Group M.005.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				• Skis 5. Repair of components and structure for which instructions are provided by the manufacturer e.g. in the maintenance manual and which do not require additional specialised training such as: • Patching of a hole in a fabric, metal or composite non-structural component. • Stop-drilling of cracks 6. Alterations for which specific instruction are provided by the manufacturer e.g. in the maintenance manual such as: • Installation of a communications radio, transponder, GPS and antenna • Installation of a strobe light system • Compliance with a manufacturer service directive when the person conducting the alteration is listed as an authorised person to accomplish the alteration by the specific instruction are provided by the manufacturer. 7. Additional limited pilot maintenance tasks or exemptions from the limited pilot maintenance tasks listed above may be specified by the manufacturer of the product, the holder of the TC or STC in its maintenance manual."			
206	AR Bartlett	Explanatory Note	-	IV A 9 The regulatory Impact Assessment has a wide remit and could have a negative impact on gliding. A representative sample of individual pilots should be consulted.	The capital investment by glider owners is at risk due to the potentially overwhelming impact that the proposed regulatory changes would have.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
207	AR Bartlett	Draft Opinion	M.A.901	The airworthiness certification of Gliders should continue to be supervised by National Gliding organizations – e.g. in the UK by the British Gliding Association (BGA).	The BGA and other national bodies have a long & successful history of the management of Glider airworthiness and safety. I do not believe that the increase in paperwork proposed by EASA would contribute in any way to an increase in the safety of gliding flight. In fact it may actually reduce safety through the introduction of unnecessary bureaucracy and additional process complexity.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
208	AR Bartlett	Draft Opinion	M.A.302	MA302 The introduction of individual maintenance schedules for individual sporting aviation aircraft is both impractical and unworkable. In the case of historic aircraft, it will be impossible due to the age of the aircraft and the non-availability of manufacturer's detailed information. The production of large numbers of detailed manuals for the hundreds of gliders types presently in use is a large task that will be hampered by the limited numbers of qualified technical writers capable of performing the task. Also manuals will have to be translated into many European languages. The gliding movement is unable to financially support the production of such large numbers of technical manuals.	The British Gliding Association and other national gliding bodies have effectively supervised the certification of Gliders for over 50 years, employing a network of trained inspectors and senior inspectors, many of whom are unpaid volunteers. Changing an efficient and pragmatic system that is clearly working is an unnecessary burden and may compromise the high safety standards that already exist. Statistics held by the BGA show that fatal glider accidents caused by aircraft structural and maintenance issues are very rare.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
209	AR Bartlett	General	-	The British Gliding Association (BGA), should be granted status as a Competent Authority so that it can continue to regulate gliding airworthiness and other related matters in the UK.	The BGA has successfully managed gliding in the UK for a long time. It should be allowed to continue to do so. The organizational success of the BGA can be measured through the UK accident statistics which I believe have already been supplied to EASA. I further believe that these statistics compare favorably with accident statistics from other countries and may indeed surpass those found in some countries with stricter regulation.	Further to the reply to your comment 207:Competent Authority status can only be designated by a Member State	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
210	Eric Lown	Explanatory Note	-	I don't see any reason for being rushed into this aspect without proper debate. I support the idea of a Working Party to consider the implications.		Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
211	Eric Lown	Draft Opinion	M.A.302	This rule should be made relevant to gliders.	An individual programme of maintenance will do nothing but make gliding more complicated. There is nothing wrong with the present system, BGA and other similar National bodies overseeing what we do.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC.Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	
212	Eric Lown	Draft Opinion	M.A.901	Airworthiness Review Certificates should be issued by a certifying person.	This was what came out of the Regulatory Impact Assessment. There will be an unacceptable increased cost to owner/operators with nothing more to show for it.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901
213	Eric Lown	General	-	The BGA should be permitted to continue to manage gliding airworthiness processes.	It has done so for a very long time and has been satisfactory in every aspect of its work.	Further to the reply to your comment 210:Competent Authority status can only be designated by a Member State	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
214	J Sherman	General	-	There has been no state regulation of UK gliding for nearly 60 years, other than where gliding activities affect other aviators and airspace users. All aspects of gliding are self-regulated and managed by the British Gliding Association (BGA). The BGA is the only organisation with the necessary experience to carry out regulation of gliding in the UK and in order to continue doing so within the Part M framework, it will need to become the Competent Authority for UK Gliding. In view of the fact that the UK Department of Transport has so far designated the UK CAA as the sole Competent Authority, EASA needs to find the means for the BGA to become the UK Competent Authority for gliding, in order to take advantage of the accumulated regulatory and management experience that resides within the BGA. Safety in UK gliding will be best served by EASA finding the means to enable the BGA to continue its function of managing glider airworthiness, in the same manner as it has done to date.	The BGA is fully capable of ensuring air safety. This is demonstrated by accident/incident statistics for the UK, which compare favourably with countries where more stringent state regulation has been imposed and are, in some cases, better. If the BGA is required to become a continuing airworthiness management organisation under sub part G, there will be a significant cost burden associated with this, but there will very likely be no increase in safety, based on historical data.	Further to the reply to your comment 215:Competent Authority status can only be designated by a Member State	
215	J Sherman	Explanatory Note	-	Paragraph 8 By choosing to only carry out a limited RIA, EASA has failed to consider the impact of some requirements, which will prove extremely onerous for the gliding community. There is a clear need for a working group to be set up to identify and address issues which are of particular concern to gliding. I am particularly concerned that the impact of MA302 in Sub Part C : Continuing Airworthiness, has not been given consideration in the RIA. The requirement contained therein, that a	By failing to carry out a complete and thorough RIA, EASA is going to produce bad regulation, which will harm the viability of the activities it seeks to regulate, without necessarily realising any safety benefits. The need does not exist, in gliding, for the additional administration that individual maintenance programmes will entail. Introducing them will not improve safety, but will lead to the costs of producing and monitoring the thousands of individual manuals, being passed on to individual owners.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest,	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				maintenance programme be drawn up for each individual aircraft, will impose a totally unacceptable burden on the gliding community and is completely inappropriate and ill conceived. Does EASA believe that gliding has been invented yesterday and that decades of accumulated maintenance experience do not exist? The USA works to FAR 43 13, which provides a far more suitable procedure model that will avoid the expense and bureaucracy which would follow from MA302.	There is absolutely nothing wrong with the current system whereby national associations maintain technical oversight of generic maintenance programmes, which incorporate manufacturers maintenance manuals, technical bulletins and Airworthiness Directives. The current system is effective and proven.	including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
216	J Sherman	Explanatory Note	-	Paragraph 16 EASA has chosen to reject the RIA recommendation that Airworthiness Review Certificates be issued by a certifying person preferring that, in effect, the ARC be issued by a state body (ie 'competent authority'). Currently no such bureaucratic apparatus exists in the UK for gliding, but the existing arrangement of continuing airworthiness being administered by the British Gliding Association works well and receives the full backing of the UK CAA. The safety case for introducing a state regulated system, with all the additional cost burden to owner/operators has not been made. The procedure for renewal of airworthiness certificates in "uncontrolled environments" contained in Part M will add considerably to the burden of bureaucracy and will prove more expensive. What EASA is proposing will create two expensive bureaucratic operations to achieve the same result that	Part M takes no account of the relative simplicity of glider construction and design, which allows maintenance to be carried out according to the manufacturer's maintenance programmes. If individual glider inspectors are permitted to make an ARC recommendation to the approved certifying person there is no increased risk in comparison with what has been proposed in NPA 07 2005. Provided that the BGA is permitted to become an Airworthiness Management Organisation under Sub Part G, as it seeks to do, safety oversight could be assured by means of an External Airworthiness Review carried out by the BGA on a 5 yearly basis. Although the UK gliding fleet is not currently regulated by the State, it is in effect maintained in the same manner and to the same standards as other European states. The UK CAA has formally approved the existing glider airworthiness system, under which all necessary	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				can be achieved under the existing system. This can only result in gliding being put beyond the financial reach of many who are currently able to participate. A better approach would be to allow the approved person at the sub part G organisation to issue the ARC. EASA should simplify procedures for gliding by issuing appropriate Acceptable Means of Compliance documents.	procedures and safeguards are provided. The scant statistics in respect of airworthiness related accidents bear witness to the effectiveness of the existing system. If gliding is forced to comply with Part M, EASA will be imposing inappropriate maintenance solutions, which are intended for large, complex aircraft and only make sense for these types. Further, the gliding community is concerned that Part M would provide an inferior level of safety, in comparison to the existing system, for a higher cost.		
217	GD Harris	General	-	Part M in so far as it affects Gliding in particular and Light General Aviation in general.	Whilst the introduction of common standards across Europe is to be applauded, a significant opportunity to apply appropriate standards and procedures is being squandered. Examination of the proposals suggests that the starting point was maximum regulation, appropriate to commercial aviation. Rather than the existing and substantially satisfactory existing arrangements in the larger countries. In order to avoid serious and expensive over regulation, that will in the long term damage commercial aviation, EASA should urgently re-address the many issues of concern to gliding, particularly those in Part M. In particular the massive paperwork implied by MA302 is quite inappropriate. EASA should be seeking a unified system based on the best existing national practices not imposing 'heavy' procedures from other branches of aviation.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
218	Diana King	General	-	EASA should work with the representatives of sporting aviation to find ways of encouraging national aviation authorities to relinquish their demand to be the sole Competent Authorities in their country, thus enabling competent organisations such as the BGA to become Competent Authorities and to regulate their own operations. Alternatively, means should be explored to enable the BGA to manage its own technical and other safety issues.	As a pilot of some 35 years, I have seen numerous accidents and had one serious accident myself. I would support any reasonable steps being taken which could lead to increased safety. However my opinion is that improved pilot knowledge, understanding and currency is the single largest contributor to flying safety. Anything which takes time, attention or resource away from that is liable to have a detrimental rather than positive effect. The BGA has for many years managed and self-regulated all aspects of gliding in the UK, with the recognition and understanding of the UK CAA and close liaison with other agencies such as the Air Accidents Investigation Branch. The BGA has a culture of seeking continuous improvement in its safety and technical work as well as elsewhere. There is no evidence that the technical management of the UK glider fleet would be improved by the proposals in Part M. Further there is evidence that eliminating safety hazards caused by technical problems would have an insignificant effect on the total accident statistics. The implementation of the proposed regulations would create a cost	Further to the reply to your comment 219:Competent Authority status can only be designated by a Member State	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					and administrative burden which would fall on individual pilots. The effect would be to increase overall costs to such an extent that many pilots would be unable to continue flying so much; some might reduce the costs by reducing their annual hours, causing likely safety issues due to lack of currency. It is well documented that the great majority of accidents are due to pilot error. Any regulations which deliberately or inadvertently discourage pilots from flying regularly are likely to reduce rather than increase safety.		
219	Diana King	Explanatory Note	-	IV A) 8By restricting the RIA to subparts E to I, it failed to address all the concerns of glider pilots and operators. In particular, subpart C contains a number of proposed regulations of significance to gliding, with proposals for processes which would be considerably more bureaucratic and therefore more costly. The likely impact of these proposals has not been considered. A further RIA of the other subparts should be carried out by individuals or a working group with knowledge and understanding of gliding.	In order to maximize the possibility that the new regulations will be accepted and followed by private glider pilots, it is essential that a proper study of the implications is undertaken.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						airworthiness regulation lies with the individual NAA's	
220	AEI	Draft Opinion	Appendix VIII	16. Trouble shooting and repairing broken circuits in landing light wiring circuits. In the case of gliders, also trouble shooting and repairing broken wiring circuits for non-critical optional equipment.	The whole paragraph should be deleted. The work specified requires knowledge about trouble shooting methods, and the repair of any faults can involve special tools and repair procedures, something that a pilot owner is not likely to possess. Landing lights in particular have electrical circuits that are drawing high currents, and could therefore be very dangerous (fire hazards is one reason) if repaired incorrectly!	NOTED: Revision of Appendix VIII will be performed by Working Group M.005.	
221	AEI	Draft Opinion	M.A.801	M.A. 801 () Aircraft Certificate of Release to Service (c) By derogation to M.A.801(b) in the following unforeseen cases, where an aircraft is grounded at a location other than the main base where no appropriate certifying staff is available, the person responsible under M.A.201(a) may authorise any person with not less than 3 5 years maintenance experience and holding a valid ICAO compliant aircraft maintenance licence rated for the aircraft type requiring certification,	There are sufficient maintenance personnel available with extensive experience, so there is not necessary to require only 3 years experience, as well as diluting the regulation in other areas.	Not accepted. The purpose of this paragraph is to address situations where there are no approved organisations. It may be difficult to find personnel with extensive experience.	
222	AEI	Draft Opinion	M.A.801	M.A. 801 (c) Aircraft Certificate of Release to Service (c) By derogation to M.A.801(b) in the following unforeseen cases, where an aircraft is grounded at a location other than the main base where no appropriate certifying staff is available, the person responsible under M.A.201(a) may authorise any person with not less than 3 years maintenance experience and holding a valid ICAO compliant aircraft maintenance licence rated for the aircraft type requiring certification, provided there is no organisation appropriately approved under this Part at that location and the contracted organisation obtains and holds on file	This excludes the use of a Part 145 AMO when available, and as a result unnecessarily restricts the possibilities of finding qualified personnel.	Accepted. This has been included in the proposed change.	See revised M.A.801

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				evidence of the experience and the licence of that person.			
223	AEI	Draft Opinion	M.A.801	M.A. 801 (c) 2. Aircraft Certificate of Release to Service 2. ensure that any such maintenance that could affect flight safety is rechecked at the next visit to main base, or next scheduled maintenance activity, which ever comes first, by an appropriately authorised M.A.801(b) person, and	A time limit (like the one proposed, but not necessarily the same wording) should be included in the text here, to limit the time period during which this rectification goes unchecked.	Accepted. This has been included in the proposed change.	See revised M.A.801
224	AEI	Draft Opinion	M.A.901	M.A. 901 (e) Aircraft Airworthiness Review (e) Whenever circumstances show the existence of a potential safety threat or in the absence of a continuing airworthiness management organisation approved for the aircraft type, the competent authority ~~may decide to~~ will/shall carry out the airworthiness review and issue the airworthiness review certificate itself. In this case, the owner or operator shall provide the competent authority with:	This wording (will or shall) ensures a common standard approach under these circumstances, and excludes the possibilities for loop holes.	Accepted. Text has been modified accordingly.	See revised M.A.901
225	AEI	Draft Opinion	M.A.901	M.A. 901 (e) Aircraft Airworthiness Review (e) Whenever circumstances show the existence of a potential safety threat or in the absence of a continuing airworthiness management organisation approved for the aircraft type, the competent authority may decide to carry out the airworthiness review and issue the airworthiness review certificate itself. In this case, the owner or operator shall provide the competent authority with: - the documentation required by the competent authority,	This text has no bearing on the activity that has to be carried out, besides the present stipulation could compromise the Authority. It is possible for the Authority to do this itself quite satisfactory.	Noted. The modification to M.A.901 goes beyond this comment,	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				- suitable accommodation at the appropriate location for its personnel, and - when necessary the support of personnel appropriately qualified in accordance with Part-66.			
226	AEI	Draft Opinion	Appendix VIII	10. 10. Applying preservative or protective material to components where no disassembly of any primary structure or operating system is involved and where such coating is not prohibited or is not contrary to good practices, and it is performed in accordance with the type certificate holders instructions.	There is no definition of "good practices", so this is not a good standard. The type certificate holder however would prescribe such methods, or if not, could provide a satisfactory answer when asked.	Noted. Revision of Appendix VIII will be performed by Working Group M.005.	
227	Roy Colman	Explanatory Note	-	Part M/IV A) Para 8 A working group should be established by EASA and carried out by the Agency to specifically address all of the issues raised within Part M that are of particular relevance to gliders, sailplanes and the sport of gliding.	The Agency's decision to limit the scope of the RIA to an assessment of subparts E to I means that the assessment did not cover all of the concerns of the gliding community with regards to Part M. This is further demonstrated by the fact that the issues raised by the RIA do not represent many of the concerns of the gliding community.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
228	Roy Colman	Draft Opinion	M.A.302	MA302 The decision requiring a maintenance programme to be drawn up for every aircraft and approved by the competent authority should be relaxed for gliders and sailplanes. If deemed necessary it should be replaced by a rule along the lines of FAR 43 13.	The decision currently proposed by Part M would impose an unnecessary level of bureaucracy and expense on the gliding community with little perceived benefit over the existing systems. Furthermore the practicalities of writing manuals for vintage gliders and sailplanes, often produced in low volumes and where the original manufacturers have long since ceased to exist, may result in many of these aircraft ceasing to fly.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
229	Roy Colman	General	-	The airworthiness procedures and practices employed in the maintenance of gliders and sailplanes would be best administered by a recognised body with experience relating to the specific issues of the subject and which is dedicated to these issues. At present in the United Kingdom this function is ably fulfilled by the British Gliding Association (BGA). A mechanism should be put in place by EASA by which the BGA can continue to fulfill its current role in managing gliding airworthiness procedures and practices and which will permit the BGA to be recognised as a Competent Authority for gliding in the UK.	To date the CAA has found that the British Gliding Association is capable of ensuring air safety with respect gliding in the UK. This is further demonstrated by the fact that gliding in the UK has not been state regulated since the late 1940s other than its interaction with other airspace users. A proven system is already in existence and should be built upon primarily for reasons of continued safety but also with considerations of efficiency and cost effectiveness.	Further to the reply to your comment 227:Competent Authority status can only be designated by a Member State	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
230	Deutscher Aero Club e.V.	General	M.A.202	MA 202, (a) Occurrence reporting Any person or organization responsible under M.A. 201 shall report to the State of registry any identified condition of an aircraft or component that hazards seriously the flight safety. The state of registry is to inform the Agency for further action if required.	To avoid administrative mistakes which would affect safety we ask for a simple and single address reporting system. While it might be feasable that operators for commercial air transport aircraft report to the design organization concerned the owner of a non complex aircraft requires a single point reporting system which is best the state of registry. It is the state of registry who have access to the data bases and the required knowledge.	Partially accepted. We recognise that a simplified reporting system is a good objective but this issue must be addressed through Part-21 before hand. We agree that the competent authority of the state of registry is a better structure for reporting than just the state of registry. Nevertheless to ensure communication between the TC holder or STC holder and the owner is upheld, such reporting is also mandated. Furthermore, the Agency will work towards finding a more efficient manner to carry out occurrence reporting in order to simplify the system for the applicant and to avoid loss of information.	See revised M.A.202
231	Deutscher Aero Club e.V.	General	M.A.202	MA 202, (c) Occurrence reporting towards the end of (c) insert behind: ..any such condition: “adversely”	The insertion clarifies the intention that only conditions need to be reported which have a negative affect of flight safety.	Not accepted. The paragraph is clearly referring only to M.A.202(a) occurrences (i.e. any identified condition of an aircraft or component that hazards seriously the flight safety).	
232	Deutscher Aero Club e.V.	General	M.A.301	MA 301, 1, Continuing Airworthiness Tasks amend the sentence to read: the accomplishment of pre-flight inspections and, in the case of sailplanes, daily inspections.	The proposal is a necessary consequence resulting from the comment to Reg 2042 Article 2 h/j	Not accepted The NPA 7/2005 which amends the Appendix VIII of Part-M includes any check below the 6 months / 50 h inspection to be carried out by the pilot/owner. This covers the daily inspection currently applied to sailplanes which is accepted as part of pilot / owner maintenance.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
233	Deutscher Aero Club e.V.	General	M.A.302	MA 302, (a), Maintenance ProgrammeAdd a new sentence:For aircraft up to a MTOM of 2730 kg not operated commercially generic maintenance programmes may be grouped according to criteria suitable to the category of aircraft.An example should be added to the corresponding AMC.	The strict application of the existing text would completely overload owners, manufacturer and especially, the approving authorities, without increasing the level of safety. Within the EASA area about 85 000 aircraft are registered, the vast majority are recreational and airsports aircraft of simple design who can easily be maintained airworthy by using a standard and short maintenance programme.	Partially accepted.As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC.Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
234	Deutscher Aero Club e.V.	General	M.A.304	MA 304, Data for modifications and repairs This paragraph needs further explanation and clarification. Especially in recreational and sports aviation damage assessment relies on the practical experience and the acquired knowledge of the person inspecting the damage. Not all damage to an aircraft can be described in detail, expert judgment is required. Standard guidelines to assess damage and procedures and methods for conducting repairs, like laid down in AC 43-16 B , should be approved by the Agency and listed in an AMC.	Minor damage not affecting airworthiness is quite often the result of a field landing, rigging the sailplane or pushing the aircraft into a hangar. Repairs done by the airsports community follow the best practice and state of the art procedures.	Partially accepted. Task M.019 is scheduled to start at the beginning of 2008 in order to define an equivalent to AC43-13. As an interim measure, group M.017 will evaluate how to incorporate AC43-13 in the current rule.	
235	Deutscher Aero Club e.V.	General	M.A.305	MA 305, (a)/(b) Recording It is accepted that a recording system for vital maintenance is required. Recreational and airsports aircraft do not require more than one recording book.	One single logbook is sufficient and can be handled much easier therefore reducing the danger of omitted or faulty entries. This contributes to flight safety.	Noted. Transferable log-books facilitates movement of components between airframes. To this end the use of transferable log-cards or binders is accepted as appropriate.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
236	Deutscher Aero Club e.V.	General	M.A.306	M.A 306, operators technical log It is requested to clarify and confirm that this paragraph as a whole refers only to commercial air transport.	Logcards for non complex aircraft not used for commercial operations are an unnecessary bureaucratic burden and do not contribute to flight safety.	Not accepted As mentioned in 201(h) and (i), the word operator is limited to commercial air transport and activities which needs a certificate. This paragraph is not intended to be applicable to non commercial operation.	
237	Deutscher Aero Club e.V.	General	M.A.401	M.A 401, (1.) Maintenance data It is requested to change the para to read as follows.: Any applicable requirement, procedure, standard or information issued or approved by the Agency or competent authority.	This enables the Agency or the relevant competent authority to approve maintenance data which reflect best practise in aviation maintenance. This is especially true for aircraft where no TC holder is appointed like orphan or some older aircraft. One example is the approval of the FAA AC 43-13 b.	Partially accepted The proposed text is already included in Opinion 06/2005, which has not been approved yet by the Commission. The second part of the comment is being addressed by group MDM 032 for possible modification of Part 21.	
238	Deutscher Aero Club e.V.	General	M.A.402	M.A 402 a, Performance of Maintenance Confirmation is requested that “qualified personnel” in the sense of this of this paragraph for non complex aircraft not used in commercial operation includes the pilot owner and his privileges.	This contributes to the clarity of the rule and to the acceptance of the procedure by the aviation community concerned.	Noted. The AMC MA402(a) parag 2 already addresses the issue.	
239	Deutscher Aero Club e.V.	General	M.A.403	M.A 403 b, Aircraft defects Change the paragraph to read as follows: Only the pilot in command or the authorised certifying staff, according to M.A 801 (b) 1, M.A. 801 (b)2 or Part 145 can decide, whether an aircraft defect hazards seriously the flight safety and therefore decide which rectification action shall be taken before further flight and which rectification can be deferred.	Basically, only the trained pilot has the overall judgement and is able to assess the status of his aircraft. In case of complex aircraft maintenance personnel is required to inform the pilot about the detailed status of aircraft systems but the final decision rest with the pilot. In case of non complex aircraft the pilot is considered as qualified personnel and therefore enabled to final decision making whether to fly or not fly. Any other procedure would not be acceptable to the aviation community concerned.	Not accepted. Part-M is not the appropriate place to incorporate pilot responsibilities. Rules concerning pilot responsibilities should be developed in the appropriate licensing and operations rules.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
240	Deutscher Aero Club e.V.	General	M.A.501	M.A 501 a Installation Add a new sentence: In case of sailplanes and balloons standard parts as listed in the relevant AMC may be installed as components without EASA Form One or equivalent.	Equipment which is not part of the CS requirement and which is not an essential part for declaring the aircraft airworthy must be able to be installed in gliders and balloons/airships without an EASA Form One. This is common standard practise since more than 50 years and did not and will not adversely affect flight safety.	Noted. Decision 2006/13/R has been issued by the Agency which redefines the definition of standard parts installed on sailplanes and powered sailplanes certified under the provision of CS 22.1301b.	
241	Deutscher Aero Club e.V.	General	M.A.502	M.A.502 (b) A appropriate definition of components and standard parts is recommended for small aircraft.	It is a problem that the term “maintenance” does not distinguish between different types of maintenance, e.g. functional testing or installation/removal versus operations actually being an intrusion into the component. The requirement that components may only be removed for maintenance “when such removal is expressly permitted by the aircraft maintenance manual” is unnecessarily strict, particularly because maintenance manuals for gliders and light aircraft do not usually specify allowable removal/installation of components to this degree of detail.	Partially accepted. Answer to the request on Standard parts is made in answer n° 182 to Verb Deutscher Segelflugzeughersteller + EGMA. Qualification of personnel carrying maintenance on aircraft or on a component is specified in M.A.606 and this paragraph does not alter this requirement. In the light of this remark, the wording "Aircraft maintenance manual" is replaced by "maintenance data" in M.A.502.	See revised M.A.502
242	Deutscher Aero Club e.V.	General	M.A.604	M.A.604 AMC material should provide a generic organsiation manual adapted to size and complexity of work carried out in the organisation.		Not accepted. The Appendix IV to AMC M.A.604 has been developed for general aviation purposes and is already in use in some Member States	
243	Deutscher Aero Club e.V.	General	M.A.606	M.A.606 (d) The rule or AMC material should permit certifying staff on a voluntary basis.	Presently national air sport organsiations are running maintenance organisation without employees but with voluntary staff only.	Not accepted. The AMC M.A.606 (d) provides for the possibility of employing or contracting staff on a volunteer basis.	
244	Deutscher Aero Club e.V.	General	M.A.607	M.A.607 (a) 1 This rule should be removed for sailplanes and other small aircraft.	In the air sport environment certifying staff is not working day by day but at weekends on a voluntary basis.	Not accepted. Part-66 currently refers to national law for glider and balloon, refer to 66.A.100. Within the current rulemaking process a Part-66 "light" is under consideration.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
245	Deutscher Aero Club e.V.	General	M.A.608	M.A.608 Recommendation for an AMC: For individuals something simpler should be considered, such as “the person undertaking the maintenance should ensure that he has tools available which are suitable for the work and that tools which require calibration are calibrated to relevant official standards.”	Maintenance manuals of small aircraft do not always refer to tools.	Not accepted. This paragraph applies to organisations, whether they are large or a "one-person" organisation.	
246	Deutscher Aero Club e.V.	General	M.A.610	M.A.610 The German Aero Club recommends an AMC which clarifies that written work orders are required only if there is a commercial relationship between the organisation and the customer.	In case a local club is part of an M.A.Subpart F organisation no written work orders are required.	Partially accepted. The reason of having an agreed Work Order is to protect both parties. Firstly, the Subpart F organisation is protected from undeclared maintenance needs since the release to service must only cover what has been ordered. Secondly, the owner / operator is protected from requested work not being carried out. The word "customer" has been found to be misleading and will be replaced by "the entity requesting maintenance" Additional AMC material is under consideration to specify the type of documents that can constitute a Work Order (i.e, Snag Sheet, Log Book entry, etc).	See revised M.A.610
247	Deutscher Aero Club e.V.	General	M.A.613	M.A.613An appropriate definition of components is necessary. To give an example the change of a brake lining should be possible without issuing an EASA Form 1.	The definition of components and standard parts should be appropriate to the category of aircraft.	Noted. The definition of component already exists on EC2042/2003.Changing a component (i.e, a brake lining) does not constitute component maintenance and does not require issuing a Form 1 on installation. The component itself needs to come accompanied with a Form 1 from the manufacturer or the maintenance organisation that repaired it.	
248	Deutscher Aero Club e.V.	General	M.A.703	M.A.703 To make it easier for small organisations and for standardization reasons examples		Not accepted. The Appendix V to AMC M.A.704 provides detailed instructions for	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				of organisation manuals should be offered.		preparing a subpart-G organisation manual, which may be adapted to the size of the organisation.	
249	Deutscher Aero Club e.V.	General	M.A.707	M.A.707 (b) 2. The German Aero Club recommends a separate paragraph for the requirements of airworthiness review staff for balloons and sailplanes (CS-22).	Even when Part 66.A.100 refers to national regulations this rule should offer a less stringent requirement as an aeronautical degree or equivalent. A large majority of inspectors for balloons and sailplanes do not hold an aeronautical degree.	Partially accepted. It is recognised that these requirements need to be amended for non complex non commercial aviation (not just gliders and balloons). Amendments would be made to AMCs to clarify the requirements for these categories of general aviation aircraft. Note that within M.A.707(a)2, Part-66 defers to national regulations for balloons and gliders .	
250	Deutscher Aero Club e.V.	General	M.A.708	M.A.708 (a) 1. Europe Air Sport recommends to give the choice to maintain a non commercial operated aircraft according either to approved maintenance manuals or to an maintenance programme.	It is not feasible for continuing airworthiness management organisations to develop and control maintenance programmes for all individual aircraft. To illustrate the problem: the work of a Subpart G organisation might often be conducted by an national aero club which has inspectors working on a voluntary basis. In such a case neither the Subpart G organisation nor the inspectors will develop the management programmes. Instead there will be maintenance documentation with each glider in the single clubs belonging to the aero club. This typical system has worked since more than 40 years without any problems.	Partially accepted. The formulation of M.A.302 does not preclude generic maintenance programmes adapted to the aircraft configuration. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC to M.A.302. In accordance with M.A.302(e) when the aircraft is managed by a CAMO, its maintenance programme and its amendments may be approved through an "indirect" approval procedure to be agreed between the CAMO and the authority. MA708 is modified to reflect this possibility.	See revised M.A.708
251	Deutscher Aero Club e.V.	General	M.A.709	M.A.709 It is recommended that AMC material is produced to clarify the requirements in M.A.401 for maintenance data when there is no TC holder supporting an aircraft.		Partially accepted. A working group 21-023 is considering the case of orphan aircraft (aircraft without a TC holder) and some change to Part-21 may result from this.	
252	Deutscher Aero Club e.V.	General	M.A.710	M.A.710 An AMC should provide a template (checklist) for an airworthiness review	AMC material helps to have common interpretation of this rule.	Noted. Details in M.A.710 supported by the AMC 710(a) and (b and c) are considered sufficient to meet this	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				and for a physical survey as well.		need.	
253	Deutscher Aero Club e.V.	General	M.A.711	M.A.711 (a) Add paragraph 4. 4. approve maintenance programmes even when the aircraft is not managed by the approved M.A. Subpart G organisation.	Approving maintenance programmes for 85.000 aircraft of the air sport community would require a high increase of certifying staff at competent authorities. This would lead to increase of cost for the air sport community. Its difficult to predict approval fees for this task but fees up to 500 Euros are realistic. An easy review of the maintenance programme during the physical survey should be possible.	Partially accepted. The formulation of M.A.302 does not preclude generic maintenance programmes adapted to the aircraft configuration. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC to M.A.302. In accordance with M.A.302(e) when the aircraft is managed by a CAMO, its maintenance programme and its amendments may be approved through an "indirect" approval procedure to be agreed between that CAMO and the authority. MA708 is modified to reflect this possibility.	See revised M.A.708
254	Deutscher Aero Club e.V.	General	M.A.712	M.A.712 (f) The German Aero Club welcomes the rule change in M.A.712 (f) provided by the NPA 7/2005.		Noted.	
255	Deutscher Aero Club e.V.	General	M.A.801	M.A.801 (b) The German Aero Club refuses the recommendation by AES: “Additional AMC to clarify how a pilot-owner can be trained to carry out maint. tasks and demonstrate competence.”	A requirement for additional qualification would contradict the idea of limited pilot-owner maintenance.	Accepted. This work is being carried out by working group M-005	
256	Deutscher Aero Club e.V.	General	M.A.803	M.A.803 (a) It should be clarified that a persona according to M.A.803 (a) is qualified according to M.A.402 (a) without any further qualification.	A requirement for additional qualification would contradict the idea of limited pilot-owner maintenance.	Accepted. This issue is being addressed by group M.005.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
257	Deutscher Aero Club e.V.	General	M.A.803	M.A.803 (b) EAS recommends to review the Appendix VIII of Part M completely. Different aircraft categories could more easily addressed, if the Appendix would be segmented in different chapters for each aircraft category. The very specific list of tasks in the actual wording must be always considered as an example and not as the ultimate list. It's impossible to capture all possible pilot-owner tasks in one list. A general definition of pilot-owner maintenance would be the best solution. "Simple maintenance tasks which will not endanger airworthiness in the case of improper execution will be checked at the next annual airworthiness inspection. Those maintenance tasks have to be documented by the pilot-owner in the logbook of the aircraft to enable the inspection during the annual airworthiness review. Maintenance tasks which might endanger airworthiness in the case of improper execution will be checked after completion of the maintenance by approved maintenance organisations or approved inspectors."	The actual list in Appendix VIII is not appropriate to all aircraft categories from 80 kg up to 2730 kg. A lot of tasks which are presently performed by the pilot-owner are not covered by Appendix VIII.	Noted. Revision of Appendix VIII will be performed by Working Group M.005.	
258	Deutscher Aero Club e.V.	General	M.A.901	M.A.901 (b) The idea of a controlled environment is truly well adapted to commercial air transport carriers but is not appropriate or practical for the air sport community. Running a approved M.A.Subpart G organisation on local club level would be possible for larger clubs only. Smaller clubs (i.e. 30 members, 5 aircrafts) had to be grouped under one M.A.Subpart G organisation. In this case it would be very complicated to implement the required information procedures to meet the		Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				requirements of a controlled environment. It's very difficult to imagine that the accountable manager is responsible for personnel or aircrafts hundreds of miles away. An insurance for such a M.A.Subpart G organisation would be extremely expansive perhaps even not insurable. Therefore the air sport community very much prefers the uncontrolled environment.		authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	
259	Deutscher Aero Club e.V.	General	M.A.901	M.A.901 (d)Independent (not employed by the competent authority) certifying staff with an appropriate license should be allowed to issue an Airworthiness Review Certificate (ARC) immediately after performing the physical survey on behalf of the competent authority. Alternately an Airworthiness Review Organisation (could by a CAMO) contracted to the competent authority should be allowed to issue ARC on behalf of the competent authority.	A large majority of certifying staff is not employed by competent authorities but is working on a voluntary basis. If this procedure could not be continued the competent authorities would have to increase there number of certifying staff to perform thousands of physical surveys. This would lead to a tremendous increase of cost for the air sport community.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901
260	Deutscher Aero Club e.V.	General	AMC M.A.604	AMC M.A.604 This AMC should be changed to clarify that for an M.A.Subpart F organisation with more then 10 voluntary maintenance staff no Part 145 approval is required, but the organsiation manual should be adopted to the complexity of the organisation.	In the air sport environment maintenance organizations are often implemented on a national level with the local club workshops as brunches. Those organizations should not be obliged to apply for a Part 145 approval.	Noted. AMC material does not ask Subpart F organisation with more than 10 staff to be approved as part 145 organisation but simply asking subpart F organisation to organise their manual as that requested for Part 145 organisations.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
261	Deutscher Aero Club e.V.	General	Appendix VIII	Appendix VIII The German Aero Club recommends to review the Appendix VIII of Part M completely. Different aircraft categories could more easily addressed, if the Appendix would be segmented in different chapters for each aircraft category. The very specific list of tasks in the actual wording must be always considered as an example and not as the ultimate list. It's impossible to capture all possible pilot-owner tasks in one list. A general definition of pilot-owner maintenance would be the best solution. "Simple maintenance tasks which will not endanger airworthiness in the case of improper execution will be checked at the next annual airworthiness inspection. Those maintenance tasks have to be documented by the pilot-owner in the logbook of the aircraft to enable the inspection during the annual airworthiness review. Maintenance tasks which might endanger airworthiness in the case of improper execution will be checked after completion of the maintenance by approved maintenance organisations or approved inspectors."	The actual list in Appendix VIII is not appropriate to all aircraft categories from 80 kg up to 2730 kg. A lot of tasks which are presently performed by the pilot-owner are not covered by Appendix VIII.	Noted. Revision of Appendix VIII will be performed by Working Group M.005.	
262	Deutscher Aero Club e.V.	General	M.B.902	M.B.902 (b) 4. Also personnel which is not employed by the competent authority should be allowed to perform an airworthiness review and issuing an Airworthiness Review Certificate (ARC). An AMC should clarify that personnel which is working on behalf of the competent authority is in a position with appropriate responsibilities.	In the air sport community a lot of inspectors licensed but not employed by the competent authority are issuing ARC on behalf of the competent authority.	Noted. This paragraph does not prevent the Competent Authority from contracting ARC review staff if they meet the requirements established in their procedures, and they are nominated by the authority to sign on their behalf.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
263	Deutscher Aero Club e.V.	General	-	A special edition of Part M, lets call "Maintenance Guide Air Sport" should be published. This guide should consist of paragraphs related to non commercial light aviation, only. It's also recommended to have the AMC material incorporated.	From a regulators point of view the Part M with all his cross-references is a very good documents. But from a users point of view the maintenances rules a very lavish to read and very complicated to understand.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
264	Deutscher Aero Club e.V.	General	2042/2003	Article 2, (h), (j) Add to read h last line: … with the exception of preflight and daily inspection; Add to read j after last line: In case of sailplanes, daily inspection means the preflight inspection carried out after rigging a sailplane or before the first flight of a day.	The flight manuals of sailplanes built to CS 22 standards differentiate between "daily inspection" and "preflight inspection", both to be performed by the pilot. Therefore a second sentence is required to enable the pilot to perform both inspections.	Not accepted. The NPA 7/2005 which amends the Appendix VIII of Part-M includes any check below the 6 months / 50 h inspection to be carried out by the pilot/owner. This covers the daily inspection currently applied to sailplanes which is accepted as part of pilot / owner maintenance.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
265	Deutscher Aero Club e.V.	Annex III	-	Article 5 (1) Annex III (Part 66) is required to be amended to introduce a so called airsports mechanic license, possible B 3. The requirements should be tailored to the simplicity of the various airsports category concerned. The Agency should be enabled to task qualified entities with training and license issue.	At present, the requirements detailed in Annex III for B1 and B2 do not match the simplicity of the non complex powered aircraft which will have a detrimental effect on the maintenance of the aircraft concerned. The requirements need to be adapted which best is achieved to introduce a simple and light license for an airsports mechanic where the responsibility can be transferred to the airsports body concerned.	Partially accepted. The MDM 032 working group decided to propose a "Light" Part 66. This is being performed by a subgroup within M.017 group.	
266	Deutscher Aero Club e.V.	Annex IV	-	New Article 6,3 Annex 4 (part 147) needs to be amended to cater for the concept of transferring training and AML license issuing responsibilities to qualified entities like airsports associations.	Over many years have air sports associations and national aeroclubs trained their own expert mechanics. This resulted in an extreme high level of safety for recreational and airsports aviation. It is logical to maintain this proven system of self administration.	Partially accepted. MDM 032 working group decided to propose a "Light" Part 66. Any need to take an action on Part 147 will be evaluated accordingly	
267	Martin Raper	General	M.A.901	The certification of the airworthiness of Gliders should continue to be supervised by the National Gliding organizations - in the UK by the British Gliding Association.	The BGA and other national bodies have a 50+ year history of the successful management of Glider airworthiness and safety. The increased paperwork proposed by the EASA would not contribute in any way to increasing the safety of gliding flight, and may actually compromise safety through the introduction of unnecessary additional system complexity.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's.. M.A.901: Partially accepted The paragraph M.A.901 has been modified.	
268	Martin Raper	General	M.A.901	The certification of the airworthiness of Gliders should continue to be supervised by the National Gliding organizations – in the UK by the British Gliding Association. *(similar to comment 267)*	The BGA and other national bodies have a 50+ year history of the successful management of Glider airworthiness and safety. The increased paperwork proposed by the EASA would not contribute in any way to increasing the safety of gliding flight, and may actually compromise safety through the introduction of unnecessary additional system complexity.	Refer to answer to comment 267	
270	Michael Witton	General	-	The design of the structure & systems used in gliders have to be extremely simple so as to maintain a lightweight construction; there is no weight allowance for excessive complication. Due to the simple underlying design philoshophies even a basic failure modes & effects analysis would demonstrate that there is far less to go wrong with any glider than would be shown by a similar analysis on even the most simple of powered aircraft let alone a commercial aircraft.Forcing the gliding community to comply with the large aircraft maintenance solutions described in part M including the need to comply with the stringent requirements of subparts F & G will massively increase the cost of maintenance & administration with no added increase in safety. It would be as constructive as putting a bicycle through a roadworthiness test designed for a lorry & expecting this to provide the end user with an increase in safety.It is vitally important that the scope & regularity of maintenance procedures are appropriate to the type of aircraft in question. Clearly,		Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				the regulations as currently proposed are far beyond the scope of what is necessary for glider maintenance to the point of being meaningless bureacracy.The British Gliding Association is uniquely geared towards the needs of the gliding community in a way that neither the CAA or EASA is likely to ever be. I feel very strongly that EASA must continue to let the BGA continue it¡¦s work as the implementation of part M in it¡¦s current form would be such a heavy handed measure that there will be lasting & profoundly damaging effects on the UK gliding community.		Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
271	Michael Witton	General	M.A.302	To draw up individual maintenance programmes for every individual aircraft within the gliding community will provide no greater increase in safety & will only increase the levels of bureaucracy to no overall end. There is a system already in place that is implemented by the BGA very effectively by way of overseeing generic maintenance programmes that incorporate manufacturer¡¦s maintenance manuals & instructions such as Airworthiness Directives. This rule should be relaxed & if absolutely necessary replaced with a rule similar in context to FAR 43 13.		Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
272	Michael Witton	General	-	The Regulatory Impact Assessment did not adequately take into account the needs & concerns of the gliding community. The scope of the RIA was too limited & as a result did not even touch on many issues that are of significant importance to the gliding community		Reply to this is covered in the response text to your previous comment (270)	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
273	J Shipley	General	-	- Explanatory Note –- Part M as applicable to the commercial flying world seems to ignore the specific needs of gliding as it exists in terms of “fit for purpose” maintenance controls – as a BGA inspector my opinion is that the present BGA system and controls ensures a “fit for purpose” system in practice and application to ensure pilot and public safety dependant upon existing intrinsic BGA glider maintenance standards - “Don’t fix something that isn’t broke!” The only way for the BGA to meet external standards is to exceed them to avoid negative feedback and eventually restrictive sanctions. - Draft Decision - Appendices - dismissing already identified increased costs and staffing difficulties (identification of qualified people & their training) as insignificant is not seen as insignificant by those at the customer end either in the short term or in the long term stability. - General Comment(s) - the proposed ideas for glider maintenance through Part M standards and mechanisms as documented are inappropriate and will add costs to maintenance without any tangible benefits. Resourcing the competent person/authority to provide manuals and reports etc on every glider which are very simple aircraft, will be an unacceptable restriction on the sport in general and club training activities. MS302 - maintenance manual per aircraft MA901 - F & G organisations will add significant costs and inconvenience without any benefits to the present functional BGA system examining existing structure and standards for functionality and “fit for purpose” must be the way forward. Only seek change where deficiencies are found.	My participation in gliding and long term commitment to the sport - active for 43 years in gliding (3000hours P1) also past Club Technical Officer, Full Rated Instructor since 1981, and an instructor since 1974, BGA Inspector, BGA safety Chairman 1986-1991, member of BGA Instructors’ Committee 1986-1994 and 2000 - to-date and Regional Examiner since 2001 (Basic Instructor Coach since 1981)	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 “ A concept for better regulation on General Aviation”, which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
274	GJ Croll	Explanatory Note	-	IV A 9 The regulatory Impact Assessment has such a potentially wide and devastating effect on gliding that a representative sample of individual pilots should be consulted.	The capital tied up in gliders is substantially at risk due to the overwhelming impact that the proposed regulatory changes would have.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
275	D Haughton	Explanatory Note	-	IV Content of the draft opinion C) The rejected changes c) M.A.901 Aircraft airworthiness review EASA has rejected a Part M RIA consultation recommendation that "certifying persons" should be authorized to issue Airworthiness Review Certificates, on the grounds that the 'competent authority' should issue them. This will impose significant additional	Part M is suited to the maintenance of large aircraft. Gliders are robust and simple aircraft designed out of a long tradition of owner maintenance. Manufacturers are familiar with documenting maintenance steps that can be completed reliably by competent amateurs overseen where appropriate by qualified maintenance inspectors. Therefore the requirement to subject	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				costs. In addition the current system in the UK, which is the same as that recommended in the RIA consultation, is delivering proven results and the EASA is requested to evaluate what benefits the more onerous requirements proposed in Part M will bring. Application of Part M for maintenance in an uncontrolled environment will impose significant administrative burdens on the gliding community and is unnecessary when current systems for maintenance result in a demonstrably good safety record.	gliders to routine inspection on the same terms as larger and much more complex aircraft is not sustainable given the significant extra costs that would be incurred in doing so. National gliding associations could provide periodic reviews of airworthiness status in the capacity of an Airworthiness Management Organisation (subpart G organizations). The competence of gliding associations in Europe, such as the BGA, is demonstrated by the statistics on airworthiness related accidents. EASA is requested to review statistics on airworthiness related accidents for countries in which gliding organisations maintain their fleets under the delegation of the National Aviation Authority such as the existing UK gliding airworthiness system, which is formally approved by the CAA and assess what benefits Part M offers over the current system EASA should issue Acceptable Means of Compliance (AMC) material that simplifies the procedure for maintenance of gliders in an uncontrolled environment by virtue of the simplicity of the aircraft	out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
276	D Haughton	Explanatory Note	-	IV. Content of the draft opinion, A) The regulatory impact assessmentThe regulatory Impact Assessment excludes subparts A, B, C and D. The issues in subparts I to E that are covered by NPA-07_2005 do not adequately address many of the concerns that national gliding associations, glider owners and operators have over implementation of Part M.	Specific aspects of implementing Part M that will be onerous for the gliding movement while offering no benefits in safety, economic or social outcomes have been raised but are not addressed in NPA_07_2005. For example the requirement for subpart B paragraph MA302 (see separate NPA_07_2005_cmtform.doc) to be applied to gliders, given the existence of proven and successful equivalents currently in use, or the less onerous provisions of FAR 43.13 has not been addressed.EASA is requested to solicit the opinion of gliding associations, glider owners and operators address their concerns about the impact of Part M on the gliding movement.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
277	D Haughton	Explanatory Note	-	IV. Content of the draft opinion, A) The regulatory impact assessment The Regulatory Impact Assessment did not cover subpart B, which has particular impact on the activity of glider owners and operators. Specifically paragraph MA302 describes a requirement that "Every aircraft shall be maintained in accordance with a maintenance programme approved by the competent authority, periodically reviewed and amended accordingly." and that "The maintenance programme and any subsequent amendments shall be approved by the competent authority", with the maintenance programme establishing compliance with instructions issued by a multitude of organizations is inappropriate for gliders. EASA is requested to make an exemption to this requirement for gliders.	The success of current maintenance programmes administered by national gliding associations is evidence that the application of such a new requirement to gliders is not justified on safety or economic grounds Safety grounds National gliding movements maintain detailed records of accidents and incidents that will demonstrate the effectiveness of their current maintenance systems. EASA is requested to gather and collate statistics from representative gliding associations and demonstrate that the new system, or comparable systems in use elsewhere, will reduce the incidence of issues related to maintenance that compromise safety. Economic grounds Such a requirement would represent a very heavy administrative workload on glider owners and operators. The preparation of manuals for individual aircraft would be prohibitively expensive and would duplicate the work embodied in manufacturers' maintenance manuals. These manuals have long been used, in conjunction with instructions for continuing airworthiness, by national gliding associations in proven and effective maintenance programs. EASA is requested to justify the additional burden that subpart B MA302 would impose on the gliding movement and demonstrate that it would provide quantifiable benefits in terms of safety or other relevant considerations, over the current system based on manufacturers' maintenance manuals and instructions for continuing airworthiness. If an alternative to MA302 is required the	Additional to comments above: Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					US practices described in FAR 43.13 "Performance rules" offer a common sense and workable alternative that require appropriate "methods, techniques and practices" defined either by the manufacturer (in the manufacturers' maintenance manuals), using tools and equipment in accordance with industry practices or recommended by the manufacturer and using appropriate materials to be employed in glider maintenance. While is clear that this passes aspects of the control of maintenance programmes from the authority to the manufacturer (as noted in NPA_07_2005) EASA is requested to demonstrate why this would lead to reduced maintenance standards given the arguments made above for the success of maintenance programmes based on manufacturers' maintenance manuals.		
278	IGSA	Explanatory Note	M.A.901	c) MA 901 Aircraft airworthiness review paragraph f The proposal from the consultant to allow individuals to issue an ARC for small aircraft of 2730 kg MTOM or below has been rejected. We would ask EASA to reconsider their position because the proposed change would significantly decrease the financial burden placed on gliding by the application of Part M. For gliding, there would be no risk of a decrease in safety because gliders are very simple aircraft and because the gliding movement in Europe has demonstrated over many years their capacity to maintain their aircraft themselves	The current draft of Part M does not take into account the specifics of gliders which are the simplest aircraft (simpler for example than many microlights) and still requires them to be maintained in the same way as all other aircraft below 5, 7 tonnes MTOM. Most modern gliders are designed in such a way that they can generally be maintained for several years by performing only the simple operations of cleaning, lubricating, and polishing specified in the maintenance program of the manufacturer. Therefore there would be no safety risk in enabling individuals to issue the ARC or at least an ARC recommendation. The NAA could keep a proper safety oversight by requesting an external airworthiness review to be performed by a subpart G organization at suitable intervals (5 to 10 years).	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						7/2005.	
279	CAA Sweden	General	SUP	The Swedish Civil Aviation Authority wish to express its support for the proposed amendments.		Noted.	
280a	Anne Crowden	General	M.A.302	Part M / MA302 MA901 MA302 - The rules maintenance of British gliders should be relaxed. The current system controlled by the BGA under the control of the CAA is effective in terms of safety. Any changes should be more along USA lines similar to FAR 43 13. EASA should allow the BGA to become a Competant Authority for gliding in the UK thereby retaining the excellent systems currently in place.	MA302 - The accident rate for gliders as a result of maintenance is lower than for general aviation. The British Gliding Association's control with the approval of the CAA works very well and should not be complicated with unnecessary further legislation which will result in a huge work burden, increase bureacracy and costs and inevitably lead to a decline in participation in gliding for a section of the community.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
280b	Anne Crowden	General	M.A.901	Part M / MA302 MA901 MA901 - Part M should be simplified bearing in mind the simple construction ogf gliders. EASA should allow the BGA to become a Competant Authority for gliding in the UK thereby retaining the excellent systems currently in place.	MA901 - There is proven to be no additional risk with the current certification method which could be overseen with a 5 year check.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						7/2005. The status of BGA within the UK airworthiness structure is a matter for UK alone and not a responsibility of the Agency.	
281	KNVvL	General	PAR	Assuming that "personnel safety parachutes" are considered as operational components, we question if Part M applies or not. If EASA considers that Part M applies to "personnel safety parachutes", there is definitely a need for an adaptation of at least Subpart E and Subpart F of Part M. In accordance with Article 1 of commission regulation (EC) No 2042/2003, it is also suggested to specify in M.1 chapter that "Part M applies only to aircraft and components for installation thereto" and to add that "personnel safety parachutes are not considered as aircraft".	On the one hand, Article 1 of commission regulation (EC) No 2042/2003 states that "Part M applies only to aircraft and components for installation thereto". "personnel safety parachutes" include "emergency parachutes", usually worn by pilots and passengers, and "reserve parachutes", usually worn by parachutists. So, "personnel safety parachutes" are not components "installed there to" (an aircraft) but personnel components that are worn by human beings in an aircraft. The "personnel safety parachutes" do not form an intergral part during the construction and/or maintainance of the aircraft. The "personnel safety parachutes" are not stored on the aircraft. Following this logic, Part M does not apply to "personnel safety parachutes". On the other hand, any "personnel safety parachute" manufacturer may ask EASA for a CS-ETSO certification (CS-ETSO c23d). In this case, it seems that Part M could apply "personnel safety parachutes". Indeed, as far as "personnel safety	Noted Refer to answer made to comment 21 from FFP. Currently the airworthiness and maintenance aspects have not been defined, however once the safety parachutes are definitely considered to be affected by Part-M, subpart E and F of Part-M will be modified accordingly. The paragraph M.1 of Part-M is limited to the definition of the competent authority.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					parachutes" are concerned, there are potential contradictions and multiple interpretations of Part M scope. If EASA considers that Part M applies to "personnel safety parachutes", here are a few examples of issues that can be further discussed : 1/ paragraphs (a) and (b) of M.A.501 and paragraph (b) of M.A. 502 : If these paragraphs apply, these paragraphs should be adapted to "personnel safety parachutes" since they do not "fit in an aircraft" but are "worn by human beings". 2/ paragraph (d) of M.A.501 : If it applies, this paragraph may have a significant economical impact on parachute activity since this provision is not at all commensurate to parachute business and maintenance means. For instance, a safety parachute includes consumable rubber bands that cannot reasonably be "traceable". 3/ paragraph (a) of M.A.502 : If it applies, this paragraph may have a significant economical and financial impact on parachute activity. Indeed, the maintenance organisation required in Subpart F does not seem to be commensurate to the most usual type of maintenance performed on personnel safety parachutes : "repacking". This maintenance task includes : personnel safety parachute opening, visual inspection, safety canopy folding and safety parachute packing.		

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					In Europe, this maintenance task is usually performed by a qualified packer on a year basis, it takes only a few hours and does not need any formal “organisation”. A clean room and a qualified packer is usually quite enough. Annex 2 of regulation (EC) No 1592/2002 In accordance with Article 1 of commission regulation (EC) No 2042/2003, it is suggested to specify in M.1 chapter that “Part M applies only to aircraft and components for installation thereto” and to add that “personnel safety parachutes are not considered as aircraft”. As far as “personnel safety parachutes” are concerned, there is a potential contradiction and multiple interpretation of Part M scope. - personnel safety parachute” includes “emergency parachutes” for pilots and passengers and “reserve parachutes” for parachutists. Indeed, on one hand, the definition of “aircraft” in Article 2 of commission regulation (EC) No 2042/2003 applies to any personnel safety parachute since emergency parachutes (for pilots) and reserve parachutes (for parachutists) can both “derive support in the atmosphere from the reactions of the air. In this case, Annex 2 of regulation (EC) No 1592/2002 definitely puts them out of EASA scope since there are “aircraft with a total mass without pilot of less than 70 kg”.		

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
282	A Crowden	General	-	The proposed changes to the maintenance and airworthiness control of gliders should be amended to take into consideration the simple construction of a glider and the successful operation of the current UK system over many years. Changes should be abandoned or toned down to take into account that the UK safety record is as good as any country that currently has state control. Control could be regularised according to EASA requirements by making the British Gliding Association a Competent Authority for gliding in the UK alongside the CAA.	The changes proposed would increase the costs of participating in gliding putting it out of reach of many current and future pilots and negating the good work the BGA is doing to increase participation. Toning down the requirements nearer to the current UK system would in no way compromise safety as is shown by comparing current accident figures. The current system has served the UK very well for over 50 years and consideration should be given that gliders are simple aircraft capable of being efficiently maintained and controlled in a different manner to that used in general aviation.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
283	RF Whittaker	General	-	- Explanatory Note- The RIA did not fully cover all the concerns of the gliding clubs on the implementation of part M. I would recommend that EASA forms a working group to discuss the concerns of the gliding movement with regard to part M.- Draft Decision- MA302- Part M requires individual maintenance programs to be drawn up for each glider at great expense. Why not use a similar system to FAR 43 13 as used in the USA.-There is no proof that a change to a very bureaucratic and expensive system would improve safety.- I would recommend using a similar system to the USA.MA901Has replaced the BGA as certifying authority with CAA.There is no proof that in other European countries, where the State has control over airworthiness of gliders, that the safety record is any better than that of the BGA.Gliders are simple structures and do not need the maintenance system as large and complex aircraft structures.- Appendices- General Comment(s) The BGA has managed British gliding safety for many years in a professional manner. EASA should work with the BGA to continue the management of glider flight safety.		Noted.(Several issues noted or partially accepted)Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's..As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will	See revised M.A.302 and M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						be put in one maintenance programme shall be developed in an amendment to the AMC.Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a seperate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Reissuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	
284	EEATA	Draft Opinion	Appendix I	Proposed text: For the aircraft and aviation components, manufactured or maintained by relevant manufacturers or service providers in the third countries, certified by their national rules, the following documents are temporarily considered as equivalent to EASA Form 1: - Manufacturer's Formulae for airframe, engines and APU - Manufacturers Component Passport (Label) for components. The term of applicability is determined by the EASA approved date of operation of the aircraft concerned by EU operators. Comment: The EEATA expert groups have compared the contest of these		Not accepted In order to accept the proposal the maintenance standards of those third countries need to be deemed as equivalent to the EU standards. If such equivalence has not been demonstrated, the proper way to proceed is through the appropriate Basic Regulation Article 10 exemptions and the establishment of the appropriate compensating measures.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				documents and found that these above mentioned documents contain more technical information than EASA Form 1. and can provide required technical and safety level. This conclusion has been done on the basis of EEATA experts' analysis, done together with involved maintenance service providers, designers and manufacturers.			
285a	Danish Soaring Association	Explanatory Note	-	The regulatory impact assessment # 8 The Danish gliding community has great concerns about Part M, and DSvU would like to propose a task force to be formed, in order to have clarified the areas where gliding is altered by Part M.	The decision made by EASA, that only subparts E-I should be assessed, has restricted the aim of the RIA.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
285b	Danish Soaring Association	Draft Opinion	M.A.901	As things works in the glider environment in many member states to-day, renewal of airworthiness certificate is quite a simple task. As the glider community has managed to take care of maintenance and airworthiness for decades without any other interference from CAA's than supervision, we urgently ask EASA to find a solution for us to continue in a similar manner.	Renewal of an ARC could for gliders and motor gliders very well be done by authorisation of a staff of controllers inside the gliding movement. We should urgently ask EASA to find a solution for especially the glider community to continue with the ongoing practice regarding ARC's.	Refer to comment answer 285a	
285b	Danish Soaring Association	Explanatory Note	M.A.901	DSvU asks EASA to review if the rejection of a proposal from the RIA consultant to allow individuals to issue an ARC for especially gliders and motor gliders are well considered.	In our opinion Part M does not take into account, that gliders and motor gliders are of a very uncomplicated construction with no fancy technique like many other aircrafts. In fact gliderpilots are more comfortable with having their glider maintained and released in a glider environment as it is performed to day, as they know that issuing an ARC is done by an approved organisation with essential knowledge to gliders, their construction and how they should be maintained.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005. The status of DSvU within the Danish airworthiness structure is a	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						matter for Denmark alone and not a responsibility of the Agency.	
285d	Danish Soaring Association	Draft Opinion	M.A.901	We have almost every task regarding maintenance of gliders delegated from our CAA, which we are aware of is the same situation in many member states. Looking at the accident records form decades, there is no sign or evidence that this is not done in a proper way. People in the gliding movement takes care of each other, and any repair and the following inspection is carried out carefully.	Maintenance of gliders is normally done by owners or club members in accordance to the manufacturer's maintenance manual and under supervision of an appropriate member of the club. Major repairs and annual maintenance is done under supervision of an appropriate member, and is inspected by a controller, who is entitled to sign for release to service or renew CofA. This has worked out for many years, and no severe accident seems to have been initialized during poor maintenance or control. This is the situation in several member states, and nobody has ever attacked this way of taking care of maintenance, which EASA should take in consideration.	Refer to response to comment 285a	
285e	Danish Soaring Association	Draft Opinion	M.A.302	Having drawn up a maintenance program for each individual aircraft seems to be an over kill and unnecessary use of work. For many years maintenance of gliders is described in maintenance manuals issued by the manufacturer. Following this context should secure the proper maintenance of the individual glider.	We have seen no evidence so far, that maintenance of gliders has not been done in a proper way. Accidents caused by poor maintenance have to our knowledge never occurred. As maintenance has to be done in accordance with manufacturer's manuals or AD's, there is no need for individual maintenance programs for each aircraft of non complex types as gliders and motorgliders.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						AMC M.A. 302 has created confusion and has been reviewed.	
286	Finnish Aeronautical Association	General	-	Light aviation like gliders and motor gliders must be excluded from PART M. We do not accept it as it is now. Part M is still a major threat for our sports because it will certainly increase the paperwork and the cost of the maintenance of our fleets without any significant effect to real safety.		Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
287	CAA Finland	Draft Opinion	Appendix VIII	Propose to re-structure Appendix VIII by - moving contents of item 41 (minor scheduled maintenance) into general description in the beginning - grading allowable scheduled maintenance for different categories of aircraft - describing other allowed tasks in a general sense by comparison to minor scheduled maintenance - making the numbered list of items a list of examples, not trying to list all possible tasks - deleting item 41. For proposed text please refer to enclosure. Other comments: - Item 31. The text in parenthesis "(excluding those of automatic flight control systems, transponders, and microwave frequency distance measuring equipment (DME))", while considered necessary in item 30, is believed not to be necessary here. - Item 40. The word "tabulator" should probably be "turbulator".	The aircraft categories for which limited pilot-owner maintenance would be allowed differ much in complexity. They also differ by complexity of required maintenance. A sample of maintenance instructions for different aircraft categories has revealed that the content of an annual inspection of a sailplane can be very simple when compared with a 50 hours inspection of a helicopter. To achieve a balance, grading the allowed scheduled maintenance tasks for different aircraft categories is proposed. An attempt to list all allowed specific maintenance tasks for all aircraft categories with different complexity under one title is an ambitious goal. By means of restructuring the appendix the legislator could be released from updating the long list of specific tasks.	Noted. Revision of Appendix VIII will be performed by Working Group M.005.	
288	CAA Finland	Draft Opinion	M.A.712 (f)	In M.A.712 (f) "commercial activity" is proposed to be superseded by "activities specified in M.A.201 (i)".	The phrase "commercial activity" is not defined.	Accepted. See proposed text.	See revised M.A.712
289	CAA Finland	Draft Opinion	M.A.801 (c) and (c) 1	In M.A.801 (c) it is proposed to end of sentence at "provided there is no organisation appropriately approved under this Part at that location." and remove the text ~~and the contracted organisation obtains and holds on file evidence of the experience and the licence of that person.~~ The text of M.A.801 (c) 1 is proposed to read: "1. obtain and hold in the aircraft records details of all the work carried out and evidence of the experience and the licence held by that person issuing the	It would be more logical that the person who authorizes a person to issue CRS holds the evidence of the experience and shall notify the competent authority or contracted CAMO with these details.	Partially accepted. The rule should allow Part-145 organisations to also be acceptable that the text proposed by the commentator does not do.	See revised M.A.801

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				certification, and"			
28a	P.J. Galloway	General	M.A.302	Explanatory Note The Regulatory Impact Assessment has failed to address the concerns raised by the Gliding Community relating to the application of Part M. The RIA addressed only subparts E to I that had been selected by the EASA. Additionally, the questions raised by the RIA addressed very few of the concerns identified by the Gliding Community. Recommendation: The EASA should set up a working group to properly address the issues within Part M that have been identified and raised by the Gliding movement.		Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Subsequently, Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's Re- MA302 . As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005. The status of the BGA within the UK airworthiness structure is a matter for UK alone and not a responsibility of the Agency.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
290	ECOGAS	General	-	ECOGAS generally supports all of the specific amendments outlined in this NPA. However the NPA format does not easily allow for a more general expression of concern relating to those recommendations from Air Eurosafe that the Agency did not carry forward to NPA. Indeed ECOGAS believes that even the Air Eurosafe report did not significantly distinguish between the flexible light touch requirements necessary for the maintenance of small non-commercial aircraft. We feel that Part M, in its entirety, still reflects a large industry/airline bias rather than that appropriate to the small and medium size enterprises (SMEs) that dominate the General Aviation sector. This is not in accordance with the EU Charter of Small Business nor the present European initiative “think small first”. ECOGAS recognizes that Part M, in common with the other maintenance related regulations, was generally adopted from previous JAA publications. We would therefore hope that as a matter of urgency the Agency will consider a more fundamental review of Part M as it affects the SMEs of Europe. This wider review, not simply a regulatory impact assessment, should seek to radically reshape Part M to ensure far better flexibility for SMEs. ECOGAS will be pleased to join any Working Group proposed by the Agency to examine this possibility.	EU Charter for small business	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 “ A concept for better regulation on General Aviation”, which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
291	Graham Thompson	General	-	2. The British Gliding Association regulates all aspects of gliding with no state involvement other than where gliding reacts with other airspace users. It has done this for more than half a century. CAA scrutiny has invariably been satisfied by the BGA performance. The proposal under Part M means that the	EASA should take note of the exemplary record and seek to facilitate the continued development of the BGA rather than subject it to costly and onerous regulations that offer no improvement in the safety or pleasure of gliding	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 “ A concept for better regulation on General Aviation”, which was	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				BGA would have to become the Competent Authority in the UK to continue to control gliding. Unfortunately the CAA is designated as THE competent authority by the UK Dept. of Transport which is unlikely to grant this privilege to the BGA as well.		charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA'sCompetent Authority status can only be conferred on an organisation by it own National Airworthiness Authority. In UK this is a matter for the UK Civil Aviation Authority	
292	Graham Thompson	General	M.A.901	EASA has rejected the proposal in the RAI that an ARC should be issued by a Certifying Person, effectively what happens now in the UK, and demanded that the ARC be issued by a` Competent Authority.' Ie. The State. No improvements in safety will result from this demand. Only increased costs and administration workload. The proposals seem to take no account of the fact that glider are simple in design and construction with much less chance of something going wrong than in more sophisticated aircraft. Perhaps simpler and		Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				less sophisticated proposals would be more appropriate for gliders. Meanwhile the statistics speak for themselves.		authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	
293	Graham Thompson	General	M.A.302	Part M proposes a maintenance programme that will result in unnecessary excessive costs and bureaucracy for the gliding community. The present system where maintenance programmes are overseen by the appropriate national bodies incorporating manufacturers manuals and instructions is proven and effective	It is recommended that EASA should relax this rule for gliders. If more bureaucracy is felt necessary FAR 43 13 may provide a suitable guidline	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
294	Peter Häberli	General	SUP	We herewith declare our full agreement with your proposal concerning NPA-07 2005 and declare your position as being our own.		Noted.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
295	Douglas Gardner	Draft Opinion	M.A.302	MA302 This paragraph, if implemented for gliders, would be wholly unacceptable to the gliding fraternity. The requirement that a maintenance programme be prepared for each aircraft and approved by the competent authority would result in a huge additional workload and expense for glider owners and the British Gliding Association. The latter already has an excellent and proven system of supervising the regular maintenance of gliders in accordance with each manufacturer's maintenance manuals and with subsequent directives if modifications are required to ensure airworthiness. There should be an exception from this proposal for gliders to enable the existing maintenance system to continue.	The avoidance of unnecessary bureaucracy and expense.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
296	Douglas Gardner	Draft Opinion	M.A.901	EASA should provide for alternative Acceptable Means of Compliance for GLIDERS similar to those that already exist in the UK, as was recommended by the Part M Regulatory Impact Assessment consultation.	The existing system operating in the UK is that airworthiness certificates are issued by competent persons specialising in the maintenance of gliders and authorised by the British Gliding Association as delegated by the national aviation authority. This system has worked perfectly satisfactorily for very many years (as have similar systems elsewhere in Europe). It achieves a high standard of maintenance at a relatively low financial and administrative cost. To now require that airworthiness certificates for gliders should be issued by the state would be a retrograde step. It would replace an extremely inexpensive and effective system with an overly bureaucratic and costly one that would not be appropriate to an amateur non-commercial form of aviation such as gliding. Indeed it might well result in a lesser level of safety than the high level achieved under the present system. Please reconsider.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005. The status of BGA within the UK airworthiness structure is a matter for UK alone and not a	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						responsibility of the Agency.	
297	Douglas Gardner	Explanatory Note	-	EASA should arrange for a group to consult further with the GLIDING movement and address the substantial concerns that the gliding fraternity still has over various aspects of Part M	The Regulatory Impact Assessment only considered the impact of subparts E to I and not the severe impact in terms of increased cost and bureaucracy (and possible reduction in safety) that the application of other aspects Part M will have on the GLIDING movement	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
298	Jukka Helminen	Draft Opinion	M.A.302	M.A.302 Maintenance programme Every aircraft shall be maintened in accordance with manufacturer issued programme or if not aplicable using generic programme acceptable to National authority	This system has been in use since 1960´s in most countries. It has been good and suffucient way to full fill the requirements.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
299	Jukka Helminen	Draft Opinion	Appendix VIII	Appendix XIII Limited pilot owner maintenance, 41 Minor scheduled maintenance requirem. 50 hours/6 months .. except gliders 100 hours/6 months	Glider season 4-6 months in Europa. Two seaters are flying a lot in short time and arrangements of maintenance during the season could be done only by pilot owners	Noted. Revision of Appendix VIII will be performed by Working Group M.005.	
300	Jukka Helminen	General	-	NPA-07-2005 Part M is not acceptable for soaring	Part M is suitable only for commercial passanger and freight operation. Soaring is well organized by volunteers and flying clubs. National aviation authorities are not ready in two years to organize the systems. Atleast 5 years postponing is needed.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
301	GR Nunan	General	-	EASA should develop a system that allows for an identical or similar system of certification of gliders that is used in the UK today to continue.	The statistics speak for themselves! The system for glider airworthiness certification that is used in the UK today has been shown to be both safety effective and cost effective. To change the system would not only increase the cost and administrative burden but would likely have no increase in safety or even, possibly, a negative impact upon safety. EASA should be very careful about making changes that may negatively affect the historically extremely safe and effective system of glider airworthiness certification that has been developed over decades.	Noted. See reply to your comment 302 below.	
302	GR Nunan	Explanatory Note	-	EASA should set up a review of Part M to consider the legitimate concerns of the gliding community which will be adversely affected by the application of the proposed Part M.	The RIA was restricted to considering just sub-parts E to I of Part M. Also the questions raised by the RIA did not fully represent the concerns of the gliding community. Therefore a large number of legitimate concerns of the gliding community were not considered.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest,	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
303	GR Nunan	Draft Opinion	M.A.302	M.A.302 The requirement for individual maintenance programmes should be removed for gliders and replaced with something like FAR 43 13 which works very well in the United States.	The proposed requirement for individual aircraft maintenance programmes is completely inapplicable to gliders and would impose a heavy financial and administrative burden on glider owners without any safety benefits whatsoever.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
304	GR Nunan	Draft Opinion	M.A.901	M.A.901 The AMC material as applicable to gliders should be simplified or a simpler version of Part M for gliders developed.	The initial consultation recommended that ARCs should be issued by a certifying person. This would be similar to the system used for gliders in the UK at the moment which has proved to be very effective in terms of safety, cost and bureaucracy. The current certifying individuals are often experienced glider pilots who have an intimate knowledge of the gliders that they certify which is likely to be safer than an overall competent body dealing with all types of aircraft. The individuals are also more likely to have a vested interest in keeping the gliders safe since they will fly similar or the same gliders themselves. The gliding community has the experience gained over many decades of safe practices and these can be statistically seen to be effective. Gliders are also inherently simpler with less to go wrong than other aircraft and procedures recommended by the glider manufacturer have proved to be entirely safe, adequate and cost effective.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901
305	Keith Green	General	-	Explanatory Note 1A. I am a glider pilot and do not understand how RIA will impact on me (and my sport). I fear such an impact will be adverse to my, and the gliding movements) best interest and as such find this proposed situation unsatisfactory. Recommendation: Please advise a suitable working group to address gliding issues. Relating to: MA302: Bureaucracy gone wild, there is no need in the gliding community for such swinging maintenance regimes they will not add to safety which is the ONLY real concern. Recommendation: Abandon this rule, or at		Noted. (Several issues noted or partially accepted) Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial,	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				least reduce it, for gliders. Relating to MA901: See above (MA302). Recommendation: Simple system required, similar to existing British BGA system, which has worked well, at low cost, for many years. General comment: The British Gliding Association has for a great number of years effectively safely run gliding in the UK, free from excessive bureaucracy (to the benefit of all). I believe that currently the CAA now take responsibility for gliding activities and fear bureaucracy will stifle the gliding movement. Recommendation: I would like to see EASA promote a process whereby the UK BGA model for the management of airworthiness issues is adopted, rather than quashed.		non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's.. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a seperate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	
306	P Cox	General	-	The regulatory Impact Assessment has such a potentially wide and devastating effect on gliding that a representative sample of individual pilots should be consulted.	The capital tied up in gliders is substantially at risk due to the overwhelming impact that the proposed regulatory changes would have. This may cause a significant movement out of the sport.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
307	JF Goudie	Draft Opinion	M.A.901	The Part M Regulatory Impact Assessment that the ARC should be issued by a certifying person as is now effective in the UK was rejected in favour of another layer of bureaucracy 'the competent authority' in other words the State	The increased administration costs will be significant. The existing BGA method approved by the CAA which has worked for many years and the statistics prove this. An appropriate AMC or a much simpler version of part M should be applied to gliders.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901
308	A Sanderson	General	-	There is no history suggesting that the regime for continuing airworthiness of gliders in the UK, currently delegated by the CAA to the BGA, is anything other than extremely successful in all aspects. The proposed changes to the regime would cause glider pilots unnecessary and wholly disproportionate costs for compliance. Attempts to over-regulate a successful and effective self-regulation (and safety driven) scheme should be regarded as oppressive and as a clear example of maladministration.	Twofold: Firstly, in its attempts to create a coherent safety policy, EASA should not attempt to destroy successful working relationships, nor destroy (or make prohibitively expensive) sport aviation in general. Secondly, EASA should be aware of the effect upon its own reputation (and that of the European ideal in general), should this proposal be passed into law without appropriate exemptions or alternative arrangements, such as for sporting glider owners. Furthermore, the BGA should remain responsible for the maintenance of gliders, as it is the only competent authority.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest,	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
309	Martyn Davies	Explanatory Note	-	IV. A) 8That all subparts of Part M need to be considered in the RIA, in order to address all the issues that affect the gliding community. (I note that only subparts E to I were considered.) That these outstanding sections should be discussed by an EASA sub committee convened for that purpose. The terms of reference of the sub committee should ensure that these remaining issues are thoroughly examined.	The Regulatory Impact Assessment does not adequately cover all the (concerns) submissions that have been made previously by the British Gliding Association on behalf of gliding in the United Kingdom together with submissions made from further afield.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
310	Martyn Davies	Draft Opinion	M.A.302	MA302 The existing draft legislation is unnecessarily bureaucratic and must result in substantial cost increases for glider pilots. For instance, the need to write thousands of maintenance manuals, one for every glider, will be extremely costly and very time consuming. An acceptable model for simplicity and for the control of these matters can be found in FAR 43 13 in the USA. This document together with the existing arrangements for gliding in Europe should be carefully scrutinised by EASA before proceeding further with its own proposals.	EASA's proposals will not enhance safety and as result, the proposed changes are unnecessary.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
311	Martyn Davies	Draft Opinion	M.A.901	Part M does not take sufficient account of the technical simplicity for gliders. Because of this the complex servicing requirements that govern commercial aircraft maintenance (as proposed by EASA) are quite inappropriate for gliders.	The existing procedure whereby the British Gliding Association (BGA) is authorised by the CAA to grant gliding airworthiness certificates has been conspicuously successful since 1948. The safety statistics (since 1987) previously submitted by the BGA to the EASA Rulemaking Director make this abundantly clear. Indeed, there is a fear that the historic safety levels in the UK will be at	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					risk in the future due to the EASA proposals.	Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	
312	Martyn Davies	General	-	I request that the BGA be granted "Competent Authority" status in the United Kingdom (UK) in order that the BGA can continue to manage airworthiness matters for gliding (in the UK) under the auspices of EASA.	The British Gliding Association (BGA) has been authorised by the Civil Aviation Authority (CAA) to manage all gliding matters in United Kingdom since 1948. The BGA has established all the necessary skills and services over those many years. The BGA's management of all the requirements for gliding in the UK have satisfied the CAA's technical and procedural criteria throughout that period.	Further to the reply to your comment 309:Competent Authority status can only be designated by a Member State	
313	Derrick Sandford	Explanatory Note	-	Paragraph 8 The need does not exist, in gliding, for the additional administration that individual maintenance programmes will entail. Introducing them will not improve safety, but will lead to the costs of producing and monitoring the thousands of individual manuals, being passed on to individual owners. There is absolutely nothing wrong with the current system whereby national associations maintain technical oversight of generic maintenance programmes, which incorporate manufacturers maintenance manuals, technical bulletins and Airworthiness Directives. The current system is effective and proven.		Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
314	Derrick Sandford	General	-	The BGA is fully capable of ensuring air safety. This is demonstrated by accident/incident statistics for the UK, which compare favourably with countries where more stringent state regulation has been imposed and are, in some cases, better. If the BGA is required to become a continuing airworthiness management organisation under sub part G, there will be a significant cost burden associated with this, but there will very likely be no increase in safety, based on historical data.		Previous reply to your comment 313 covers this point.	
315	Derrick Sandford	Explanatory Note	-	Part M takes no account of the relative simplicity of glider construction and design, which allows maintenance to be carried out according to the manufacturer's maintenance programmes. If individual glider inspectors are permitted to make an ARC recommendation to the approved certifying person there is no increased risk in comparison with what has been proposed in NPA 07 2005. Provided that the BGA is permitted to become an Airworthiness Management Organisation under Sub Part G, as it seeks to do, safety oversight could be assured by		Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				means of an External Airworthiness Review carried out by the BGA on a 5 yearly basis. Although the UK gliding fleet is not currently regulated by the State, it is in effect maintained in the same manner and to the same standards as other European states. The UK CAA has formally approved the existing glider airworthiness system, under which all necessary procedures and safeguards are provided. The scant statistics in respect of airworthiness related accidents bear witness to the effectiveness of the existing system. If gliding is forced to comply with Part M, EASA will be imposing inappropriate maintenance solutions, which are intended for large, complex aircraft and only make sense for these types. Further, the gliding community is concerned that Part M would provide an inferior level of safety, in comparison to the existing system, for a higher cost.		ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	
316	GSJ Bambrook#	Explanatory Note	M.A.302	Paragraph 8 By choosing to only carry out a limited RIA, EASA has failed to consider the impact of some requirements, which will prove extremely onerous for the gliding community. There is a clear need for a working group to be set up to identify and address issues which are of particular concern to gliding. I am particularly concerned that the impact of MA302 in Sub Part C : Continuing Airworthiness, has not been given consideration in the RIA. The requirement contained therein, that a maintenance programme be drawn up for each individual aircraft, will impose a	By failing to carry out a complete and thorough RIA, EASA is going to produce bad regulation, which will harm the viability of the activities it seeks to regulate, without necessarily realising any safety benefits. The need does not exist, in gliding, for the additional administration that individual maintenance programmes will entail. Introducing them will not improve safety, but will lead to the costs of producing and monitoring the thousands of individual manuals, being passed on to individual owners.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				totally unacceptable burden on the gliding community and is completely inappropriate and ill conceived. Does EASA believe that gliding has been invented yesterday and that decades of accumulated maintenance experience do not exist? The USA works to FAR 43 13, which provides a far more suitable procedure model that will avoid the expense and bureaucracy which would follow from MA302.	There is absolutely nothing wrong with the current system whereby national associations maintain technical oversight of generic maintenance programmes, which incorporate manufacturers maintenance manuals, technical bulletins and Airworthiness Directives. The current system is effective and proven.	AMC M.A. 302 has created confusion and has been reviewed.	
317	Peter Thomas	Explanatory Note	-	Regulatory Impact AssessmentI believe that it is necessary for EASA to set up a working group to deal properly with the whole range of concerns of the Gliding community	Part M has the potential to seriously damage gliding within the United kingdom by dismantling the existing maintenance arrangements, with no guarantee that new system will be present or have sufficient capacity or expertise. I do not believe the RIA reflected the seriousness of these views expressed by the gliding community.The RIA did not have all sections of part M inside its scope and it did not adequately reflect the seriousness of the concerns of the gliding community in the questions it raised.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						airworthiness regulation lies with the individual NAA's	
318	Peter Thomas	Draft Opinion	M.A.302	Relating to requirements for individual maintenance manual I feel it is wholly inappropriate to require the preparation of a maintenance manual for individual gliders This rule should be relaxed for gliders to allow maintenance to be based on the Manufactures manual requirements or similar arrangements dealt with by the competent person carrying out the maintenance (for example, using an EASA or national body checklist for older types	Gliders are in general approved types under Previous EASA rules. It is wholly inappropriate to multiple manuals to be produced a single type, which will inevitably differ from aircraft to aircraft especially where multiple competent bodies are involved. Gliders are the simplest aircraft and almost all maintenance activities are generic.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302
319	E Norman	General	-	Explanatory Note Your RIA on part M and gliding has been restricted and does not cover many concerns of glider operators. I would recommend that you consider a working group to discuss our concerns fully. MA302 The idea that we draw up a different servicing schedule for each glider instead of using a standard one such as FAR 43 13 will lead to excessive bureaucracy and massive costs. Our current safety record more than supports our current simple inexpensive procedures. I can just see the job creation and costs of your ideas as being excessive.	In general all the suggested procedures are a direct transfer from the commercial air transport industry with no supporting safety case being made for the suggested massive increase in bureaucracy and costs when applied to what are essentially very simple aircraft (from a maintenance viewpoint). You must have heard of using a sledgehammer to crack a nut, I would suggest that is what you are doing.	Noted. (Several issues noted or partially accepted) Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a	See revised M.A.302 and M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				MA901 In the UK we have the position that the inspecting engineer you have decided that the CAA should issue the ARC this will increase costs dramatically for no proven gain in safety. You have completely ignored the simplicity of glider construction. The BGA should be allowed to continue with is well proven system		Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's.. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
						Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	
320	R Boyd	General	-	I am concerned about the effect of including gliders in the regulations proposed in Part M and linked Parts 66, 145 and 147. It is clear to me that these regulations are designed for large commercial airliners carrying fare paying passengers, operating for large organisations with significant maintenance facilities involving millions of pounds worth of equipment. It is obvious to me that to apply the same rules to simple aircraft such as gliders operated mostly by private individuals or small 'self help' amateur clubs. Glider maintenance in the UK is again mostly done by inspectors, such as myself, approved by the British Gliding Association. Again, we operate as unpaid individuals, often in small workshops or at home in suitable garage accomodation. The effect of over regulation will clearly not improve sfaety, which under the BGA has been excellent for well over 40 years. Most glider incidents are pilot induced, and not due to poor maintenance. Excessive regulation may even reduce safety due to unnecessarily complicated and hard to understand rules. I propose that for the UK, the BGA be the	The BGA has developed over a period of more than 40 years a very effective set of rules and guidance material to enable the efficient and affordable maintenance and repair of gliders, including those of wood, metal and composite structures. The BGA has a very large and accessible library of maintenance directives, along with recommendations for every conceivable item of work, modification or repair. This has been continually maintained and updated. The very high qualifications listed in the EASA documentation are not appropriate for gliders. I have an honours degree in Aeronautical Engineering and Design, and have worked in the UK aerospace industry for over 30 years. In my 11 years as a BGA inspector I have very rarely had to call upon my professional knowledge of aeronautical matters. The most significant requirement for a BGA inspector is practical experience and honesty. No new inspector is certified without the recommendation of at least two other Inspectors who have personal knowledge of the applicants experience. An important premise is that if a problem arises of which an inspector has no experience, then the BGA team will provide appropriate advice. The addition of a greater workload to cover extra paperwork will undoubtedly	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's. Competent	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				regulatory body for maintenance of gliders.	discourage volunteers such as myself. It is also likely that several of the professional glider repairers will be forced out of business, due to rising costs and the inability of private owners to afford the costs of annual inspections. The British gliding movement will be reduced to only the very rich, and more than half of clubs in the UK will be unable to continue in operation. The BGA has shown itself to be an extremely effective control of the British gliding movement. The BGA should be decared as the regulatory authority for the UK.	Authority status can only be designated by a Member State.	
321	Jo Oosterveer	General	PAR	Potentially Subpart E and Subpart F of Part M at least. Assuming that “Personnel safety parachutes” are considered as operational components, we wonder whether Part M applies or not. If EASA considers that Part M applies to “Personnel safety parachutes”, there is definitely a need for an adaptation of at least Subpart E and Subpart F of Part M.	On the one hand, Article 1 of commission regulation (EC) No 2042/2003 states that “Part M applies only to aircraft and components for installation thereto”. “Personnel safety parachutes” include “emergency parachutes”, usually worn by pilots, and “reserve parachutes”, usually worn by parachutists. So, “Personnel safety parachutes” are not components “installed there to” (an aircraft) but personnel components that are worn by human beings in an aircraft. In this case, it seems that Part M does not apply to “Personnel safety parachutes”. On the other hand, any “personnel safety parachute” manufacturer may ask EASA for a CS-ETSO certification (CS-ETSO c23d). In this case, it seems that Part M applies to “Personnel safety parachutes”. Indeed, as far as “personnel safety parachutes” are concerned, there are	Noted Refer to answer made to comment 281 from KNVvL	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					potential contradictions and multiple interpretations of Part M scope. If EASA considers that Part M applies to "personnel safety parachutes", here are a few examples of issues that can be further discussed: 1/ paragraphs (a) and (b) of M.A.501 and paragraph (b) of M.A. 502 : If they apply, these paragraphs should be adapted to "personnel safety parachutes" since they do not "fit in an aircraft" but are "worn by human beings". 2/ paragraph (d) of M.A.501 : If it applies, this paragraph may have a significant economical impact on parachute activity since this provision is not at all commensurate to parachute business and maintenance means. For instance, a safety parachute includes consumable rubber bands that cannot reasonably be "traceable". 3/ paragraph (a) of M.A.502 : If it applies, this paragraph may have a significant economical impact on parachute activity. Indeed, the maintenance organisation required in Subpart F does not seem to be commensurate to the most usual type of maintenance performed on personnel safety parachutes : "repacking". This maintenance task includes : personnel safety parachute opening, visual inspection, safety canopy folding and safety parachute packing. In Europe, this maintenance task is usually		

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					performed by a qualified packer on a year basis, it takes only a few hours and does not need any formal “organisation”. A clean room and a qualified packer is usually quite enough.		
322	Jo Oosterveer	General	PAR	In EASA rules EC N° 1592/2002 Basic rules article 4 Paragraph 1 and paragraph 2 Annex II also specifies that aircraft lighter than 70 kilos including all components are outside the application field Text 2042/2003 Article 1 paragraph 2 in reference to Annex II of basic rules (1592) shows that this text does not apply to aircraft lighter than 70 kilos, therefore also includes parachutes. We ask to modify annex II from rules 1592 paragraph 2: “ aircraft with a total mass without pilot of less than 70 kilos” into “ aircraft with a total mass without pilot of less than 70 kilos except personnel and safety parachutes “ Let’s add and create this item i : The personnel safety parachutes will be the object of a specific reglementation	This will be according to our aim to set up harmonized European maintenance technical recommendations for personnel safety parachutes. These recommendations may become a maintenance European minimum technical standard applicable to “approved personnel safety parachutes”. “Approved personnel safety parachutes” include ETSO certified parachutes. Harmonized European maintenance technical recommendations will be in order to guarantee safety and public protection.	Noted. Refer to answer made to comment 21 from FFP.	
323	Jo Oosterveer	General	PAR	In EASA rules EC N° 1592/2002Basic rules article 4Paragraph 1 and paragraph 2Annex II also specifies that arcraft lighter than 70 kilos including all components are outside the application fieldAbout the 1702/2003We are asking, in accordance with paragraph i from annex II of rule 1592, that will be created a subpart “parachutes”	This will be according to our aim to set up harmonized European maintenance technical recommendations for personnel safety parachutes. These recommendations may become a maintenance European minimum technical standard applicable to “approved personnel safety parachutes”.“Approved personnel safety parachutes” include ETSO certified parachutes.Harmonized European maintenance technical recommendations will be in order to guarantee safety and public protection.	Noted. Refer to answer made to comment 21 from FFP.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
324	Jo Oosterveer	General	PAR	In EASA rules EC N° 1592/2002 Basic rules article 4 Paragraph 1 and paragraph 2 Annex II also specifies that aircraft lighter than 70 kilos including all components are outside the application field In the rule 2042 article 1 paragraph 2, we ask to add : In accordance with annex II from paragraph “i”, just created (from basic rule 1592) the personnel safety parachute will be the object of a specific subpart.	The European manufacturers shall make the proposal for the specific subpart concerning parachute 2042 (certification, construction) and ESPWPG shall make proposals relative to the subpart "parachute from text 2042" In case our proposal for these 3 texts is not acceptable considering that personnel safety parachutes is outside the application field (like shown above), we will ask to apply a specific text to the parachute equipment. This will be according to our aim to set up harmonized European maintenance technical recommendations for personnel safety parachutes. These recommendations may become a maintenance European minimum technical standard applicable to “approved personnel safety parachutes”. “Approved personnel safety parachutes” include ETSO certified parachutes. Harmonized European maintenance technical recommendations will be in order to guarantee safety and public protection.	Noted. Refer to answer made to comment 21 from FFP.	
325	European Gliding Union	General	Appendix VIII	Appendix VIII 1) A specific appendix VIII should be written for each category of a/c (sailplanes, balloons) to make it more readable. 2) Upon recommendation of Air Eurosafe EASA has included an operation such as the replacement of elastic gear door operating traps. If EASA is indeed willing to go to this level of detail, there are many more operations to be listed even for a simple a/c like a sailplane. This will result in Appendix VIII becoming a thick book and the pilot owner will have a huge		Noted. Revision of Appendix VIII will be performed by Working Group M.005.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				amount of paperwork to issue a CRS for every such minor operations. Such an approach shows a distrust of people and is not reasonable! 3) Instead of writing such a book it is perhaps more convenient to write a list of maintenance operations which a pilot owner is not allowed.			
326	European Gliding Union	General	-	A the regulatory impact assessment *COMMENTS SPREAD FROM 264 TO 266* Paragraph 8 This NPA RIA does not cover all the concerns the gliding movement has since it is, theoretically, limited to sub parts E to I as the RIA exercise was limited by EASA to those sub parts. The EGU will nevertheless also comment on paragraphs that were not the subject of the RIA because the gliding movement will also be deeply affected by these parts once Part M will be implemented.	The scope of the RIA has been restricted from the beginning by the EASA since they decided that only subparts E-I (para numbering 500 to 900) had to be assessed. In fact we have also comments on subparts B,C and D (para numbers 200- 400) which will affect our activity as well. Furthermore the questions asked during the RIA for assessing the impact of each of subparts E-I did not reflect many of our concerns. The EGU therefore will therefore comment all subparts of Part M.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
327	European Gliding Union	General	-	General Part M is much too complex for light aircraft and in particular for gliding. The EGU therefore requires a Part M “light” be written for non-commercial and recreational aircraft below 2.7 tons MTOM.	Part M is a bureaucratic headache; it is much too long and extremely difficult to read because it contains too many cross-references. For the maintenance of CS 22 aircraft we clearly need a much shorter document describing in simple words what the pilot owners, the workshop managers and the mechanics who are generally working in a voluntary environment have to do in practice.	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 “ A concept for better regulation on General Aviation”, which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	
328	European Gliding Union	General	M.A.901	c) MA 901 Aircraft airworthiness review paragraph f The Rule makers have rejected the proposal from the consultant to allow individuals to issue an ARC for small aircraft of 2730 kg MTOM or below. The EGU asks EASA to reconsider their position because such a change would significantly decrease the financial burden placed on air sports by the application of	The current draft of Part M does not take into account the specifics of sailplanes which are the simplest aircraft (simpler for example than many microlights…) and still requires them to be maintained in the same way as all other aircraft below 5, 7 tonnes MTOM. The promised AMC will not reduce significantly the paperwork and costs associated with the application of Part M. Most modern sailplanes are designed in such a way that they can	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				Part M. For gliding in particular there would be no risk to decrease safety because sailplanes are very simple aircraft and because the gliding movement in Europe has demonstrated over many years their capacity to maintain their aircraft themselves. This would really be the "opening of the bird's cage" promised by the Director of Rulemaking!	generally be maintained for several years by performing only the simple operations of cleaning, lubricating, and polishing requested in the maintenance program of the manufacturer. Therefore there would be absolutely no safety risk to enable individuals to issue the ARC or at least an ARC recommendation. The NAA may keep a proper safety oversight by requesting an external airworthiness review to be performed by a subpart G organization every five or ten year.	out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	
329	European Gliding Union	Draft Opinion	M.A.901	c) MA 901 Aircraft airworthiness review paragraph d The procedure for renewal of the validity of the airworthiness certificate in the uncontrolled environment will be more complicated and also probably more expensive than the current procedure for renewing the certificate of airworthiness. The EGU asks the EASA to simplify this procedure and make it more cost effective.	In the uncontrolled environment, an airworthiness review, including a physical check, has to be carried out once a year by a Continuous Maintenance Management Organization, but the CAMO is only entitled to issue a recommendation to the Member State of Registry. Only the Competent Authority of the State is allowed to issue the Airworthiness Review Certificate (ARC) and has a period of 30 days to do so. This procedure is clearly more complicated than the procedure used to date in all countries for renewing a C of A since the applicant has to contact two different organizations, a CAMO for getting a recommendation and the competent authority for getting the ARC. Additionally this procedure will introduce an administrative delay of 30 day for getting the ARC renewed, thus forcing the pilot-owner to programme the airworthiness review completion at least one month in advance to ensure a continuous airworthiness. In at least one country (UK) this time-lag for turning around the paperwork is overcome by the 'Inspector', under the authority of the National Gliding Organisation, issuing a 30 day temporary renewal of the C of A on completion of the maintenance, inspection and paperwork that is submitted to the	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					authority (in the UK, the BGA). Without this arrangement, for at least one month in every year the sailplane would be grounded without any good reason. Furthermore, even if we do not yet know what will be the charges for these two separate operations, it is to be expected that they will be significantly higher than the renewal of an airworthiness certificate performed directly by the competent authority under the current framework. To avoid such an increase of the bureaucratic burden and of the costs in the uncontrolled environment the EGU asks the EASA to issue AMC material or even a Part M "light" in order to simplify this procedure and make it more cost effective. One possibility could be to allow the pilot-owner to issue the ARC recommendation. Another possibility would be to extend the validity of the ARC to 3 years also in the uncontrolled environment. The 3 years' validity of the C of A already exists in some countries and has proven to be safe because sailplanes are very simple aircraft and because the gliding movement has demonstrated over many years its capacity and capability to maintain their aircraft themselves. Such a relaxation of the rules would certainly improve the acceptance of the Part M in the gliding movement.		

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
330	European Gliding Union	Draft Opinion	M.A.901	Subpart G Continuing Airworthiness Management OrganisationMA 901 711-716Many National Gliding Organizations (NGOs) in Europe have broad delegations from their NAAs for maintaining their fleets. Safety records over several decades show that there is no safety case for changing the existing arrangements.Forcing the gliding movement to enter into the controlled environment mould of part M and to comply with the stringent formalisation of Subpart F and G organizations will dramatically increase the administrative burden and the costs of maintenance. The EGU asks the EASA to issue a Part M "light or at least AMC material in order to allow the gliding organizations to continue to maintain their fleets in the pragmatic and cost effective way they have used so far.	In Austria, Belgium, Denmark, Finland, Sweden, and Switzerland, the NG Os (National Aero Clubs or Gliding Associations / Federations) have a broad delegation from their NAAs for maintaining all sailplanes, powered sailplanes and tow-planes owned and operated by their members.In general the NGOs has a staff of controllers, who are members of the clubs working on a voluntary basis, and who have been trained on a course, generally under supervision of the NAA. They have also from time-to-time to participate in training sessions for renewal of their certificates. The NGOs keep a record of the activity of the controller and if they are not maintaining their skills their certificate as a controller is withdrawn.Normally the owner, or members of the club, maintain their own sailplanes under supervision of an appropriate club member with knowledge to maintenance. Of course they may only do maintenance work in accordance with what the maintenance manual describes can be done by a non technical person - mostly polishing, lubricating and minor repairs of scratches in the surface etc. No disassembling of rudder, elevator, aileron, air brakes or flap systems or major repairs is allowed. For such minor repairs and maintenance, the owner is authorised to sign for release to service.If major maintenance or repairs are necessary, a controller must be the supervisor, and only a controller can sign for release to service after major repairs.Once a year the sailplanes have to pass an inspection by a controller. The controller checks out that all ADs have been fulfilled, that the sailplane is in good condition and is airworthy in accordance to the maintenance manual, and that maintenance work done is recorded properly in the papers and / or sailplane log book.If the controller finds everything is satisfactory,	Refer to comment answer 329	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					he renews the C of A for another 12 months. (36 months in some countries). Only a controller is entitled to renew a C of A, but only for sailplanes and TMG's owned by members of the NGO.From time to time the NAA may keep oversight by auditing the NGO's organisation of maintenance.This system is simple, administratively not too burdensome, and the NAA's auditing has invariably demonstrated that NGOs are fully capable of ensuring air safety. Additionally, these maintenance procedures, which are mainly based on voluntary work, are cost effective. If Part M is be enforced, it is not clear if the NGO will have to set up one single Subpart F/G organisation or if each club will have to set up their own subpart F/G organisation. The EASA seems to favour the latter solution which unfortunately is the most burdensome both from the administrative and from the cost points of view. Making the exposure manual and the approval documents for all clubs in Europe is a huge task especially if it has to be done in the voluntary environment. Furthermore we have not yet received any estimate of the fees which will be charged by the NAA for approving and maintaining the approval of such organisations but if they are of the same order of magnitude as the fees charged by the EASA for similar procedures an explosion of the costs of maintenance is to be expected. For all these reasons the gliding community would prefer to have one single F/G organisation in each country (or a restricted number of regional F/G organisation for larger countries). The EGU therefore would like AMC material to be issued on an acceptable basis before finalisation of Part M as it might apply to gliding, in order to clarify this issue and to avoid every NAA making its own interpretation.Furthermore, even if the single F/G organisation approach were to		

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					be acceptable the NGOs will still have to adapt themselves to the strict formalisation required by subpart F and G to ensure a continuous airworthiness. This will clearly require more paperwork. In particular the mandatory communication between Subpart F and G organisation (written orders, reporting flying hours) will increase the administrative burden compared to the existing situation where the work done under delegation mainly consists in checking physically each sailplane every year.Although the BGA is not subject to a delegation from the UK CAA for the maintenance of sailplanes and tugs, nevertheless the systems of control outlined above for other countries is very similar in the UK, with the BGA being the top-level authority through its Technical Committee and its Chief Technical Officer.The EGU therefore asks the EASA to a Part M "light", or AMC material, in order to allow the NGOs to continue to maintain their fleets in the pragmatic and cost effective way they have used so far.		
331	European Gliding Union	General	-	In the UK, gliding has -not been state-regulated at all since 1948, other than in areas where gliding interfaces with other aviators and airspace users. The British Gliding Association self-regulates and manages all aspects of gliding. In order to be able to continue to benefit from this freedom in the framework of Part M, the BGA would have to become the Competent Authority for Gliding in the UK. Unfortunately the UK Department for Transport has already designated the UK CAA as THE (rather than 'a') Competent Authority, and as yet has not seemed willing to grant this privilege to the BGA. The EGU therefore request EASA to find a means to allow the BGA to become the Competent Authority for gliding in the UK.	The BGA has managed UK gliding in a satisfactory way for decades. CAA scrutiny has invariably found that the BGA is fully capable of ensuring air safety as demonstrated by accident / incident rates which compare favourably with, and often exceed, those of countries where stricter legislation is applied. Details of accident rates due to airworthiness or maintenance, since 1987, have already been supplied to the EASA Rulemaking Director. If the BGA would have to enter into the Part M mould and become a continuing airworthiness management organization the administrative and cost burden would significantly increase (See comment EGU 3), for no likely increase in safety based on historic performance. The EGU therefore request EASA finds a means to enable the BGA to continue to manage gliding as has	Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					done to date.	means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's Competent Authority status can only be designated by a Member State.	
332	European Gliding Union	General	M.A.202	Sub Part B M.A.202 Occurrence reporting Para. (a) requires reporting to the State of registry, the organisation responsible for the type design or supplemental type design, and if applicable, the Member State of the operator. Proposed change: single reporting to the Competent Authority.	A reporting system must be easy /simple to fulfil and to be adequate. One single reporting address in every Member State will do. The pilot/owner may not know which organisation is responsible for the TC's/STC's.	Partially accepted. We recognise that a simplified reporting system is a good objective but this issue must be addressed through Part-21 before hand. We agree that the competent authority of the state of registry is a better structure for reporting than just the state of registry. Nevertheless to ensure communication between the TC holder or STC holder and the owner is upheld, such reporting is also mandated. Furthermore, the Agency will work towards finding a more efficient manner to carry out occurrence reporting in order to simplify the system for the applicant and to avoid loss of information.	See revised M.A.202

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
333	European Gliding Union	General	M.A.302	MA 302 Maintenance Program Paragraph a and b According to the paragraphs, a maintenance programme will have to be drawn up for each and every aircraft and approved by the competent authority. This rule is unacceptable for the gliding community because such a programme is unnecessarily bureaucratic and a cost burden. The EGU therefore asks the EASA to relax this rule for sailplanes and to replace it by a rule similar to FAR 43 13	Since there are existing manufacturers' type specific maintenance manuals, AD's, and Service Bulletins we do not see the need for adding an additional official document gathering all these documents for simple design products like sailplanes. Furthermore there is no need to approve again such an individual programme since all its parts will refer to maintenance manuals, AD, technical notes already approved by the competent authority. Writing 22,000 manuals is a huge task which cannot be fulfilled easily in a volunteer environment and will have a large regulatory cost attached to it. The costs would not only be 'one-off' but continuing as any updates to programmes would have to be reviewed and processed by the competent authority. Furthermore the approval of so many programmes by the competent authority will need a staff they probably do not have. In many countries the national gliding associations or federations have the competence to create and oversee generic maintenance programmes. This activity is at a cost that is almost certainly significantly less than the cost that would be generated by NAAs. Maintenance of sailplanes has not been a problem, statistically, in terms of the causes of fatal or serious accidents in the European gliding community. The maintenance regimes, mostly managed in practice by the gliding associations or federations, have assured an adequate level of safety, and are based on generic maintenance programmes or check lists that apply to all sailplanes. We therefore propose to simply require the person performing maintenance to have all adequate documents as it is done in FAR 43.13 (a): "(a) Each person performing maintenance,	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					alteration, or preventive maintenance on an aircraft, engine, propeller, or appliance shall use the methods, techniques, and practices prescribed in the current manufacturer's maintenance manual or Instructions for Continued Airworthiness prepared by its manufacturer, or other methods, techniques, and practices acceptable to the Administrator, except as noted in §43.16. "		
334	European Gliding Union	General	M.A.303	M.A.303 Airworthiness Directives Of course any applicable AD must be carried out but the pilot/owner must be able to find and collect this information. An easy access reachable/consultable AD system must be set up. Also the language problem must be solved, in that English is not the only language in Europe (!).	The pilot/owner must be able to find/collect the necessary AD's and related material in an easilyy way. Actually the pilot/owner has to consult the EASA-AD-list, publications by the member state/CAA, even the state of origin. Due to the importance of this information, it should an advantage to get this information at one single address and preferable in different EU languages.	Noted. EASA is responsible, in accordance with ICAO Annex 8, Chapter 4, for notifying to the affected States of Registry of the ADs related to those products where EASA is the State of Design. These AD's are available at the Agency web site www.easa.europa.eu. Each State of Registry should notify all applicable AD's to the affected owners / operators.	
335	European Gliding Union	General	M.A.304	M.A.304 Data for modifications and repairs EASA should set up as soon as possible standard repair procedures and inspection procedures for sailplanes A clear distinction must be made between damage when it affects airworthiness or when it does not. Furthermore a European equivalent of AC 43-13 should be set up in order to ease the design of standard repairs. This has been requested by some member states and is also recommended by Air EuroSafe.	Even if some manufacturers and TC holders have issued standard repair procedures for some of their products, there are for the time-being no common standards like those existing in FAA AC 43 13. Putting Part 21 in force without introducing an equivalent of AC 43-13 and drawing a clear dividing line between small, non-structural damages and minor repairs requires maintenance organisations to ask for approved data for every simple repair. This situation has, Besides the large, unnecessary and unwarranted administrative burden, this situation will have a dramatic negative economic effect on the aircraft owners.	Partially accepted. Task M.019 is scheduled to start at the beginning of 2008 in order to define an equivalent to AC43-13. As an interim measure, group M.017 will evaluate how to incorporate AC43-13 in the current rule.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
336	European Gliding Union	General	M.A.305	MA 305 For non complex a/c it should be allowed to have only one single log-book for the aircraft and to include all the relevant data for each component in this log-book.	This record system with several logbooks is much too complicated for sailplanes and powered sailplanes	Noted. Transferable log-books facilitatesmovement of components between airframes. To this end the use of transferable log-cards or binders is accepted as appropriate.	
337	European Gliding Union	General	M.A.306	Sub Part C M.A 306, operators technical log It is requested to clarify and confirm that sub sections (b) and (c) of this paragraph as a whole refers only to commercial air transport.	Technical logs for non-complex aircraft not used for commercial operations are an unnecessary bureaucratic burden and do not contribute to flight safety.	Not accepted As mentioned in 201(h) and (i), the word operator is limited to commercial air transport and activities which needs a certificate. This paragraph is not intended to be applicable to non commercial operation.	
338	European Gliding Union	General	M.A.403	MA 403 For sailplanes and powered sailplanes pilot owners should be allowed to decide themselves whether or not an aircraft defect seriously hazards flight safety.	It is common practice in gliding that the pilot owners are allowed to decide themselves if a sailplaneglider defect seriously hazards flight safety. This is because authorized certifying staff are normally not available on the airfield during gliding operations, which take place mainly during week-ends and holidays. Furthermore the flight manual gives sufficient information about such defects to make such a decision by the pilot-owner possible. This procedure has proved to be safe and there is no reason to tighten the long established practices by this proposed rule.	Not accepted. Part-M is not the appropriate place to incorporate pilot responsibilities. Rules concerning pilot responsibilities should be developed in the appropriate licensing and operations rules.	
339	European Gliding Union	General	M.A.501	MA 501 The fact that some specific sailplane equipment may be considered as standard parts and installed without EASA Form 1 should be mentionned here.	A modification of Part 21 to allow installation of sailplane equipment used only for sporting purposes is on- going.	Noted. Decision 2006/13/R has been issued by the Agency which redefines the definition of standard parts installed on sailplanes and powered sailplanes certified under the provision of CS 22.1301b.	
340	European Gliding Union	General	M.A.606	MA 606 (g) The reference to Part 66 is not valid for gliding. The text should therefore be modified in order to take into the account the specific situation in gliding. Furthermore it should be clearly mentionned that certifying staff may be	Part 66 does not define certifying staff for sailplanes and for the time being this results in the application of national requirements for such personnel. This should be clearly mentionned in MA 606 (g)	Not accepted. Part-66 currently refers to national law for glider and balloon, refer to 66.A.100. Within the current rulemaking process a Part-66 "light" is under consideration.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				volunteers since this is usual in gliding.			
341	European Gliding Union	General	M.A.607	MA 607 a Rule (a) must be relaxed for gliding since in our activity most certifying staff do not work on a “day-by day” basis but rather only on week ends. Furthermore the work is done by volunteers	-	Accepted. This paragraph will now refer to experience requirements in Part-66 that itself currently refers to national rules for gliders and balloons.	See revised M.A.607
342	European Gliding Union	General	M.A.608	MA 608 This rule should be amended to facilitate less onerous tooling requirement	The tools needed for glider maintenance are often quite simple and comparable to those used for simple repairs on cars. Furthermore the type of tool is generally not specified in the maintenance manual of sailplanes. Control and calibration of such simple tools has therefore to be kept on a reasonable level otherwise these tools will become too expensive especially for small maintenance organisations	Noted. Only those tools required by the maintenance data for a day-to-day job are required to be held. Other tools must only be accessed. Calibration only needs to be performed when required. The extent and complexity will depend on the scope of work of the approved organisation. It must be noted that alternate tools can be used if they are demonstrated to be equivalent.	
343	European Gliding Union	General	M.A.610	MA 610Formal written work orders are inappropriate in a non commercial environment. The requirement for written orders is an unnecessary bureaucratic burden for maintenance of sailplanes.	The often quite simple maintenance tasks on sailplanes are generally documented only after completion of the work. This practice has been used for decades and has proved to be safe. Written orders should therefore only be required if there is a commercial relationship between the pilot-owner subpart F organisation.	Partially accepted. The reason of having an agreed Work Order is to protect both parties. Firstly, the Subpart F organisation is protected from undeclared maintenance needs since the release to service must only cover what has been ordered. Secondly, the owner / operator is protected from requested work not being carried out. The word "customer" has been found to be misleading and will be replaced by "the entity requesting maintenance" Additional AMC material is under consideration to specify the type of documents that can constitute a Work Order (i.e, Snag Sheet, Log Book entry, etc).	See revised M.A.610

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
344	European Gliding Union	General	M.A.707	MA 707 Since the reference to Part 66 is not valid for gliding, the qualification necessary for issuing an ARC for a sailplane should be clearly defined. The requirements of MA 707 are far too stringent for sailplane continuing airworthiness management where certifying staff mostly work on a voluntary basis. In particular the requirement of 5 years experience in sailplane maintenance is considered as too high. The EGU considers that 3 years are sufficient.		Partially accepted. It is recognised that these requirements need to be amended for non complex non commercial aviation (not just gliders and balloons). Amendments would be made to AMCs to clarify the requirements for these categories of general aviation aircraft. Note that within M.A.707(a)2, Part-66 defers to national regulations for balloons and gliders .	
345	European Gliding Union	General	M.A.708	MA 708 In the case where a National Gliding Organisation will havebe onea single subpart G organisation for the management of theirits fleet, it will be nearly impossible for them it to develop and to control maintenance programmes for all individual aircraft. This is one more reason not to require an individual maintenance programme for every sailplane.		Partially accepted. The formulation of M.A.302 does not preclude generic maintenance programmes adapted to the aircraft configuration. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC to M.A.302.	
346	European Gliding Union	General	M.A.801	MA 801 A CRS should not be required after completion of every simple maintenance task a pilot-owner of a sailplane is allowed to do.	For glider maintenance Appendix VIII only allows very simple tasks which are normally performed before the flight operations. Issuing a CRS for such tasks is an unnecessary bureaucratic burden. The pilots have done such operations for decades without issuing a CRS and this has never created a safety problem so far.	Noted. This shall be reviewed with the AMC material.	
347	European Gliding Union	General	M.A.802	MA 802 Same comment as for MA 801: A CRS should not be required after completion of every simple maintenance task a pilot-owner of a sailplane is allowed to do.		Noted. Maintenance on components must be carried by an approved maintenance organisation according to ICAO. It is therefore not possible for pilot-owners to carry out component maintenance.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
348	European Gliding Union	General	M.A.803	MA 803 The definition of the pilot-owner is too restrictive. Members of flying clubs who do not individually own an aircraft or who have no valid glider pilot license, should also be included in the definition.		Noted. The issue of whether the members of a club are considered as pilot owners is being consulted with EASA Legal Services as part of Working Group M.005 and Task M.010.	
349	British Gliding Association	Draft Opinion	M.A.202	MA 202 Occurrence Reporting paragraph (d) The rule states that Occurrence reports must be made within 72 hours. It would be more appropriate to allow reports to be made within 7 days for gliders and light aircraft.	The majority of persons engaged in maintenance and operation of gliders and light aircraft are voluntary or operating in remote areas where access to the necessary communication tools, email, photographic services etc are not readily available or the volunteer organisation persons have other demands on their spare time such as employment, family commitments. In most cases 72 hours would be unachievable but would be able to report within 7 days.	Not accepted. The period of 72 hours was agreed at the time of Part M developing looking at the current system in place in most EU Countries. Since the number of such occurrences covered under M.A.202(a) are not expected to be large and would normally be expected to arise during maintenance such time is still judged to be adequate. Refer to AMC M.A.202(a) for details.	
350	British Gliding Association	Draft Opinion	M.A.305	MA 305 Aircraft Continuing Airworthiness Records System paragraph (b) Technical Log is included in this paragraph and should be removed, as it is not applicable to non-commercial air transport operations.	Technical log for commercial air transport operations is included in MA 306	Partially accepted. An operator's technical log may be required by the Member State for other operational activities in accordance with M.A.201(i).	See revised M.A.305
351	British Gliding Association	Draft Opinion	M.A.403	The rules state that only authorised certifying staff may assess defect hazards for flight safety. In the case of non-commercial air transport this is inappropriate. The pilot in command should be able to assess defects and call upon qualified certifying staff if appropriate or if the defect is of a complex nature.	Pilots will have a well developed sense of self-preservation and are unlikely to fly an aircraft that has a defect that seriously affects airworthiness. Operational guidelines developed by sporting bodies offer guidance to pilots assessing defects and indicating when technical assistance is required. All defects will be assessed by qualified maintenance staff during maintenance.	Not accepted. Part-M is not the appropriate place to incorporate pilot responsibilities. Rules concerning pilot responsibilities will be developed in the appropriate licensing and operational rules.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
352	British Gliding Association	Draft Opinion	M.A.606	MA 606 Maintenance Organisation paragraph (g) Staff shall comply with the requirements of Part 66 is inappropriate for gliders where there is no Part 66 licence. Staff may be authorised by a subpart F maintenance Organisation in a manner acceptable to the competent authority where there is no Part 66 licence or where national procedures exist. Staff authorisation procedures shall be specified in the organisation manual and approved by the competent authority.	Certifying staff for gliders, motor gliders and tug aircraft in the UK have been authorised for many years by the BGA in a manner acceptable to the competent authority. There is no Part 66 or national licence for gliders in the UK	Not accepted. Part-66 currently refers to national law for glider and balloon, refer to 66.A.100. Within the current rulemaking process a Part-66 "light" is under consideration.	
353	British Gliding Association	Draft Opinion	M.A.610	MA 606 Maintenance Work orders Formal written work orders are inappropriate for non-commercial maintenance activities. Work orders should only be required where an aircraft is contracted to a commercial organisation for the completion of maintenance or repair.	Most maintenance to gliders and motor gliders in the UK is carried out by the owners under supervision of authorised inspectors who are generally acting in a voluntary role who will act as the certifying engineer on completion. At the owner's behest, work orders should only be required where a commercial transaction is taking place.	Partially accepted. The reason of having an agreed Work Order is to protect both parties. Firstly, the Subpart F organisation is protected from undeclared maintenance needs since the release to service must only cover what has been ordered. Secondly, the owner / operator is protected from requested work not being carried out. The word "customer" has been found to be misleading and will be replaced by "the entity requesting maintenance" Additional AMC material is under consideration to specify the type of documents that can constitute a Work Order (i.e, Snag Sheet, Log Book entry, etc).	See revised M.A.610

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
354	British Gliding Association	Draft Opinion	M.A.707	MA 707 Maintenance Review Staff Paragraph (a) 1 5 years experience in continuing airworthiness is inappropriate for gliders. 3 years experience would be more appropriate for gliders.	The time taken to achieve suitable experience will vary from as little as two years for someone who is an experienced engineer and working full time in a glider repair and maintenance environment. For someone not involved full time with less initial experience, probably acting in a voluntary role, gaining the necessary experience may take in excess of 5 years. Gliders are a simple aircraft, the maintenance regime is well documented and the airworthiness review is a relatively simple documented task. The competence of the individuals should be assessed by the CAMO with competent authority approval, as they are the only people who will fully appreciate an individual's ability to carry out airworthiness reviews. By reducing the experience minimum time to 3 years will still achieve an acceptable level of control whilst not subjecting the gliding sector to unnecessary negative economic impact by drastically reducing the ability to renew the ARC.	Partially accepted. It is recognised that these requirements need to be amended for non complex non commercial aviation (not just gliders and balloons). Amendments would be made to AMCs to clarify the requirements for these categories of general aviation aircraft. Note that within M.A.707(a)2, Part-66 defers to national regulations for balloons and gliders .	
355	British Gliding Association	Draft Opinion	M.A.707	MA 707 Maintenance Review Staff Paragraph (a) 2 The term "equivalent" does not leave scope for national qualifications. It would be more appropriate to amend to say "National equivalent" to allow for situations where there is no Part 66 licence and where a degree would be inappropriate.	There is no Part 66 licence for gliders and a national inspector authorisation would not be considered an equivalent to a degree. Most EU countries have a national system for appointing glider inspectors and their function, in addition to certifying maintenance, is for recommendation for C of A renewals to the national authority (NAA or approved organisation). Either the paragraph needs amendment or the AMC/GM needs to allow for national qualifications without equivalence to degree or part 66 licence.	Partially accepted. It is recognised that these requirements need to be amended for non complex non commercial aviation (not just gliders and balloons). Amendments would be made to AMCs to clarify the requirements for these categories of general aviation aircraft. Note that within M.A.707(a)2, Part-66 defers to national regulations for balloons and gliders .	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
356	British Gliding Association	Draft Opinion	M.A.707	MA 707 Maintenance Review Staff Paragraph (a) 3 Formal aeronautical maintenance training would be an unnecessary burden on certifying staff and CAMO for simple aircraft such as gliders and lower end GA not used for commercial air transport. If "formal" were changed to "Appropriate" this would allow for in the workplace vocational training.	There is no need for formal training as the majority of glider and light aircraft engineers gain experience and skills under the guidance of more senior engineers. Formal training in the simple GA sector is normally only carried out by larger organisations with the financial resources to support it. The volunteer sector could not support formal training. At the point of applying for a licence or inspector authorisation the issuing authority will review training and only appoint if the workplace vocational training has been appropriate and comprehensive enough to satisfy the requirements. AMC/GM could be further developed to clarify this point.	Partially accepted. It is recognised that these requirements need to be amended for non complex non commercial aviation (not just gliders and balloons). Amendments would be made to AMCs to clarify the requirements for these categories of general aviation aircraft. Note that within M.A.707(a)2, Part-66 defers to national regulations for balloons and gliders .	
357	British Gliding Association	Draft Opinion	M.A.707	MA 707 Maintenance Review Staff Paragraph (d) Listing airworthiness review in the exposition would be inappropriate for larger organisations. By adding ", or; in a manner acceptable to the competent authority" would allow for electronic and personal records to be maintained separately from the exposition.	Larger organisations hold authorised staff records on computer databases and in personal files. Reference should be made to these records in the management exposition and audited by the competent authority. The CAMO could manage its review staff effectively without amending the exposition constantly.	Partially accepted. It is recognised that these requirements need to be amended for non complex non commercial aviation (not just gliders and balloons). Amendments would be made to AMCs to clarify the requirements for these categories of general aviation aircraft. Note that within M.A.707(a)2, Part-66 defers to national regulations for balloons and gliders .	
358	British Gliding Association	Draft Opinion	M.A.710	MA 710 Airworthiness Review Paragraph (c)This paragraph does not allow for cases where there is no part 66 licence such as for gliders.Adding after Part 66 ", or authorised by M A 707 (a) 2" would be appropriate.	MA 710 (c) contradicts the qualifications stated in MA 707 (a) 2 and implies that only Part 66 qualified staff can certify airworthiness reviews.	Noted. To carry out the M.A.710(c) physical survey, airworthiness review staff may need the support of Part-66 personnel appropriately rated if he does not hold such a licence himself. Therefore there is no contradiction. In the case of gliders and balloons Part-66 defers to national requirement.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
359	British Gliding Association	Draft Opinion	M.A.803	MA 803 (a) (b) & (d) Pilot-Owner authorisation MA 803 specifies that a pilot-owner is authorised to issue a certificate of release to service following pilot-owner maintenance as per Appendix VIII, providing he / she holds a valid pilot licence. In the UK, glider pilots have never been required to hold a glider pilot's licence as glider pilot qualifications have not been state controlled. However, glider pilots are qualified under the training regime and systems of the British Gliding Association and its member clubs. Until such time as the expected European Recreational Pilot's Licence (including one for glider pilots) is implemented, UK glider pilots would be precluded, technically, from carrying out pilot-owner maintenance under MA 803. This would be unacceptable, and was probably not intended. It is suggested that suitable wording is drafted for the future Part M air sports-specific AMCs and GM to cover this point, in the event that Part M becomes effective before the implementation of the expected European Recreational Pilot's Licence and the granting of grandfather rights to a licence for current UK glider pilots.	Self-explanatory.	Partially accepted. A working group M.010 is starting some work on the status of pilot-owner and the associated privileges. AMC should be modified following this work.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
360	British Gliding Association	Draft Opinion	M.A.902	MA 902 (a) 3 Validity of the Airworthiness Review Certificate The British Gliding Association would wish the wording of paragraph M.A. 902 (a) 3 to be changed to 'in the Member State' instead of 'of the Member State'.	At present, only gliders that have flown for the first time in the UK after 28 September 2003 are being registered on the UK CAA's aircraft register. Gliders in existence in the UK before that date are currently the subject of negotiation with EASA, the UK Department for Transport and the UK CAA as regards their certificate of airworthiness status. In consequence the latter group of gliders (some 2,300) are not registered on the UK CAA's aircraft register, although they are registered on the register of the British Gliding Association (BGA). Further, it is the intention of the BGA to seek derogation from the UK Department for Transport for glider registration to be continued solely by the BGA with registration markings that coincide with the BGA's sequential numbering system. Pending the outcome of these matters, the B GA would not want its glider owners to be disenfranchised by paragraph (a) 3 of M.A 902 by the fact that gliders are not registered on the aircraft register of a Member State. Therefore the BGA would wish the wording of this paragraph to be changed to 'in the Member State'. Such a change would allow for flexibility, with agreement of the Member State concerned.	Noted. This was a transient issue, and now has been overtaken by events.	
361	Europe Air Sports	General	Whole of the NPA 7-2005	Please see covering letter to M.Claude Probst, Rulemaking Director, in respect of the comments by Europe Air Sports.		Noted. Detailed text in comment 405.	
362	Europe Air Sports	Draft Opinion	2042/2003	Add to read (h) last line: .. with the exception of pre-flight and daily inspection; Add to read (j) after last line: In the case of gliders or sailplanes, daily inspection means the pre-flight inspection	The flight manuals of gliders / sailplanes built to CS 22 standards differentiate between "daily inspection" and "pre-flight inspection", both to be performed by the pilot. Therefore a second sentence is required to enable the pilot to perform both forms of inspections.	Not accepted. The NPA 7/2005 which amends the Appendix VIII of Part-M includes any check below the 6 months / 50 h inspection to be carried out by the pilot/owner. This covers the daily inspection currently applied to	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				carried out after rigging a glider or sailplane or before the first flight of a day.		sailplanes which is accepted as part of pilot / owner maintenance.	
363	Europe Air Sports	General	-	Annex III (Part 66) is requiresd to be amendedment to introduce a so- called airsports mechanic license, possibley B 3. The requirements should be tailored to the simplicity of the various airsports category concerned. The Agency should be enabled to task qualified entities with training and license issue.	At present, the requirements detailed in Annex III for B1 and B2 do not match the simplicity of the non- complex powered aircraft. whichThis will have a detrimental effect on the maintenance of the aircraft concerned. The requirements need to be adapted whichand this is best is achieved toby the introductione of a simple and light license for an airsports mechanics where the responsibility can be transferred to the airsports body concerned.	Partially accepted. The MDM 032 working group decided to propose a "Light" Part 66 . This task is being performed by a sub-group within group M.017.	
364	Europe Air Sports	General	CA	Although not covered by the scope of the RIA - New Article 6,3 Annex 4 (part 147) needs to be amended to cater for the concept of transferring training and AML license issuing responsibilities to qualified entities like airsports associations.	Over many years have air sports associations and national aeroclubsaero clubs have trained their own expert mechanics. This resulted in an extreme high level of safety for recreational and airsports aviation. It is logical and necessary to maintain this proven system of self- administration.	Partially accepted. MDM 032 working group decided to propose a "Light" Part 66. Any need to take an action on Part 147 will be evaluated accordingly	
365	Europe Air Sports	General	M.A.202	Although not covered by the scope of the RIA - MA 202, (a) Occurrence reporting AIn the case of non-commercial aircraft < 5700kgs, any person or organization responsible under M.A. 201 shall report to the Competent Authority State of registry any identified condition of an aircraft or component that seriously hazards seriously the flight safety. The state of registry Competent Authority is toshall inform the Agency for further action if required.	To avoid administrative mistakes, which would affect flight safety, we ask forpropose a simple and single address reporting system. While it might be feasaible that operators for commercial air transport aircraft reportaircraft report to the design organization concerned the owner of a non- complex aircraft requires a single point reporting system which is best the state of registryCompetent Authority. It is the state of registry whoCompetent Authority which haves access to the data bases and the required knowledge.	Partially accepted. We recognise that a simplified reporting system is a good objective but this issue must be addressed through Part-21 before hand. We agree that the competent authority of the state of registry is a better structure for reporting than just the state of registry. Nevertheless to ensure communication between the TC holder or STC holder and the owner is upheld, such reporting is also mandated. Furthermore, the Agency will work towards finding a more efficient manner to carry out occurrence reporting in order to simplify the system for the applicant and to avoid loss of information.	See revised M.A.202

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
366	Europe Air Sports	General	M.A.202	Although not covered by the scope of the RIA - MA 202, (c) & (d) Occurrence reporting Towards the end of (c) insert behind: … any such condition: “adversely” after “any such condition”. In (d) we propose changing 72 hours to 7 days.	The insertion clarifies the intention that only conditions need to be reported which have a negative aeffect of flight safety need to be reported. The reporting time of 7 days is more practical for the recreational and airsports communities’ environment.	Not accepted. Refer to answers made to comment 231 from Deutscher Aero Club e.V and to comment 349 from BGA.	
367	Europe Air Sports	General	M.A.301	Although not covered by the scope of the RIA - MA 301, 1, Continuing Airworthiness Tasks amend the sentence to read: “the accomplishment of pre-flight inspections andor, in the case of sailplanes, daily inspections.”	The proposal is a necessary consequence resulting of from the parallel comment to Reg 2042 Article 2 (h) / and (j)	Not accepted. The NPA 7/2005 which amends the Appendix VIII of Part-M includes any check below the 6 months / 50 h inspection to be carried out by the pilot/owner. This covers the daily inspection currently applied to sailplanes which is accepted as part of pilot / owner maintenance.	
368	Europe Air Sports	General	M.A.302	Although not covered by the scope of the RIA - MA 302, (a), Maintenance Programme Add a new sentence: “For aircraft up to a MTOM of 2730 kg and not operated commercially, generic maintenance programmes may be grouped according to criteria suitable to the category of aircraft.” It is also recommended, for sailplanes and balloons, an alternative to the NAA as the competent authority should be provided for, such as the relevant national air sport association or National Aero Club. An example should be added to the corresponding AMC.	The strict application of the existing text would completely overload owners, manufacturers and especially, the approving authorities, without increasing the level of safety. Within the EASA area about 85 000 such aircraft and balloons are registered, the vast majority of which are recreational and airsports aircraft of simple design whicho can easily be maintained in an airworthy state by using a standard, brief and shortgeneric maintenance programme. In some Member States the national air sport association, for many years, has been the equivalent of the competent authority for the particular air sport.	Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
369	Europe Air Sports	General	M.A.304	Although not covered by the scope of the RIA -MA 304, Data for modifications and repairsThis paragraph needs further explanation and clarification. Especially in recreational and sportsing aviation damage assessment relies on the practical experience and the acquired knowledge of the person inspecting the damage. Not all damage to an aircraft can be described in detail, as might be implied by 'data approved by the Agency'; on the spot expert judgment is required. Standard guidelines to assess damage and procedures and methods for conducting repairs, likesuch as laid down in AC 43-16 B ,B, should be approved by the Agency and listed in an AMC.	Minor damage not affecting airworthiness is quite often the result of a field landing by a sailplane or balloon for example, rigging thea sailplane or pushing thean aircraft into a hangar. Repairs donecarried out by the airsports communityies follow the best practice and state of the art procedures.	Partially accepted. Task M.019 is scheduled to start at the beginning of 2008 in order to define an equivalent to AC43-13. As an interim measure, group M.017 will evaluate how to incorporate AC43-13 in the current rule.	
370	Europe Air Sports	General	M.A.305	Although not covered by the scope of the RIA - MA 305, (a)/(b) RecordingAircraft Continuing Airworthiness System It is accepted that a recording system for vital maintenance is required. Recreational and airsports aircraft do not require more than one recording book.	One single logbook is sufficient and can be handled much more easily,er therefore reducing the danger of omitted or faulty entries. This contributes to flight safety.	Noted. Transferable log-books facilitate movement of components between airframes. To this end the use of transferable log-cards or binders is accepted as appropriate.	
371	Europe Air Sports	General	M.A.306	Although not covered by the RIA - M.A 306, operators technical log It is requested to clarify and confirm that sub sections (b) and (c) of this paragraph as a whole refers only to commercial air transport.	Technical Llogcards for non- complex aircraft not used for commercial operations are an unnecessary bureaucratic burden and do not contribute to flight safety.	Not accepted As mentioned in 201(h) and (i), the word operator is limited to commercial air transport and activities which needs a certificate. This paragraph is not intended to be applicable to non commercial operation.	
372	Europe Air Sports	General	M.A.401	Although not covered by the RIA - M.A 401, (1.b) Maintenance data It is requested to change the para (b) to read as follows.: "Any applicable requirement, procedure, standard or information issued and / or	This enables the Agency or the relevant competent authority to approve maintenance data which reflect best practise in aviation maintenance. This is especially true for aircraft where no TC holder is appointed likesuch as orphan aircraft or some older aircraft. One	Accepted. The change proposed is already part of the opinion 06/2005 which has not been approved by the Commission yet.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				approved by the Agency or the competent authority."	example is the approval of the FAA AC 43-13 b.		
373	Europe Air Sports	General	M.A.402	Although not covered by the RIA - M.A 402 (a), Performance of Maintenance and related AMC 402 (a) Confirmation is requested that "qualified personnel" in the sense of this of this paragraph for non- complex aircraft not used in commercial operation includes the pilot- owner and his privileges.	In AMC 402 (a) paragraph 2 the requirement for acceptance by the competent authority of the experience of every pilot-owner to conduct pilot-owner maintenance is impractical, unnecessary and bureaucratic, and should be removed for recreational and air sports aviation. During training the pilot is likely to have learnt about the basics of aircraft maintenance. This contributes to the clarity of the rule and to the acceptance of the procedure by the aviation community concerned.	Noted. The AMC MA402(a) parag 2 already addresses the issue. A working group currently considers this issue for clarity of the rule.	
374	Europe Air Sports	General	M.A.403	Although not covered by the RIA - M.A 403 (b), Aircraft defects Change the paragraph to read as follows:	Only the pilot in command or the authorised certifying staff, according to M.A 801 (b) 1, M.A. 801 (b) 2 or Part 145 can decide, whether an aircraft defect seriously hazards seriously the flight safety and therefore decide which rectification action shall be taken before further flight and which rectification can be deferred." Basically, only the trained pilot has the overall judgement and is able to assess the status of his aircraft. In the case of complex aircraft maintenance, personnel isare required to inform the pilot about the detailed status of aircraft systems but the final decision rests with the pilot. In case of non- complex aircraft the pilot is considered as a qualified personnel and therefore capable of enabled tothe final decision- making whether to fly or not to fly. Any other procedure would not be acceptable to the aviation community concerned.	Not accepted. Part-M is not the appropriate place to incorporate pilot responsibilities. Rules concerning pilot responsibilities should be developed in the appropriate licensing and operations rules.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
375	Europe Air Sports	General	M.A.501	M.A 501 (a) Installation of Components Add a new sentence: 'In case of sailplanes and balloons standard parts as listed in the relevant AMC may be installed as components without EASA Form One or equivalent.'	Equipment which is not part of the CS requirement and which is not an essential part for declaring the aircraft airworthy must be able to be installed in gliderssailplanes and balloons/airships without an EASA Form One. This is and has been common standard practise sincefor more than 50 years and didhas not and will not adversely affect flight safety adversely.	Noted. Decision 2006/13/R has been issued by the Agency which redefines the definition of standard parts installed on sailplanes and powered sailplanes certified under the provision of CS 22.1301b.	
376	Europe Air Sports	General	M.B.902	M.B.902 (b) 4. Also personnel which iswho are not employed by the competent authority should be allowed to perform an airworthiness review and issueing an Airworthiness Review Certificate (ARC). An AMC should clarify that personnel whoich isare working on behalf of the competent authority isare in a position with appropriate responsibilities.	In the air sport communityies a lot of qualified inspectors, licensed but not employed by the competent authority, are issue ing ARCs on behalf of the competent authority.	Noted. This paragraph does not prevent the Competent Authority from contracting ARC review staff if they meet the requirements established in their procedures, and they are nominated by the authority to sign on their behalf.	
377	Europe Air Sports	General	M.A.502	M.A.502 (b) Installation (Components) Despite the definition of standard parts contained in AMC MA 501 (c), an ~~A~~ appropriate definition of components and standard parts is recommended for ~~small~~recreational and air sports aircraft.	It is a problem that the term “maintenance” does not distinguish between different types of maintenance, e.g. functional testing or installation/removal versus operations actually being an intrusion into the component. The requirement that components may only be removed for maintenance “when such removal is expressly permitted by the aircraft maintenance manual” is unnecessarily strict, particularly because maintenance manuals for gliders and light aircraft do not usually specify allowable removal/installation of components to this degree of detail.	Partially accepted. Answer to the request on Standard parts is made in answer n° 182 to Verb Deutscher Segelflugzeughersteller + EGMA. Qualification of personnel carrying maintenance on aircraft or on a component is specified in M.A.606 and this paragraph does not alter this requirement. In the light of this remark, the wording "Aircraft maintenance manual" is replaced by "maintenance data" in M.A.502.	See revised M.A.502
378	Europe Air Sports	General	M.A.604	M.A.604 Maintenance Organisation Manual Despite AMC M.A 604, AMC material specific to recreational and air sports	Many organisations that are candidates for approval under sub part F are very small, with between one and five people. The draft organisational manual in M.A 604 is unnecessarily detailed, complex and	Not accepted. The Appendix IV to AMC M.A.604 has been developed for general aviation purposes and is already in use in some Member States	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				aircraft should provide a simple generic organsisation manual adapted to the size of organisation and complexity of work carried out in the organisation.	bureaucratic for small organisations.		
379	Europe Air Sports	General	M.A.606	M.A.606 (g) Personnel Requirements (sub part F) For recreational and air sports maintenance, particularly gliding and ballooning, the mandatory requirement for certifying staff to comply with Part 66 is unnecessary and unacceptable, based on historic experience. Therefore this paragraph needs to be changed to delete that requirement as mandatory for thiese categoryies of aviation.	We have been informed on several occasions by EASA personnel that glider maintenance would NOT require Part 66 qualified personnel within sub part F organizations. If that requirement is maintained in the draft rules, then these aviation activities (gliding and ballooning) will suffer a severe shortage of relevant personnel. The current qualification criteria for personnel in these maintenance activities is quite adequate for purpose, and whilst 'grandfather rights' will ensure continuity, the major issue is attracting new personnel into this activity without insuperable barriers that Part 66 would create.	Not accepted. Part-66 currently refers to national law for glider and balloon, refer to 66.A.100. Within the current rulemaking process a Part-66 "light" is under consideration.	
380	Europe Air Sports	General	M.A.606	M.A.606 (c) & (d) Personnel Requirements (sub part F) and AMC M.A. 606 (c) & (d) The rule or AMC material should permit certifying staff on a voluntary basis. The requirement for the periods of experience should be reduced appropriately to reflect non full-time involvement.	This whole paragraph is orientated to larger commercial maintenance operations. Presently national air sport organsisations are running maintenance organisations without employees but with only, or mainly, voluntary staff only, and not necessarily full-time, paid, employees. This paragraph M.A. 606 and the associated AMC material need to be adapted accordingly to recreational and sporting aviation maintenance support organisations.	Not accepted. The AMC M.A.606 (d) provides for the possibility of employing or contracting staff on a volunteer basis. M.A.606 (c) and (d) refers to the personnel of the organisation and not to certifying staff.	
381	Europe Air Sports	General	M.A.607	M.A.607 (a) 1 Certifying StaffThis rule should be removed for sailplanes and other smallrecreational and air sports aircraft, as 'six months' might imply full-time occupation.	In the air sports environment most certifying staff isare not working day- by-day but at weekends on a voluntary basis.	Accepted. This paragraph will now refer to experience requirements in Part-66 that itself currently refers to national rules for gliders and balloons. Furthermore, for powered aircraft a Part-66 light is under consideration and a working group WG 66-008 is addressing the issue of renewal of licences and associated recent experience required.	See revised M.A.607

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
382	Europe Air Sports	General	M.A.608	M.A.608 Components, equipment and tools Recommendation for para. M.A. 608 or the an AMC: For individuals something simpler should be considered, such as “the person undertaking the maintenance should ensure that he has tools available which are suitable for the work and that tools which require calibration are calibrated to relevant official standards.”	Maintenance manuals of smallrecreational and air sports aircraft do not always refer to tools. The requirements in M.A. 608 are overly burdensome and bureaucratic for the recreational aircraft environment, although calibration where necessary is accepted.	Not accepted. This paragraph applies to organisations, whether they are large or a "one-person" organisation.	
383	Europe Air Sports	General	M.A.610	M.A.610 Maintenance Work Orders Europe Air Sports recommends an AMC which clarifies that written work orders are required only if there is a full commercial relationship between the organisation and the customer.	In the case where a local club is part of an M.A.Subpart F organisation no written work orders areshould be required for its own aircraft.	Partially accepted. The reason of having an agreed Work Order is to protect both parties. Firstly, the Subpart F organisation is protected from undeclared maintenance needs since the release to service must only cover what has been ordered. Secondly, the owner / operator is protected from requested work not being carried out. The word "customer" has been found to be misleading and will be replaced by "the entity requesting maintenance" Additional AMC material is under consideration to specify the type of documents that can constitute a Work Order (i.e, Snag Sheet, Log Book entry, etc).	See revised M.A.610
384	Europe Air Sports	General	M.A.613	M.A.613 Components Certificate of Release to Service An appropriate definition of components is necessary. To give an example the change of a brake lining should be possible without issuing an EASA Form 1. Further clarification should be embodied in a bespoke AMC for light aviation.	The definition of components and standard parts should be appropriate to the category of aircraft. There are many components in recreational and air sports aircraft which are not critical to airworthiness. A requirement for a Form 1 CRS is overly bureaucratic and not justified on safety grounds.	Noted. The definition of component already exists on EC2042/2003. Changing a component (i.e, a brake lining) does not constitute component maintenance and does not require issuing a Form 1 on installation. The component itself needs to come accompanied with a Form 1 from the manufacturer or the maintenance organisation that repaired it.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
385	Europe Air Sports	General	M.A.703	M.A.703 Extent of Approval (sub part G) To make it easier for small organisations and for standardization reasons examples of a CAMO exposition organisation manuals should be offered. It is particularly important that such expositions do not become a bureaucratic nightmare for national air sports organisations, with many geographically dispersed qualified personnel (mostly volunteers), when applying for, and refreshing, approval as sub part G organisations.	K.I.S.S. principle - Keep It Simple …	Not accepted. The Appendix V to AMC M.A.704 provides detailed instructions for preparing a subpart-G organisation manual, which may be adapted to the size of the organisation.	
386	Europe Air Sports	General	M.A.707	M.A.707 (ba) 2 1 to 4. Airworthiness Review Staff Europe Air Sports notes the EASA comments in paragraph 19 of the Explanatory Note, but disagrees with the reasons given for not making the proposed changes. Nevertheless, Europe Air Sports welcomes the Agency's commitment (last paragraph in 19.) to review AMC material (presumably as part of task M005) to take account of the specific issues for balloons, sailplanes and GA aircraft. Europe Air Sports recommends a separate paragraph for the requirements of airworthiness review staff for balloons and sailplanes (CS-22) to relax the qualification criteria for Airworthiness Review Staff. Further, some relaxation is justified for non-commercial powered aircraft below 2730kgs. The requirements as set out in MA 707 (a) are generally too high for the relatively non-complex types of aircraft under consideration (recreational and air sports), particularly as in many sectors the airworthiness review staff will include mainly volunteers who achieve such status under the oversight of national air sports associations or national aero clubs without	Even when Part 66.A.100 refers to national regulations this rule should offer a less stringent requirement as an aeronautical degree or equivalent. A large majority of inspectors for balloons and sailplanes do not hold an aeronautical degree. Implementation of the draft rule, as currently drafted, will almost certainly lead to a significant reduction of new airworthiness review staff, completely unnecessarily, and therefore a threat to the continued, largely volunteer, body of such staff, to the detriment of the recreational and air sports communities.	Partially accepted. It is recognised that these requirements need to be amended for non complex non commercial aviation (not just gliders and balloons). Amendments would be made to AMCs to clarify the requirements for these categories of general aviation aircraft. Note that within M.A.707(a)2, Part-66 defers to national regulations for balloons and gliders .	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				formal training and almost always without an aeronautical degree or equivalent. What they do have is proven experience which is subjected to testing in interview or from personal knowledge by others of the individuals. It needs to be recognized that not everything in life can be, or should be, governed by rules. Another point, which applies generally throughout these draft Implementing Rules, is that if interpretation is left to National Aviation Authorities, one may reasonably assume that the tightest interpretation will often be made by the NAAs. Thus whilst the author(s) of the draft rules may have intended the widest interpretation and flexibility, there is a distinct danger of narrow interpretation by NAAs. Therefore it may be better to be more specific in the drafting, either in the rules themselves, or in the supporting, and bespoke, AMC and GM. An example of the above is contained in MA 707 (a) 1.in that whilst EASA may intend 'five years experience' to allow 'five years voluntary part-time experience' there is no guarantee an NAA will interpret the statement that way, insisting on five years full-time experience. It is provisionally proposed (pending the outcome of further review) that MA 707 (a) be revised along the following lines: In addition to M.A. 706 requirements, these staff shall have acquired: 1. In the case of Commercial Air Transport aircraft: (i) at least five years' experience is continuing airworthiness and (ii) an appropriate Part 66 licence or an			

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				aeronautical degree or equivalent, and (iii) formal aeronautical maintenance training, and (iv) a position in the approved organisation with appropriate responsibilities 2. In the case of non-commercial aeroplanes (below 2730kgs?) (i) at least three years full, part-time or voluntary experience in continuing airworthiness, and (ii) an appropriate Part 66 licence or an aeronautical degree or equivalent, or an authorisation recognised by the National Aviation Authority, and (iii) appropriate aeronautical training (iv) a position in the approved organisation with appropriate responsibilities 3. In the case of non-commercial non-powered aircraft and balloons (i) at least three years full, part-time or voluntary experience in continuing airworthiness, and (ii) a nationally-recognized qualification appropriate to the aircraft category (iii) appropriate training (iv) a position in the approved organisation with appropriate responsibilities			
387	Europe Air Sports	General	M.A.708	M.A.708 (b) 2 Continuing Airworthiness Management Organisations in the recreational and airsports aircraft sectors, particularly the national air sports associations or national aero clubs for balloons and sailplanes / gliders, should be empowered to approve maintenance programmes without submitting them to the Competent Authority for approval. The means of achieving this may be either to change the proposed wording of MA 708 (b) 2 or to	In several countries the national aero clubs or the specific national air sport associations already have the role of approving maintenance programmes, generally generic to the aircraft type. Often these are embodied in the aircraft technical manual provided by the type certificate holder. The requirement in MA 708 (b) 2 to have these programmes additionally approved by the Competent Authority (assuming that status is not granted to the national aero clubs or specific national air sports associations by the Member States)	Partially accepted. The formulation of M.A.302 does not preclude generic maintenance programmes adapted to the aircraft configuration. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC to M.A.302. In accordance with M.A.302(e) when the aircraft is managed by a CAMO, its maintenance programme and its amendments	See revised M.A.708

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				make it clear in the wording that Competent Authorities should (not 'may'), where the necessary criteria are met, grant such approval rights to the national air sports associations or national aero clubs.	is an unnecessary and costly piece of bureaucracy without a safety justification.	may be approved through an "indirect" approval procedure to be agreed between the CAMO and the authority. MA708 is modified to reflect this possibility.	
388	Europe Air Sports	General	M.A.708	M.A.708 (ab) 1. Continuing Airworthiness Management Europe Air Sports recommends to giving e the choice to maintain a non-commercial operated aircraft according either to approved aircraft-type maintenance manuals or to an generic maintenance programme.	It is not feasible for continuing airworthiness management organisations to develop and control maintenance programmes for all individual aircraft. To illustrate the problem: the work of a Subpart G organisation might often be conducted by an national aero club which has inspectors working on a voluntary basis. In such a case neither the Subpart G organisation nor the inspectors will develop the maintenance management programmes. Instead there will be maintenance documentation with each aircraft glider in the single clubs belonging to the aero clubbelonging to either clubs or private owners. This typical system has worked sincefor at least more than 40 years without any problems.	Partially accepted. The formulation of M.A.302 does not preclude generic maintenance programmes adapted to the aircraft configuration. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC to M.A.302.	
389	Europe Air Sports	General	M.A.709	M.A.709 Documentation It is recommended that specific AMC material is produced to clarify the requirements in M.A.401 for maintenance data when there is no TC holder supporting an aircraft.	Self-evident	Partially accepted. A working group 21-023 is considering the case of orphan aircraft (aircraft without a TC holder) and some change to Part-21 may result from this.	
390	Europe Air Sports	General	M.A.710	M.A.710 (b) Airworthiness Review This paragraph limits the qualified people to Part 66 holders, which is not what is intended by M.A 707 (a) 2. We therefore recommend changing the wording accordingly, and indeed to be in line with our suggested changes incorporated in the comment on M.A. 707 (a) 1 to 4.	A Part 66 licence should not be required for airworthiness review staff for balloons and CS 22 sailplanes / gliders.	Noted. As mentioned in the response to M.A.707(a)2: Part-66 defers to national regulations for balloons and gliders.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
391	Europe Air Sports	General	M.A.710	M.A.710 (a) to (f) Airworthiness Review This comment is more by way of seeking clarification for airworthiness review staff, particularly as it applies to recreational and air sports aircraft and in a largely volunteer environment. It is normal practice in some countries for an inspector (who would in future most probably be a volunteer member of a sub part F and / or G organization) to issue a '30 day ticket' following satisfactory completion of maintenance comprising an airworthiness review, or, as it is commonly known today a 'renewal of the C of A'. The purpose is to allow the aircraft to be flown pending return of the C of A renewal (in future the ARC) from the central organization. It is recommended that such practice be allowed to continue. Sub paragraph (f) seems to imply this possibility, but confirmation would be welcome.	Most recreational and air sports activities in Europe are seasonal (i.e. mainly from March to October), which means that when a C of A renewal (in future an airworthiness review) falls due during these months, the owners, quite reasonably, want the maximum use of their aircraft, without any period of lay-up awaiting returning of paperwork. The individual airworthiness review qualified person should be able to grant a temporary extension of airworthiness pending turn-around of the ARC at the central organisation, whether that be the Headquarters of the sub part G organization or the Competent Authority. Without such provision, under the proposed system, owners might be inclined to schedule the airworthiness review for the winter months, thus creating a seasonal distortion in the maintenance market. Failing which, they could be faced with an uneconomic period of down-time, despite the provision for airworthiness review up to 90 days ahead of the due date (which does not solve the potential problem outlined).	Noted. M.A710(d) provides already the possibility to anticipate the airworthiness review by 90 days maximum without loss of continuity of the airworthiness review pattern, to allow the physical review to take place during a maintenance check.	
392	Europe Air Sports	General	M.A.710	M.A.710 (a) & (c) Airworthiness ReviewAn AMC should provide a template (checklist) for an airworthiness review and for a physical survey as well.	AMC material helps to have a common interpretation of this rule.	Noted. Details in M.A.710 supported by the AMC 710(a) and (b and c) are considered sufficient to meet this need.	
393	Europe Air Sports	Explanatory Note	M.A.711	M.A.711 (ab) Privileges of the organisation In the explanatory note paragraph 20, last sentence, justification for allowing individual persons to not be excluded from applying for approval as a sub part G organisation is given as '...and holds an identity card or a working permit'. In at least one EU country, a bona fide resident does not need to hold either an identity card, work permit or indeed a passport. Therefore, the assurance that such persons will be able to apply for, and be approved		Noted. The acceptance of alternative documents is within the competence of the Member State.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				for, sub part G status, must reply upon other valid criteria.			
394	Europe Air Sports	General	M.A.711	M.A.711 (a) Privileges of the Organisation Add paragraph 4. 4. approve maintenance programmes even when the aircraft is not managed by the approved M.A. Subpart G organisation.	Approving maintenance programmes for 85.000 aircraft of the air sport community would require a high increase of certifying staff at competent authorities. This would lead to large increases ofin cost for the air sport community. It is difficult to predict competent authority approval fees for this task but fees up to 500 Euros are realistic. This would be unacceptable. An easy review of the maintenance programme during the physical survey should be possible.	Partially accepted. The formulation of M.A.302 does not preclude generic maintenance programmes adapted to the aircraft configuration. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC to M.A.302. In accordance with M.A.302(e) when the aircraft is managed by a CAMO, its maintenance programme and its amendments may be approved through an "indirect" approval procedure to be agreed between that CAMO and the authority. MA708 is modified to reflect this possibility.	See revised M.A.708
395	Europe Air Sports	General	M.A.712	Europe Air Sports welcomes the rule change in M.A.712 (f) provided by the NPA 7/2005.	No need.	Noted.	
396	Europe Air Sports	General	M.A.801	M.A.801 (b) Aircraft certificate of release to service M.A 801 (b) 2 includes a reference to Part 66. Please refer to comments on M.A 707 (a) 1 to 4 concerning the issue of Part 66 qualifications, which we do not think necessary for all recreational and air sports aircraft, only some (aeroplanes).	This paragraph contains an unnecessary reference to Part 66 qualifications.	Partially accepted. It is recognised that these requirements need to be amended for non complex non commercial aviation (not just gliders and balloons). Amendments would be made to AMCs to clarify the requirements for these categories of general aviation aircraft. Note that within M.A.707(a)2, Part-66 defers to national regulations for balloons and gliders .	
397	Europe Air Sports	General	M.A.803	M.A.803 (a) Pilot-Owner Authorisation It should be clarified that a personapilot-owner according tounder M.A.803 (a) is qualified according to M.A.402 (a) without any further qualification.	A requirement for additional qualification would contradict the idea of limited pilot-owner maintenance.	Partially accepted. A working group M.005 is working on the status of pilot-owner and the associated privileges.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
398	Europe Air Sports	General	M.A.803	M.A.803 (b) Pilot Owner Authorisation See Europe Air Sports comment on Appendix VIII The comments to Appendix VIII are provisional, pending further discussions expected in 2006 in accordance with rulemaking task M005, which according to the EASA task programme is scheduled for 2006 with an Opinion in 2007.		Noted.	
399	Europe Air Sports	General	M.A.901	M.A.901 (b) Aircraft Airworthiness ReviewThe idea of a controlled environment is ~~truly~~ well adapted to commercial air transport ~~carriers~~ operators but ~~is~~ may not be appropriate or practical for the air sport community, without some changes. Running an approved M.A.Subpart G organisation ~~on~~ at a local club level would be possible for larger clubs only. Smaller clubs (~~ie~~.g. 30 members, 5 aircraft~~s~~) would have ~~had~~ to be grouped under one M.A. Subpart G organisation. In this case it would be very complicated to implement the required information procedures to meet the requirements of a controlled environment. It is very difficult to imagine that the accountable manager is responsible for personnel or aircraft~~s~~ hundreds of miles away. ~~An~~The insurance for such a M.A. Subpart G organisation ~~would~~might be extremely exp~~a~~ensive and perhaps not even ~~not~~ insurable. Therefore the air sport community very much prefers the uncontrolled environment, but would prefer to also have the availability of a controlled environment based on a simpler model where the national air sport association (such as in gliding or ballooning) acts as a competent authority and the clubs or groups form a simple equivalents of sub part F&G organisations.	The controlled environment principle offers some benefits, but needs to be adapted to the reality of how things have worked, very well, in recreational and air sports environments for many years, particularly club-based activities such as gliding. Key to this is the role of the national air sport associations which have had responsibilities equivalent to the competent authority in some cases, or at least those of a sub part G organisation with club based officials being part of that organisation alongside the sub part F activities.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
400	Europe Air Sports	General	M.A.901	M.A.901 (e) Aircraft Airworthiness Review The organizational structure, relationships and responsibility divisions embodied in Part M, involving sub part F and G organisations as well as a Competent Authority, are unnecessarily and overly complex, and potentially very costly for recreational and air sports aircraft, including balloons. In countries where there are simpler structures, operated largely by volunteers, there are no significant maintenance problems, as evidenced by fatal accident statistics. This represents proof that less bureaucratic systems can and do work, and that there is no safety case for making the changes that are represented by Part M. Europe Air Sports is dismayed with the comments in paragraph 21 of the Explanatory Note, and considers that EASA's response to the RIA comments is inadequate. Of course the proposals put forward in the RIA do not follow the general concept of Part M, because the proposals put forward by industry are challenging Part M. For good reasons! Europe Air Sports disagrees with the statement (paragraph 21, third sentence from the end) "Derogating to this concept would not provide for a proper safety oversight and lead to down grading the current levels." The British Gliding Association, for one, with a very satisfactory record of glider 'C of A renewal' without state involvement, totally disagrees with this statement, as well as several other leading air sports organizations where the current systems allow the issue of the ARC by other than the competent authority in the form of an NAA. We therefore urge EASA to reconsider		Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's.. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				this point, and trust that future discussions will reach a satisfactory conclusion.		carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	
401	Europe Air Sports	General	M.A.901	M.A.901 (d) Aircraft Airworthiness ReviewIndependent (not employed by the competent authority) certifying staff with an appropriate ~~license~~qualification should be allowed to issue an Airworthiness Review Certificate (ARC) immediately after performing the physical survey on behalf of the competent authority. Alternately an Airworthiness Review Organisation (could be~~y~~ a CAMO) contracted to the competent authority should be allowed to issue ARC on behalf of the competent authority.	~~A l~~Large numbers ~~majority~~ of certifying staff ~~is~~are not employed by competent authorities but ~~is~~ work~~ing~~ on a voluntary basis. If this procedure could not be continued the competent authorities would have to increase the~~re~~ numbers of certifying staff to perform thousands of physical surveys. This would lead to a tremendous increase of cost for the air sport communities, and would be totally unacceptable and unjustified~~y~~.	Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901
402	Europe Air Sports	General	AMC M.A.604	AMC M.A.604 Maintenance Organisation Manual This AMC should be changed to clarify that for an M.A. Subpart F organisation with more then 10 voluntary maintenance staff no Part 145 approval is required, but the organisation manual should be adoptedadapted to the complexity of the organisation.	In the air sport environment maintenance organizations are often implemented on a national level with the local club workshops as bruanches. Those organizations should not be obliged to apply for a Part 145 approval.	Noted. AMC material does not ask Subpart F organisation with more than 10 staff to be approved as part 145 organisation but simply asking subpart F organisation to organise their manual as that requested for Part 145 organisations.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
403	Europe Air Sports	General	Appendix VIII	Appendix VIII Limited Pilot Owner Maintenance EAS recommends toa complete review of the Appendix VIII of Part M completely. It is noted in paragraph 15 of the Explanatory Note that EASA plans to address the issues surrounding Appendix VIII as task M005. It is noted that task M005 is scheduled for 2006 with a view to publishing an Opinion in 2007. In which case, what status does the revised Appendix VIII in the Draft Opinion to the NPA have at the current time? Europe Air Sports considers that, in the light of the commitment in paragraph 15 of the Explanatory Note, there is little point in making a detailed response to the draft Appendix VIII at this stage, though it is noted, with appreciation, that various amendments are proposed for gliders / sailplanes and balloons as a result of earlier representations in the Air Eurosafe and other consultations. Different aircraft categories (including balloons) could more easily be addressed, if the Appendix were to would be segmented in different chapters for each aircraft category. The very specific list of tasks in the actual wording must be always be considered as an example and not as the ultimate list. It' is impossible to capture all possible pilot-owner tasks in one list. A general definition of pilot-owner maintenance, taking account of expertise, knowledge and risk to flight safety, would be the best solution. For example: 'Simple maintenance tasks which will notare highly unlikely to endanger airworthiness in the case of improper execution should be will be checked at the next [annual] airworthiness inspection. Those maintenance tasks have tomust be	The actual list in Appendix VIII is not appropriate to all aircraft categories from 80 kg up to 2730 kg. A lot of tasks, which are presently performed by the pilot-owner, are not covered by Appendix VIII even in is proposed revised form.	Noted. Revision of Appendix VIII will be performed by Working Group M.005.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				documented by the pilot-owner in the aircraft logbook of the aircraft so as to enable theinform inspection during the [annual] airworthiness review. Maintenance tasks which might endanger airworthiness in the case of improper execution must will be checked after completion of the maintenance by approved maintenance organisations or approved inspectors.'			
404	Europe Air Sports	General	_	(No comment)	In the UK, the BBAC operates a network of inspectors (approximately 40) with differing levels of authorisation and who have no formal qualification (for example a glider technician's licence) with regard to carrying out maintenance. All maintenance work is contracted or sub-contracted to individuals and third party organisations. It is difficult to argue that an organisation of this complexity should not be an organisation with a quality system to audit/assess its inspectors/sub-contractors and ensure all continued airworthiness data is in place. Under these proposals, the only route open to the BBAC would be to become a Part 145 organisation with its references to Part 66 licences, Level III NDT and all the other things that are not applicable in the ballooning world. Apart from the cost implications the whole "raison-d'être" of Part 145 is to manage commercial air transport operations. We need a lower level of Part 145 that is applicable to large national organisations but not commercial air transport. It was our understanding that the	Noted. If BBAC is not commercially operating balloons, there is no requirement to have the maintenance carried out under Part-145. Maintenance organisations shall be approved to subpart F only. Having a quality system does not imply that there is a need for a Part-145 approval. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
					regulatory process under EASA would be one of standardisation and harmonisation. We assumed that this would include assimilating data from the member states on a specific discipline (e.g. ballooning), determining the appropriate level of regulation and distilling it down into a system that would create a level playing field based on existing practices. It seems we have ended up trying to force national balloon associations to fit the fixed wing model which is inappropriate to our needs. The situation is similar, but on a smaller scale in some other countries.	taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Part 66 for balloons and gliders refers to national rules. It must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's. Competent Authority status can only be conferred on an organisation by it own Member State.	
405b	Europe Air Sports	General	-	In the UK, the BBAC operates a network of inspectors (approximately 40) with differing levels of authorisation and who have no formal qualification (for example a glider technician's licence) with regard to carrying out maintenance. All maintenance work is contracted or sub-contracted to individuals and third party organisations. It is difficult to argue that an organisation of this complexity should not be an organisation with a quality system to audit/assess its inspectors/sub-contractors and ensure all continued airworthiness data is in place. Under these proposals, the only route open to the BBAC would be to become a Part 145 organisation with its references to Part 66 licences, Level III NDT and all the other things that are not applicable in the ballooning world. Apart from the cost implications the whole "raison-d'être" of Part 145 is to manage commercial air transport operations. We need a lower level of Part 145 that is applicable to large national organisations but not commercial		Noted. If BBAC is not commercially operating balloons, there is no requirement to have the maintenance carried out under Part-145. Maintenance organisations shall be approved to subpart F only. Having a quality system does not imply that there is a need for a Part-145 approval. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Group M.017	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				air transport. It was our understanding that the regulatory process under EASA would be one of standardisation and harmonisation. We assumed that this would include assimilating data from the member states on a specific discipline (e.g. ballooning), determining the appropriate level of regulation and distilling it down into a system that would create a level playing field based on existing practices. It seems we have ended up trying to force national balloon associations to fit the fixed wing model which is inappropriate to our needs. The situation is similar, but on a smaller scale in some other countries.		has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a direct action in response to general criticism of the full EASA Part M approach. Part 66 for balloons and gliders refers to national rules. It must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's. Competent Authority status can only be conferred on an organisation by it own Member State.	
405c	Europe Air Sports	General	M.A.712	M.A.712 (f) Quality System Europe Air Sports welcomes the rule change in M.A.712 (f) provided by the NPA 7/2005.	No need.	Noted.	
405d	Europe Air Sports	General	M.A.901	M.A.901 (b) Aircraft Airworthiness Review The idea of a controlled environment is truly well adapted to commercial air transport carriersoperators but ismay not be appropriate or practical for the air sport community, without some changes. Running an approved M.A.Subpart G organisation onat a local club level would be possible for larger clubs only. Smaller clubs (ie.g. 30 members, 5 aircrafts) would have had to be grouped under one M.A. Subpart G organisation. In this case it would be very complicated to implement the required information procedures to meet the requirements of a controlled environment. It' is very difficult to imagine that the accountable	The controlled environment principle offers some benefits, but needs to be adapted to the reality of how things have worked, very well, in recreational and air sports environments for many years, particularly club-based activities such as gliding. Key to this is the role of the national air sport associations which have had responsibilities equivalent to the competent authority in some cases, or at least those of a sub part G organisation with club based officials being part of that organisation alongside the sub part F activities.	Refer to comment answer 401	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				manager is responsible for personnel or aircrafts hundreds of miles away. AnThe insurance for such a M.A. Subpart G organisation wouldmight be extremely expaensive and perhaps not even not insurable. Therefore the air sport community very much prefers the uncontrolled environment., but would prefer to also have the availability of a controlled environment based on a simpler model where the national air sport association (such as in gliding or ballooning) acts as a competent authority and the clubs or groups form a simple equivalents of sub part F&G organisations.			
406e	FFA	General		Cette NPA ne traite que de la Part M et nous regrettons qu'elle ne soit limitée qu'à cela. Elle ne reprend qu'une partie des recommandations formulées par le consultant Air EuroSafe, lequel n'a pas rapporté dans son rapport final toutes les remarques et suggestions que nous avions clairement formulées au cours de la réunion de travail. Avec 47000 pilotes et 2200 avions utilisés, notre Fédération représente l'aviation sportive et de loisir française. Celle-ci se situe en Europe parmi la plus importante et la plus dynamique. Cette activité, essentielle pour notre pays est économiquement fragile. L'augmentation exorbitante des coûts supplémentaires qu'engendrerait la mise en place de la réglementation 2042/2003 de l'EASA, telle qu'elle est définie à ce jour, menacerait, à moyen terme, son existence même. A ce titre, nous considérons que toutes les opinions que nous exprimons doivent être non seulement intégralement rapportées,		Noted. Since the public consultation round on Part M was launched (2005), ongoing discussions with European General Aviation bodies resulted in the formation of Group MDM.032 " A concept for better regulation on General Aviation", which was charged with improving EASA legislation on General Aviation. MDM.032 recently reported via NPA 14/2006, available on the EASA website. This makes wide-ranging recommendations across the regulatory fields of interest, including the possible proposal of a Part M (Light), for non commercial, non-complex aircraft. Subsequently, Group M.017 has been formed, jointly with industry, to consider further the means by which this intent might be taken forward. This will include continuing airworthiness regulation (including maintenance), and the corresponding Acceptable Means of Compliance (AMC) and Guidance Material (GM). This constitutes a	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				mais étudiées et prises en compte. La sécurité aérienne est aussi notre objectif et nous ne sommes pas opposés au principe d'une homogénéisation d'une réglementation de base applicable à tous les Etats membres de la communauté européenne. Toutefois, nous considérons que pour les aéronefs de l'aviation sportive et de loisir, hors activité commerciale, de 450 kg à 2730 kg de MTOW (6000 lbs), l'agence doit se limiter à édicter les exigences essentielles. Les modalités d'application, au sens le plus large, doivent être confiées aux Etats membres, seuls à même de les adapter aux structures et organisations nationales. Trop de contraintes tuent l'Europe. Aussi, si dans un Etat, les règles en vigueur n'ont pas d'impact négatif sur la sécurité aérienne et fonctionnent correctement, tel est le cas de la France, elles doivent pouvoir continuer à être utilisées. La Part 66 est aussi une de nos préoccupations majeure. L'agence n'ayant pas prévu de NPA pour ce texte, nous n'avons pas d'autres moyens pour nous exprimer qu'utiliser la présente consultation. L'organisation originale du système français ne prévoit pas que les mécaniciens d'entretien soient titulaires d'une licence pour pouvoir exercer leur profession. Nous sommes d'accord, comme cela se pratique dans un certain nombre d'Etats, pour la mise en place d'un règlement communautaire imposant à tout mécanicien d'entretien, éligible à la délivrance d'une APRS, la subordination de l'obtention d'une licence. Toutefois, dans le règlement 2042/2003, qu'il s'agisse de transport public ou non, une seule catégorie d'aéronefs est prévue pour les licences des mécaniciens : 450 kg à		direct action in response to general criticism of the full EASA Part M approach. Nevertheless it must be recognised that the responsibility for implementation of the continuing airworthiness regulation lies with the individual NAA's	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				5700 kg de MTOW. Il en résulte un niveau de formation exigé pour l'obtention de ces licences inadapté aux compétences nécessaires et suffisantes pour assurer l'entretien de nos avions à technologie simple. Aussi, nous réitérons avec insistance la demande que nous avions déjà exprimée avec force lors de l'étude d'impact Air EuroSafe et à l'occasion des différentes réunions de travail, à savoir que : Une licence à compétence limitée à l'entretien d'aéronefs de l'aviation sportive et de loisir, hors activité commerciale, de 450 kg à 2730 kg de MTOW (3000 lbs), doit être non seulement envisagée mais est indispensable. Cette licence adaptée, du niveau du Certificat d'Aptitude Professionnel T1 (C.A.P. Aéronautique) dont le contenu serait à définir, se substituerait à la licence B 1.2, du niveau des connaissances théoriques du Baccalauréat Professionnel + 2 exigé dans la Part 66. Une étude, et les modalités d'application qui en découleraient, serait confiée aux Etats membres.			
407	FFA	Explanatory Note	M.A.901	*2. Explanatory NoteIV Contenu du projet d'opinionB) Les amendements envisagés* - Changes retained by the Agency.*e) Paragraphe M.A 901 (e) revue de navigabilité* - Parag M.A.901(e) Airworthiness review.*Pour les aéronefs de l'aviation sportive et de loisir, hors activité commerciale, d'une MTOW inférieure à 2730 kg, nous demandons qu'un organisme habilité sous-partie I n'ai pas la possibilité d'effectuer les examens de navigabilité d'aéronefs dont il n'a pas lui-même la responsabilité de l'entretien, sous-partie F, et du suivi de navigabilité, sous-partie G. Les examens de navigabilité de ces aéronefs ne peuvent être confiés qu'à l'autorité compétente.*For	B) En effet, en ne faisant appel qu'à des organismes privés, en général à vocation commerciale, il en résulterait une augmentation incontrôlable des coûts qui serait à terme insupportable pour notre aviation sportive et de loisir : prix des visites fixé unilatéralement, immobilisation des aéronefs au prétexte d'organisation et de planification, obligation qui pourrait être imposée par l'organisme de contrôler l'aéronef sur son site, etc.B) Effectively, while calling private organisations, ususally commercial organisations there would be a detrimental increase of costs which would become a heavy burden to the air sport and recreational aircraft activities: costs of	Partially accepted. Maintenance and Maintenance Management are two different issues. The performance of an Airworthiness Review should not be linked to the performance of maintenance. However, in order to be approved to perform Airworthiness Reviews (Subpart I) it is necessary to be approved as Subpart G.	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				recreational and air sport aircraft, of less than 2730 Kg and not commercially operated, we ask that an approved subpart I organisation does not hold the privilege of carrying an airworthiness review for aircraft when it does not have the responsibility for carrying out the maintenance as a subpart F organisation and managing the CA as a subpart G organisation.*C) Les amendements rejetésC)* Rejected paragraphs:*c) Paragraphe M.A 901 (f) Paragraphe d'examen de navigabilité d'aéronef*c) Paragraph M.A.901(f): Review of CA of the aircraft.*La Fédération partage la proposition du consultant et regrette que celle-ci ait été rejetée par l'agence.Nous ne sommes pas d'accord avec la position de l'agence qui, pour imposer une cohérence de système, ne prend pas en compte les différences fondamentales qui existent entre les aéronefs de l'aviation sportive et de loisir, hors activité commerciale, d'une MTOW comprise entre 450 kg et 2730 kg et de conception simple, et les aéronefs utilisés en transport public ou non d'une MTOW supérieure à 2730 kg.*The Federation shares the consultant's proposal and regreats that it had been rejected by the Agency. We do not share the Agency position, which for consistency reason, does not consider the essential differences between recreational and air sport aircraft not commercially operated between 450 Kg and 2730 Kg and of simple design, and the aircraft over 2730 Kg, whether they are operated commercially or not.*3. Draft DecisionPas de commentaires* - No comment.	maintenance checks unilateraly determined, immobilization of aircraft under the pretext of planning and organisation, which could be imposed by the organisation in charge of the aircraft on its site...		

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
408	FFA	Appendices	-	4. Appendices A l'analyse des points saillants de l'étude d'impact de la partie M du règlement 2042/2003 et des propositions qui en découlent, objet de la NPA, la Fédération : 1. regrette qu'un certain nombre de questions que nous avons posées à l'occasion de la réunion de travail avec le consultant n'apparaissent pas dans la synthèse. 2. regrette que l'agence ne réponde pas à toutes les propositions du consultant formulées par les autorités compétentes ou les dépositaires. 3. espère que les différents AMC qui seront développés dans le programme de travail 2007-2009 ne modifient pas l'esprit de la réglementation. Ces textes qui devraient apporter un certain nombre d'éclaircissements arriveront tardivement pour une mise en place prévue par l'agence en 2008. Nous estimons qu'il serait raisonnable de prévoir, au-delà de l'échéance de 2008, une période transitoire de 5 ans pour adapter les modalités d'application aux spécificités des Etats membres.		Noted. Refer to response to your comment 406e.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
409	FFA	General	M.A.201	M.A.201 Responsabilités Appendix II to M.A. 201 (h) (1) *e) text cité.* *PROPOSITION D'AMENDEMENT:* *e) Afin de satisfaire aux responsabilités du paragraphe a), le propriétaire ou l'exploitant d'un aéronef doit s'assurer de la réalisation des tâches associées au maintien de la navigabilité.* *Il peut effectuer ces tâches lui-même ou les sous-traiter à un organisme de gestion du maintien de la navigabilité, agrée ou non.* *Dans tous les cas, il doit vérifier que ces tâches soient correctement accomplies.* M.A. 201(e) In order to satisfy the responsibilities of paragraph (a) the owner of an aircraft may contract the tasks associated with continuing airworthiness to an approved continuing airworthiness management organisation as specified in M.A. Subpart G (continuing airworthiness management organisation hereinafter) in accordance with Appendix I. In this case, the continuing airworthiness management organisation assumes responsibility for the proper accomplishment of these tasks. PROPOSED TEXT: e) In order to satisfy the responsibilities of paragraph (a) *the owner or the operator of an aircraft must* *ensure that the tasks related to continuing airworthiness are correctly implemented. He may carry out theses tasks himself, or sub-contract them to a CA management organisation, approved or not approved. In any case he must ensure tah the tasks are correctly implemented.*	Par ailleurs, la mise en concurrence de fait d'organismes agréés F, G et I avec des organismes agréés F et G ou seulement F, n'est intellectuellement pas satisfaisante. Malgré l'interdépendance prévue par la réglementation des agréments F, G et I, il serait tentant pour certaines entreprises de sanctionner de petits organismes sous-partie F en n'accordant pas l'examen de navigabilité et ce pour détourner à leur profit une activité potentiellement intéressante.	Not accepted. The proposal offered contains inaccurate clauses. All CAMO's need to be approved and when the owner contracts a CAMO the responsibility for the tasks is transferred to the CAMO. However in the light of your comment the rule has been reworded for clarity.	See revised M.A.201

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
410	FFA	General	M.A.401	*L'exigence relatives aux cartes de travail est onéreuse pour les petits organismes en l'absence de données constructeur et n'est pas justifiée pour les avions simples.* The requirement on task cards is onerous to small organisations when no manufacturer data is available and is not justified for small aircraft.		Partially accepted. For general aviation and depending on the complexity of the task, the work card or worksheet system called up in M.A.401 may be as simple as a page with a list of all the tasks included in a particular check, with reference to the Maintenance Manual, where appropriate, where the maintenance instructions are contained. It should contain a place for authorised personnel to sign. Additional clarification will be given in AMC.	
411	FFA	General	M.A.501 (a),(b),(c),(d)	*M.A.501 installation* *PROPOSED TEXT/COMMENT:* *c) Les pièces standard seront montées sur un aéronef ou un élément d'aéronef uniquement lorsque les données d'entretien prévoient la pièce standard concernée. Ces pièces doivent uniquement être montées si elles sont accompagnées d'une attestation de conformité à la norme applicable. Les pièces fabriquées à partir d'un STC seront considérées comme des pièces standard et devront répondre aux mêmes critères que celles-ci.* PROPOSED AMENDMENT: c) Standard parts shall only be fitted to an aircraft or a component when the maintenance data specifies the particular standard part. Standard parts shall only be fitted when accompanied by evidence of conformity traceable to the applicable standard. Parts manufactured from an STC shall be considered as standard parts and shall meet the same requirement.	Prise en compte des pièces fabriquées sous STC. Considering the parts manufactured under STC	Not accepted. Parts manufactured for an STC are deemed to be manufactured from the STC holder data. This does not fit with the definition of standard parts. A Decision is under publication for an extension of standard parts to gliders optional parts.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
412	FFA	General	M.A.601	*M.A.601 Domaine d'activitéLa présente sous-partie établit les conditions à remplir par un organisme pour la délivrance ou le maintien des agréments d'entretien des aéronefs ou d'éléments d'aéronef non listés dans le M.A.201 (f) et (g).PROPOSED TEXT/COMMENT:La présente sous-partie établit les conditions à remplir par les organismes non Part 145 pour la délivrance ou le maintien des agréments d'entretien des aéronefs ou d'éléments d'aéronef non listés dans le M.A.201 (f) et (g).*M.A.601 ScopeThis Subpart establishes the requirements to be met by an organisation to qualify for the issue or continuation of an approval for the maintenance of aircraft and components not listed in M.A.201(f) and (g).PROPOSED AMENDMENT;This subpart establishes the requirement to be met by *the non-Part-145 AMO* to qualify for the issue or continuation of an approval for the maintenance of aircraft and components not listed in M.A.201(f) and (g).	Particularités des organismes non Part 145.Particularities of non approved Part-145 organisations.	Not accepted. The proposal does not add any useful information. However, a change in M.A.601 is made to delete reference to M.A.201(f).	See revised M.A.601
413	FFA	General	M.A.603 (a),(b)	*M.A.603 Domaines couverts par l'agrément* *AMC M.A.603 (a), AMC M.A.603 (b)* *PROPOSED TEXT/COMMENT:* *a) L'agrément est signifié par la délivrance d'un certificat (inclus dans l'appendice 5) par l'autorité compétente. Le manuel d'organisme d'entretien (MOE) agréé M.A.604 précise l'étendue des travaux pour lesquels l'agrément est demandé. L'appendice 4 de cette partie définit l'ensemble des classes et qualifications possibles selon la sous-partie F de la partie M.A.* *L'article 11 de l'appendice 4 définit pour les organismes UNIPERSONNEL les limites maximales autorisées. Les travaux d'entretien non couverts par l'agrément doivent être soumis à l'approbation de l'autorité compétente avant leur*	Prise en compte des organismes UNIPERSONNEL (organismes dans lesquels une seule personne est habilitée à délivrer l'APRS). Considering the one-man organisations (where only one man is authorised to sign the release of an aircraft)	Not accepted. The national authority cannot grant any approval beyond the scope of work in Appendix IV paragraph 11 except by application of Article 10 of Basic Regulation 1592/2002. There is no intention to increase the scope of work for one-man maintenance organisations.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				exécution. M.A.603 Extent of approval (a) The grant of approval is indicated by the issue of a certificate (included in Appendix 5) by the competent authority. The M.A.604 approved maintenance organisation's manual must specify the scope of work deemed to constitute approval.The Appendix 4 to this Part defines all classes and ratings possible under M.A. Subpart F. Text added: The paragraph 11 of Appendix 4 defines for the one-man organisation the maximum limits. The maintenance tasks not included in the approved scope must be submitted to the authority before their implementation.			
414	FFA	General	M.A.604, Appendix IV to AMC M.A.604	*M.A.604 Manuel d'organisme d'entretien AMC M.A.604, Appendix IV to AMC M.A.604* *a) L'organisme d'entretien fournit un manuel contenant au moins les informations suivantes :* *1. une attestation signée par le dirigeant responsible pour confirmer que l'organisme travaillera en permanence conformément à la partie M et au manuel à tout moment, etc …* *PROPOSED TEXT/COMMENT:* *a) L'organisme d'entretien fournit un manuel adapté à la taille de l'organisme. Il doit contenir au moins les informations suivantes :* *1. une attestation signée par le dirigeant responsable pour confirmer que l'organisme travaillera en permanence conformément à la partie M et au manuel à tout moment, etc.....* TEXT AMENDED: (a) The maintenance organisation shall	Le manuel d'organisme d'entretien doit être adapté à la taille de l'entreprise. L'annexe IV à l'AMC 604 propose un plan du format d'un manuel d'organisme d'entretien acceptable pour un petit organisme avec moins de 10 employés. Nous avons décompté dans ce plan plus de 120 points auxquels doivent répondre les petits organismes ainsi concernés. Ce niveau d'exigence nous paraît exagéré et de toute façon inadapté aux organismes UNIPERSONNEL (organismes dans lesquels une seule personne est habilitée à délivrer l'APRS). L'annexe IV à l'AMC doit être revue c'est-à-dire allégée puis complétée par un plan du format d'un manuel d'entretien pour les organismes UNIPERSONNEL. The MOE should be adapted to the size of the organisation. The Appendix IV to AMC 604 proposes a form of MOE acceptable to organisations with less than 10 persons. We have calculated that the small organisations shall comply with more than 120 items. This level of	Not accepted. The list provided in Appendix IV to AMC604 shows an example of the expected contain of the MOM for a small organisation. For a particular one-man organisation some of those items may not be applicable, and they don't need to be developed. Each particular case should be discussed with the applicable Competent Authority. It must be noted that a one-man organisation is not an organisation with only one person authorised to perform the release to service of the aircraft. It is the case where the same person performs all the functions required by Subpart F.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				provide a manual adapted to the organisation size. It shall contain at least the following data: 1. a statement signed by the accountable manager to confirm that the organisation will continuously work in accordance with Part-M and the manual at all times, and	completion seems exagerated to us, and nevertheless inappropriate to small organisations of one-man staff (where only one man is authorised to sign the release of an aircraft). The Appendix IV should be lightened and completed with with a new form of MOE for one-man organisations.		
415	FFA	General	M.A.605 (a)	*M.A.605 Locaux - PROPOSED TEXT/COMMENT:* *d) Les organismes UNIPERSONNEL doivent disposer au moins, d'un site de réparation séparé des aéronefs, d'un bureau pour l'étude de la documentation technique et les tâches administratives, et d'un magasin pour le stockage des pièces détachées comprenant une zone de quarantaine.* M.A.605 Facilities - TEXT ADDED: d) The one-man organisations shall include at minimum one seperated area for carrying the repair of aircraft, an office for the study of technical data and administrative management, and stores for components which would include a quarantine area.	Prise en compte des organismes UNIPERSONNEL (organismes dans lesquels une seule personne est habilitée à délivrer l'APRS) Considering the one-man organisations (where only one man is authorised to sign the release of an aircraft)	Not accepted. The proposed paragraph does not provide any additional flexibility for small organisations. The current text already provides flexibility for adapting the facilities to the scope of work of the small organisation. These facilities should be described in the MOM.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
416	FFA	General	M.A.606	*M.A.606 Exigences en matière de personnel* *d) L'organisme emploie du personnel qualifié pour le travail normalement prévu par contrat. L'emploi temporaire de personnel sous-traitant est permis dans le cas d'un travail plus important que prévu et uniquement pour le personnel ne délivrant pas de certificat d'approbation pour remise en service.* *e) La qualification de tous les personnels impliqués dans l'entretien est justifiée et enregistrée.* *f) Le personnel qui effectue des tâches spécialisées comme le soudage, les essais/le contrôle non destructif autre que le contraste des couleurs, est qualifié conformément à une norme reconnue officiellement.* *g) L'organisme d'entretien emploie suffisamment de personnel habilité pour délivrer des certificats M.A.612 et M.A.613 d'approbation pour remise en service d'aéronefs et d'éléments d'aéronef. Ils doivent respecter les exigences de la partie 66.* *PROPOSED TEXT/COMMENT:* *g) L'organisme d'entretien emploie suffisamment de personnel habilité pour délivrer des certificats M.A.612 et M.A.613 d'approbation pour remise en service d'aéronefs et d'éléments d'aéronef. Ils doivent respecter les exigences de la partie 66. Le contenu de la licence exigée pour le personnel habilité exclusivement à l'entretien d'aéronefs de l'aviation sportive et de loisir, hors activité commerciale, dont la MTOW est comprise entre 450 et 2730 kg, est une responsabilité de l'Etat membre. Cette licence devra se conformer au moins aux exigences de l'Annexe 1 de la Convention de Chicago.* M.A.606 Personnel requirements	La qualification du personnel, éligible APRS, doit être titulaire d'une licence telle que définie dans la PART 66. Il est regrettable que La Part 66 ai été exclue de la mission du consultant. Le niveau de formation exigé pour les mécaniciens d'entretien d'aéronefs de l'aviation sportive et de loisir, hors activité commerciale, dont la MTOW est comprise entre 450 et 2730 kg est trop contraignante, trop onéreuse et surtout totalement inadapté aux aéronefs à technologie simple concernés. Le lancement d'une NPA sur la Part 66 est fermement demandé. The certifying staff shall comply to Part-66. We regreat that the consultant could not deal with Part-66. The level of knowledge required to mechanics working on air sport and recreational aircraft of less than 27630 Kg but more than 450 Kg not commercially operated is too high, expensive and mostly inappropriate to simple design aircraft. Launching an NPA on Part-66 is strongly required.	Partially accepted. Within the current rulemaking process a Part-66 "light" is under consideration.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				(d) The organisation shall have appropriate staff for the normal expected contracted work. The use of temporarily subcontracted staff is permitted in the case of higher than normally expected contracted work and only for personnel not issuing a certificate of release to service. (e) The qualification of all personnel involved in maintenance shall be demonstrated and recorded. (f) Personnel who carry out specialised tasks such as welding, non-destructive testing/inspection other than colour contrast shall be qualified in accordance with an officially recognised standard. (g) The maintenance organisation shall have sufficient certifying staff to issue M.A.612 and M.A.613 certificates of release to service for aircraft and components. They shall comply with the requirements of Part-66. TEXT ADDED: g) The maintenance organisation shall have sufficient certifying staff to issue M.A.612 and M.A.613 certificates of release to service for aircraft and components. They shall comply with the requirements of Part-66. The content of the licence required to certifying staff of less than 2730 Kg but more than 450 Kg sport and recreational aircraft not involved in commercial activities, is the responsibility of the NAA. This licence shall meet the annexe 1 of ICAO.			
417	FFA	General	M.A.607	*M.A.607 Personnels habilitésa) En plus prévu au M.A.606 (g), le personnel habilité ne peut exercer ses prérogatives que si l'organisme s'est assuré que :1. le personnel habilité peut justifier soit de six mois d'expérience pertinente en matière*	La justification de six mois d'expérience pertinente au cours des deux dernières années est trop restrictive, en particulier pour les organismes qui ont recours au bénévolat. L'exécution de deux visites de 100 heures au cours des deux dernières	Noted. An NPA shall be published on April 2007 clarifying the experience requirements. Comments will be accepted. In addition, further consideration may be given during	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				*d'entretien au cours des deux dernières années ou remplir les conditions pour la délivrance des prérogatives concernées, et2. ces personnels habilités ont une bonne compréhension des aéronefs ou éléments d'aéronef à entretenir ainsi que des procédures d'organisme associées.PROPOSED TEXT/COMMENT:a) En plus prévu au M.A.606 (g), le personnel habilité ne peut exercer ses prérogatives que si l'organisme s'est assuré que :1. le personnel habilité peut justifier soit de six mois d'expérience pertinente en matière d'entretien au cours des deux dernières années ou avoir exécuté au moins 2 visites de 100 heures au cours des 2 dernières années, ou remplir les conditions pour la délivrance des prérogatives concernées, et.....M.A.607 Certifying staff(a) In addition to M.A.606(g), certifying staff can only exercise their privileges, if the organisation has ensured:1. that certifying staff can demonstrate that in the preceding two-year period they have either had six months ofrelevant maintenance experience or, met the provision for the issue of the appropriate privileges; and...TEXT MODIFIED:(a) In addition to M.A.606(g), certifying staff can only exercise their privileges, if the organisation has ensured:1. that certifying staff can demonstrate that in the preceding two-year period they have either had six months ofrelevant maintenance experience or, has carried out at least two 100 H checks during the last 2 years period, or met the provision for the issue of the appropriate privileges; and...	années serait plus judicieuse et moins contraignante.The requirement to have 6 months of experience within the last 2 years is too much resrictive, particularily for organisations calling for personnel working on a voluntary basis. Carrying out two 100 H inspection checks during the last 2 years would be more judicious and less restrictive.	preparation of the Part-66 "light" task.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
418	FFA	General	M.A.616, Annexe VIII à l'AMC M.A.616	M.A.616 Revue d'organisation - AMC M.A.616, Annexe VIII à l'AMC M.A.616 Afin de s'assurer que l'organisme d'entretien agréé continue à répondre aux exigences de la présente sous-partie, il organise régulièrement des revues d'organisations. PROPOSED TEXT/COMMENT: Afin de s'assurer que l'organisme d'entretien agréé continue à répondre aux exigences de la présente sous-partie, il organise régulièrement des revues d'organisations et au moins une fois par an. M.A.616 Organisational review - AMC M.A.616, Annexe VIII à l'AMC M.A.616 To ensure that the approved maintenance organisation continues to meet the requirements of this Subpart, it shall organise, on a regular basis, organisational reviews. PROPOSED TEXT/COMMENT: To ensure that the approved maintenance organisation continues to meet the requirements of this Subpart, it shall organise, on a regular basis, organisational reviews and at least once a year.	Une fréquence minimum doit être fixée. Remarque : les exigences contenues dans l'annexe VIII à l'AMC M.A 616 sont démesurées et irréalistes pour un organisme de moins de 10 personnes. A minimal frequency (presumely of organisational reviews) shall be stablished. Remark: The requirements stated in Appendix VIII to AMC MA.A.616 are beyond measures and irrealistic to less than 10 persons organisations.	Noted. The provision for a 1 year interval is already covered by Appendix VIII to AMC M.A.616, paragraph 2.d, for the case of organisations with less that 10 maintenance staff.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
419	FFA	General	M.A.701	*M.A.701 Domaine d'activité* *La présente sous-partie établit les conditions de délivrance ou de maintien des agréments des organismes pour la gestion du maintien de la navigabilité des aéronefs.* *PROPOSED TEXT/COMMENT:* *La présente sous-partie établit les conditions de délivrance ou de maintien des agréments des organismes pour la gestion du maintien de la navigabilité des aéronefs. Une personne ou un organisme non agréé peut assurer la gestion de maintien de navigabilité relative aux opérations d'entretien de sa compétence.* M.A.701 Scope This Subpart establishes the requirements to be met by an organisation to qualify for the issue or continuation of an approval for the management of aircraft continuing airworthiness. TEXT MODIFIED: This Subpart establishes the requirements to be met by an organisation to qualify for the issue or continuation of an approval for the management of aircraft continuing airworthiness. A person or a non approved organisation may manage the CA related to maintenance tasks of its competency.	Il n'est pas nécessaire d'avoir un agrément pour assurer la gestion du maintien de la navigabilité des aéronefs. The management of continuing airworthiness of aircraft does not require an approval.	Not accepted. Your proposal is already addressed by M.A.201(e), which has been revised for clarity. The owner of the aircraft doesn't need a CAMO approval to manage the continuing airworthiness of his aircraft.	See revised M.A.201

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
420	FFA	General	AMC M.A.704, Appendix V to AMC M.A.704	SOUS-PARTIE G - ORGANISME DE GESTION DU MAINTIEN DE LA NAVIGABILITÉ M.A.704 Spécifications de gestion du maintien de la navigabilité AMC M.A.704, Appendix V to AMC M.A.704 a) L'organisme de gestion du maintien de la navigabilité fournit des spécifications de gestion du maintien de la navigabilité contenant les informations suivantes : 1. une attestation signée par le dirigeant responsible pour confirmer que l'organisme travaillera à tout moment conformément à cette partie et aux spécifications, et 2. le domaine d'activité de l'organisme, et 3. les titres et noms des personnes nommées conformément au M.A.706 (b) et M.A.706(c), et 4. un organigramme montrant les chaînes de responsabilités entre les personnes mentionnées dans le M.A.706 (b) et M.A.706(c), et 5. une liste du personnel d'examen de navigabilité prévu au M.A.707, et 6. une description générale et l'emplacement des installations, et 7. des procédures spécifiant comment l'organisme de gestion du maintien de la navigabilité garantit une mise en conformité avec la présente partie, et 8. les procédures d'amendement des spécifications de gestion du maintien de la navigabilité. 9. Les spécifications de gestion du maintien de la navigabilité et leurs amendements sont approuvées par l'autorité compétente. B) Nonobstant le paragraphe b), des amendements mineurs aux spécifications peuvent être approuvés selon une	Le M.A.704 et l'AMC sont inadaptés aux organismes UNIPERSONNEL (organismes dans lesquels une seule personne est habilitée à délivrer l'APRS). L'activité principale du responsable technique est le maintien de la navigabilité qu'il contrôle par le biais des revues organisationnelles. Ces tâches sont définies dans le manuel d'entretien de l'organisme. Il peut en sous-traiter une partie à d'autres organismes. M.A.704 and its AMC are inappropirate to one-man organisations (organisation where one man is authorised to sign the release of aircraft). The main activity of the Tchnical Manager is the management of CA that he controls through organisational reviews. These tasks are decribed in the maintenance programme of the organisation.He may sub-contract part of the tasks to other organisations.	Not accepted. The M.A.711(a).3 provides for a CAMO to sub-contract tasks associated with management of continuing airworthiness within the limitation of his approval provided the sub-contractor works under the CAMOs quality system. However, without a quality system, no sub-contracting is allowed since the CAMO can not discharge its responsibilities.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				procédure prévue au titre de l'agrément de l'organisme (ci-après nommée approbation indirecte). PROPOSED TEXT/COMMENT: c) Dans le cas des organismes UNIPERSONNEL, le responsable technique assure le maintien de la navigabilité qu'il contrôle par le biais des revues organisationnelles, il peut sous-traiter certaines de ces tâches à d'autres organismes. PROPOSED TAXT / COMMENT: c) In the case of one-man organisation, the Technical Manager ensures the management of CA through the organisational reviews, he may sub-contract some of these tasks to other organisations.			
421	FFA	General	AMC M.A.707 (a)	M.A.707 Personnel d'examen de navigabilitéAMC M.A.707 (a)a) Pour être habilité à effectuer des examens de navigabilité, un organisme de gestion du maintien de la navigabilité dispose du personnel d'examen de navigabilité approprié pour délivrer les certificats d'examen de navigabilité et recommandations de la sous-partie I de la partie M.A. En plus des exigences prévues au M.A.706, ce personnel a acquis :1. au moins cinq années d'expérience dans le domaine du maintien de la navigabilité, et..PROPOSED TEXT/COMMENT:a) Pour être habilité à effectuer des examens de navigabilité, un organisme de gestion du maintien de la navigabilité dispose du personnel d'examen de navigabilité approprié pour délivrer les certificats d'examen de navigabilité et recommandations de la sous-partie I de la partie M.A. En plus des exigences prévues au M.A.706, ce personnel a acquis :1. au	Dans le cas de personnel dont les prérogatives sont limitées à l'habilitation des examens de navigabilité des aéronefs de l'aviation sportive et de loisir, hors activité commerciale, d'une MTOW inférieure à 2730 kg, l'exigence de cinq années d'expérience dans le domaine du maintien de la navigabilité est irréaliste, d'une part en raison du turnover important d'un personnel, en général, en début de carrière, et, d'autre part, du fait de la simplicité du matériel concerné qui ne le justifie pas.For the personnel whose privileges are limited to the issuance of the ARC for sport air and recreational aircraft of less than 2760 Kg not commercially operated, the requirement of 5 years experience in continuing airworthiness is not realistic. The first reason is the important turn-over of staff, generally replaced with person at the beginning of their carrier, the second one is the simplicity of design of aircraft which does	Partially accepted. It is recognised that these requirements need to be amended for non complex non commercial aviation. Amendments would be made to AMCs to clarify the requirements for these categories of general aviation aircraft.	

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				moins cinq années d'expérience dans le domaine du maintien de la navigabilité, qui peuvent être réduites à 2 ans si les prérogatives des personnels concernés sont limitées à l'habilitation des examens de navigabilité relatifs aux aéronefs de l'aviation sportive et de loisir, hors activité commerciale, d'une MTOW inférieure à 2730 kg et ….PROPOSED TEXT/COMMENT:(a) To be approved to carry out airworthiness reviews, an approved continuing airworthiness management organisationshall have appropriate airworthiness review staff to issue M.A. Subpart I airworthiness review certificates and recommendations.In addition to M.A.706 requirements, these staff shall have acquired:1. at least five years experience in continuing airworthiness which can be reduced to 2 years if the privileges of these persons are limited to the issuance of the airworthiness reveiws of air sport and recreational aircraft, when not commercially operated, and of less than 2730 Kg MTOM, and;.....	not require extensivily trained personnel.		
422	FFA	General	M.A.801 (b),(d), (e), (f)	SOUS-PARTIE I – CERTIFICAT D'EXAMEN DE NAVIGABILITÉ M.A.901 Examen de navigabilité d'un aéronef AMC M.A. 801 (b), AMC M.A.801 (d), AMC M.A.801 (e), AMC M.A.801 (f) Pour assurer la validité du certificat de navigabilité d'un aéronef, un examen de navigabilité de l'aéronef et de ses renseignements de maintien de navigabilité est réalisé périodiquement. ..... (original text) 2.14 PROPOSED TEXT/COMMENT: Unchanged from a) to c) included d) Si un aéronef n'est pas dans un environnement contrôlé, l'examen de navigabilité est exécuté par l'Autorité	Voir notre remarque : 2. Explanatory Note, e) Paragraphe M.A 901 (e) revue de navigabilité. Comme cela ce pratique aujourd'hui sous une autre forme, un organisme agréé F+ G ou sous traitant G à un organisme agréé G, doit pouvoir bénéficier de la possibilité de prolonger deux fois la durée de validité du certificat d'examen de navigabilité pour une période d'un an, à chaque fois. Refer to our remark n°2. Explanatory note, e) paragraph M.A.901(e) Airworthiness review. As ususally carried out nowadays under another form, a subpart F+G approved organisation or sub-contracting to an organisation G, should be able to extend twice the validity of the ARC for a period	Noted. Initial issuance of ARC is carried out by the competent authority as it also issues the CoA and reissuance is carried out either by the competent authority or by an approved CAMO that can be a one man organisation as mentioned in the NPA 7/2005. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO. This text has been modified. AMC has been added to limit the number of bodies involved. Regarding item 2, a CAMO can only extend an ARC when such an ARC was issued by itself and the aircraft has remained under its	See revised M.A.901

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
				compétente qui délivre le certificat d'examen de navigabilité. e) Si un aéronef est dans un organisme agréé selon les sous parties F et G ou agréé F et sous traitant le maintien de la navigabilité à un organisme agréé G, l'examen de navigabilité est effectué par l'autorité compétente qui délivre le certificat de navigabilité et qui peut prolonger de deux fois la durée de validité du certificat d'examen de navigabilité pour une période d'un an, à chaque fois. Un certificat d'examen de navigabilité ne sera pas prolongé si l'autorité nationale sait ou a des raisons de croire que l'aéronef est inapte au vol. f) unchanged	of 1 year each time.	control for the previous 12 months. The authority is not a CAMO and does not manage the continuing airworthiness of the aircraft.	
423a	Simon Holland	General	M.A.302	Part M - MA302 Individual Maintenance Program for all Aircraft. This is an unacceptable burden to the gliding community and will prove so expensive that it would effectively put an end to the sport for no good reason whatsoever. The current maintenance regime with the UK gliding community has worked extremely effectively for many years and there is no good reason to change it to this onerous system of "reinventing the wheel" for every glider in the UK in respect of its maintenance program. There is absolutely no reason to write separate operation manuals for every glider currently flying in the UK.		Partially accepted. As written, M.A.302 states "Every aircraft shall be maintained in accordance with a maintenance programme approved by the CA …. ". This formulation does not preclude generic maintenance programmes adapted to the aircraft configuration. In this respect, this rule is not different to FAR 43-13 and is capable of encompassing current practices. Means by which several aircraft will be put in one maintenance programme shall be developed in an amendment to the AMC. Nonetheless the current wording of M.A. 302 and the Appendix I to AMC M.A. 302 has created confusion and has been reviewed.	See revised M.A.302

Cmnt #	Commentator	Part name	Art/Nr/Chapter	Comment text	Reason text	Response text	Modified text in NPA
423b	Simon Holland	General	M.A.901	Part M - MA901The Regulatory Impact Assessment consultation recommended that the Airworthiness Review Certificates for gliders in the UK continue to be issued by a certified person. This has been rejected by EASA and insists that the competent authority issues them. EASA should reconsider this judgement on the grounds of cost to the glider community in the UK. There is no safety issue as to why the ARC should be issued by anyone other than the existing regime. Involving the State in the form of the CAA would only increase costs, and would do nothing more for safety than the existing BGA (British Gliding Association) already does, and has done for many decades.		Partially accepted. A modification to M.A.901 has been proposed as an adjustment to Part-M to address the needs of aircraft other than complex-motor-powered aircraft or creation of a separate Part-M specific to aircraft other than complex-motored-powered aircraft, combined with a Light Part-66 license Initial issuance of ARC is carried out by the competent authority as it also issues the CoA. Re-issuance is carried out either by the competent authority or by an approved subpart G and I CAMO. In both cases the ARC could be issued by an individual, either a competent authority surveyor or a one-man CAMO as mentioned in the NPA 7/2005.	See revised M.A.901

DRAFT OPINION OF THE EUROPEAN AVIATION SAFETY AGENCY

For a Commission Regulation amending Commission Regulation (EC) No 2042/2003, on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks

(Text with EEA relevance)

(EC) No 2042/2003
Article 5
Certifying staff

1. Certifying staff shall be qualified in accordance with the provisions of Annex III, except as provided for in ~~M.A.607 (b)~~ M.A.801 (c) and M.A.803 of Annex I and in 145.A.30 (j) of and Appendix IV to Annex II.

2. …….

M.A.201 Responsibilities

(d) ……

(e) In order to satisfy the responsibilities of paragraph (a) the owner of an aircraft shall ensure the proper accomplishment of the tasks associated with the continuing airworthiness. Alternatively, the owner of an aircraft may contract the tasks associated with the continuing airworthiness to an approved continuing airworthiness management organisation as specified in M.A. Subpart G (continuing airworthiness management organisation hereinafter) in accordance with Appendix I. In this case, the continuing airworthiness management organisation assumes responsibility for the proper accomplishment of these tasks.

(f) ……

M.A.202 Occurrence reporting

(a) Any person or organisation responsible under M.A.201 shall report to the competent authority of the State of registry, the organisation responsible for the type design or supplemental type design and, if applicable, the Member State of operator, any identified condition of an aircraft or component that hazards seriously the flight safety.

(b) ……

M.A.302 Maintenance programme

(a) ~~Every~~ The maintenance of the aircraft shall be ~~maintained~~ organized in accordance with a maintenance programme ~~approved by the competent authority~~, which shall be periodically reviewed and amended accordingly.

(b) The maintenance programme and any subsequent amendments shall be approved by the competent authority. When the aircraft continuing airworthiness is managed by a Part-M, Subpart G organisation, the maintenance programme and its amendments may be approved by the Part-M, Subpart G organisation through an approval procedure (hereinafter called "indirect approval procedure"). This procedure shall be established by the Part-M, Subpart G organisation, included in the Continuing Airworthiness Management Exposition, and approved by the competent authority responsible for that Part-M, Subpart G organisation.

(c) The maintenance programme must establish compliance with:

1. instructions for continuing airworthiness issued by type certificate and supplementary type certificate holders and any other organisation that publishes such data in accordance with Part-21, or

2. instructions issued by the competent authority, if they differ from subparagraph 1 or in the absence of specific recommendations.~~, or~~

~~3. instructions defined by the owner or the operator and approved by the competent authority if they differ from subparagraphs 1 and 2,~~

The owner or the operator may propose to the competent authority alternate and/or additional instructions to those defined in paragraphs 1 and 2. These alternate and/or additional instructions may be included in the maintenance programme once they have been approved by the competent authority.

(d) The maintenance programme shall contain details, including frequency, of all maintenance to be carried out, including any specific tasks linked to specific operations. ~~The programme must include a reliability programme when the maintenance programme is based:~~

1. ~~on Maintenance Steering Group logic, or;~~

2. ~~mainly on condition monitoring.~~

(e) ~~When the aircraft continuing airworthiness is managed by an M.A. Subpart G organisation the maintenance programme and its amendments may be approved through a maintenance programme procedure established by such organisation (hereinafter called indirect approval).~~ For large aircraft, when the maintenance programme is based on:

1. Maintenance Steering Group logic, or,

2. mainly on condition monitoring

the programme must include a reliability programme.

(f) The maintenance programme must be subject to periodic reviews and amended when necessary. The reviews will ensure that the programme continues to be valid in light of operating experience whilst taking into account new and/or modified maintenance instructions promulgated by the Type Certificate holder.

(g) The maintenance programme must reflect applicable mandatory regulatory requirements addressed in documents issued by the Type Certificate holder to comply with Part 21.A.61.

M.A.305 Aircraft continuing airworthiness record system

(a) ……

(b) The aircraft continuing airworthiness records shall consist of, as appropriate, an aircraft logbook, engine logbook(s) or engine module log cards, propeller logbook(s) and log cards for any service life limited component and, when required by the Member State in accordance with M.A.201(i), the operator's technical log.

(c) ……

M.A.401 Maintenance data

(a) ……

(b) For the purposes of this Part, applicable maintenance data is:

1. any applicable requirement, procedure, standard or information issued by the competent authority, and;

2. any applicable airworthiness directive, and;

3. applicable instructions for continuing airworthiness, issued by type certificate holders, supplementary type certificate holders and any other organisation that publishes such data in accordance with Part 21, and;

4. any applicable data issued in accordance with 145.A.45(d).

(c) ……

M.A.502 Component maintenance

(a) ……

(b) Maintenance on any component may be performed by M.A.801(b)2 certifying staff only whilst such components are fitted to the aircraft. Such components, nevertheless, can be temporarily removed for maintenance when such removal is expressly permitted by the aircraft maintenance ~~manual~~ data to improve access.

M.A.601 Scope

This Subpart establishes the requirements to be met by an organisation to qualify for the issue or continuation of an approval for the maintenance of aircraft and components not listed in M.A.201 ~~(f) and~~ (g).

M.A.607 Certifying staff

(a) In addition to M.A.606(g), certifying staff can only exercise their privileges, if the organisation has ensured:

1. that certifying staff can demonstrate that ~~in the preceding two-year period they have either had six months of relevant maintenance experience or, met the provision for the issue of the appropriate privileges;~~ they have the experience required by Part-66, and,

2. that certifying staff have an adequate understanding of the relevant aircraft and/or aircraft component(s) to be maintained together with the associated organisation procedures.

~~(b) In the following unforeseen cases, where an aircraft is grounded at a location other than the main base where no appropriate certifying staff is available, the maintenance organisation contracted to provide maintenance support may issue a one-off certification authorisation:~~

~~1. to one of its employees holding type qualifications on aircraft of similar technology, construction and systems; or~~

~~2. to any person with not less than five years maintenance experience and holding a valid ICAO aircraft maintenance licence rated for the aircraft type requiring certification provided there is no organisation appropriately approved under this Part at that location and the contracted organisation obtains and holds on file evidence of the experience and the licence of that person.~~

~~All such cases must be reported to the competent authority within seven days of the issuance of such certification authorisation. The approved maintenance organisation issuing the one-off certification authorisation shall ensure that any such maintenance that could affect flight safety is re-checked.~~

(b) The approved maintenance organisation shall record all details concerning certifying staff and maintain a current list of all certifying staff.

M.A.610 Maintenance work orders

Before the commencement of maintenance a written work order shall be agreed between the organisation and the ~~customer~~ organisation requesting maintenance to clearly establish the maintenance to be carried out.

M.A.708 Continuing airworthiness management

(a) ……

(b) For every aircraft managed, the approved continuing airworthiness management organisation shall:

1. develop and control a maintenance programme for the aircraft managed including any applicable reliability programme,

2. present the aircraft maintenance programme and its amendments to the competent authority for approval (unless covered by an indirect approval procedure in accordance with M.A.302) and provide a copy of the programme to the owner of non commercially operated aircraft,

3. ……

M.A.711 Privileges of the organisation

(a) ……

(b) An approved continuing airworthiness management organisation, may additionally be approved to carry out M.A.710 airworthiness reviews and:

1. issue ~~an~~ the related airworthiness review certificate, ~~or;~~ and,

2. make a recommendation for the airworthiness review to a Member State of Registry. In the case of aircraft of 2730 Kg MTOW and below, that are not used in Commercial Air Transport, the recommendation shall be issued only on the import of an aircraft in accordance with Part-21 and M.A.904.

(c) ……

M.A.712 Quality system

(e) ……

(f) In the case of a small M.A. Subpart G organisation ~~that does not have the privileges granted under M.A.711(b),~~ the quality system can be replaced by performing organisational reviews on a regular basis except when the organisation issues airworthiness review certificates for aircraft above 2730 kg MTOW.

M.A.801 Aircraft certificate of release to service

(b) ……

(c) By derogation to M.A.801(b), in the case of unforeseen situations, where an aircraft is grounded at a location other than the principle place of business where no appropriate certifying staff is available, the owner may authorise any person, with not less than 3 years of appropriate maintenance experience and holding the proper qualifications, to maintain according to the standards set out in subpart D and release the aircraft, provided there is no organisation appropriately approved under this Part or Part 145 at that location.
The owner shall:

1. obtain and keep in the aircraft records details of all the work carried out and of the qualifications held by that person issuing the certification, and

2. ensure that any such maintenance is rechecked and released by an appropriately authorised M.A.801(b) person or a Subpart F organisation or a Part-145 organisation at the earliest opportunity but within a period not exceeding 7 days, and

3. notify the Subpart G organisation responsible for continuing airworthiness management when contracted in accordance with M.A.201(e), or the competent authority in the absence of such a contract, within 7 days of the issuance of such certification authorisation.

(d) In the case of a release to service under (b)2 the certifying staff may be assisted in the execution of the maintenance tasks by one or more persons under his direct and continuous control.

(e) A certificate of release to service shall contain basic details of the maintenance carried out, the date such maintenance was completed and:

1. the identity including approval reference of the M.A. Subpart F approved maintenance organisation and certifying staff issuing such a certificate; or

2. in the case of subparagraph (b)2 certificate of release to service, the identity and if applicable licence number of the certifying staff issuing such a certificate.

(f) Notwithstanding paragraph (b) in the case of incomplete maintenance, such fact shall be entered in the aircraft certificate of release to service before the issue of such certificate.

(g) A certificate of release to service shall not be issued in the case of any known non-compliance which hazards seriously the flight safety.

M.A.901 Aircraft airworthiness review

To ensure the validity of the aircraft airworthiness certificate an airworthiness review of the aircraft and its continuing airworthiness records must be carried out periodically.

(a) An airworthiness review certificate is issued in accordance with Appendix III (EASA Form 15a or 15b) on completion of a satisfactory airworthiness review and is valid one year.

(b) ~~An aircraft in a controlled environment is an aircraft~~ Aircraft used in Commercial Air Transport and aircraft above 2730 kg MTOW are considered to be in a controlled environment when they have been continuously managed by an M.A. Subpart G approved continuing airworthiness management organisation, ~~which has~~ have not changed organisations in the previous 12 months, and ~~which is~~ are maintained by approved maintenance organisations. This includes M.A.803(b) maintenance carried out and released to service according to M.A.801(b)2 or M.A.801(b)3.

~~(c) If an aircraft is within a controlled environment~~ In such cases, the continuing airworthiness management organisation managing the aircraft may if appropriately approved:

1. issue the airworthiness review certificate in accordance with M.A.710, and;

2. for airworthiness review certificates it has issued, when the aircraft has remained within a controlled environment, extend twice the validity of the airworthiness review certificate for a period of one year each time. An airworthiness review certificate shall not be extended if the organisation is aware or has reason to believe that the aircraft is not airworthy ~~unairworthy~~.

(c) ~~(d) If an aircraft is~~ Aircraft used in Commercial Air Transport and aircraft above 2730 kg MTOW, which are not within a controlled environment, or managed by an M.A. Subpart G approved continuing airworthiness management organisation that does not hold the privilege to carry out airworthiness reviews, the airworthiness review certificate shall be issued by the competent authority following a satisfactory assessment based on a recommendation made by an appropriately approved continuing airworthiness management organisation sent together with the application from the owner or operator. This recommendation shall be based on an airworthiness review carried out in accordance with M.A.710.

(d) For aircraft of 2730 Kg MTOW and below, that are not used in Commercial Air Transport, any continuing airworthiness management organisation appointed by the owner may if appropriately approved

1. issue the airworthiness review certificate in accordance with M.A.710 when the aircraft has been maintained by approved maintenance organisations since the last Airworthiness Review Certificate issuance. This includes

M.A.803(b) maintenance carried out and released to service according to M.A.801(b)2 or M.A.801(b)3, and;

2. for airworthiness review certificates it has issued, extend them twice for a period of one year each time when the following conditions are met:

   a. the aircraft has remained managed by this continuing airworthiness management organisation since it issued the Airworthiness Review Certificate, and
   b. the aircraft has been maintained by approved maintenance organisations since this continuing airworthiness management organisation issued the Airworthiness Review Certificate. This includes M.A.803(b) maintenance carried out and released to service according to M.A.801(b)2 or M.A.801(b)3.

An airworthiness review certificate shall not be extended if the organisation is aware or has reason to believe that the aircraft is not airworthy.

(e) ~~Whenever circumstances show the existence of a potential safety threat,~~ In addition to M.A.901(c), the competent authority ~~may decide to~~ shall carry out the airworthiness review and issue the airworthiness review certificate itself in the following cases: ~~In this case, the owner or operator shall provide the competent authority with:~~

1. whenever circumstances show the existence of a potential safety threat, or
2. for aircraft of 2730 Kg MTOW and below, that are not used in Commercial Air Transport, when the aircraft has not been maintained by approved maintenance organisations in accordance with M.A.901(d)1, or when not managed by an M.A. Subpart G approved continuing airworthiness management organisation that holds the privilege to carry out airworthiness reviews.

~~▪ the documentation required by the competent authority,~~
~~▪ suitable accommodation at the appropriate location for its personnel, and~~
~~▪ when necessary the support of personnel appropriately qualified in accordance with Part-66.~~

(f) When the competent authority carries out the airworthiness review and issues the airworthiness review certificate itself, the owner or operator shall provide the competent authority with:

- the documentation required by the competent authority,
- suitable accommodation at the appropriate location for its personnel, and
- when necessary the support of personnel appropriately qualified in accordance with Part-66.

Appendix I
Continuing Airworthiness Arrangement

5. ……

5.1. Obligations of the approved organisation:

4. ……

5. inform the ~~airworthiness~~ competent authority of the Member State of registry whenever the aircraft is not presented to the approved maintenance organisation by the owner as requested by the approved organisation;

6. inform the ~~airworthiness authorities~~ competent authority of the Member State of registry whenever the present arrangement has not been respected;

7. carry out the airworthiness review of the aircraft when necessary and ~~fill~~ issue the airworthiness review certificate or the recommendation to the competent authority of the Member State of registry.
For aircraft of 2730 Kg MTOW and below, that are not used in Commercial Air Transport, the recommendation will be limited to the import of an aircraft in accordance with Part-21 and M.A.904.

8. carry out all occurrence reporting mandated by applicable regulations;

9. inform the ~~authorities~~ competent authority of the Member State of registry whenever the present arrangement is denounced by either party.

5.2. Obligations of the owner:

6. ……

7. inform the ~~authorities~~ competent authority of the Member State of registry whenever the present arrangement is denounced by either party.

8. inform the ~~authorities~~ competent authority of the Member State of registry and the approved organisation whenever the aircraft is sold.

9. carry out all occurrence reporting mandated by applicable regulations.

10. inform on a regular basis the approved organisation about the aircraft flying hours and any other utilization data, as agreed with the approved organisation.

Appendix II

EASA Form 1

Use of the EASA Form 1 for maintenance

Block 12 ……

Block 13 It is mandatory to state any information in this block either direct or by reference to supporting documentation that identifies particular data or limitations relating to the items being released that are necessary for the User/installer to make the final airworthiness determination of the item. Information shall be clear, complete, and provided in a form and manner which is adequate for the purpose of making such a determination.

Each statement shall be clearly identified as to which item it relates.

If there is no statement, state 'None'.

Some examples of the information to be quoted are as follows:

— The identity and issue of maintenance documentation used as the approved standard.
— Airworthiness Directives carried out and/or found carried out, as appropriate.
— Repairs carried out and/or found carried out, as appropriate.
— Modifications carried out and/or found carried out, as appropriate.
— Replacement parts installed and/or parts found installed, as appropriate.
— Life limited parts history.
— Deviations from the customer work order.
— ~~M.A. Subpart F approval reference~~ The M.A.613 Certificate of Release to Service statement.
— Identity of other regulation if not Part-145 or Part-M Subpart F.
— Release statements to satisfy a foreign maintenance requirement.
— Release statements to satisfy the conditions of an international maintenance agreement such as, but not limited to, the Canadian Technical Arrangement Maintenance and the USA Bilateral Aviation Safety Agreement — Maintenance Implementation Procedure.

Blocks 14, 15, 16, 17 & 18: Must not be used for maintenance tasks by M.A. Subpart F approved maintenance organisations. These blocks are specifically reserved for the release/certification of newly manufactured items in accordance with Part 21 and national aviation regulations in force prior to Part 21 becoming fully effective.

Block 19 ~~Contains the required release to service statement~~ For all maintenance by M.A. Subpart F approved maintenance organisations the box "other regulation specified in block 13" shall be ticked and the certificate of release to service statement made in block 13. ~~When non-Part-M maintenance is being released block 13 shall specify the particular~~

~~national regulation. In any case the appropriate box shall be 'ticked' to validate the release.~~

The following M.A.613 Certificate of Release to Service statement shall be included in block 13:
"Certifies that, unless otherwise specified in this block, the work identified in block 12 and described in this block was accomplished in accordance with Part-M, Subpart F requirements and in respect to that work the item is considered ready for release to service"

The certification statement "~~except as~~ unless otherwise specified in ~~block 13~~' this block" is intended to address the following ~~situations~~ cases;

(a) ~~The case~~ Where the maintenance could not be completed.

(b) ~~The case~~ Where the maintenance deviated from the standard required by Part-M.

(c) ~~The case~~ Where the maintenance was carried out in accordance with a non Part-M requirement. In this case block 13 shall specify the particular national regulation.

Whichever case or combination of cases shall be specified in block 13.

Block 20 ……

Appendix VIII
Limited Pilot Owner Maintenance

The list below ~~following~~ constitutes the limited pilot maintenance referred to in M.A.803 provided it does not involve complex maintenance tasks and is carried out in accordance with M.A.402. Limited pilot owner maintenance tasks listed below, where appropriate to a particular aircraft, shall be specifically listed in the maintenance programme.

1. Removal, installation of wheels. In the case of gliders, also replacing elastic landing gear door operation straps.
2. Replacing elastic shock absorber cords on landing gear.
3. Servicing landing gear shock struts by adding oil, air, or both.
4. Servicing landing gear wheel bearings, such as cleaning and greasing. In the case of gliders, also replacing and servicing main skids and tail skids.
5. Replacing defective safety wiring or cotter keys.
6. Lubrication not requiring disassembly other than removal of non-structural items such as cover plates, cowlings, and fairings.
7. Making simple fabric patches not requiring rib stitching or the removal of structural parts or control surfaces. In the case of balloons, the making of small fabric repairs,

excluding complete panels, to envelopes (as defined in, and in accordance with, the ~~balloon manufacturers'~~ Type Certificate holder's instructions) not requiring load tape repair or replacement.

8. Replenishing hydraulic fluid in the hydraulic reservoir.
9. Refinishing decorative coating of fuselage, balloon baskets, wings tail group surfaces (excluding balanced control surfaces), fairings, cowlings, landing gear, cabin, or cockpit interior when removal or disassembly of any primary structure or operating system is not required.
10. Applying preservative or protective material to components where no disassembly of any primary structure or operating system is involved and where such coating is not prohibited or is not contrary to good practices.
11. Repairing upholstery and decorative furnishings of the cabin, cockpit, interior or balloon basket ~~interior~~ when the repairing does not require disassembly of any primary structure or operating system or interfere with an operating system or affect the primary structure of the aircraft.
12. Making small simple repairs to fairings, non-structural cover plates, cowlings, and small patches and reinforcements not changing the contour so as to interfere with proper air flow. In the case of gliders, also making minor repairs to direct vision windows and canopies.
13. Replacing side windows where that work does not interfere with the structure or any operating system such as controls, electrical equipment, etc.
14. Replacing safety belts. In the case of balloons, airships and gliders, also replacing harnesses.
15. Replacing seats or seat parts with replacement parts approved for the aircraft, not involving disassembly of any primary structure or operating system.
16. Trouble shooting and repairing broken circuits in landing light wiring circuits. In the case of gliders, also troubleshooting and repairing broken wiring circuits for non-critical optional equipment.
17. Replacing bulbs, reflectors, and lenses of position and landing lights.
18. Replacing wheels and skis where no weight and balance computation is involved.
19. Replacing any cowling not requiring removal of the propeller or disconnection of flight controls.
20. Replacing or cleaning spark plugs and setting of spark plug gap clearance.
21. Replacing any hose connection except hydraulic connections. In the case of balloons and airships, the replacement of propane or similar hoses is prohibited.
22. Replacing prefabricated fuel lines. In the case of balloons and airships, the replacement of prefabricated fuel lines is limited to flexible hose types with quick release connectors.
23. Cleaning or replacing fuel and oil strainers or filter elements.
24. Replacing and servicing batteries.
25. Cleaning and replacing ~~of~~ balloon burner pilot and main nozzles and piezo-electric igniters in accordance with the balloon ~~manufacturer's~~ Type Certificate holder's instructions.
26. Replacement or adjustment of non-structural standard fasteners incidental to operations.

27. The interchange of balloon baskets, fuel cylinders and burners on envelopes when the basket, fuel cylinder or burner is designated as interchangeable in the balloon type certificate data and the baskets, fuel cylinders and burners are specifically designed for quick removal and installation.
28. The installations of anti-misfuelling devices to reduce the diameter of fuel tank filler openings provided the specific device has been made a part of the aircraft type certificate data by the aircraft manufacturer, the aircraft manufacturer has provided instructions for installation of the specific device, and installation does not involve the disassembly of the existing tank filler opening.
29. Removing, checking, and replacing magnetic chip detectors.
30. Removing and replacing self-contained, front instrument panel-mounted navigation and communication devices that employ tray-mounted connectors that connect the unit when the unit is installed into the instrument panel, (excluding automatic flight control systems, transponders, and microwave frequency distance measuring equipment (DME)). The approved unit must be designed to be readily and repeatedly removed and replaced, not require specialist test equipment and pertinent instructions must be provided. Prior to the unit's intended use, an operational check must be performed. In the case of gliders or powered glider's instrument panels, these may be removed and reinstalled providing all air data connections are self sealing connector blocks.
31. Updating self-contained, front instrument panel-mounted Air Traffic Control (ATC) navigational software databases (excluding those of automatic flight control systems, transponders, and microwave frequency distance measuring equipment (DME)) provided no disassembly of the unit is required and pertinent instructions are provided. Prior to the unit's intended use, an operational check must be performed.
32. Replacement of wings and tail surfaces and controls, balloon envelopes, baskets, burners and controls (including safety pins, turnbuckles and karabiners) the attachment of which are designed for assembly immediately before each flight and dismantling after each flight. In the case of gliders, also minor adjustment to non-flight or propulsion controls whose operation is not critical for any phase of flight.
33. Replacement of main rotor blades that are designed for removal where specialist tools are not required.
34. Replacement of balloon and airship fuel cylinder quick release connector seals where accessible in accordance with the balloon Type Certificate holder's instructions.
35. Minor adjustment of balloon burner shut-off valves without disassembly in accordance with the balloon Type Certificate holder's instructions.
36. Replacement of balloon envelope temperature sensors.
37. Minor adjustment of balloon basket skids retaining fasteners in accordance with type certificate holders' instructions.
38. In the case of a self-sustaining gliders the removal only of the propulsion system where defined in the Flight Manual as a pilot task and where all connections are self sealing.
39. Cleaning and lubrication of glider tow release units where specified as a daily inspection.

40. In the case of gliders, replacement of flying control self adhesive sealing tapes and tabulators providing removal of a control surface or operating system is not required, and a full and free check of the controls is carried out.
41. Minor scheduled maintenance (excluding Airworthiness Directives unless specifically allowed) required at 50 hours / 6 months or less for piston-engine aeroplanes, piston-engine helicopters, gliders, balloons or airships with MTOW not exceeding 2730 kg where specified in accordance with M.A.803(c).